



## CONSULTATIVE MEETING OF MEMBERS OF THE DEVELOPMENT PLAN PANEL

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Meeting to be held remotely\* on 18 January 2022  
at 1.30pm

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### MEMBERSHIP

Councillors

B Anderson  
C Campbell  
C Gruen  
J McKenna  
N Walshaw (Chair)  
D Collins  
R Finnigan  
K Brooks  
H Hayden  
A Lamb  
E Taylor

**Note to observers of the meeting:** To remotely observe this meeting, please click on the 'To View Meeting' link which will feature on the meeting's webpage (linked below) ahead of the meeting. The webcast will become available at the commencement of the meeting.

<https://democracy.leeds.gov.uk/ieListDocuments.aspx?CId=1211&MId=11792&Ver=4>

\*This is being held as a remote 'consultative' meeting. While the meeting will be webcast live to enable public access, it is not being held as a public meeting in accordance with the Local Government Act 1972.

**Head of Strategic Planning:  
Martin Elliot  
Tel: 0113 37 87634**

# A G E N D A

Item No	Ward/Equal Opportunities	Item Not Open		Page No
1			<p><b>APOLOGIES FOR ABSENCE</b></p> <p>To receive any apologies for absence.</p>	
2			<p><b>DECLARATIONS OF INTEREST</b></p> <p>To disclose or draw any attention to any interests in accordance with Leeds City Council's 'Councillor Code of Conduct'.</p>	
3			<p><b>MINUTES OF THE PREVIOUS MEETING</b></p> <p>To note for information the minutes of the meetings held 2<sup>nd</sup> November and 14<sup>th</sup> December 2021.</p>	5 - 12
4			<p><b>LOCAL PLAN UPDATE: TOWARDS A PUBLICATION DRAFT</b></p> <p>To receive the report of the Chief Planning Officer provides an update on the Local Plan Update (LPU) and sets out the next steps as the plan moves towards a Publication draft. The report therefore includes four elements: 1) Appendix 1 is a Report of Consultation providing a final analysis of the statutory (Regulation 18) consultation which took place over the summer of 2021. 2) A discussion within the report on agreeing the final scope for the Local Plan Update. 3) An introduction to the rationale for assessing policy options and reasonable alternatives for their sustainability, 4) A headline review of the Government's 'Net Zero Strategy: Build Back Greener' and its implications for the Local Plan Update.</p>	13 - 46

**DISCUSSION PAPER - STATEMENT OF  
COMMUNITY INVOLVEMENT (SCI) REVIEW:  
OPPORTUNITIES FOR MORE EFFECTIVE  
CONSULTATION AND ENGAGEMENT**

To receive the report of the Chief Planning Officer which sets out the opportunities to revise the Statement of Community Involvement (SCI) to take account of a successful 'scoping' consultation and other engagement activities the results of which reflect locally, more recent research that has taken place nationally. The paper is intended to invite discussion on what the future SCI should look like and contain.

**DATE AND TIME OF NEXT MEETING**

Tuesday, 1<sup>st</sup> March 2022 at 1.30 pm.

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# Public Document Pack Agenda Item 3

## Development Plan Panel

Tuesday, 2nd November, 2021

**PRESENT:** Councillor N Walshaw in the Chair

Councillors C Campbell, C Gruen,  
J McKenna, D Collins, K Brooks,  
H Hayden, A Lamb, E Taylor and T Smith

Approximately 15 students from Leeds Beckett University attended the meeting.

### **19 Appeals Against Refusal of Inspection of Documents**

There were no appeals against the refusal of inspection of documents.

### **20 Exempt Information - Possible Exclusion of the Press and Public**

There was no exempt information.

### **21 Late Items**

There were no formal late items.

### **22 Declaration of Interests**

There were no interests raised at the meeting.

### **23 Apologies for Absence**

Apologies for absence were received from Councillor B Anderson and Councillor R Finnigan. Councillor T Smith attended as substitute on behalf of Councillor B Anderson for the duration of the meeting.

### **24 Minutes - 9 September 2021**

**RESOLVED-** That the minutes of the Development Plan Panel meeting held on 9<sup>th</sup> September 2021, be approved as an accurate record.

### Matters Arising

Minute No 16 – Leeds Local Plan Update Consultation Progress ('Your Neighbourhood, Your City, Your Planet'). Members requested an update on the Statement of Community Involvement (SCI) and in response, were informed that an update will be provided at the meeting to be held in January 2022.

### **25 Themes Emerging from the Local Plan Update Statutory Consultation**

Further to the minutes of the meeting held 9<sup>th</sup> September 2021, the report of the Chief Planning Officer sets out the initial themes of the Local Plan Update (LPU) statutory consultation, which took place 19<sup>th</sup> July – 13<sup>th</sup> September 2021. The consultation provided stakeholders with the opportunity to comment on the subject and proposed objectives of the LPU scope (agreed by Executive Board and as advised by DPP). The five broad topic areas include 1) Carbon Reduction, 2) Flood Risk, 3) Green Infrastructure, 4) Placemaking, and 5) Sustainable Infrastructure.

The Group Manager (Policy and Plans) introduced the report and provided the Panel with a PowerPoint Presentation on the scope of the consultation, as well as a summary of the issues covered in the responses analysed so far. It was noted that there was general support across all 5 areas, with comments received regarding expansion of the scope to include housing numbers and distribution, affordable housing, and employment land.

Next steps will focus on undertaking a detailed analysis of data to help inform an assessment of reasonable alternatives to meet objectives of the Plan and the full analysis of the representations will be presented as a full Report of Consultation at the next DPP meeting in January 2022.

General discussions covered the following topics:

Blue Infrastructure – it was noted that clarity is needed on the role of blue infrastructure as part of a combined ‘Green and Blue Infrastructure’ topic. Members raised concern regarding the need to address sewerage issues, particularly in terms of new developments and exploring the idea of using canals / rivers as a mode of transport to help towards tackling the Climate Emergency. Members were informed that although there are limitations in terms of the planning system, colleagues are working with agencies to mitigate sewage issues.

### **Green Infrastructure**

- Trees – the importance of ensuring mature trees are protected and treated as if they have a Tree Preservation Order (TPO), as well as the protection of grass verges. Officers confirmed there is an issue nationally, and TPOs are established on the basis of amenity value of a tree(s) rather than the amount of carbon they produce. The Panel supported work to be carried out to enhance the carbon status on existing mature trees.
- Biodiversity – concerns were relayed regarding viability and the production of net gains offsite and the need to strengthen policy wording to better enable members determining future planning applications, as well as engaging and emphasising the importance of delivering onsite to developers. It was noted that additional work will be required beyond the provisions of the Environment Bill to ensure delivery occurs onsite. It was suggested that there should be a focus on alternative environmental interventions such as wetland, for better biodiversity options.
- Food production – protecting the quality of agricultural land and encouraging landowners to bring livestock on their land. It was confirmed that there are limitations in terms of what the planning system can do with agricultural landowners and there is further work required on what the planning system is able to do. Issues with urban food production were relayed in terms of contamination and the impact this has on biodiversity and amenity space.
- Green space – a number of suggestions were put forward in terms of utilising spaces, such as using rooftops to place greenhouses and roof gardens to produce food.

## Placemaking

- Presumption against car usage – clarity was sought on the definition and a suggestion was put forward that there should be a hierarchy including pedestrians, cyclists and cars as it was recognised that there is good public transport provision in most inner-city areas, but there is still a need to access cars for employment and for people with disabilities citywide. Whilst the consensus was that developments should be less dependent on parking facilities, other services such as public transport and access to services required change.

## Sustainable Infrastructure

- Digital Connectivity – members were informed about the commitment from the Government to help towards installing new gigabit-capable connections for home and businesses in rural locations and the support towards digital connectivity in the NPPF. However, it is left to the discretion of developers; it was considered that new policy may have a role in ensuring high standards of connectivity in Leeds until new legislation is enacted.
- Mass Transit – ensuring future considerations work around existing transport routes

A couple of members discussed concerns regarding a shortfall in employment land and expressed the importance of including this in the scope. Panel members were advised that LPU (1) focused on new / revised policies to help tackle the climate emergency and matters such as Housing Requirement, Affordable Housing Employment Requirement, Local and Town Centres, Housing and Employment Allocations Minerals & Waste and Gypsies & Travellers will be considered as part of LPU (2). It was also confirmed that the Spatial Development Strategy will be revisited at a later date and is yet to be determined whether spatial distribution of growth will be considered as part of LPU (2).

Panel members commended the work undertaken so far on the consultation and emphasised the need to expedite establishing policies despite drivers for change such as COP26, Planning Reforms and the Environment Bill. It was acknowledged there is a clear opportunity to move things along positively and the comments received will help shape robust policies in relation to the topic areas.

### **RESOLVED – To:**

- a) note the contents of the report, together with comments raised on the emerging themes during discussion of this item.
- b) note the progress so far, and the intention to receive a full Report of Consultation at the DPP meeting to be held January 2022.

## **26 Update on the HMO, PBSA and Co-Living Amenity Standards SPD**

The report of the Chief Planning Officer provided the Panel with an update on the progress of the draft Houses in Multiple Occupation (HMO), Purpose-Built Student Accommodation (PBSA) and Co-Living Amenity Standards Supplementary Planning Document (SPD). The report also set out the proposed timetable for progressing the draft SPD to adoption.

Appendix 1 included a summary of the representations made during the consultation period as well as the Council's initial response and proposed actions in response to the comments received.

The Senior Planner presented the report and provided a general overview of the range of responses received (65 reps received, providing 500 individual comments relating to the draft SPD) from the 6-week consultation, including work undertaken in relation to continued informal engagement with the landlord sector on concerns relating to the status of the SPD and its relationship to other Council workstreams. It was noted that a Frequently Asked Questions (FAQ) document will be published alongside the draft SPD and will address a number of concerns not directly related to the content of the draft SPD.

Members heard that a wider "Student Housing" working group convened by Unipol Housing will take place in November / December 2021, to discuss issues relating to the student housing sector.

It was also noted that co-living schemes are emerging in Leeds, and there is a need for further clarity relating to the strategic policy context, therefore it is proposed that the co-living section of the draft SPD will be removed. The Council are advocating for a similar approach used for PBSA; emerging co-living schemes will present an opportunity to establish a Leeds methodology.

It was confirmed that a revised "Pre-Adoption" draft SPD will be presented to DPP in January 2022, for endorsement for a further 4 weeks of publicity in January / February 2022. It was noted that the anticipated adoption date for the SPD remains unchanged and is expected July 2022.

A member emphasised the importance of ensuring there are representatives present at the Student Housing working group, from Student Unions. Officers confirmed that efforts will be made to seek those representatives, and feedback from the working group will be reported at the DPP meeting in January 2022.

Members collectively shared their concerns regarding emerging co-living schemes, in terms of space standards and there being no policy set nationally to set a baseline for such proposals and how Leeds will determine proposals under existing policies. Members queried the difference between co-living accommodation and HMOs, and further raised concerns regarding amenity space and the impact on mental health.

Officers outlined the process in terms of determining emerging planning applications and confirmed that there will be a co-living member workshop on the 2<sup>nd</sup> December that will provide members with the opportunity to discuss their concerns in more depth, and an invitation will be extended more widely to all Plans Panel Members.

**RESOLVED** – To note:

- a) the contents of the report and the progress on the SPD, together with comments raised by Members during discussion of this item.
- b) the continued work with key stakeholders to remedy concerns raised before further consultation takes place on the draft SPD.
- c) that the co-living section of the SPD will be removed.



- d) that the revised draft SPD will be presented to DPP in January 2022, before Pre-Adoption Publicity takes place in January/February 2022.
- e) the intention for all DPP members to receive an invitation to attend the Co-Living Workshop.

(Councillor H Hayden left the meeting at 15.48)

## **27 Any Other Business**

The Group Manager (Policy and Plans) informed the Panel that an additional workshop will be arranged to cover discussions around the Transport Supplementary Planning Document (SPD) and the plan for an Affordable Housing Delivery Partnership Plan. It was noted that Members will be emailed provisional dates and times following the commencement of the meeting. The two dates discussed at the meeting were as follows:

- Tuesday 23<sup>rd</sup> November 2021, 1 – 3.30 pm. And;
- Thursday 16<sup>th</sup> December 2021, 1 – 3.30 pm.

## **28 Date and Time of Next Meeting**

**RESOLVED** – To note the date and time of the next meeting as Tuesday 18<sup>th</sup> January 2022, at 1.30 pm.

(The meeting concluded at 16:00)

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## **Development Plan Panel**

**Tuesday, 14th December, 2021**

**PRESENT:** Councillor N Walshaw in the Chair

Councillors B Anderson, J McKenna,  
D Collins, K Brooks, H Hayden and  
E Taylor

### **29 Appeals Against Refusal of Inspection of Documents**

There were no appeals against the refusal of inspection of documents.

### **30 Exempt Information - Possible Exclusion of the Press and Public**

There were no exempt items.

### **31 Late Items**

There were no formal late items.

### **32 Declaration of Interests**

No interests were raised at the meeting.

### **33 Apologies for Absence**

Apologies for absence were received from Councillors C Gruen, C Campbell and A Lamb.

Councillor E Nash attended as a substitute on behalf of Councillor C Gruen.

### **34 Leeds Site Allocations Plan Remittal - Inspector's proposed Main Modifications**

The report of the Chief Planning Officer invited members to comment on the Inspector's proposed Main Modifications to the Leeds Site Allocations Plan (SAP) and recommend to Executive Board that it approves public consultation on the schedule of Inspector's Main Modifications for a period of 6 weeks from 17<sup>th</sup> December 2021 to 28<sup>th</sup> January 2022.

The Panel Report included a copy of the Executive Board Report 15 December 2021 (The MMs and Council's commentary were included in the Executive Board Report).

The Head of Strategic Planning introduced the report and provided some background context on the Inspector's proposed Main Modifications. It was noted that the Inspector's proposed changes were in effect the same as the Council's submitted changes i.e., that 36 housing sites be returned to the Green Belt and 1 site (Barrowby Lane, Manston) be released from the Green Belt for employment use.

Opposition members requested it be recorded that they supported Main Modifications relating to 36 housing sites being returned to the Green Belt, however, did not support the release of land for employment at Barrowby Lane.

### **RESOLVED –**

- a) That the contents of the report, including the Executive Board Report 15 December, be noted;
- b) That Executive Board be recommended to note the comments of the Development Plan Panel meeting 14 December 2021 and approve the public consultation of the schedule of Inspector's Main Modifications (contained as an Appendix to the Executive Board Report) for a period of 6 weeks from 17<sup>th</sup> December 2021 to 28<sup>th</sup> January 2022.

**35 Date and Time of Next Meeting**

**RESOLVED** – To note the date and time of the next meeting as Tuesday, 18<sup>th</sup> January 2022 at 1.30 pm.

(The meeting ended at 13.40)

## Local Plan Update: Towards a Publication Draft

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

Report of: Chief Planning Officer

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

Will the decision be open for call in?  Yes  No

Does the report contain confidential or exempt information?  Yes  No

**Wards affected: ALL**

Have ward members been consulted?  Yes  No

### What is this report about?

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

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

### Recommendations

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

### Why is the proposal being put forward?

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

*The Report of Consultation*

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

#### *The Scope of the Plan*

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

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

### *Alternative Scopes Proposed*

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

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

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

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

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



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

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

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

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

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

#### *Alternative Policy Options*

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

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

*'Net Zero Strategy: Build Back Greener'*

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

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

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

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

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

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

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

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

19. The preparation of the LPU and accompanying evidence base is a resource intensive endeavour which incurs additional cost, in terms of evidence base preparation and consultation, at a time of increased budget pressure. In general, costs will be met from within existing provisions. All of the work undertaken has been with collaboration with teams from across the Council.

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

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

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

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

22. The plan-making process is a complex one and subject to a number of inherent risks as well as the risk surrounding the overall objective of the LPU to help address the climate emergency. These risks are as follows:
23. Changes to national guidance – this remains a key risk to policy development as it is likely that by the time draft policies are submitted to the Secretary of State for examination by the Planning Inspectorate the Government may have changed the planning and building control systems. The Council will therefore need to set out clear evidential links between proposed policies and achieving its Carbon Budget as required by the Climate Change Act 2008 as well as seeking to pre-empt a national direction of travel. From a technical perspective, changes to the planning system may result in national Development Management policies (as expressed through a revised NPPF) not giving local authorities flexibility to set their own policies on the matters proposed to be in scope for the LPU. In addition, proposed changes to the building regulations may result in local authorities having no scope to prescribe carbon emission rates from new development. At present however, LPAs are being encouraged to continue progressing with their Local Plans.
24. The viability of development – the LPU plays a key role in helping development reduce carbon emissions and help places adapt to climate change. However, there remains a requirement for Leeds to meet its development needs to adequately house its residents and provide necessary jobs. Therefore, the policies need to be effective and viable, both individually and cumulatively. This will be a key issue in plan-making and the Council will seek to work proactively with the development industry to consider the ways in which innovative approaches to development viability can be used to help deliver the objective of the LPU.
25. Resources – the Council's overall financial position is challenging. This may impact on the resources available for progressing the Local Plan Update in a timely manner and, in association with other parts of the Local Plan, may involve sequencing plan-production in accordance with resources available.

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

Inclusive Growth

Health and Wellbeing

Climate Emergency

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

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

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

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

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

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

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

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

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

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

### **Appendices**

32. Appendix 1 – Report of Consultation

### **Background papers**

33. None



## **Leeds Local Plan Update**

### **Report of Consultation – Regulation 18**

#### **Introduction**

The Local Plan Update consultation, ‘Your Neighbourhood, Your City, Your Planet’ commenced on 19<sup>th</sup> July 2021 for 8 weeks and officially ended 13<sup>th</sup> September 2021.

The consultation was a ‘scoping’ consultation and was in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This requires that the Local Planning Authority must notify residents, businesses and consultation bodies on the “*subject of the local plan which the local planning authority propose to prepare and invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain*”. This represents the first key stage in the process of preparing a Development Plan Document.

As a scoping consultation, there is a balance to be struck between seeking views on the general issues of interest and concern to local people (and other stakeholders) and the clear direction provided by the Council given the critical and urgent nature of the climate emergency, declared in 2019. As such the consultation material made clear that “*The priority for the Local Plan Update is to update and improve existing policies and make new ones to address climate change, and the climate emergency declaration to achieve net zero emissions by 2030*”. This was further expressed within the consultation material through five central themes that were highlighted as key areas of focus to consider following initial research and evidence-gathering. These five themes are:

- Carbon Reduction
- Flood Risk
- Green Infrastructure
- Placemaking
- Sustainable Infrastructure

Within these topics specific ideas regarding potential policy areas were provided, in order to give some focus for discussions and comments. However, it was made clear that these were initial ideas and the consultation provided the opportunity for respondents to agree/disagree any part of the material and include their own ideas, suggestions and evidence.

#### **Principles/aims**

The consultation was guided by the principles set out in the Interim Statement of Community Involvement (ISCI), which allowed us to undertake consultations online whilst the Covid-19 rates remained high and social distancing restrictions were in place. We also embedded the use of plain English, accessibility and inclusion within the consultation in line with guidance contained in the Interim SCI. It is important to stress that whilst the Interim SCI curtailed face to face meetings that would normally

be held, these were replaced by a number of other communication methods, such as digital advertising and social media, and there is nothing to suggest that the Interim SCI resulted in less awareness raising of the Local Plan Update. Well in advance of the start of the consultation an Engagement Strategy was prepared where we considered how we could ensure that the methods proposed for promotion, information and consultation were in line with the Interim SCI and were as effective, far-reaching and inclusive as possible.

Our vision for the consultation was:

*'We want everyone to take part in the consultation, whether they live in the inner-city, a village or a town and whether they feel confident and knowledgeable about the issues that we are consulting on or not. As a result of taking part in the consultation we want participants to feel listened to, valued and to have learnt about how climate change can be tackled city-wide and locally.'*

When preparing the Engagement Strategy we looked at the feedback and lessons learned from previous planning consultations and we made sure we acted upon the main points during the Local Plan Update consultation. Some of the lessons included:

- Lack of awareness of consultations amongst the public.
- Number of questions on consultation surveys can be off-putting to some.
- The consultation should be accessible.
- There should be early engagement, and relevant information that is shared in a timely manner.
- A range of methods should be used.
- More engagement with young people, inner city communities and any other groups who are often disconnected from planning consultations.
- Sufficient time should be allowed to comment.
- Make it clear where comments have been taken into account.

## **Campaign Page**

The dedicated web campaign page [www.leeds.gov.uk/lpu](http://www.leeds.gov.uk/lpu) was produced. This included all sections of the draft Local Plan Update document in an accessible web format with links to Smart Surveys to collect responses, webinar information and YouTube links, and provided a home for the PDF version of the material. The same logo, colours and some of the photos used in the pdf material were inserted into the webpage for consistency and a coherent user experience. 'Topic pods' were available which made accessing information and surveys on each topic clear. Following issues reported by some consultees regarding confusion over where to comment the Web Team altered the layout slightly to make the user journey more straightforward and ensure that people could submit comments easily.

There were 10,345 unique views over the campaign duration, with 14,000+ views in total. It was also the 27<sup>th</sup> most popular LCC webpage during campaign. 69% of people accessing the content did so via mobile or tablet, compared to 45% for other Planning content on the LCC website.

## **Consultation Material**

The consultation material comprised a series of 'Topic Papers' which went into detail about the range of issues we thought should be considered through the Local Plan Update. The detailed topic papers were also condensed down to form a 'Summary' version, with the main information picked out, and there was a 'Plan on a Page' graphic for each topic which provided a general overview. This ensured that people had choice over how much information they wished to read and how much time they needed to commit to learning about the local plan update. Splitting the document into separate topic areas also meant that respondents were able to provide feedback on the sections that were of interest / relevance to them. The material was available via the campaign page in two formats:

- HTML format - an accessible web-based format which can be used on e-readers and translated into different languages using relevant software. The html format is also mobile phone/tablet-friendly, which means the text fits the size of the screen and can be easily scrolled.
- Pdf format - a graphically designed version of the full material was produced. LCC Creative Services created a logo to tie all the aspects of the consultation together, and designed the material to be more engaging and visually appealing with the use of colour, photographs and other graphics.

Copies of the pdf version were also printed and sent to all the libraries and community hubs in the district so people unable to access the digital version could still inform themselves. Spare paper copies were also available upon request.

The identity developed for the material and overall campaign was impactful and well-received by stakeholders and colleagues. There were 583 downloads of the PDF Local Plan document.

## **Communications**

A variety of different promotional methods were used during the campaign:

- Three Local Plan Update specific Govdelivery bulletins were delivered to 2,054 contacts on the Planning consultation database. There were also links provided on some more general resident bulletins on COVID / essential information updates. There was an average open rate of the bulletins of 35% (more than 600 people), and a total of 121 unique clicks through to the website.
- We emailed information to 'trusted messengers', such as Ward Members, Neighbourhood Forums, Parish/Town Councils, Localities Team network, Equality Hub network, local interest groups, Leeds Youth Council, the Universities etc., so information could be cascaded to reach different audiences and neighbourhoods. Reminders were also sent nearer the close of the consultation. Information was shared with WYCA, the LEP and all statutory bodies via email, and with businesses via Inward Investment team.

- Posters were created by Creative Services and approximately 80 posters were displayed in LCC libraries, hubs and leisure centres, around the city centre and in Morley with the support of a local resident.
- Four media releases were issued at different stages of campaign, signposting to website, Coverage secured in a number of local media websites and newspapers, including Wharfedale Observer, Leeds Star, Caring Together, Leeds Climate, Doing Good Leeds, South Leeds Live, The Telegraph & Argus and Yorkshire Evening Post.
- Paid-for Facebook advertising was undertaken throughout the duration of the campaign targeting over 18s living in Leeds, segmented into the 10 community committee areas. In total, 166,693 people were reached through these adverts with 448,851 impressions and 3,032 clicks to the website. Facebook, Twitter and Instagram ads were also posted via LCC accounts, encouraging participation and tailored towards the individual topics. These had a total reach of 1,026,139 across Facebook, Twitter and LinkedIn, with 57,378 total impressions. LinkedIn accounted for more than 318 clicks to the website, 100 clicks to the webpage via Facebook and 117 for Twitter.
- There was also paid digital advertising targeting web users aged 18 and above across the Leeds district, from 1/8/21 to 31/8/21. In total, 66,645 unique devices were reached with 500,289 impressions and 1,468 clicks to the website.

Overall, communications have been effective in reaching a broad range of people and communities, establishing a baseline for us to work from along with stimulating conversations around 'best practice' in how we communicate planning consultations in future. Efforts to move to a more digital and accessible way of communicating have broadly been well-received but as we move out of the pandemic we need to consider how a 'digital-first' approach should be supplemented by face-to-face / traditional communications that may be more effective in other communities, for future rounds of LPU consultation.

## **Engagement**

Several engagement methods were used during the consultation, including some that had never been tried by the service before:

- A series of online webinars were held to help people gain greater depth of understanding of the topics and policies and ask specific questions. 10 webinars were held, two per topic, with five taking place during working hours, and five in the evening. The webinars were better attended during the day which suggests more attendance from the professional community, but more residents attended during the evening sessions which led to more Q&A style engagement. One attendee with hearing loss was unable to participate effectively, so was sent transcripts and slides prior to each event which was well received. The webinars were recorded and saved on the LCC Youtube channel so anyone who missed live events could watch them at their leisure.
- Five short videos giving a more 'bitesize' explanation of the topic areas were created and posted on the LCC Youtube Channel, providing a short and more

visual explanation of the material and encouraging people to view the website. The videos were posted in mid-August and had 351 views.

- Targeted workshops were held with groups including Leeds Youth Council, Developers Forum and Age Friendly Leeds. These were successful and indicated that working with established groups/teams who have an existing relationship with communities was an effective way of encouraging participation.
- A series of workshops were organised with Planning Aid England. The aim of the workshops was to engage harder-to-reach groups in the consultation process. Outreach took place through a variety of networks, including the Universities, Localities Team, Equality hub and Neighbourhood Forums, but uptake was low, with only one workshop proceeded. Feedback was positive however, and the comments made by participants during the workshop were used as a formal consultation response.
- It was initially thought that no face-to-face engagement could take place due to Covid-19 restrictions. However, towards the end of the consultation period officers attended the Age Friendly Leeds Festival, taking along copies of the material.

## **Submissions**

There were a variety of ways for people to submit comments on this consultation:

- 5 detailed Smart Surveys, accessible through the ‘topic pods’ on the campaign page.
- 5 summary Smart Surveys with a higher-level overview of the consultation material and a smaller number of questions, asking for more general endorsement or opposition with text boxes for further comments, ideas or suggestions.
- Local Plan Update email inbox ([lpu@leeds.gov.uk](mailto:lpu@leeds.gov.uk)) for anyone to email responses.
- The postal address was provided for written responses.
- The Policy & Plans team telephone number was published for any queries.

Overall, 760 consultation submissions were made. Of these, 655 submissions were made via Smart Survey links from content on the website. 65 responses were received via email, with the remaining 40 captured on-street by ‘Our Future Leeds’ as part of their drive to get people in Leeds engaged in the Local Plan Update. Below is an example of the postcards designed by Our Future Leeds to collect quick responses from interested parties.








Of the 655 Smart Survey submissions, 417 submissions (64%) related to the summaries of each topic. This shows that more people were inclined to interact with shorter versions of the materials.

The official end of the consultation was 13<sup>th</sup> September, however we received emails from some stakeholders to say that due to the consultation largely taking place over the summer holidays they were struggling to get their comments completed by this deadline. We advised anyone struggling for time to submit a 'holding comment' with a broad outline of their submission by 13<sup>th</sup> September, with full comments accepted until 30<sup>th</sup> September. The campaign page wasn't taken offline until 30<sup>th</sup> September to allow anyone who had requested the informal extension of time to access the full material.

## An Analysis of the Comments Received

### Overall Scope

Do you agree that to meet the objective of the Local Plan Update the scope should focus on the Climate Emergency, including topics 1. Carbon Reduction 2. Flood Risk 3. Green Infrastructure 4. Place-Making 5. Sustainable Infrastructure?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		80.3%	183
2	Agree		7.9%	18
3	Neither agree nor disagree		5.7%	13
4	Disagree		2.2%	5
5	Strongly disagree		3.9%	9
			answered	228

The chart above shows that of those who responded to the full online response form there was strong support for the proposed scope of the Plan. The vast majority of consultee representations have made it clear that they support the Plan focussing on the climate emergency, with respondents being encouraged by the proposed direction the Plan will take. Respondents have also clearly stated their feelings, that addressing the climate emergency is the most pressing issue faced by the Council and society at large.

However, a number of respondents suggested that alternative matters should also be addressed in the scope of the Plan. In particular a number of consultees suggested that housing policies and allocations should be included within the scope of this Plan, including reassessing the housing requirement to include the Government’s standard method and 35% urban uplift; reviewing the spatial distribution of housing; reassessing needs for affordable housing and its delivery in order to fully address the UN Sustainability Goals; or looking to curtail housing growth in order to reduce further carbon emissions.

In addition, the following amendments to the scope were suggested:

- The “Ecological Emergency” should be added to the scope,

- “Blue Infrastructure” should be explicitly added to the scope to maximise the benefits of our waterways,
- Employment land requirements and provision,
- Consideration of the important contributions Leeds’ mill buildings make to the its urban and historic environment,
- Review and update policy on specialist housing for older people,
- The Plan should have a clear 15-year Plan Period lasting until 2038,
- The plan Period should be extended to 30 years,
- Health equity and addressing other inequalities should be an explicit goal,
- A strategic plan for how funding from developments is used,
- The Plan should consider the role of communities within the process,
- New policy to increase provision of EV charging points in areas without off-street parking,
- New developments should be encouraged to have car clubs,
- A clearer commitment to the ‘Circular Economy’, by decoupling economic activity from the consumption of finite resources by keeping materials in use for longer, e.g. more use of recycled and recyclable materials.
- Inclusion of Public Rights of Way
- Inclusion of Protection of soil
- Inclusion of Air quality and pollution
- Promotion of community projects
- The Local Plan Update should be a wholesale review of the entire Local Plan,
- Inclusion of jobs, skills and the supply chain
- Consideration of whether utilities, such as water, should be included within the Sustainable Infrastructure topic,
- More consideration of how Covid will impact society. managing the future risks of pandemics should be an objective of the Plan.

In most cases where respondents are seeking to broaden the subject of the Plan and its scope, they are still overtly supportive of the inclusion of the climate emergency as the key driver for the LPU. Such consultees are seeking additions, rather than deletions to the proposed scope. These suggestions will be considered in relation to the specific subject and proposed objectives of the LPU and also within the wider Local Plan process. It is noted that in defining the objectives of the LPU the Council carried out a Review of Local Plan policies in 2020, to see if they needed to be updated, in line with Government guidance.

Whilst not directly related to the scope of the Plan, concern was raised by a number of parties about the inconsistent national, regional and sub-regional targets to achieve net zero and the impacts this may have on planning within the development industry. In addition comments were raised about the structure of the Plan review, with concerns raised that an already confusing and piecemeal Local Plan, could be made even more complicated by the LPU process.

Finally, it is noted that a very small number of respondents objected to the proposed scope of the Plan on the basis of rejecting the Council’s objectives of addressing the



climate emergency, citing the potential for negative impacts on private car use and the knock-on effects this could have on the economy.

### Carbon Reduction



In quantitative terms, there was strong support for new or refreshed policies on all the policy areas raised within the Carbon reduction topic.

The detailed comments covered issues including:

**Whole Life Carbon Emissions** – general support was expressed for a policy requiring assessments to be made in whole life carbon emissions, with many consultees expressing that these kinds of assessments should be introduced as soon as possible. Detailed comments included:

- Concerns over how policy will interrelate with other policies and how it could affect the viability for small house builders, who argue that it should only apply to large schemes,
- Concerns over who will monitor/assess the information, otherwise applicants will be ‘marking their own homework’,
- Views expressed that Building Regulations may be a better place to introduce this kind of assessment. However, others considered that current Building Regulations do not go far enough,
- Clarity needed for the assessment framework/agreed standard. Also, requests were made for a transitional period to allow the housing industry to understand how to undertake an assessment,
- Better use of modular buildings that can be easily deconstructed and re-assembled to give building materials new purpose,
- The Council may need to widen the types of technology used, which may mean relaxing planning guidance on the appearance of buildings,
- The Council should be promoting the re-use of existing buildings first and foremost,
- Views expressed that developers and builders will not do this voluntarily, so policies must be robust.

**Operational Energy** – strong support was expressed for a zero-carbon emissions energy standard to be introduced into planning policy as shown in the tables below.

Do you think we should require new development to achieve a zero-carbon energy performance standard for the operational use of the buildings?				
Answer Choices			Response Percent	Response Total
1	Yes		88.52%	54
2	No		11.48%	7





**Do you think we should require new development to achieve a zero-carbon energy performance standard for the operational use of the buildings?**

Please note this is a collation of online responses to the above question in the FULL documentation and does not take account of responses via email or Smartsurvey to the SUMMARY consultation.

answered

61

**Do you agree or disagree with the following Policy Idea: Zero carbon developments – There is an opportunity to ensure there are improvements to the energy efficiency of new developments so their operational energy use is carbon neutral.**

Answer Choices			Response Percent	Response Total
1	Strongly agree		87.13%	88
2	Agree		9.90%	10
3	Neither agree nor disagree		1.98%	2
4	Disagree		0.00%	0
5	Strongly disagree		0.99%	1
Please note this is a collation of responses to the above question in the SUMMARY documentation and does not take account of responses via email or Smartsurvey to the FULL consultation.			answered	101

The following detailed points were also raised as part of the consultation:

- Carbon off-setting should be the last resort,
- All new buildings should be required to provide solar panels,
- The technology exists to introduce carbon neutral development now, and therefore this should be a requirement of development,
- Retrofitting poorly insulated older properties is a bigger priority,
- The policy will need to define what zero energy performance means and how to measure it,
- It is unreasonable for all developments to be zero carbon within such a short time frame,
- New standards can cause confusion and undermine economies of scale for product manufacturers,
- Rather than introducing new bespoke targets, the new national Future Homes Standards should be used for operational carbon performance standards. The Council needs to take Government policy into account and any future changes to the Building Regulations,
- Certain development, such as healthcare buildings, have different energy demands and have difficulty meeting high energy standards,
- General support for new development requiring on site renewable energy, however any policy would need to understand that site constraints may not allow it,
- On site renewables may not always be the most efficient way to meet standards.

**Sustainable Construction** – There is strong support for Leeds setting a sustainable construction standard, with many consultees expressing the view that this should be a national or international standard rather than Leeds developing their own bespoke standard. The contrary view is that existing standards do not go far enough, and that Leeds could develop its own world leading standard for sustainable construction. Concerns were expressed from some representatives of the development industry that any future standards should not be overly prescriptive, as such an approach could limit innovation and new working practices. Comments also suggested that Leeds should work with other Local Planning Authorities to avoid a fragmented approach.

**Resilience to Heat** – General support was expressed for a policy on this topic. Objectors raised the issue that matters related to overheating were already covered in existing guidance and regulations. However, other consultees expressed the view that these did not go far enough to meet the challenges we are likely to face. Detailed responses provided information on ventilation systems (natural and mechanical), the importance of improved fabric efficiency and passive design to minimise unwanted heat gain, the benefits of access to outdoor space and mitigating impacts of landscaping features such as trees, as well as the dangers of solar gain via windows. Concerns were also raised on the conversion of office space to residential and the subsequent heating problems this could produce. The UK Green

Buildings Future Homes Playbook was also highlighted as a key piece of evidence for developing policies on this subject.

**Renewable Energy** – strong support was expressed for the provision of renewable energy, with many respondents feeling that 100% of the energy needs of a development should be derived from on-site renewable sources. Below are some of the detailed comments raised:

- The requirement of on-site provision will help encourage the growth of the industry,
- Appropriate energy storage solutions also need to be factored in, as small-scale generation is not readily accommodated by the National Grid,
- Ground source heat pumps are more efficient than air source heat pumps and are ideal for larger sites,
- New builds can be designed to ensure roof mounted PV cells are perfectly aligned to the sun, to maximise efficiency,
- Rainwater harvesting should be incorporated into new developments,
- The Council should be encouraging the use of new technologies such as solar glass (a clear photovoltaic cell that can be used in windows whilst also generating electricity),
- The Canal and Rivers Trust have raised ideas on water source heat pumps, and the opportunities provided by the canal network to generate renewable energy.

There was also general support for the strategic provision of renewable energy, with many consultees supporting setting local targets. Evidence has been provided from Munich and Vancouver which have committed to generating 100% of their energy from renewable sources by 2025 and 2050 respectively. However, others felt that there were limited benefits for Leeds taking such an approach when the national policy approaches to energy would dwarf any contribution Leeds could make, particularly with the economies of scale of off-shore wind being far more efficient than local solutions.

**Energy Storage** – strong support was expressed for new policy on energy storage. However, some objections were raised that such a policy would be unnecessary as Government do not require local authorities to set such targets. Below are some of the detailed comments raised:

- A ‘flexible network’ needs to be developed to allow home generated energy to be stored and released into the grid when needed,
- Setting ambitious but realistic targets for energy storage is likely to help increase total energy storage solutions,
- Robust policy on energy storage will help address public nervousness about hydrogen,
- The Council must lead the way on this new area,
- Without a target it is unlikely that significant storage will be provided,
- a clear and fair policy on the siting of energy infrastructure will make it easier for local residents to accept new installations.
- It is important to consider the location of any new energy storage proposal to ensure that it is adequately resilient and sustainable to future climate risks,
- Targets need to be realistic.

### Flood Risk

There is broad support for the Flood Risk topic in general and the detailed policy areas in particular to be included within the scope of the Plan. A range of stakeholders have provided comments including detailed comments from statutory consultees such as the Environment Agency, as well as developers and members of the public.

The comments covered issues including:

**Development in flood risk areas** – the results show strong support for this policy area being within the scope of the LPU. However, a range of opinions have been expressed relating to whether the Council has currently got the balance right between locating homes close to the services and facilities that people need whilst avoiding high flood risk areas. Many respondents felt that we need to give priority to avoiding flood risk, with suggestions that these areas would be better used for ‘rewilding’ than for development. However, others have expressed the view that provided buildings can be made resilient to flooding then development can take place in otherwise sustainable locations that are subject to flood risk. The Civic Trust (amongst others) raised the view that new developments may no longer need to be located close to services due to increased digital connectivity limiting the role of physical proximity.

**Functional floodplain** – strong support was expressed for limiting urban expansion in unprotected high flood risk areas, with some consultees noting that an adequate land supply was protected by the Flood Alleviation Scheme (FAS). The Environment Agency (EA) have requested that the Council write policy to limit development in flood risk areas and *future* high flood risk areas under climate change scenarios.

Related to this issue the EA also advise through their representation that the LPU should include a policy which sets out which uses would be appropriate in which flood risk zones, in order to ensure that no inappropriate development is developed in areas of high flood risk.

**Sustainable Drainage Systems (SuDS)** – Similarly there is general support for the LPU to consider policies relating to SuDS and the Council’s suggested approaches within the consultation material to increase their usage in developments, with the notable exception of objections from some housebuilders and other developers who have expressed the view that matters relating to SuDS should be left to the NPPF with local interventions being focussed on guidance rather than policy.




Respondents suggested the inclusion of the full spectrum of blue green infrastructure techniques should be used including rain gardens, swales, permeable paving, rainwater collection, green space, tree cover and wildlife ponds to slow run-off, as well as minimising the areas of impermeable surfaces. Others advocated that LPAs should have the power to make SuDS mandatory. In addition, it was advocated that Natural flood risk management should be used both on site and at source locations, which can be informed by further mapping work.

The importance of strong linkages between these policy areas and those of green infrastructure and placemaking was also highlighted, with consultees urging that effective connections be made across the topics.



**Resilience** – There is strong support for enhancing the Local Plan Policy position with regard to flood resilient housing. However, a number of representatives of the housebuilding industry have argued that Leeds should not be setting new standards for flood resilient housing on the grounds of cost and viability. It is also argued that local standards may reduce the opportunities for developers to use modern methods of construction. Other representations have raised the following issues:

- Clarity needed on the role of blue infrastructure in place-making as well as green infrastructure,
- Policy needs to get the balance right between encouraging innovation and meeting standards,
- Strong emphasis from others that resilience is an essential regardless of the cost,
- If we want to build in flood risk areas it must be demonstrated that the developments are resilient to flooding,
- The EA are keen for us to set our own policies for safe access and egress.

Do you agree or disagree with the following Policy Idea: Enhanced resilience – Making sure development is safe for its lifetime, increasing flood proofing and ensuring safe access and escape routes are included where appropriate.		
Answer Choices	Response Percent	Response Total

Do you agree or disagree with the following Policy Idea: Enhanced resilience – Making sure development is safe for its lifetime, increasing flood proofing and ensuring safe access and escape routes are included where appropriate.				
1	Strongly agree		86.67%	65
2	Agree		10.67%	8
3	Neither agree nor disagree		2.67%	2
4	Disagree		0.00%	0
5	Strongly disagree		0.00%	0
Please note this is a collation of responses to the above question in the SUMMARY documentation and does not take account of responses via email or Smartsurvey to the FULL consultation.			answered	75

**Vulnerable People** – broad support was expressed for the view that accommodation for more vulnerable people should not be in areas of high flood risk.

9. Should the Local Plan consider where accommodation for more vulnerable people is located?				
Answer Choices			Response Percent	Response Total
1	Yes		91.89%	34
2	No		8.11%	3
Please note this is a collation of online responses to the above question in the FULL documentation and does not take account of responses via email or Smartsurvey to the SUMMARY consultation.			answered	37

**Permitted development rights and porous paving** – Strong support was expressed for the LPU considering this vital issue, whilst noting frustrations at the lack of powers that local authorities have in this regard, as a result of permitted development rights. Ideas were raised in line with a policy approach adopted in Harringay which requires a % of the site area to be kept green or natural, limiting further extensions to existing properties within flood risk areas. However, of course it must be noted that any formal policy can only be applied where planning permission is required.





## Green infrastructure

Overall, there is strong support for the inclusion of Green Infrastructure policies within the LPU. As a general matter, a number of consultees expressed a desire to see more overt references being made to blue infrastructure as part of a combined 'Green and Blue Infrastructure' topic. As part of this, both the EA and Natural England have asked for the LPU to include policies on water quality and water resources.

**Biodiversity** – There is significant debate within the representations as to whether the Council should stick with the 10% biodiversity net gain baseline as established through the Environment Bill, or whether it should pursue a more ambitious local target. Generally, those within the development industry supported not exceeding the 10% figure, citing the viability of future developments as a key concern. Others felt that the real issue was not one of percentages but about the long-term management and maintenance of any gains for nature, thus ensuring that ecologically beneficial improvements were made.

In addition, the view has been expressed that the LPU needs to make clear mention of the 'ecological emergency' as well as the 'climate emergency', given the impact human activity is having on bird and insect populations.

## **Trees –**

Do you agree or disagree with the following Policy Idea: Plant more trees – There is an opportunity to better protect the trees we have and plant more new trees to help capture dangerous carbon emissions, manage flood risk and create happier healthier places.				
Answer Choices			Response Percent	Response Total
1	Strongly agree		86.32%	82
2	Agree		9.47%	9
3	Neither agree nor disagree		3.16%	3
4	Disagree		1.05%	1
5	Strongly disagree		0.00%	0
Please note this is a collation of responses to the above question in the SUMMARY documentation and does not take account of responses via email or Smartsurvey to the FULL consultation.			answered	95

Strong support was shown for the protection of existing trees and for increased new planting. The consultation has highlighted the tension between clarity and flexibility, which emerges when making decisions on setting clear targets for tree replacement based on a numeric approach (e.g. 3 for 1), or those based on replacing on-site levels of carbon sequestration, which would be more bespoke to each site.



Generally, there is support for going further than the existing policy requirement of a 3:1 replacement, with the importance of tree diversity also being highlighted. This helps to increase resilience, by avoiding similar species in the same locality, and their potential to be collectively impacted by disease. Other ideas/matters raised included:

- Presumption in favour of native and local species,
- Promote the planning of hedgerows as wildlife corridors and ensure their management and maintenance encourages increased biodiversity,
- Policies should allow for off-site provision where sites are particularly constrained e.g. city centre,
- Trees are important in protecting the ecology of rivers,
- Use Leeds Habitat Network and Local Nature Recovery Strategies to identify suitable locations for additional woodland,
- All mature trees should be treated as if having Tree Preservation Order status, due to their carbon sequestration and biodiversity value.

**Nature conservation** – strong support was shown for enhancing planning policy related to nature conservation, with comments including:

- Homeowners should be encouraged to rewild their gardens and plant productive plants which enhance natural drainage, promote biodiversity, increase carbon storage and also deliver crops,
- Provision must be made for monitoring and reviewing the Leeds Habitat Network to ensure that it is a high quality and effective ecological network across Leeds District and beyond,
- Must require development to maintain and create connectivity between habitats to prevent fragmentation of nature and maintain healthy populations of animals and plants that are then more resilient to climate change,
- Bird and bat boxes should be provided on all new homes.

However, other respondents suggested that new policies were not required and instead reliance should be placed on national policy and regulations.

**Food production** – Strong support was expressed for the LPU including new policies for local food production, with many consultees noting the negative impacts food miles has on the environment and the lack of connection modern communities have to the food they eat. Many representations have included detailed responses and these comments have helped expand our understanding of the issues presented by this topic. Organisations such as Feed Leeds are keen for us to work closely with them in the future as we develop new policy. Comments raised included:

- Consideration should be given to requiring “growing space” to be part of new developments, through larger gardens, allotments and other community food growing spaces,
- Land should be set aside for local food growing and use of Shared Spaces and roof gardens,
- Support for new techniques such as hydroponics, aeroponics and mushroom farming, with places such as roofs and abandoned buildings being better utilised. As well as under-utilised land such as car parks which sit largely empty,
- Targets could be set for local food production and this could be supported by smaller allotment plots and use of Council parks to include community food growing projects
- More allotments need to be provided,
- The policy should also focus on commercial food production by better protecting good quality agricultural land,
- The ‘Space Left Over After Planning’ - SLOAP - runs to many thousands of square metres within the city, and policy to ensure that this land is either planted with low maintenance edible forest garden style plantings, or made available for local community growing, could open up many new opportunities for local residents.

However, some representatives of the development industry feel that food production areas should not be provided as part of new housing development, as this would reduce the quantity of housing that could be delivered. Instead, local food production should be considered more strategically and considers whether local parks could incorporate such provision.

**Green space** – Responses suggest that stakeholders are supportive of increased greenspace provision within the City Centre and beyond. However, fears have been raised that better greenspace (and other GI more generally) as part of new developments could result in higher maintenance costs, which could get passed on to consumers. Separately, strong support has been expressed for green roofs, green walls and roof gardens, to be part of the green space and wider GI solution. Further comments included:

- The Council needs to better understand the types of greenspace it would like to see on sites. More clarity and evidence needs to be provided,
- Trees are multifunctional, so are a really positive tool for meeting multiple needs,
- Green verges need protection,
- GI should be better and more clearly defined to ensure we can better protect it.

### Placemaking

**20-Minute Neighbourhoods** – Responses indicate that consultees are very supportive of the 20-minute neighbourhood concept, particularly as a means of tackling climate change and also the effects of current and future pandemics. Detailed questions and comments have related to:

- How the concept can be applied across the city,
- How can we be proactive with other Council directorates to make sure the delivery of services are co-ordinated,
- Some representatives of the development industry have also expressed support but state that the concept needs to align with housing delivery, with calls for a review of the SAP given their opinion that housing is not being distributing correctly.

**Presumption against cars** – General support was expressed for the Council's aspirations to be a City where you don't need to own a car and how planning policies could be used to prevent further car-borne developments, with much of the emphasis being placed on increasing the ease of active travel and public transport. Views were also expressed that new developments should be as car-free as possible. However, strong views were also expressed by those who for a range of reasons (mobility, employment access etc) felt they had to own a car and feared being unfairly penalised.

**Sustainable Development Checklist** – There was general support for ensuring that health and wellbeing and climate change issues were fully addressed in all development proposals. Supporters felt that such an approach would encourage greater provision of local amenities and active travel opportunities. It was also felt that it could be used to support developers taking appropriate action, provided they could be enforced. However, it should be noted that other consultees feared that such checklists would result in increased bureaucracy and red-tape for development, with little benefit.

### Sustainable Infrastructure

**HS2 and Leeds Station** – Broad support has been expressed for a policy on this topic, however a number of concerns were raised relating to the focus on HS2. Some of the issues raised included:

- Greater emphasis should be placed on Northern Powerhouse Rail and Transpennine upgrades, with many feeling this is more crucial than HS2,
- The Council should not focus on just the station element of HS2; the wider scheme itself is also key and how it integrates with the wider city,
- Improving integrated transport is the key, justifying strong links to the transport strategy,
- The policy should focus on ensuring permeable and active spaces underneath the viaduct,
- There is an opportunity to enhance the river environment, given the proximity to water courses,
- Given the uncertainty surrounding HS2 there should be a focus on making Leeds Station a hub for active travel and its crucial connections with other public transport modes.
- Policy should be flexible and relevant to any and all new strategic railway lines, not just HS2,
- There is too much focus on the city centre and more needs to be done (with regard to rail connections) for other areas.
- Climate change considerations are vital, when understanding carbon emissions from railway construction and encouraging onward journeys by sustainable modes.
- More green spaces need to be associated with the station,
- A strategy is required for creating active permeable spaces under the viaduct.
- Should consider opportunities to enhance local waterways as part of station redevelopment.

In addition to the issues raised above, on the topic of meanwhile uses, which is raised through the consultation materials, responses were received stating that such uses should not include car parks.

**Mass Transit** – general support was expressed for a policy considering Mass Transit. However, many respondents raised the argument that the Council should still be focussing on improving existing bus and rail networks, noting the risks of relying too heavily on the transformational benefits of Mass Transit, should the project not come to fruition. Comments also raised the following issues:

- Safeguarding of the route would be premature at this stage as there is a lack of clarity on that route,
- Mass transit should link to the overall spatial strategy of development, so greater densities can be delivered at key transport nodes,
- Reducing the need to travel should be the priority, particularly as Covid has changed commuting patterns. The risk is that Mass Transit is designed to fit in with pre-Covid commuting patterns,
- Mass Transit's role as a stimulus for new investment means that the route can have a positive impact on communities,
- Important to consider natural surveillance at stops, as well as how walking routes can be made attractive for pedestrians.
- Walking and cycling routes should be well-linked to Mass transit network,
- There should be disincentives for parking in the city centre,
- There needs to be a vision for how Mass Transit is integrated into the City, so that it sits well within the street scene and doesn't present any barriers. As such there are important links with place-making principles around the route and at stops.

**Leeds Bradford Airport** – strong support was expressed for a new policy concerning Leeds Bradford Airport. However, some doubts were expressed as to whether the sustainability of the airport could be enhanced. Leeds Bradford Airport have responded to express their in-principle support for the LPU whilst also highlighting the important role the airport has for the local economy, as well as the importance of the LPU following national policy. Other consultees (including WYCA) have set out that a future policy should explicitly set out how the airport could be supported through the development of public transport, such as rail and bus, and establish who is responsible for delivering and funding these interventions and by when.

**Digital Connectivity** – There is strong general support for the Council providing new policies on digital connectivity, largely in response to the important role digital connectivity has in modern life, and the damage it can do for those who do not have a good level of connectivity. However, some representatives of the development industry felt (whilst clearly noting the importance of digital connectivity) that the Council should not be establishing standards that go beyond the provisions of existing national policy and building regulations, particularly in light of the Government's commitment to address this through new legislation.

### Sustainability Appraisal

The Local Plan Update will need to be accompanied by a Sustainability Appraisal (SA) prepared in accordance with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. The first stage of the

Sustainability Appraisal process is to prepare a Scoping Report to consult with the three environmental consultee bodies (the Environment Agency, Natural England and Historic England) which:

- identifies other policies, plans and programmes relevant to the LPU,
- provides baseline information, either already collected or still needed,
- identifies social, environmental and economic issues identified as a result of the work undertaken,
- presents the SA framework, including objectives and indicators, and,
- sets out the proposed structure and content of the SA Report.

An SA Scoping Report has been prepared and consultation undertaken with the Environmental Bodies during the LPU Scoping consultation period. The proposed scope was based on the SA Framework used to assess the Core Strategy Selective Review adopted in 2019 with an update to baseline economic, social and environmental data and policies, plans and programme reflecting the scope of the LPU themes.

Responses were received from the Environment Agency (EA) and Natural England who both expressed general support for the proposed approach of the Sustainability Appraisal. The EA have suggested an additional sustainability objective around the water environment and water resources and the need to include reference to groundwater and preventing pollution. Both bodies have provided further information in relation to policies, plans and programme and baseline data that should be considered within the appraisal process.

## **Conclusion**

As shown above, there is strong support for the scope of the Plan as proposed, with a range of contributions from consultees to help the Council refine these policy areas and progress towards draft policies within a Publication draft.

The largely digital Local Plan Update consultation had considerable benefits and enhanced our ability to connect with consultees that may not have attended face to face meetings. The use of social media and digital advertising improved our reach and provided useful analytics that can be used as baseline data for monitoring the success of future consultations. A range of new methods of engaging were utilised which provide a strong basis for future engagement. It is hoped and expected that we will be able to engage both physically and digitally on the Publication draft plan consultation as restrictions and Covid-19 rates ease.

## Discussion Paper - Statement of Community Involvement (SCI) Review: opportunities for more effective consultation and engagement

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

Report of: Chief Planning Officer

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

### What is this report about?

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

- This report sets out the opportunities to revise the Statement of Community Involvement (SCI) to take account of a successful 'scoping' consultation and other engagement activities the results of which reflect locally, more recent research that has taken place nationally. The paper is intended to invite discussion on what the future SCI should look like and contain.
- Community engagement is integral to good planning decisions as the planning system operates in the public interest. A local authority's duty to carry this out is enshrined within legislation, and the mechanism to establish how a local planning authority will carry this out is set out within a SCI.
- The SCI is a statutory document (required under the Planning and Compulsory Purchase Act 2004) and sets out how residents and other stakeholders can get involved and participate in the preparation of planning policies, frameworks and the neighbourhood planning process in Leeds and describes the opportunities for community and local involvement on individual planning applications. There are also [statutory requirements](#) for publicising planning applications, which the Council must adhere to.
- The adoption of the SCI has been delayed by the pandemic but its revision comes at an opportune time, allowing for a reflection on the recent Local Plan Update consultation during the summer of 2021 and an exploration of the opportunities and recommendations set out in the Civic Voice/University of Reading report, 'Paper Tigers': A critical review of Statements of Community Involvement in England' published in October 2021 ([LINK](#)). The City Council also has a chance to reflect legislative changes and advances in digital communications.
- Following on from the SCI scoping report presented to the DPP meeting in June 2019, an 'Engagement Group' was formed to assist in a 'scoping consultation' during late 2020 and in the preparation of the draft SCI itself. The group has a wide range of skills and interests, comprising community representatives, neighbourhood planning groups, businesses, internal service providers and Leeds Beckett University.
- Revising the SCI presents a significant opportunity for the Council to adapt and improve engagement and consultation to meet changing needs and requirements and to build on the

collaboration that has taken place across the district with neighbourhood planning groups and others in recent years. By working more 'smartly' and efficiently we can improve service delivery and seek to reduce overall costs wherever possible, without compromising on quality engagement and consultation. Digital technology and techniques are particularly important in this regard. However, it is recognised that digital consultation is not available for everyone and is not always the best approach, consequently we need to also factor that into what we do.

- It is, however, important to recognise that in planning for a city with the size and diversity of Leeds, there will always be more engagement steps that can be taken, but with the resources that are available to the Council, this has to be balanced against the cost effectiveness of such steps. Engagement opportunities need to be proportionate to the scale of the task and be mindful of the for expeditious decision making. The SCI provides an opportunity to set out what service customers should expect as a minimum and what opportunities may arise for more expansive, detailed or targeted engagement in certain circumstances.
- Once adopted, the SCI will become binding and the Council must comply with it when undertaking statutory consultations. As a statutory document the SCI must be considered and followed in all plan making and decision taking process and therefore it is important to formalise an approach to consultation and engagement which is achievable. So whilst it will be right for the revised SCI to be ambitious, the Council will need to ensure that the requirements of the SCI are not unattainable given available resources, budgets and practicalities. It is intended that following this opportunity for Members of DPP to express their views on what an SCI should contain, a draft SCI document will be presented to DPP at the next scheduled meeting on the 1<sup>st</sup> March 2022.

## **Recommendations**

Members of Development Plan Panel are requested to:

- a) Note the contents of the report and provide comments on the matters raised therein, including the draft SCI Consultation Principles, the proposal for a 3-part SCI, the use of indicators to measure success, and how to strike the correct balance between digital and face-to-face engagement with available resources.

## **Why is the proposal being put forward?**

- 1 The adoption of a new SCI for Leeds presents an opportunity to ensure that the planning service is leading on wider city ambitions around inclusion and diversity, and to ultimately provide a service that is both effective and responsive to the diverse needs across the district and to ensure that people are kept up to date with planning.
- 2 An 'Interim SCI' was adopted by the Chief Planning Officer in December 2020, to allow the Council to continue with its core planning functions during the Pandemic, in line with Government guidance. This document has served the Local Planning Authority well, allowing the planning service to continue to function during challenging times. However, there is a need to look to a 'post-pandemic' world and to be prepared for a return to face-to-face consultation activity, as well as an increased formal role for digital communication. Many lessons have been learnt during the Pandemic, including the benefits of using digital technology to target and adapt during consultation activity, the fast-changing digital opportunities for consultation and engagement but also the need to ensure that others are not excluded.



- 3 The scoping consultation for the City Council’s draft Local Plan Update (LPU) during summer 2021, ‘Your Neighbourhood, Your City, Your Planet’, highlighted what can be achieved through digital consultation and allowed an opportunity to explore a variety of techniques to ensure maximum effectiveness with minimum resource. It is considered that a new, refreshed SCI should provide a commitment to continue to use and explore digital opportunities but at the same time reinforcing the importance of more traditional methods of consultation and engagement.
  
- 4 The LPU consultation was generally successful, but as in previous consultations there were some challenges in connecting with the majority of people who live in the inner city (or in more deprived neighbourhoods). A notable exception to this is where there is existing neighbourhood planning activity. This tends to suggest that where there is knowledge (of the consultation), understanding (of planning) and trust (existing collaboration with officers on neighbourhood planning) there will be a far greater chance of positive engagement. There are clear lessons here for future consultation and engagement activity. This lack of engagement is a serious issue for the planning system nationally and it accords with the [Grosvenor - Building Trust](#) research which found that only 7% of people would trust Local Planning Authorities to make decisions in the public interest.
  
- 5 The Civic Voice report “Paper Tigers’: A critical review of Statements of Community Involvement in England”, published in October 2021 effectively set a challenge to all Local Planning Authorities to make their SCI’s more accessible, relevant to all communities and pro-active. The findings of this report fit neatly, if uncomfortably, with the Grosvenor research. The key recommendations from the report include:
  - An SCI should be clearly located, accessible and labelled on the website (the most up-to-date applicable version only) and the LPA should ensure it is widely promoted.
  - The substance of the SCI should be clear and upfront, with the basic statutory requirements in a separate section or clearly cross-reference annexes.
  - The SCI should have SMART consultation principles that can be agreed and actioned by the LPA and communities and measured against clear actions and outcomes to ensure effective monitoring and review.
  - Successful relationships with other Council departments should be fostered to support good quality engagement and ensure that principles and expectations are consistent across the authority.
  - The SCI should facilitate a wider culture shift, recognising communities as an important local resource, valuing participation, pursuing community learning and be accepting of informed influence.
  - LPA’s should use innovation to produce a locally specific approach to engagement, rather than repeating the national statutory minimum requirements.

**What impact will this proposal have?**

<b>Wards affected:</b>		
Have ward members been consulted?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

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

- 6 Levels of engagement with stakeholders has been high and constructive to date. An early 'soft market' exercise helped lay the foundations to form the 'SCI Engagement Group' and this group assisted in advising on what the new SCI should look like and in the consultation in 2019.
- 7 Responses to the SCI scoping consultation were received from a total of 48 respondents. This included responses from a variety of Parish and Town Councils, Neighbourhood Forums, Community and Residents Associations, Action Groups, interest groups and forums and 17 individual residents from across the Leeds Metropolitan District.
- 8 Respondents were asked a variety of questions during the consultation including what planning matters are important to them, their experiences regarding commenting on planning applications and planning policy documents and any involvement with neighbourhood planning.
- 9 As far as we are aware, the consultation principles that are being considered for the draft SCI are the first in the country to be drafted and agreed with community representatives (via 'the SCI Engagement Group'). These are:

#### TRUST

- Commitment to working with partners and communities in a joined-up way
- There will be honesty about what can and can't be influenced and achieved
- Officers will consult with residents/other stakeholders in a respectful manner

#### TIMELY

- Consultations will be at a time when proposals are still at a formative stage to give people maximum opportunity to influence outcomes ('frontloading')
- An adequate length of time will be allocated for the consultation period
- All relevant information will be provided in a timely fashion to inform a meaningful response

#### VISIBLE

- There will be clarity about the aims, purpose and scope of the consultation
- The use of plain English at all times will ensure accessible consultations
- Consultation and engagement activity will be promoted as widely as possible making the best use of technology and other methods, as well as targeted to those most affected where necessary

#### INCLUSIVE

- Consultation will be open and accessible to engage with different sectors of the community
- There will be a commitment to eliminating discrimination and advancing equality of opportunity

#### TRANSPARENT

- The results of consultation will be used to show how it has influenced decisions
- The findings of the consultation, meaningful feedback and outcomes will be easily accessible
- Value for money will be achieved by ensuring that consultation is effective and proportionate to the issues being considered and the communities affected

- 10 The following key points were made during the SCI 'scoping' consultation:

- Being unaware of what is happening and how to get involved.
- Consider best use of social media, apps and digital opportunities.
- Don't forget more traditional forms of advertising consultation, these are important for many.
- Increase awareness of Public Access and the tracking/saved searches facilities.

- People are not always aware when an application has been submitted - neighbour notifications are not always received or site notices get missed.
- Concern that comments on planning matters more generally are not always taken into account.
- Lack of knowledge about how to find the outcomes of an application or consultation and where feedback on responses is provided.
- More community education/awareness of planning matters and concepts such as 'material planning considerations' would make it easier for people to make meaningful comments.
- More community engagement by the development industry.
- Use plain English – minimise technical language, jargon and acronyms.
- Provide a simple user experience for both the website and Public Access.
- Ensure that all consultation and engagement activity considers at the outset how people without internet access/those who are not computer literate will be able to easily and positively engage with and comment on the consultation.
- Public consultations should be a genuine effort to gauge public opinion and views, not just a box-ticking PR exercise.

11 Reflecting on the success of the Local Plan Update scoping consultation, the recommendations of the Civic Voice report and on the consultation feedback to date, there are a number of opportunities to revise the SCI to be a more engaging and locally-distinctive document:

- A revised SCI could be split into three parts, to make the document easier to navigate and to provide a natural separation between aims and objectives, requirements/what we propose to do and monitoring and review (with the introduction of possible 'indicators').
- Part 1 could provide a clear and simple explanation of what the SCI is and adopt an encouraging tone to better connect with local communities. This part would also include the 'consultation principles', as well as setting out how communities can engage and take part in consultations more effectively.
- Part 2 could set out how the Council will consult and engage on planning policy documents and publicise planning applications and how it will support neighbourhood planning. This section would provide a balance between simply setting out the key statutory requirements and clarity on how and when community involvement can take place.
- There is an opportunity to include a new section (Part 3) which would set out the opportunities and challenges to consultation and engagement in Leeds. These would be linked to the importance of having deliverable and locally specific 'indicators' which will make sense to local communities and will be relevant to their needs. Consultation on the draft SCI could explore what these indicators could be.

12 The opportunity for a 3-part SCI as set out would respond positively to the concerns raised during the 'scoping consultation' and many of the issues raised in the Civic Voice report. However, the real test will be how the SCI is used when it is adopted and the levels of trust and collaboration that can be achieved with local communities. The concerns raised have been expressed repeatedly and consistently across the planning service and the new SCI presents a significant opportunity to address these issues and make Leeds a more inclusive city. However, it should be noted that the concerns noted are repeated across the country and are not unique to Leeds.

13 Reflecting on the work done to date and the issues covered in this report, Members may wish to consider the following:

- To what extent the 3-part SCI as outlined respond positively to the Civic Voice report and the issues raised during the 'scoping consultation'?
- How can we make the best use of digital technology (interactive website, online workshops and targeting specific groups and neighbourhoods during consultations) but still ensure that those who can't (or won't) take part online are still included in consultation and engagement?
- What indicators could we include to judge the success of consultation and engagement activity in the future?

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

14 Revising the SCI does not commit the Council to additional expenditure, but any additional consultation activities may lead to pressure on resources and existing staff. A key consideration will be how digital technology and electronic communication can be used to reduce costs, as well as using in-house expertise and existing networks to make our consultation and engagement material and resources as engaging as possible and maximise reach. It is anticipated that any costs to the Council associated with community involvement will be met from within agreed budgets. However, it should be recognised that the more extensive consultation and notification and publicity practices that the SCI prescribes, the more consultation costs are likely to increase. In addition, it is not for the local planning authority to take the lead on all engagement. Developers have a role in engaging with communities to explain their proposals and to help ensure that community feedback is genuinely taken into account as part of the design and development process.

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

15 Section 18 of the Planning and Compulsory Purchase Act 2004 requires that a Local Planning Authority must prepare a Statement of Community Involvement.

16 The SCI was originally a document that was required to be approved by Full Council and subjected to an independent examination. The law has since changed and the Chief Planning Officer now has delegated authority to adopt the statement.

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

17 The revised SCI will seek to balance the increased expectations of local communities with the need for an efficient and effective planning system, delivered within budget constraints. This will mean ensuring that once adopted, the Council complies with the commitments made. The Annual Monitoring Report and Local Development Scheme provide an opportunity to monitor performance and delivery.

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

Inclusive Growth       Health and Wellbeing       Climate Emergency

18 The revised SCI will support Inclusive Growth by aiding meaningful community collaboration which can help to identify those neighbourhoods lacking in certain types of housing, employment opportunities, retail provision and open spaces which can, in turn, influence what sort of development is encouraged or supported in that area. This means that the right sort of development should take place in those areas that need it most, improving sustainability across the District.

19 Health & Wellbeing can be addressed through supporting engagement with those neighbourhoods where improvements to green space and active travel infrastructure are

needed, working towards prioritising appropriate developments in those areas to the direct benefit of the health and wellbeing of those communities.

- 20 By ensuring that we have a clear and robust framework for open and informative consultation and engagement on planning matters, we can facilitate participation that is valued, accessible and inclusive and can be an investment for the planning service in the future.
- 21 The opportunity to consult on possible 'indicators' to assist with monitoring and review of the SCI could help with issues around trust and collaboration and encourage more people to not only take part in consultation and engagement, but to do so again.
- 22 Revising the SCI will help us to better work with communities to identify opportunities to improve physical and social infrastructure in a sustainable way in line with the aims of the declared Climate Emergency priority, as well as maximising public support for new sustainable and/or emission-reducing initiatives which may require behaviour change by residents and businesses.

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

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

- 23 The preparation and adoption of an SCI is a statutory requirement. The approach taken to the drafting of the document will be a meaningful and serious approach to increase consultation and engagement activity in every neighbourhood in Leeds.

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

- 24 The draft SCI presents an opportunity to introduce a series of 'indicators' to assist in monitoring and review, which could be a part of the consultation on the draft document. In addition to this, the satisfaction levels of individual consultation and engagement activities could be covered in a 'Consultation Report' for local plan making and a 'Consultation Statement' for neighbourhood planning.

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

- 25 The draft SCI will be presented to DPP on the 1st March 2022. This will be subject to further consultation.

### **Appendices**

- 26 None

### **Background papers**

- 26 None

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