

*Vision for Green Infrastructure: Leeds will create new Green Infrastructure (GI) through the planning process, and identify, improve, protect and extend existing GI to address the challenges of climate change and create a healthy city for all.*

### What is this topic about?

As part of our aspiration to make Leeds zero carbon by 2030 we want to ensure that we are making the most of our green spaces and natural environment to help meet our climate change aspirations and improve the health and well-being of our citizens.

### Where are we now?

Our current Local Plan has many effective policies on green infrastructure and they have seen real improvements in the way GI is delivered in Leeds. However, they don't go far enough to make us zero carbon by 2030, so we think we need to go further.

### The proposed policy areas



### Where do we want to get to

- We want to plant more trees and strengthen protections for existing trees, where possible.

- We want to ensure that people in Leeds have easy access to high quality, usable green space.

- We want to ensure that development maximises the delivery of biodiversity.

### Have your say

We need your views on whether you think our aspirations for the Local plan Update are correct. Do you agree that the topics of Green infrastructure, including green space, tree planting, biodiversity and nature conservation should be considered. How would you like to see existing policies change, if so?

# GREEN INFRASTRUCTURE

## INTRODUCTION TO THE TOPIC

### What is Green Infrastructure?

The purpose of the planning system is to achieve sustainable development, which is about meeting current needs without harming the ability of future generations to meet their own needs. The National Planning Policy Framework (NPPF) sets out that planning authorities should ensure that development meets objectives for the economy, society and the environment at the same time.

The environmental objective is defined by the NPPF<sup>1</sup> as:

*“to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

This paper looks at the role of the Leeds Local Plan in supporting Green Infrastructure, which forms a fundamental part of the natural environment and a means of achieving more sustainable development.

Green Infrastructure (GI) is defined by National Planning Policy Framework as

*“A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.”*

GI therefore includes a network of parks, green spaces, gardens, woodlands. It can also include street trees, hedges, green walls and green roofs.

These are important assets for local communities and places; on their own they make places to play or enjoy and improve well-being and together they make places attractive to live in and invest in.

They are also natural climate change assets, because GI:

- reduces greenhouse gas emissions, such as carbon dioxide, associated with new development
- benefits public health from removing and reducing air pollution
- if well managed and protected, captures and stores carbon dioxide from the atmosphere (sequestration)
- improves the resilience of places, thereby helping communities adapt to increases in flooding and heat

---

<sup>1</sup> Ref

- helps use scarce resources e.g. water more efficiently
- helps provide strong ecosystems and habitats for plants and animals to reduce biodiversity loss and help species adapt to changes in the climate

The NPPF recognises that these things have a value and recommends assessing the wider benefits of the natural environment / GI using two approaches:

- eco-systems services - the benefits that flow from nature to people
- natural capital – a way of thinking about the natural environment as an asset

In order to achieve net gains in sustainable development, it is therefore important to plan for Green Infrastructure in a way that

- clearly sets out its underpinning importance to sustainable development in Leeds
- maximises its natural climate change role
- places a value on its management, creation and loss

GI often works hand in hand with “blue infrastructure” which includes rivers, streams, canals, lakes and other water bodies. It is also multi-functional, for instance a well-designed pond that acts as a sustainable water management system for drainage of a new housing estate may also act as a natural habitat for species, a means of soaking up carbon, a leisure destination and improve people’s well-being.

GI doesn’t just exist at the individual development scale. A well designed environment throughout Leeds and beyond can connect these green areas and assets to create green routes and corridors. These allow for more pleasant environments to encourage cycling and walking over large distances. In the Leeds area it is possible to walk to Saltaire along National Route 66 from Leeds City Centre, and from Woodhouse Moor (next to the University of Leeds) to Ilkley through uninterrupted greenery along the Dales Way Link. Ultimately these GI connections extend to Windermere in the Lake District, over 90 miles away, helping to support a better variety of animal and plant populations.

The pandemic, climate change and the desire to see a healthier society are all key drivers that reinforce the importance of the natural environment to be available to everybody at a neighbourhood level and for those with limited mobility at the street and individual home level.

Elsewhere in the Local Plan Update there are topic papers which also consider interlinked issues around better place-making and 20-minute neighbourhoods. GI plays a key role in these planning areas.

Green infrastructure can also be a catalyst for economic growth and many cities across the world are promoting themselves as attractive, green centres for investment.

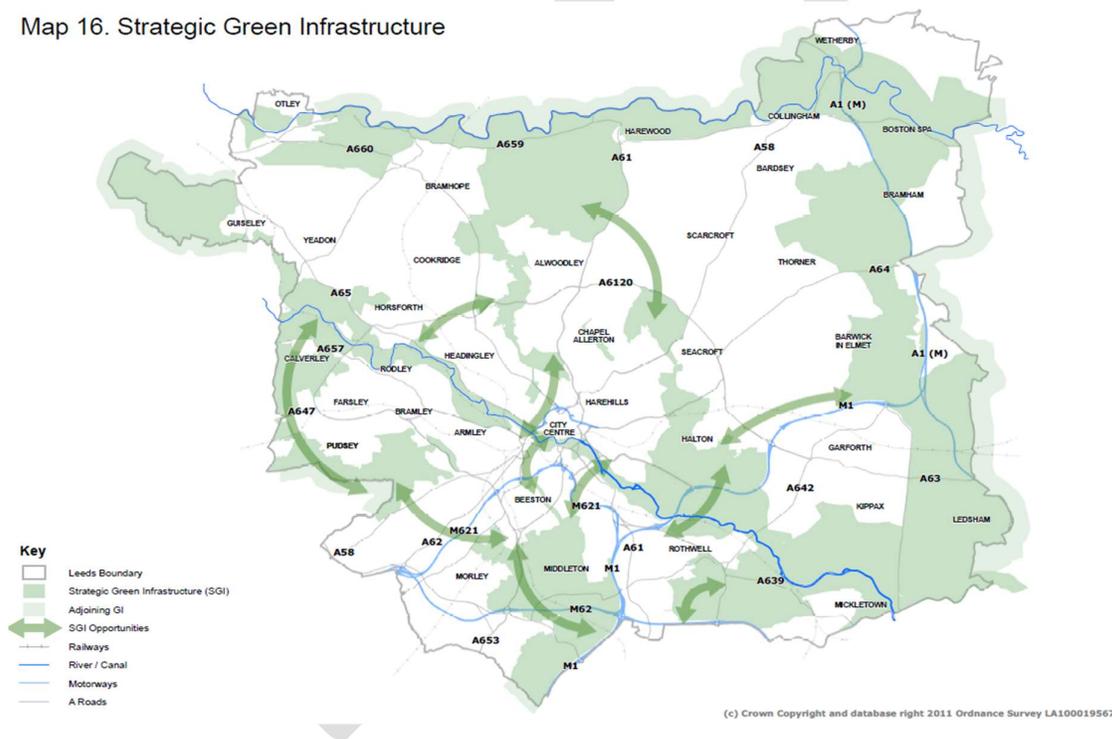
GI is also usually cheaper than traditional “grey” infrastructure<sup>2</sup>, and creates sustainable jobs.

**What do our policies currently say?**

Protecting, enhancing and extending the network of green infrastructure has been a fundamental element of the Leeds Local Plan for many years. Indeed green infrastructure forms part of the overall Core Strategy Spatial Vision (bullet 9) and managing environmental resources makes up 5 of the 24 Core Strategy objectives. Furthermore, there are many existing policies that fulfil this function (see Appendix 1) which provide an invaluable and much needed statutory basis to require protection, enhancement and extension of the natural environment.

The Local Plan currently contains policies which establish key strategic GI and ambitions to improve the gaps between key corridors.

Map 16. Strategic Green Infrastructure



This sets the framework for GI management and also more detailed plans e.g. the Aire Valley Leeds Area Action Plan (2017) which sets a GI network for a discreet area of the City experiencing transformational growth.

<sup>2</sup> See section in flood risk on SuDS



Instead we want GI to be at the heart of new development as a key underpinning asset like this:



This helps recognise the multiple benefits and roles green infrastructure can provide, such as at Killingback Meadows where the planting of 8,000 trees and the delivery of new ponds and seasonal wetlands will help reduce flooding and provide natural habitats, as part of the Killingbeck Meadows Flood Alleviation Scheme.

### National Changes

Whilst detailed Government planning guidance on GI is limited, it is clear that at a legislative and departmental level the direction of Government policy has shifted recently and creates a more positive context for improved GI policies.

A Natural Capital Committee (NCC) was an independent committee which advised the government on natural capital, including ecosystems, species, freshwaters, soils, minerals, the air and oceans, as well as natural processes and functions. It led to a number of changes which support a strong direction of travel on embedding GI into planning policy at the local level as follows:

- a 25 year Environment Plan (2018) which sets the Government's goals for improving the environment, within a generation, and leaving it in a better state than we found it
- an Environment Bill (initially laid before parliament in 2019) setting out how the Government plans to deliver its commitment to protect and improve the natural environment in the UK in light of evidence and public concern around biodiversity and habitat loss, climate change and environmental risks to public health
- guidance (2020) for policy and decision makers to help them to include natural capital, ecosystem services and the value of these into policy (including changes to HM Government Green Book guidance on how

appraisals are done)

The main issues pertinent to the Local Plan Update are:

- setting targets for improving the natural environment and people's enjoyment of it and a duty to meet and report on the targets set
- a new system for biodiversity and nature protection including a register of biodiversity gain sites-land which is subject to a conservation covenant or planning obligation and which is to be managed for the purpose of habitat enhancement-and establishing a system of biodiversity credits-enabling developers to 'purchase' credits in biodiversity gain sites
- measuring net gain and eco-systems services at the development level

**Vision:**

Through this Local Plan Update we are aiming to adopt and improve policies that will help development adapt and mitigate against the impacts of climate change by creating a better more sustainable environment. With regard to Green Infrastructure our Vision is as follows:

*Leeds will create new Green Infrastructure (GI) (including Green Space and Natural Environment) through the planning process, and identify, improve, protect and extend existing GI to address the challenges of climate change and create a healthy city.*

This topic paper sets out the sorts of areas to be considered in taking this proposed vision forward and whether you think it's the right one.

## **POLICY TOPIC AREAS**

### **IDENTIFICATION, PROTECTION, ENHANCEMENT AND EXTENSION OF GREEN INFRASTRUCTURE**

#### **Background**

The value and importance of open land is widely recognised for a number of reasons such as giving us opportunities to visit and enjoy nature, to giving homes to wildlife, to providing much valued open views, to protecting the special character of the landscape. The restrictions due to Covid-19 have brought into focus the importance of accessible land and nature close to our doorsteps and this, along with the important role open land and the natural environment has in addressing the climate emergency, only increases the need to continue to protect, enhance and extend the existing network of green infrastructure within Leeds.

#### **Policy Aims**

- To clearly identify existing land which currently merits protection and state robust reasons why protection is necessary
- To provide statutory protection for all identified green infrastructure through formal designation and a policy presumption against the loss of GI.
- To seek improvements and high quality enhancements
- To seek the extension of the green infrastructure network through the identification and protection of additional open land.

#### **Existing Policies and rationale for potential change**

Whilst the Local Plan contains an effective suite of policies relating to GI, these policies are spread across a variety of Local Plan documents. This can be confusing and they could benefit from being strengthened and consolidated to help address the pressing challenges of the climate emergency. We have therefore been thinking how best the Local Plan can do this by setting a clear, strong, high level framework and containing more detailed policies with robust and justified requirements, directions and targets which will ensure protection and facilitate improvements and extensions. Any new policies should still recognise the different values of land, whether it be for agriculture, recreation, wildlife habitats or the visual beauty of the landscape.

Within this somewhat broader framework of GI sit other more specific issues which are considered later in this document, such as trees, areas protected for nature conservation and biodiversity.

#### **Identification and Designation**

As highlighted above there are a number of current policies which recognise the importance of open land. These illustrate clearly the value of these areas of land for

a variety of reasons but may be a little confusing and a single classification of open land which brings these together would simplify things. Care would be needed to ensure the different qualities of these areas are not lost but this could be embedded in a new, comprehensive policy or revisions of existing policies. Areas meriting designation would need to be carefully assessed and be clearly defined.

Currently the designation of land as specifically green space is dealt with through Policy GS1 in the Site Allocations Plan and that document formally identifies areas that function as green space whilst Core Strategy Policy G6 gives them protection from development. Whilst green space is an element of wider green infrastructure, it is proposed to keep separate, specific green space policies in recognition of its importance and the need to protect and lay out new green space as development occurs and additional needs arise.

### Protection

Green infrastructure is currently protected, however the climate emergency and Covid have increased its importance and necessitated a rethink of the mechanisms and levels of protection. A “presumption in favour of retaining green infrastructure” could offer increased protection for GI, however this must be balanced against the needs for wider sustainable development, whereby some development could be appropriate. Therefore there needs to be ways in which development can be accepted, subject to detailed and compelling reasons and the remediation of any detrimental effects. It is especially important to extend the recognition and protection into more highly built up areas where open space is at a premium.

### Extension of network

We should be maximising the amount of GI to make the most of its benefits to the climate emergency and our wellbeing. Therefore we should be promoting and seeking additional GI to increase the size of the current network. We are seeking views on how we can best do this through planning policy, in particular whether areas should be specifically identified and earmarked for future GI or/and whether a more flexible approach should be taken to maximise opportunities as and when they arise through, for example, development, landscaping schemes, biodiversity improvements, greening features on buildings and projects to improve the provision of open spaces such as the White Rose Forest and the Council’s Woodland Creation Scheme. There would also be benefits to new policy measures to protect any new areas created.

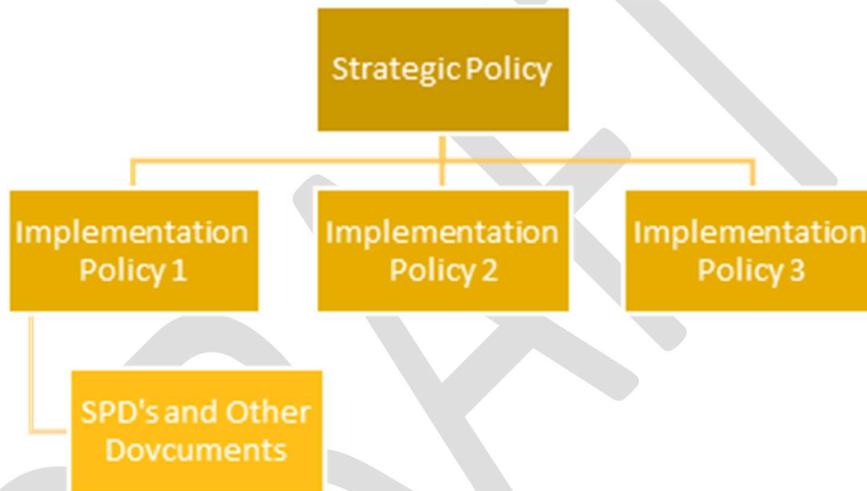
### Quality and Enhancement

It is important that areas of GI are of good quality to provide beneficial habitats for nature, opportunities for carbon sequestration and attractive, accessible locations for outdoor activities. Not all GI provided through development is of a high quality and there is a continued need for policy and practice to seek quality spaces.

## Proposed Policy Options

Currently the key policies are Core Strategy Policies SP13 and G1 (see Appendix 1) which identify areas of land in Leeds which are considered Strategic Green Infrastructure. Policy G1 then takes the defined areas and applies 'controls' to development within them. It is felt that the Policy SP13 in conjunction with Policy G1 would benefit from enhancement, especially in the context of the Climate Emergency and Covid-19.

One option would be to have an over-arching strategic policy (an improved Policy SP13) and then have a number of more detailed policies sitting underneath which give more information, requirements and guidance relating to specific matters. A further supplementary planning document would provide more guidance and useful information as well as examples of good practice.



Spatial Policy 13 and Policy G1 could therefore be re-drafted to strengthen existing designations, clarify areas that would benefit from increased provision and clearly set out the role and function of GI in addressing the climate change agenda. Key elements could be:

- Improving and expand Spatial Policy 13 to set a more holistic, strategic direction and provide consideration of all green infrastructure. This policy could set a clear definition of “Green Infrastructure”, the framework for the delivery of new green infrastructure as well as the enhancement and protection of existing and potentially new designations. This could also include a presumption against the loss of any GI.
- Revising Policy G1 to set out more clearly how the green infrastructure network could be protected, enhanced and expanded.
- Exploring new green infrastructure, with the potential for the designation of wild belts, on land that has little development value but does not currently benefit from green infrastructure designation or protection.

- There is also the opportunity for localised pockets of GI through green roofs, green walls, roof gardens and hedges that would help mitigate the urban heat island effect in built up urban areas and provide additional greenspace in high density areas.
- Explore producing a supplementary guidance document containing additional details, advice, support, examples of good practice etc to assist those who want to or are involved in the protection, enhancement and expansion of GI.

### Questions for consultation

1. **Do you agree that enhanced policy for the protection, improvement and enhancement of GI should be included in the Local Plan Update?**
2. **If so, do you have any thoughts or ideas about what you'd like to see included in such a policy?**

DRAFT

## TREES

### Background

Trees provide many benefits to our environment. They store carbon emissions and take pollutants out of the air. They provide shelter and shade and valuable habitats for flora and fauna. They soften the built environment and bring colour and texture to the places where we live and work. They provide opportunities for us to reconnect with nature and help to support our physical and mental wellbeing which has been brought into particular focus by the restrictions due to Covid-19.

The Council is a key partner in the White Rose Forest Project to develop a community forest for North and West Yorkshire (part of the wider Northern Forest). This is a partnership between local authorities, landowners, businesses and communities to increase tree cover across the region and improve the natural environment. The project will plant millions of trees in urban centres and countryside that will help manage flood risk, combat climate change, create jobs and provide happier and healthier places. The overall White Rose Forest Plan is expected to be launched in August 2021 whilst Leeds City Council's White Rose Forest Strategy has [been endorsed by Executive Board](#) and is nearing completion. This Strategy aims to significantly increase the existing 17% tree canopy cover across the District to 33% by 2050 in partnership with business, residents, institutions, communities, landowners and farmers, building on the substantial work that the Council already carries out around the planting and management of trees as well as encouraging planting and protection of trees through the planning process. Leeds City Council has [committed to planting 5.8 million trees](#) over the next 25 years as part of the city's contribution to the UK net-zero targets.

Trees have many benefits but a key one is that they extract and store damaging carbon from the air by what is called carbon sequestration (Fig 1)<sup>3</sup>. As trees photosynthesise and grow they absorb carbon dioxide that would otherwise rise up and trap heat in the atmosphere and contribute to global warming.

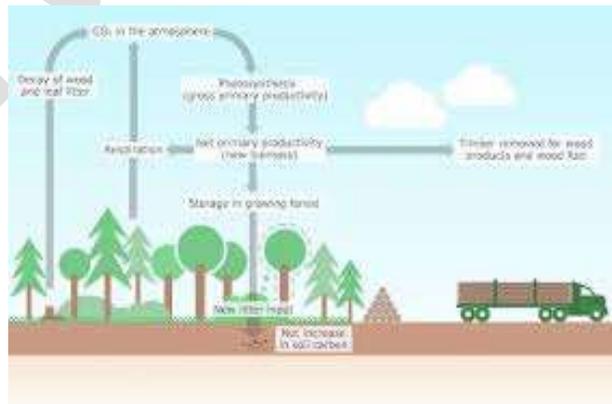


Figure 1 - Source Forestry Commission

In turn they release large quantities of oxygen. It is therefore vitally important that we protect existing trees and plants as they are an extremely valuable natural way of reducing carbon dioxide in the atmosphere.

<sup>3</sup>[https://www.google.com/url?sa=i&url=https%3A%2F%2Fwww.forestryresearch.gov.uk%2Fdocuments%2F5267%2Fch4\\_climatechange\\_FS2018.pdf&psig=AOvVaw1rTAt-7um2SVkRvByxCytt&ust=1608313485471000&source=images&cd=vfe&ved=0CAkQjhxqFwoTCOCnvej1e0CFQAAAAAdAAAAABAQ](https://www.google.com/url?sa=i&url=https%3A%2F%2Fwww.forestryresearch.gov.uk%2Fdocuments%2F5267%2Fch4_climatechange_FS2018.pdf&psig=AOvVaw1rTAt-7um2SVkRvByxCytt&ust=1608313485471000&source=images&cd=vfe&ved=0CAkQjhxqFwoTCOCnvej1e0CFQAAAAAdAAAAABAQ)

## Policy Aims

- To establish a “presumption in favour of retaining existing trees” within the existing legal framework
- To establish a comprehensive, detailed replacement planting regime which takes into account age, size, species, carbon storage capacity etc of trees to be lost and planted to ensure no loss of sequestration levels.
- To encourage additional planting and give a strong local statutory foundation for current and future tree planting projects and programmes.

## Existing policies and rationale for potential change

There are currently two key policies in the Local Plan that deal with trees (see Appendix 1):

- Core Strategy Policy G2
- Natural Resources and Waste Local Plan Policy LAND2

These are considered to be effective policies, however they were written before the declaration of the climate emergency and therefore they may need to be adapted and strengthened to respond to the current environmental crisis. Recent research from the University of Leeds state that the ratio of tree loss in terms of carbon sequestration is substantially underestimated in LAND 2 (which requires a 3 to 1 ratio to lost trees), and other factors such as tree type, girth, age etc. need to be factored in. This is coupled with new pressures and a strengthening of national agendas with regard to trees that suggest Policy G2 could be made more robust. Whilst we have ideas how we can best do this, we are particularly interested in your ideas and suggestions on how tree protection and planting should be embedded in planning policy. There are fundamentally two aspects which need to be addressed.

## Protection

Firstly, we should consider how best to protect the trees we already have, whether they be in large forests, areas of woodland, small numbers in more urban areas or individual trees. Legally there are somewhat limited opportunities to do this. The Council can serve a Tree Preservation Order on particularly visually important trees but these are only appropriate in certain circumstances and do not allow protection in recognition of trees’ biodiversity or carbon sequestration importance. Under separate legislation, trees in conservation areas are protected as are those which are within a statutory designated site or are used by a protected species such as bats. This means most trees are not legally protected and other methods of protection such as the planning system must be fully utilised. The control of development through the application of planning policies and the use of conditions and legal agreements attached to planning permissions provide tangible and robust methods to protect trees through, for example, ensuring buildings are far enough away to protect roots and canopy.

It must be remembered that in some cases the removal of existing trees may be acceptable, when balanced against other wider benefits, particularly wider improvements to Green Infrastructure.

### Planting More

Secondly, we should consider how the planning system can help contribute to the planting of more trees. The Local Plan could play a role in helping to deliver more trees by providing a strong framework for planting programmes to work within and potentially designating specific sites for future planting. We must be mindful that there are other demands on land and in more rural areas, where there is the scope for larger scale planting, the desire to plant trees must be balanced with the requirements of agriculture and food production.

Another way of planting trees, and one that falls within the remit of the planning system, is through development. Housing schemes especially are expected to provide open space. Trees should be an integral part of open space and, indeed, the layout and design of any housing development. They can be planted on land that has other functions, such as sustainable draining facilities, play spaces, verges, gardens etc. and therefore ensure these spaces are multi-functional and multi-beneficial. We need to be creative and push the boundaries in how this can be achieved. Tree policies are part of this but we also need imaginative design and solutions to practical issues e.g. drainage, transport infrastructure etc. Careful planting and comprehensive, ongoing maintenance is key to trees growing, flourishing and reaching their full potential in terms of visual quality, carbon sequestration and biodiversity gain.

### Proposed Policy Options

Options for future policies could include:

- Strengthening policy to establish a presumption in favour of tree retention, whilst recognising where exceptions may be necessary, such as the delivery of outstanding improvements to wider Green Infrastructure and biodiversity.
- Strengthening tree replacement requirements to fully recognise the role of trees in carbon storage and the need to compensate for any loss of carbon storage through tree removal. This could require applicants to audit the current carbon sequestration contribution made by trees on site, with a requirement to improve that sequestration level through increased tree planting
- Allowing developments to make off-site contributions to these tree planting areas where it is not possible to plant trees on development sites
- Identifying new land for tree planting and protect it from alternative uses, where possible.

Alternatively, options may include:

- Continuing to pursue non-planning solutions to the delivery of increased tree planting across the District, working with major landowners and other partners.
- Retaining the existing policy approach of replacing lost trees on a for 3:1 ratio basis.

### Questions for consultation

- 3. How could planning policy be used to increase tree coverage across Leeds?**

DRAFT

## Green Space

### Background

One of the key elements of Green Infrastructure within Leeds is “green space”. This is open space which primarily has a recreational function, whether that be, for example, outdoor sport, allotments or for more informal recreation. The importance and value of these sites more broadly has been discussed earlier in this document though the fact green space provides access to open space and opportunities for recreation and the enjoyment of the natural environment is particularly key to physical and mental health and the protection of nature close to people’s homes. The current green space sites are formally designated through Policy GS1 in the Site Allocations Plan (2019) and are shown on the Policies Map and in the Site Allocations Plan documentation.

Many of the broader issues and context have been covered earlier under Green Infrastructure, however within the Leeds Local Plan green space has been considered as a distinct element of green infrastructure and therefore has its own suite of policies. These policies give clear requirements for new provision, including amounts per dwelling (Policies G4 and G5 – see Appendix 1) and protection of existing (Policy G6 – see Appendix 1).

### Policy Aims

- To ensure new green space is delivered to meet current and future need
- To give existing green space strong protection against loss due to development
- To improve existing Green Space

### Existing Policies and rationale for potential change

#### Green Space Provision

The issue of green space provision outside the City Centre was recently revised through the Core Strategy Selective Review (2019) and the revision of Policy G4. It is considered this Policy is fit for purpose and does not require any changes. However, through this review we would like to consider our approach to the delivery of greens space within the City Centre to ensure that we’re getting the balance right between high density developments in sustainable city centre locations and making sure that those residents have good access to usable greenspace. This is currently addressed by Core Strategy policy G5.

The Council is committed to supporting the delivery of improved green space in the City Centre, as evidenced through the [Our Spaces Strategy](#) which launched in March 2020. Within the Strategy it was acknowledged that Leeds City Centre includes a relatively low quantity and quality of green spaces in relation to the size of the city centre. There is also a lack of nature in the city centre and limited biodiversity corridors between the city centre and the surrounding communities. In addition, the

city centre offers little provision for children's play, physical activity, relaxation and habitat diversity. In response to this, the Strategy sets key principles designed to ensure that Leeds will be a substantially greener and better connected city that is more accessible to more people, creates an environment to thrive and is recognisable as a unique place to be.

Recently approved proposals at [Aire Park](#) on the Leeds South Bank and at the Corn Exchange, and the completion of new green space at Sovereign Square help us deliver on that vision. Moving forward, we're keen to explore what role planning policy could play in supporting the aspirations to increase the quantity and quality of green space in the City Centre.

At present, developments on land less than 0.5 hectares are not required to provide green space on site, within the City Centre. Given the high densities of development in the City Centre, this can result in large developments not delivering green space. However, this must be balanced against requirements to utilise land efficiently, and in the City Centre high density residential development reflects the need to maximise good use of land. However, given the Climate emergency and the local needs exacerbated by Covid-19, it is now seen as timely to revisit this approach to see if it needs changing to reflect different circumstances.

Secondly, where appropriate, developments can make payments to the Council instead of providing new Green Space. These payments are then used to provide green space elsewhere. However, the mechanism for calculating this payment means that developments inside the City Centre contribute less than outside the City Centre. It is proposed to revisit this and assess whether the calculation should be adjusted.

Lastly, commercial developments in the City Centre above 0.5 Ha are expected to provide Green/Open Space. However, this is not the case for commercial developments outside the City Centre and it is proposed to reassess this aspect of the Policy.

### Green Space Protection

As with the broader Green Infrastructure, one of the principle concerns is with the protection of Green Space, which is currently expressed through policy G6 of the Core Strategy.

When green space is not maintained it can fall into poor condition. This can affect the usability of green space and make it vulnerable to loss, particularly through development. In some cases it may be appropriate to redevelop sites but in most cases improving existing green space should be the preferred approach. The need for the Green Space is not reduced because of its current condition. Through the Plan we are considering whether to revise our approach to the protection of Green Space to see if this can be improved.

### Proposed Policy Options

For City Centre green space, future policy options could include:

- Reviewing the site size threshold for the provision of green space
- Reviewing the methodology for the calculation of sums in lieu of new green space on site
- Considering the principle of commercial sites providing green space in the City Centre.

For wider greenspace protection and improvement consideration could be given to whether protection could be enhanced and whether it could be extended to include all green and blue infrastructure, such as trees, natural green space specific to biodiversity aims, new green space etc.

### Questions for consultation

4. **Do you agree that the Local Plan Update should consider new policies to enhance green space provision within the City Centre?**
5. **Do you think the Green Space protection Policy (G6) be extended to all Green Infrastructure.**

## Nature Conservation

### Background

There is widespread recognition of the importance to protect and enhance the natural environment, to ensure biodiversity is fully considered in decisions affecting the use and development of land and to seek opportunities to improve the network of habitats and green infrastructure to increase biodiversity. Sites are identified and formally designated to give protection to habitats, flora and fauna which are important locally, regionally, nationally and internationally. Many organisations and agencies are involved in the recognition, protection and enhancement of wildlife habitats and geologically important sites.

In Leeds there are a number of such sites which are protected against development and activities that would harm the sites under national and international legislation and Policy G8 in the Core Strategy (see Appendix 1). In recognition of the importance of land that does not meet the criteria for formal designation, the Council has identified a broader network of habitats (statutorily and non-statutorily designated) which is shown on Map 18 (see Appendix 1) in the Core Strategy. It is important that the Leeds Habitat Network is publicly available. However maps within Local Plans remain static, representing a snapshot in time. As such, they cannot easily be revised and updated as the network changes, and therefore they can become out of date.

### Policy Aims

- Provide robust and comprehensive protection of sites recognised for their wildlife and geological significance at a national, regional and local level.
- Existing policies and rationale for potential change

It is considered that existing Core Strategy policy G8 on designating local wildlife sites and nature conservation designations is effective at protecting species and habitats and if revised would only require minor changes.

### Proposed Policy Options

Future policy options could include:

- Updating outdated terms, references and documents so the policy is more relevant and applicable.
- Adding more explicit provision for monitoring, review and updating in the policy
- Reviewing Map 18 and considering whether a more easily updated version would be more valuable.

Questions for consultation

6. Do you agree that the Local Plan Update should consider a revised policy for nature conservation? If so, what would you like to see a revised policy contain?

DRAFT

## Biodiversity

### Background

Biodiversity is the term used to describe the amazing variety of life on Earth.. The National Trust described biodiversity as 'Big Nature!'<sup>4</sup> Biodiversity has a huge role in helping us live healthy and happy lives; it provides us with food, raw materials, medical discoveries and what are called ecosystem services.. There are also many and varied benefits provided by the natural environment and from healthy ecosystems such as natural pollination of crops, clean air, a supply of oxygen, clean water, extreme weather mitigation and human mental and physical well-being, recreation and even tourism.

The Earth's biodiversity is in decline due to human activities such as deforestation, land-use change, agricultural intensification, over-consumption of natural resources, pollution and climate change. A report<sup>5</sup> from the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) in 2019 stated that nature is declining globally at rates unprecedented in human history and the rate of species extinctions is accelerating. The report contains some hard-hitting statistics including:

- 75% of global environments (excluding marine) have been “severely altered” to date by human actions
- There has been a 47%: reduction in global indicators of the range, scope and condition of ecosystems against their estimated natural baselines, with many continuing to decline by at least 4% per decade.
- More than 85% of wetlands present in 1700 had been lost by 2000. Wetland loss is currently happening three times faster, in percentage terms, than forest loss.
- Up to 1 million species are threatened with extinction, many within decades
- More than 500,000 (+/-9%) of the world's estimated 5.9 million terrestrial species have insufficient habitat for long term survival without habitat restoration

The IPBES report brings sharply into focus the global scale of the destruction of the natural environment and the catastrophic effects this is and will increasingly continue to have on our lives. Biodiversity and climate change are inextricably linked through the intrinsic balance of nature and ecosystems therefore a significant change in biodiversity will inevitably have an effect on climate.

Whilst we haven't seen large scale destruction of rainforests in Leeds, we are seeing incremental loss of our indigenous natural environment through habitat destruction and a resulting loss in biodiversity. It is therefore important that we protect the variety of life locally but also reverse the trend of losing biodiversity and achieve improvements through “biodiversity net gain”.

---

<sup>4</sup> <https://www.nationaltrust.org.uk/features/what-is-biodiversity>

<sup>5</sup> <https://ipbes.net/global-assessment>

The Environment Bill (see para 1.2 above) contains a target of a minimum 10% net gain which, subject to any revisions as the Bill's progress through parliament, will become law in 2021. Developments will then be legally required to deliver a 10% gain for biodiversity. Defra's Biodiversity Metric is the nationally recognised tool to measure and quantify biodiversity on sites and will be used to assess initial biodiversity, guide measure to deliver an improvement and assess the resulting biodiversity to ensure adequate gain is achieved.

There is scope for biodiversity improvements to be delivered on different sites to where development is located and details of these will be embedded in Conservation Covenants (agreements with landowners to deliver the enhancement and management for a minimum of 30 years). The Council will have a duty to show where off-site Net Gain is being delivered, ensure this is achieving the required biodiversity gains and contributing to the Government's Nature Recovery Network. Furthermore, it will need to produce a Local Nature Recovery Strategy (LNRS) which will consist of a "Habitat Map" and "Statement of Biodiversity Priorities".

### Policy Aims

- To strengthen the requirement for improvements in biodiversity and set a required level of gain
- To expand the use of recognised methods to assess and determine levels of biodiversity
- To provide a robust policy basis for the delivery of schemes, projects and programmes that will improve biodiversity.

### Existing policies and rationale for potential change

The Council has required developments to deliver a gain for biodiversity since 2014 through Core Strategy Policy G9 and identified the Leeds Habitat Network on Map 18. Policy G9 is a valuable policy and establishes the need for development to deliver a net gain in biodiversity. However, the declaration of the climate emergency, the contents of the Environment Bill (see para 1.2 above) and the greater focus on nature close to where we live due to Covid-19 has emphasised its importance and required us to consider whether we need to be more ambitious and explicit in the levels of biodiversity gain required through development.

### Possible Approach

Whilst the elements of the Environment Bill are not legally binding yet, the Council welcomes the introduction of a clear mandatory requirement of at least 10% biodiversity gain on development sites and is looking to introduce specific quantifiable requirements in Policy G9. We must be mindful that any figure will have to be fully justified by robust data and evidence to show it is appropriate, proportionate and deliverable.

There also needs to be a system in place to ensure improvements to biodiversity are actually delivered on the ground in the right place, whether that is on development

sites or elsewhere where ecological opportunities and benefits can be maximised. Planning policies need to provide a “hook” of key requirements and criteria and set out clearly how biodiversity issues should be considered during the determination of a planning application, supplemented by guidance. A Strategic Local Recovery Strategy for Leeds could be a key mechanism for effective and successful improvements. We will continue to think how best we can do this though your ideas and suggestions would be most welcome.

Whilst biodiversity net gain is an extremely valuable mechanism to improve biodiversity, planning policy and guidance can use many other ways to reverse the loss of natural habitats and biodiversity. Protection of locally, nationally and internationally important habitats is covered by Policy G8. But we’d like to consider revised policy for those important areas which don’t meet the criteria for special protection. Using a % net gain on sites which already have a low level of biodiversity will not result in noticeable improvements therefore we’d like your views on how the protection and improvement of the range of habitats, flora and fauna can be at the heart of development proposals through a focus on nature and ecological considerations in scheme layout, design and details, including infrastructure and the use of “green” products and technology.

Further consideration should also be given to our approach to biodiversity off-setting. Biodiversity off-setting is a system whereby if one area of natural space is lost to development, another area is created or restored for wildlife with the aim for an overall biodiversity gain. This means economic activity can occur and the environment can continue to flourish.

### Proposed Policy Options

Policy options for biodiversity could include going beyond the provisions for biodiversity net gain within the Environment Bill and setting ambitious targets for net gain.

Alternatively the authority could choose to retain its existing approach, either based on the benefits of the existing policy approach or the expected provisions of the new Environment Bill.

### Questions for Consultation

**7. Do you agree that the Council should revise its policies on biodiversity? If so, what would you like updated policies to contain?**

## Local Food Production

### Background

Local food production is an important part of Green Infrastructure because it helps deliver many of the benefits of GI (e.g. for biodiversity and well-being). It is also an important part of cutting carbon in its own right because the travel and processing associated with food generates lots of carbon emissions. Indeed food is one of the biggest contributors to our individual carbon footprint. It is for this reason that the Leeds Climate Commission have concluded that growing food locally and reducing food waste are important steps in becoming a zero carbon city. Food growing can be on a commercial scale i.e. through farming, and on a local community scale, such as allotments.

From a **commercial** perspective the Government's 25 Year Environment Plan<sup>6</sup> notes that the UK needs to optimise sustainable national food production for both the climate agenda and also to respond to Brexit and make the UK more self-sufficient.

They note that this can be done through improved land management and that *“Agri-tech developments can significantly improve farm performance, in terms of both profits and the environment.”* They note that this can be achieved through more intensive horticulture, such as polytunnels in the countryside.

Researchers from the University of Leeds recommend that Leeds can also make better use of brownfield sites for vertical farms (agri-tech farms which use modern techniques to grow food indoors).

From a **community** perspective throughout the Big Leeds Climate Conversation local food production was a prime consideration. Growing food was the 5<sup>th</sup> most popular pro-environmental behaviour change that respondents would make, but say that barriers prevent them<sup>7</sup>.

Researchers from the University of Leeds recommend identifying and making better use of urban green space including parks, housing, ex-allotment sites and allowing better use of and meanwhile uses (which means temporarily using proposed development sites to grow food; possibly in containers).

The Town and Country Planning Association<sup>8</sup> specifically advocates more community food growing. They define community food growing as “the cultivation of land by groups based on residential estates, faith premises, places of employment, schools or within neighbourhoods.” There is a history of this within Leeds with

---

<sup>6</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

<sup>7</sup>

<https://democracy.leeds.gov.uk/documents/s198402/Climate%20Emergency%20Report%20Annex%20%20191219.pdf> (see page 29)

<sup>8</sup> [https://www.sustainweb.org/news/apr14\\_planning\\_sustainable\\_cities/](https://www.sustainweb.org/news/apr14_planning_sustainable_cities/)

places like Meanwood Valley Urban Farm – a larger community farm which also employs paid workers and organisations such as Feed Leeds, (a local version of the national Incredible Edible project) involved with sustainable local food.

### Policy Aims

Whilst there is already considerable enthusiasm and commitment to grow food locally the planning system can help remove barriers, such as lack of access to suitable land and through its wider Green Infrastructure policies. The proposed policy aim for local food growing are as follows:

***As a key part of the multi-faceted Green Infrastructure in Leeds and recognising its role in the Climate Emergency, the Local Plan encourages local / community food growing, so as to ensure that those who wish to grow food locally have the opportunity to do so within walking distance of their home.***

From a commercial perspective it is important to be positive about commercial food growing so that investors know that Leeds will welcome innovation and development of the food growing sector.

### Existing policies and rationale for potential change

The current Local Plan policies set the framework for Green Infrastructure and notes in para 2.38 of the Core Strategy that:

*“An integral component also of the District’s Green Infrastructure and green space and in contributing to public health, are the networks of allotment gardens across the City. These are important facilities in providing for local food production (close to communities) and in contributing to local amenity and distinctiveness.”*

However, a focus purely on allotments for growing food is considered to be too narrow, given the wider opportunities that are available and in line with a more detailed approach on Green Infrastructure policies need to be more explicit and recognise that food growing can occur on land other than allotments.

In terms of commercial agri-tech food growing opportunities the current Local Plan identifies over 400 ha of land for general employment, which would allow for vertical farming on allocated employment land and on other brownfield urban land which was not allocated for other purposes. But it is important to note that commercial agri-tech food growing may also be acceptable in the countryside too. The NPPF requires that *“Planning policies and decisions should enable... inter alia... the development and diversification of agricultural and other land-based rural businesses<sup>9</sup>”* and it also allows buildings for agriculture in the Green Belt<sup>10</sup>.

---

<sup>9</sup> NPPF para 83

<sup>10</sup> NPPF para 145

## Possible Approach

It is proposed that at this initial stage the Plan needs to set a positive framework for local food growing and provide more detail on how this can be achieved within a revised approach to protecting, managing and providing new Green Infrastructure and local place-making policy approaches being advocated elsewhere in this Local Plan Update. The Local Plan update could therefore provide policies that:

- protect existing community food growing spaces
- support the provision of new community food growing spaces in or near existing housing estates
- encourage the temporary use of vacant sites and land awaiting development
- require the incorporation of community food growing space in new residential developments as part of Green Infrastructure delivery
- require all development to incorporate measures that will contribute to on-site sustainable food production as part of Green Infrastructure delivery
- include community food growing in open space assessments and strategies in their own right, distinct from consideration of allotments

Aside from strategic support for local food growing it is considered that there are fewer opportunities to amend or set detailed policies for commercial food growing at this stage of the Local Plan Update and that the current policies are not restrictive. However, it is considered that when employment land policies and employment allocations are updated in the future, the agri-tech food sector should be specifically considered, potentially through the allocation of specific sites for this purpose. To do this now, would also necessitate a wider look at all employment sectors as to ensure that all sectors were considered in the round. This would not align with a focussed scope of the Local Plan Update for the climate emergency.

## Questions for Consultation

- 8. Do you agree that the Council should include policies to positively promote local food production?**
- 9. Do you think all new housing should deliver such opportunities or do you think they should be more strategically focussed e.g. more allotments?**
- 10. What else do you think the planning system can do to encourage local food growing?**