

# **APPENDIX 1: INTRODUCTION AND SUMMARY**

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## **LEEDS LOCAL PLAN UPDATE**

### **DEVELOPMENT PLAN DOCUMENT**

#### **INTRODUCTION, SCOPE AND SUMMARY TO THE LOCAL PLAN UPDATE SCOPING CONSULTATION**

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## 1 What is the purpose of this consultation?

- 1.1 Leeds City Council is updating its planning policies, which will form part of the statutory Local Plan. The focus is on the role of planning in helping the Council deliver its climate emergency commitments. The Council is seeking views on which parts of the existing Local Plan to update and what they should contain.
- 1.2 This update will make changes to the existing Core Strategy and Natural Resources and Waste Local Plan. These documents set out development principles for our area and are used to determine planning applications.
- 1.3 There are four formal stages to updating the Local Plan:
  - **Scoping** – the current stage where we seek views from stakeholders about the ideas, options and direction of travel of the Plan
  - **Pre-submission** – the next stage where we carefully consider the comments you've sent us and use these to draft policy wording which is intended to guide development in Leeds – we'll be consulting on these detailed policies towards the end of year
  - **Submission** – taking into account all the comments we have received, and making sure that our final draft policies are sound and legal prior to submitting to the Secretary of State for independent examination by a planning inspector
  - **Adoption** – where, following independent examination (and any proposed modification), the Council receives an Inspector's Report and can formally adopt the policies as part of the statutory Local Plan
- 1.4 At this stage we need your views on:
  - what the Local Plan Update should contain and this 'Scoping Report' explains the range of what may be addressed, including which documents will be affected, the role of the update, the Council's initial thoughts on the content and how it relates to the wider Local Plan;
  - the direction of travel of the policies – are they the right choices, are they ambitious enough, relevant to Leeds and will they deliver the type of development that you think the City needs and help make the places you would want to live in?
- 1.5 This scoping report and the detailed topic papers that sit underneath it provide information on a range of issues we think should be considered through the Local Plan Update. Throughout the documentation, questions are asked, highlighting where we need your views and opinions.

## 2 What is the Proposed Scope of the Plan?

- 2.1 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.
- 2.2 In addition, closely related topics such as green infrastructure, flood risk, place-making and sustainable infrastructure are also included within the proposed scope of the Plan. These are explained in more detail below.
- 2.3 All these policies are contained within:
  - the existing Core Strategy (as amended by a selective review, 2019) and
  - the Natural Resources and Waste Local Plan (2013).
- 2.4 These documents help guide the delivery of the Council's site allocations plans (the Aire Valley Leeds Area Action Plan (2017) and Site Allocations Plan (2019)). The allocations plans are also very recently adopted and therefore the Local Plan Update will not amend them.
- 2.5 The Local Plan Update is also likely to supersede saved policies within the Council's Unitary Development Plan (2006).

## 3 Why is the Local Plan Update focussing on the Climate Emergency?

- 3.1 Leeds City Council declared a climate emergency in March 2019 with an ambition to work towards carbon neutrality by 2030. This is a massive task, needing a sustained effort from not just the Council, who aim to lead by example, but for other agencies, businesses and residents of Leeds.
- 3.2 Leeds has a Local Plan with existing policies aimed at addressing climate change. These policies range from a spatial strategy which encourages growth in sustainable locations, to detailed policies on carbon reduction, green infrastructure, flood risk, biodiversity, flood risk, heat networks, electric vehicles, renewable energy generation, air quality and tree replacement. However, these policies were made before the declaration of the Climate Emergency and the aspiration to achieve net zero carbon emissions by 2030.
- 3.3 To achieve our ambitions by 2030 and beyond, a rapid period of transition is necessary, along with big changes.

### Why Leeds declared a Climate Emergency

- 3.4 The Council aspires to be carbon neutral by 2030 because the evidence

supports that, as follows:

- the United Nations Intergovernmental Panel on Climate Change warned that the window of opportunity to limit average global temperatures increases under 1.5 °C, and avoid the worst climate change impacts, will vanish in the next decade
- the UK government updated the Climate Change Act, committing to, by law, reduce greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050, in response to the Committee on Climate Change
- to reach this target the government has set legally-binding 'carbon budgets' in 5-year periods i.e. the amount of greenhouse gases the UK is permitted to emit for each 5-year period
- the Committee has found that the government's policies and plans are not enough to meet carbon budgets and that the policy gap has widened
- Yorkshire and Humber's share of the 'carbon budget' to 2050 on a per capita basis is estimated at circa 250 mega-tonnes. If we continue business as usual the budget will have been used up by 2025
- Climate change events are continuing to occur in frequency and severity both globally and locally e.g. frequency of storms, such as Storm Eva and the floods caused over Christmas 2015

3.5 Many local authorities across Yorkshire and Humber and the West Yorkshire Combined Authority<sup>1</sup> have now declared climate emergencies with a commitment to carbon neutrality. There are varying dates for achieving carbon neutrality locally, but all commitments are ahead of the government 2050 target. We know this is a challenge, but not trying to achieve zero carbon by 2030 would be worse than doing nothing because:

- we need to plan for the long term to make sure that we are ready for the impacts of Climate Change - the Council's Local Plan looks ahead 16 years
  - we need to help influence and inform Government on the steps that are necessary for low carbon cities
- Leeds already has a significant level of development in the pipeline (including almost 40,000 homes) to deliver, which will last beyond 2050 and if not built to higher standards may serve to exacerbate the challenge in the future.

3.6 According to a [carbon roadmap](#) report by Leeds Climate Commission, Leeds could become a carbon neutral city by 2050 – and potentially by 2030. The report demonstrates that it is technically, and to a large extent, economically possible for Leeds to become a carbon neutral city and to meet ambitious carbon reduction targets in line with the global targets set out by the United Nations. The roadmap makes clear that no single innovation will resolve the

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<sup>1</sup> Definition

climate crisis or put Leeds on a path to zero carbon but that a combination of activities are essential. This means that no-one can afford to not play their part or to leave it to someone else to make the efforts. The report sets out that there are economically viable measures that can be delivered now and acting now is much more cost effective than waiting until later.

### Leeds Climate Conversation

- 3.7 A Climate Conversation was launched in 2019 as a result of the declaration of the Climate Emergency and nearly 8,000 people responded to the Council with the overwhelming majority agreeing with the scientific consensus that the climate is changing due to human activity, that they are worried about it and that tackling the climate emergency, becoming a carbon-neutral city and protecting wildlife diversity should be priorities for the Council.
- 3.8 The majority of responses also considered that more should be done around the following issues:
- transport, especially suggestions for a mass transit system;
  - building 'greener' developments, e.g. requiring stricter energy efficiency standards, the installation of renewables;
  - making it harder to develop on green field sites;
  - planting more trees.

### The Role of Planning

- 3.9 There is a legal duty<sup>2</sup> to ensure that climate change **mitigation** and **adaptation** is a core objective of a local authorities' planning policy.
- Climate change **mitigation** is about reducing the impact of human activity on the climate, primarily through reducing greenhouse gas emissions, such as carbon (CO<sup>2</sup>) which are produced in the construction industry, when we travel by cars and when we power and heat buildings. Land use change is an important driver of climate change and can be mitigated by conserving existing woodland, as well as changing the ways in which land is managed, e.g. so that more carbon is stored in soils.
  - Climate change **adaptation** is about adjusting to the impacts of climate change, to lessen harm e.g. increased flooding protection and adapting to hotter weather.
- 3.10 Both mitigation and adaptation are linked and some adaptation measures e.g. fitting air conditioning units may lead to more mitigation. So a balanced

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<sup>2</sup> under section 19(1A) of the Planning and Compulsory Purchase Act, 2004

approach is essential.

3.11 Planning policies help determine planning applications for development that can:

- shape places in ways that contribute to radical reductions in greenhouse gas emissions, e.g. by reducing the need to travel by car
- minimise vulnerability and improve resilience e.g. by avoiding places that flood and dealing with water
- encourage more prudent use of existing resources e.g. by making homes more efficient
- support the move towards renewable and low carbon energy and associated infrastructure e.g. by setting where wind farms and solar farms can be located
- promote nature-based solutions that help adaptation to a changing climate e.g. green flood solutions that soak up water rather than store it.

3.12 The National Planning Policy Framework (NPPF 2019) is national guidance for planning and all local authorities have to consider policies within it. Section 14 (¶148 – 154), stresses that the planning system should support the transition to a low carbon future in a changing climate. In addition to the statutory requirement to take the NPPF into account in the preparation of Local Plans and in decision taking, there are wider statutory duties on local planning authorities to include policies in their Local Plans designed to tackle climate change and its impacts, including:

- Planning & Compulsory Purchase Act 2004 - Planning must secure that the development and use of land contributes to the mitigation of and adaptation to climate change;
- Planning Act 2008 - A duty that Plans have climate change targets and policies;
- Planning & Energy Act 2008 - Powers to require some low-carbon energy generation from new development;
- Climate Change Act 2008 - Establishes the importance of planning in securing legally binding targets.

### How the Climate Emergency Affects Leeds

3.13 The Climate Emergency affects Leeds in a number of ways from the inner city and the City Centre to the outer areas, some of which are specific to the nature and character of Leeds. Leeds has to be ready to deal with and adapt to a changing climate in the following ways:

- **Preparing for heat waves and their impacts.** It is recognised that as a large urban area Leeds will experience an increase in temperature fluctuations. The health impacts of heatwaves can be significant, particularly for vulnerable people, when excess deaths can occur. Therefore it is crucial that we make places ready for extremes of temperature to ensure they are resilient. In Leeds the urban heat island effect will affect those who are most vulnerable, including the elderly, those with respiratory conditions and those in built up high density areas, particularly those with little shade.
- **Planning for flood risk.** Leeds is also well aware of the issues that flooding brings e.g. the damage caused by Storm Eva in 2015, will increase as the global and local climate changes.
- **Protecting our infrastructure** which will need to be built to higher specifications and new nature-based infrastructure solutions help not only deal with the effects of climate change, they can also support biodiversity.
- **Protecting our water resources** which will need to be used more wisely in development and in activities such as agriculture.
- **Supporting nature** Temperature changes won't just affect people and there will be a need to plan for better biodiversity and resilient local habitats for our species.

## 4 What is the Plan likely to contain?

- 4.1 At this stage we are proposing topic areas and have prepared 5 topic papers to provide ideas for how planning policies could change in the future to take account of the climate emergency. At this early stage, we'd like your views on these topics and the ideas contained within each topic area. The topic areas are as follows:

Topic Area	Policy Areas Covered
Carbon Reduction	<ul style="list-style-type: none"> <li>• Whole life carbon costs for buildings</li> <li>• Reducing carbon emissions from buildings</li> <li>• Sustainable construction</li> <li>• Resilience to Heat</li> <li>• Renewable energy generation</li> <li>• Heat networks</li> <li>• Energy storage</li> </ul>
Flood Risk	<ul style="list-style-type: none"> <li>• Flood risk</li> <li>• Functional floodplain</li> <li>• Sustainable Drainage Systems</li> </ul>



Green Infrastructure	<ul style="list-style-type: none"> <li>• Strategic Green Infrastructure</li> <li>• Trees</li> <li>• Green space</li> <li>• Biodiversity</li> <li>• Nature Conservation</li> <li>• Local Food Production</li> </ul>
Place-making	<ul style="list-style-type: none"> <li>• Strategic Place-making (incl. 20-Minute Neighbourhoods)</li> <li>• Local Place-making</li> </ul>
Sustainable Infrastructure	<ul style="list-style-type: none"> <li>• High Speed 2</li> <li>• Leeds City Station</li> <li>• Mass Transit</li> <li>• Leeds Bradford Airport</li> <li>• Digital Infrastructure</li> </ul>

**Question: Do you agree that to meet the objective of the Local Plan Update the scope should focus on the Climate Emergency, including the topics of carbon reduction, flood risk, green infrastructure, place-making and sustainable infrastructure?**

## 5 Consultation

- 5.1 We are at an early stage of plan making and your ideas and opinions are crucial in shaping this Plan. In these documents we set out the background to lots of issues and some possible ideas for how planning policy could be used to help address the Council's aspirations for net zero carbon emissions by 2030. There is still lots more work for us to do and your thoughts and ideas on the direction of travel set out in this consultation will help steer and guide that work. This is your Local Plan and your views and ideas are important to us.
- 5.2 It is important to reflect that there are limits to what planning policy can do. Planning policy can only steer development that requires planning permission. We also need to be able to demonstrate that new policies are deliverable. In other words, if we set standards we need to have evidence that shows that they can be complied with. Where there are important limits to what planning can do, we have tried to set that out in the topic papers.
- 5.3 Whilst the topic papers are designed to apply across all of Leeds, we're also keen to know your local challenges and ideas. Are there specific climate change issues in your neighbourhood? Do you have any particular local evidence to support your views that you'd like to share with us?
- 5.4 We'd also welcome your general thoughts on whether the direction of travel we set out is ambitious enough, or whether you think it is unrealistic. Do you have any other comments that you would like to make?

## 6 A Summary of the Topic Areas

- 6.1 The section below provides the 'key messages' from the 5 topic areas, designed as a helpful summary. For further details please see the 5 topic papers.

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## Topic Paper 1: Carbon Reduction

Vision: To minimise energy demand and meet all heat and power requirements without increasing carbon emissions, to allow Leeds to meet its climate emergency goal of zero carbon by 2030.

### Background

The current Local Plan has numerous policies that help reduce carbon emissions across Leeds and we have seen significant reductions in carbon emissions in Leeds since 2005. However these policies were set before the Climate Emergency declaration and are not aimed at meeting a net zero carbon aspiration by 2030. As such, we'd like to explore ideas for how we might go further than the existing suite of policies

### Whole Life-Cycle Carbon Emissions

Whole life cycle carbon emissions or 'embodied carbon' refers to the carbon emissions resulting from the construction and use of a building over its entire life, including the carbon that is emitted from the operation of a building once it is complete and its end of life demolition and disposal.

We're exploring ideas for bringing in new policies that could require developments to measure their whole life-cycle carbon emissions before being granted planning permission.

**Question: Do you think that planning policy should seek to reduce the embodied carbon emissions across the whole life cycle of a development?**

**Question: Do you have any further thoughts on whole life-cycle carbon reduction, such as how quickly it should be used to require zero carbon development, or whether all developments should be required to carry out assessments?**

**Question: What kinds of mechanisms might help to accelerate zero carbon development?**

### Operational Energy Reduction

We expect our buildings not to waste energy by being built to be as energy efficient as possible. This also helps to reduce household fuel bills (and support initiatives for 'affordable warmth'), improve business competitiveness, create jobs in the energy service sectors and provide resilience in our energy supply. Cost implications are much lower when energy efficiency measures are included in a new building than when they are retrofitted and it would be a waste of resources to construct buildings now that will require retrofitting in the future.

We're keen to explore policy options that will deliver zero carbon developments, in a way that is feasible, realistic and viable. This could include requiring all development to be zero carbon from the outset, or a gradual increase of energy efficiency over time. We're also keen to explore ways that renewable and low carbon energy can be delivered on site as part of new developments.

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

**Question: Should developments still be required to include on-site renewable energy as well as meeting energy efficiency standards? If so, what proportion of the energy needs of the development should be met by renewable energy?**

### **Sustainable Construction**

Sustainable construction concerns the assessment of how environmentally responsible and energy efficient a construction project is. A number of standards exist, with perhaps the most well-known being BREEAM. The standards cover areas such as energy, health and wellbeing, materials, transport, water, waste, pollution and ecology.

The benefit of standards such as BREEAM Residential is that they give an overall assurance of the sustainability of a development (not just energy) and the developer is required to obtain an independent assessment to verify that the standard has been achieved.

**Question: Do you think that Leeds should set a standard for sustainable construction of new residential development?**

**Question: If so, do you think we should use one of the established sustainable construction rating systems such as BREEAM Residential or create our own set of standards?**

### **Resilience to Heat**

Currently it is estimated that 2,000 people a year die from over-heating in England and Wales. This figure is expected to increase to 7,000 by 2050 as a result of climate change. Given the importance of adapting to the impacts of climate change we feel it is important that the Local Plan considers how new developments could be made more resilient to the impacts of heat.

These options could include requiring developers to use the 'cooling hierarchy' to avoid buildings being at risk of over-heating. This might involve the use of passive design to minimise unwanted heat gain and manage heat – for example by using building orientation and natural shading. It could also incorporate the use of natural cooling by allowing outside air to ventilate and cool a building without the use of a powered system, for example through windows that can open and ventilation.

**Question: Do you agree that the Local Plan should contain a policy designed to increase resilience to the impacts of heat?**

**Question: How do you think Leeds could ensure that homes are more resilient to overheating?**

### **Renewable Energy Generation**

As part of the Local Plan Update we are considering possible options for renewable energy generation in Leeds. There is no requirement for Local Authorities to set targets

for renewable energy generation, and with national efforts to decarbonise the electricity grid, it may be considered that such an approach would be unnecessary. In such a scenario it may still be beneficial to set policies for how applications for renewable energy would be assessed against. Alternatively, by setting targets, we could also identify suitable areas in the district for different types of renewable energy.

The Natural Resources and Waste Local Plan currently includes a criteria based policy that we use for assessing wind farm applications but a similar policy may also be beneficial for other large scale energy generating facilities which have similar issues to those of wind farms. The wind farm policy could therefore be expanded to cover solar farms and energy storage.

Solar farms are becoming one of the most preferred renewable generation technologies. They use solar photovoltaic systems, and the land within a solar farm can be used for nature and wildlife. Based on the average annual consumption of a household, for every 5 MW installed, a solar farm will power approximately 1,500 homes for a year. Approximately 25 acres of land is required for every 5 megawatts (MW) of installation. They can be a range of sizes but those which are large and connect to the national grid will tend to be in the countryside because Leeds does not have many large brownfield sites that are not currently used or identified for other uses. The Council could set policies that consider the suitability of sites for solar power taking into account impacts on landscape, biodiversity, farming land and visual amenity as well as the need for the farm to be in a particular location e.g. near to the national grid. Alternatively the Council could identify which sites are suitable and allocate these for renewable energy generation.

***Question: Do you consider that Leeds should set targets for different types of local renewable energy generation?***

***Question: Do you have any views about where facilities for local renewable energy generation should be located?***

### **Heat Network**

Leeds City Council and its partners Vital Energi are constructing a heat network, via underground pipes, around Leeds City Centre which re-uses the heat produced from the Recycling the Energy Recovery Facility (RERF) to supply a low carbon form of heat in the urban area to local homes and businesses. When complete, the network will connect nearly 2,000 homes and businesses to provide low carbon heat and hot water, equating to a saving of 11,000 tonnes of carbon emissions per year.

Given the success of the heat network it may be considered unnecessary to update existing policies. Alternatively, it might be beneficial to supplement the existing heat networks policy with a detailed Supplementary Planning Document to match up heat networks with potential customers.

***Question: Would you like to see more connections made to the heat network or are there other more effective ways to reduce emissions?***

***Question: Do you think the existing policy should be updated? If so, do you have any thoughts or ideas about what an updated policy should contain?***

## Energy Storage

Renewable energy can sometimes result in energy being produced when it is not needed and therefore can be lost. Energy storage can help reduce this loss by storing this energy for future use. Whilst storage can take a number of different forms, the most commonly used for electricity is the chemical battery

Areas suitable for energy storage need to be within good proximity to the grid at locations where the substation has capacity for the connection. Proximity to a power generation source is also useful. Industrial areas offer good potential especially if sites have poor accessibility so as to reduce the impact on the more accessible sites in the employment land supply.

Given that there are currently no policies within the Local Plan on this topic we believe that a new local policy would be beneficial. This could include a target to establish how much energy storage is needed in the district and identify suitable areas. Or alternatively, it could identify suitable areas for energy storage without setting a target.

***Question: Do you think that a new policy is required to guide the location of energy storage proposals?***

***Question: Do you think that a target should be set for the amount of energy storage in Leeds?***

## Topic 2: Flood Risk

### Background

The Council has rigorous processes in place to ensure that development avoids flood risk where ever possible and that development is only approved when there is adequate mitigation in place. In cities which have developed historically on the floodplain, it is important to consider other factors alongside flood risk, specifically the need to focus investment in sustainable locations, close to services. The Council has a strategy for managing flood risk in the form of the Strategic Flood Risk Assessment (SFRA). This defines the levels of flood risk throughout the whole district and gives detailed advice on how to manage it. The SFRA is currently being updated and we think now is the right time to consider updating our existing suite of flood risk policies, particularly as we know that the frequency of flooding events in Leeds is increasing.

### Avoiding Development in Flood Risk Areas

We have a robust set of policies related to avoiding development in flood risk areas in Leeds. The Local Plan Update provides an opportunity to bring all the flood risk policies together and review their effectiveness in the light of climate change, and an updated SFRA (due summer 2021).

As part of the Local Plan Update we want to consider whether policies could be improved to reduce the risk of flooding, and increase our resilience to flooding events.

There is an important balance to be struck between flood risk and other sustainability benefits, such as the need for regeneration, the efficient use of brownfield land and access to services. If policy tests are made tighter to further reduce the number of permissions for 'more vulnerable' development in flood risk areas this could result in people living further away from services and facilities that they need. This would then result in longer journeys and add to emission of greenhouse gases and other pollutant gases.

***Question: Do you agree that our policy approach to development in flood risk areas should be within the scope of the Local Plan Update?***

***Question: Have we got the balance right between locating homes close to the services and facilities that people need whilst avoiding high flood risk areas?***

### Functional Floodplain

The functional floodplain is the land where water has to flow or be stored in times of flood with a 1 in 20 annual probability of flooding. Most of the functional floodplain is open land and undeveloped. . Leeds is fortunate that much of the River Aire, as it flows through the urban area, will have the benefit of the Leeds Flood Alleviation Scheme and therefore significant parts of the urban area that would have otherwise flooded with a 1 in 20 year probability, will be protected.

For those urban areas that have a 1 in 20 probability of flood risk but don't have the benefit of a flood alleviation scheme the redevelopment potential will continue to be

limited due to the high flood risk probability. The SFRA will explore the extent of these areas and the impact of climate change. The Local Plan Update may consider the policy options for limiting development in those locations.

***Question: Do you think that the Local Plan Update should consider limitations on urban expansion in unprotected areas with a very high probability (1 in 20) of flooding?***

### **Surface Water Flooding and Sustainable Draining**

Sustainable drainage systems (SuDS) are designed to control surface water run off close to where it falls and mimic natural drainage as closely as possible. One of their uses is to reduce the causes and impacts of surface water flooding (sometimes referred to as flash flooding). The current Local Plan already encourages the use of SuDS but given the many benefits of using SuDS against traditional systems, we believe the Local Plan Update should consider how the existing policy could be strengthened to make the use of SuDS a firmer requirement for new development, particularly given the benefits in addressing climate change resilience, biodiversity, urban cooling, and health and wellbeing objectives.

One potential option we are considering is the mapping of infiltration rates to identify the areas that are most suitable for SuDS and this would support delivery of SuDS in those locations. Another way to help manage surface water flooding is to identify the 'source' locations where heavy rainfall can lead to flooding at a downstream 'receptor' location. Additional measures to reduce the speed of surface water run off at the source location, such as tree planting, can avoid the need for mitigation downstream.

***Question: Do you agree that surface water flooding and use of SuDS should be within the scope of the Local Plan Update?***

***Question: Do you have any thoughts on the potential options raised above, or any alternative options you think we should consider?***

### **Resilience**

Flooding has a negative impact on the lives of everyone affected by it. Given the forecasted increases in rainfall we want to consider what we can do to make sure that new development is resilient. There has been a rise in purpose built accommodation for people who are especially vulnerable, such as elderly and disabled. These people may be less able to cope with the impacts of flooding and the effects can be devastating for them.

We currently do this by requiring a flood risk assessment FRA to be submitted to accompany planning applications which sets out mitigation measures to make sure the development will be safe for its lifetime and without making flood risk worse elsewhere for all affected people. We wish to explore whether the Local plan could provide a clearer steer on how developments can be made resilient for all users taking into account climate change.

***Question: Should the Local Plan set new standards for flood resilient housing?***



***Question: Should the Local Plan consider where accommodation for more vulnerable people is located?***

### **Permitted Development Rights and Porous Paving**

The paving over of front gardens can result in increased flood risk caused by surface water runoff which is unable to drain naturally if impermeable materials are used. Additionally, the loss of vegetation can contribute to increased air pollution in urban areas and can affect the character and appearance of traditional streetscapes.

Permitted development rights are set by the Government and set out types of development that do not require planning consent. Permitted development rights allow for the provision of a new or replacement hard surface (such as a driveway) within the curtilage of the grounds of different buildings, such as houses, offices and industrial buildings.

We're keen to explore what approaches we could take to ensure that where landscaping and gardens provide a valuable function in helping manage flood risk, they are not subsequently lost through permitted development rights.

***Question: Should the Local Plan Update consider what approaches could be taken to limit permitted development rights for new developments to ensure open areas that are needed for flood risk management are retained?***

***Question: Whilst not subject of a grant of planning permission should the Council consider how to control paving over front gardens and loss of soft and natural landscaping in existing development, for example through enhanced guidance for householders?***

## Topic 3: Green Infrastructure

### Background

Protecting, enhancing and increasing green infrastructure (GI) plays an important role in delivering the Council's strategies to improve the health and wellbeing of its citizens and to address the climate change emergency as well as creating high quality, attractive places for people to live, work and relax in. 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 and encouraging nature-based solutions to things like the provision of infrastructure. We would also be keen to look at green and blue infrastructure together where it relates to things like flood risk and storage and urban cooling.

### Strategic Green Infrastructure

The current Local Plan already contains a broad suite of policies aimed at protected and enhancing Green Infrastructure. However, they are located across a range of different documents and policies. We would like to explore how we might bring this together to form a single strategic policy that would set a clear definition of GI, set out a clear network of uses and provide increased emphasis on improving existing GI and delivering high quality GI through new developments. We are particularly keen to embrace concepts such as ecosystems services and natural capital and apply them to Leeds.

***Question: Do you agree that enhanced policy for the protection, improvement and enhancement of GI should be included in the Local Plan Update?***

***Question: If so, do you have any thoughts or ideas about what you'd like to see included in such a policy?***

### Trees

Through the White Rose Forest Project the Council is committing to doubling its tree cover by 2050. Trees have multiple benefits for the environment and our mental health. In particular, with regards to the climate emergency, they store carbon dioxide and extract it from the air we breathe. We need to provide guidance to ensure that the right species of trees are planted in the right places that support carbon capture and also biodiversity.

Whilst the planning system can only provide limited protection for existing trees, we are keen to explore options for how that protection could be enhanced. Equally, planning policies could be used to increase tree planting. Current policies require the replacement of lost trees through development on a 3 new trees for every 1 lost ratio. However, with mature trees, this often doesn't reflect the amount of carbon storage lost. In order to better recognise the role trees have in storing carbon, options for future policy could include increasing this tree replacement ratio to reflect the level of carbon stored within trees to be lost.

**Question: How could planning policy be used to increase tree coverage across Leeds?**

### Green Space

Policy for the delivery of new green space outside of Leeds City Centre was recently updated in 2019 and it is not considered necessary to revise this. However, we're concerned that our existing policies are not providing enough usable greenspace *within* the City Centre. The City Centre is one of the most sustainable locations for growth across all of Leeds and we want to ensure that current and future residents have good access to green space, particularly in light of the effect Covid-19 restrictions placed on residents within the area.

**Question: Do you agree that the Local Plan Update should consider new policies to enhance green space provision within the City Centre?**

### Nature Conservation

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.

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, as well as local policy. 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 within the Local Plan. It is also important that sites are connected and green corridors allow species to move between different areas so that biodiversity benefits are maximised.

It is considered that existing Local Plan policy on designating local wildlife sites and nature conservation designations is effective at protecting species and habitats and if revised would only require minor changes. This changes could consider updating outdated terms, references and documents; emphasising monitoring and updating policy; and considering whether existing maps could be updated more easily.

**Question: Do you agree that the Local Plan Update should consider enhanced policy for nature conservation and habitat diversity. If so, what would you like to see a revised policy contain?**

### Biodiversity

Worldwide we are seeing dramatic losses in the amount and variety of natural life on Earth. Leeds' current Local Plan already reflects this loss by requiring new developments to deliver a net gain for biodiversity. This means that developers would be obliged to assess the biodiversity value of sites before they build and ensure that once developed the sites are either improved or biodiversity is improved elsewhere in the City. We are keen to explore whether this policy should go further

by setting higher standards for the amount of net gain that should be delivered on new development sites.

***Question: 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**

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.

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.

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.

***Question: Do you agree that the Council should include policies to positively promote local food production?***

***Question: Do you think all new housing should deliver such opportunities or do you think they should be more strategically focussed e.g. more allotments?***

***Question: What else do you think the planning system can do to encourage local food growing?***

## Topic 4: Place-making

### Background

We want to minimise carbon emissions by guiding new development to locations that offer the best opportunity for active travel, for use of public transport and for minimal use of private motor vehicles. To do this we need to capitalize upon a local community's assets, inspiration and potential and create high quality, sustainable and resilient places that people want to live, work and play in and promote people's health, happiness and well-being.

### Strategic Place-making

All development plans produced in Leeds, as part of the Local Plan to-date, have sought to provide a framework for sustainable and healthy communities, having regard to quality of life and to protect and enhance the environment. This is achieved through a strategic and spatial approach and a suite of policies relating to the overall scale and distribution of development, location, layout and fabric of places.

The impacts of the Covid-19 pandemic on people's access to services and facilities, coupled with the threat of climate change have placed greater emphasis on a concept known as the '**20-Minute Neighbourhood**'. The purpose of the concept is to ensure that residents have quick access to essential facilities and services via walking, cycling or public transport. This, in turn helps support strong communities and local economies, recognising that easy and safe walking and cycle access to services/facilities is good for health, and that physical activity and less reliance on the private car reduces air pollution and carbon emissions. This approach to local growth and place making around service centres and hubs is gathering support across the world and is an easily understood way of planning for the way places change.

For Leeds to meet its objective of minimising carbon emissions it is considered that spatial growth, in line with the emerging Leeds Transport Strategy, should continue to follow a pattern of concentration particularly around the City and town centres and with less development in relatively unsustainable locations, and promote walkable neighbourhoods. In this context, we think now is the right time to consider whether existing policy needs updating to reflect how best to apply the 20-minute neighbourhood concept to Leeds' Local Plan.

***Question: What does a '20-minute neighbourhood' mean to you? Do you agree that Leeds should aim to create 20 minute neighbourhoods?***

***Question: Should Leeds introduce a presumption against car dependent development?***

### High Quality, Resilient and Healthy Places

There is also much research on the relationship between planning and good design and health benefits (Healthy by Design, NHS England, 2018) that share the benefits of addressing climate change (mitigation and adaptation) through improvements to the

layout and form of buildings and spaces and better use of resources that has clear health benefits.

Leeds' current Local Plan has sought to provide a framework for sustainable and healthy communities, having regard to quality of life and to protect and enhance the environment. All development proposals are subject to a suite of specific and more detailed place making policies on the layout and fabric of places (covering design, housing, employment, natural environment, green space/public open spaces, transport) to achieve a layout, design and fabric efficiency which both mitigates climate change and addresses impacts, such as flooding.

However, existing design policy P10 of the Core Strategy lacks explicit reference to climate change, health and well-being. It also lacks clear signposting to other technical policies which are directly related to good design. There may also be the opportunity to introduce Sustainable Development Checklists to ensure that health and wellbeing and climate emergency measures are fully addressed in all development proposals.

***Question: How would you priorities these users of residential streets, in order of importance? Busses, Cars, Cyclists, Pedestrians.***

***Question: Do you agree that more emphasis should be placed on climate change and health and wellbeing matters in future design policies and guidance? If so, how would you like to see this happen?***

## Topic 5: Sustainable Infrastructure

This topic covers a range of different types of infrastructure which all have a role to play in supporting sustainable development and responding to the climate emergency. This includes transport infrastructure, considering the proposed High Speed 2 and West Yorkshire Mass Transit schemes, as well as the growth of Leeds City Station and managing development at Leeds Bradford Airport. It also considers digital infrastructure, and access to reliable and high speed data networks.

### High Speed 2 and Leeds Station

It is important to stress that the principle and detailed routes of HS2 will not be decided by planning policy. However, where possible, we want to use the planning system to ensure that the potential social, environmental and economic benefits of HS2 for Leeds, and the areas and communities around the line, are capitalised on, and that any potential adverse impacts are avoided wherever possible, and minimised or mitigated where not.

As such we are considering the creation of new policy to help us consider proposals for the development of Leeds Station and HS2. In the future, we could also look to prepare further guidance that supports the integration of HS2 into the urban fabric of Leeds. This could provide more detailed information about the opportunities, aspirations and expectations for development in particular areas / specific plots under and around the line, and how they relate to the regeneration and development plans for the wider area.

A new policy could provide support for the growth of the station (already the busiest in the north of England) in accordance with design principles; identify the types of uses that would be appropriate alongside (or under) different parts of the new HS2 line; emphasise the importance of new public spaces and connections with the city's existing green space network; maximise the potential contribution to addressing climate change; emphasising the importance of supporting and enhancing pedestrian, cycle and bridleway routes and permeability; encourage temporary greening measures or cultural, community and commercial uses of land during periods when land is not required for construction.

***Question: Do you agree that the Local Plan Update should include a new policy on Leeds Station and HS2?***

***Question: If so, what are your views on the suggestion that this policy could focus on Leeds Station, development opportunities, integration with the Green Space network, climate change, pedestrian, cycle and bridleway routes and temporary uses?***

### Mass Transit

As reflected in Leeds' draft Transport Strategy, it is acknowledged that for the scale of growth forecast in Leeds over the next 10-15 years there is insufficient urban transport capacity to enable urban communities in the Leeds City Region to access employment opportunities. Alongside facilitating additional capacity, there is a need

to respond to the Climate Emergency declaration and reduce transport related emissions across the city.

Whilst Mass Transit is not a planning initiative it is considered important that up to date local policy is in place to ensure that Mass Transit can be delivered effectively, and that other associated benefits, such as integration with the green space network, future developments, and pedestrian and cycle routes are factored in.

The Local Plan Update could contain a policy that sets out strategic support for the scheme, and that also seeks to ensure that important aspects such as biodiversity, greenspace, active travel and Sustainable drainage systems (SuDS) are integrated into the scheme. There is also the potential for the Local Plan Update to protect the detailed route of Mass Transit from other uses, which if built on or next to the line could impede its delivery.

***Question: Do you agree that the Local Plan Update should include policy on Mass Transit? If so, what elements of the scheme would you like to see new planning policy focus on?***

#### **Leeds Bradford Airport**

As a regional airport, LBA provides a significant role to the Leeds City Region and the City as it forms part of the strategic infrastructure and a major economic driver for the Leeds City Region. The Council's current policy encourages a well-connected and accessible airport by sustainable forms of transport and surface access improvements to support the growth of the airport are one of the City's existing spatial priorities.

Air travel is a major contributor to greenhouse gas emissions, both through flights and travel to and from the airport.

The Leeds Local Plan already contains a policy (SP12 of the Core Strategy) on the airport which is supportive of growth to enable the airport to fulfil its local and regional role, provided that a series of criteria would be met. These criteria address a need for major public transport infrastructure, surface access improvements and a strategy to guide this, environmental assessment and mitigation and management of local issues.

At this early stage of the Local Plan Update we are seeking views from stakeholders on whether policies relating to the airport should be within the scope of the Local Plan Update and what issues an updated policy might address.

***Question: Do you agree that the Local Plan Update should contain new or updated policies for Leeds Bradford Airport? If so, do you have any views on how those new or updated policies should make changes to the existing policies?***

#### **Digital Connectivity**

The Council has an ambition to deliver wider digital connectivity benefits for the city as a whole with an ambition to have the best connectivity in the UK for all across the district, to be able to access gigabit capable services. Access to reliable, high-speed connectivity will allow people to work from home more easily and will give homes fast and reliable connections. The Covid-19 Pandemic has in particular highlighted the



essential need for digital infrastructure, with increasing reliance on remote working, remote communication to include home schooling, online shopping and other services. Digital Connectivity in terms of gigabit connection is now seen as essential infrastructure to facilitate the services and facilities which are now an integral part of our lives.

It is considered that there are benefits to introducing new policy for digital connectivity to focus on providing digital connectivity for new sites and new developments only.

A new policy could provide a policy hook to ensure that developers are incentivised to provide gigabit capable new housing. The benefits of this would be that; (i) we are providing housing which is meeting the needs of our modern lives, (ii) new housing is designed and built with good gigabit connectivity from the outset, (iii) new housing is not retrofitted later with digital connectivity provision, (iv) to future proof new housing, (v) to ensure that digital infrastructure is sympathetically designed as part of site development as essential infrastructure, (iv) to reduce digital poverty, this would ensure that digital connectivity is provided for all.

***Question: Do you agree that digital connectivity is essential infrastructure for new housing in Leeds?***

***Question: Do you agree that a policy should be introduced on digital connectivity?***

***Question: Should the policy focus on residential development only or commercial development too?***

***Question: Should a digital connectivity strategy be a requirement for all planning applications?***

## 7 What will the Local Plan Update look like?

- 7.1 If adopted the Local Plan Update will update and/or replace policies within the existing Leeds Core Strategy, Natural Resources and Waste Local Plan and saved policies of the Unitary Development Plan by either deleting or superseding them.
- 7.2 The Local Plan Update will be prepared in accordance with national guidance as set out in the NPPF and at its next step, once the precise scope and direction of policies has been informed by this consultation, will include:
- A preferred approach which sets out detailed policies informed by this consultation
  - A consideration and assessment of reasonable alternative approaches to the each policy area, informed by this consultation and any evidence that is gathered or provided by those engaged in the process
  - A Sustainability Appraisal Report, which will assess the social, environmental and economic effects of the DPD to ensure that any decisions made support the principles of sustainable development. The Sustainability Appraisal will build upon the assessment already completed for the wider Local Plan and assess reasonable alternatives to the Council's preferred approach
  - A Habitats Regulation Assessment, which will assess the impact of the DPD on the integrity of sites of European nature conservation importance
  - An evidence base to show that the policies are justified and will be effective. At present the ideas and options presented as part of this consultation have not been tested for their viability. Once we've captured views through this consultation we'll then be able to refine these into more detailed policies, test their viability and consult on them.
  - A monitoring framework to set out how we will ensure that the policies are achieving their stated aims
- 7.3 A series of topic papers supplement this introductory paper which explore the issues in more detail and pose consultation questions.