

# **Local Plan Update 1: Publication Draft**

## **Appendix 4: Report of Consultation**

## **Leeds Local Plan Update**

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

#### **Introduction**

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

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

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

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

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

#### **Principles/aims**

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

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

Our vision for the consultation was:

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

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

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

## **Campaign Page**

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

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

## **Consultation Material**

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

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

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

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

## **Communications**

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

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

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

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

## **Engagement**

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

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

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

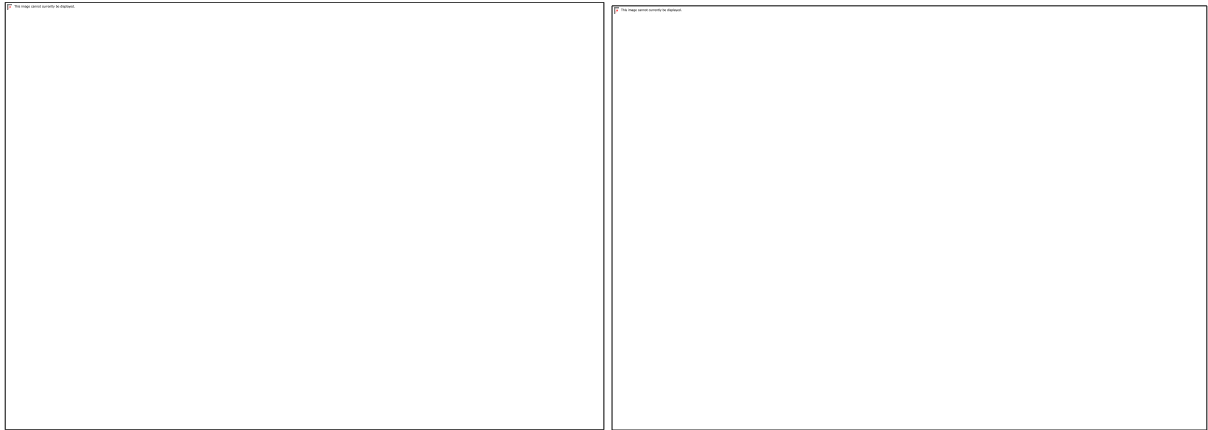
- Targeted workshops were held with groups including Leeds Youth Council, Developers Forum and Age Friendly Leeds. These were successful and indicated that working with established groups/teams who have an existing relationship with communities was an effective way of encouraging participation.
- A series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

## **Submissions**

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

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

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








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

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

## An Analysis of the Comments Received

### Overall Scope

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

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

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

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

- The "Ecological Emergency" should be added to the scope,



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

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

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

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

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

### Carbon Reduction

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

The detailed comments covered issues including:

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

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

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

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





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

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

answered

61

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

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

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

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

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

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

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

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

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

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

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

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

## Flood Risk

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

The comments covered issues including:

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

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

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

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




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

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



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

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

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

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

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

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

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







### Green infrastructure

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

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

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

### **Trees –**

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

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

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

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

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

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

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

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

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

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

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

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

### Placemaking

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

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

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

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

### Sustainable Infrastructure

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

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

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

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

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

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

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

### Sustainability Appraisal

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

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

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

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

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

## **Conclusion**

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

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