

# THE LEEDS LOCAL PLAN UPDATE PUBLICATION DRAFT CONSULTATION SUMMARY 2022

YOUR NEIGHBOURHOOD • YOUR CITY • YOUR PLANET





## FOREWORD



The Council declared a Climate Emergency in 2019 and since then we have been looking at the practical steps that we can take to turn our ambitions on reducing carbon emissions into actions.

As Executive Member for Infrastructure and Climate I recognise that the way we live, work and travel are critical to cutting Leeds' carbon emissions. I am therefore pleased to endorse these revised policies within the Council's Local Plan that take strong action to grow and develop Leeds in a way that will help avoid the worst impacts of climate change and lessen its impacts on the City.

Sustainable development sits at the heart of the planning system and is about meeting social, environmental, and economic goals at the same time. This is the basis for the Local Plan Update, which encourages good inclusive growth that meets our needs for a thriving and inclusive local economy, delivers well-constructed, designed and healthier places, encourages people to travel without their car and respects the District's green and blue infrastructure assets.

I also recognise that we need to ensure that our local environments are more resilient to the impacts of climate change. Flooding is among the most serious impacts of climate change with devastating and long-lasting impacts on people and their communities, as well as major impacts on our economy. This Plan ensures that we build in the right places and make space for water within developments and respect how we use water as climate change will bring droughts too.

There is still time to avoid the worst impacts of climate change and we know that if we change the way we approach development we can save higher costs in the future. There are many great examples already in Leeds of how development can be different, how we can easily cut emissions, deliver homes which are efficient and cost less money to heat, whilst securing locally derived renewable energy and food supplies. We are really keen to listen to everyone's views on these policies as the problem of climate change and how we adapt to it affects all our lives.

I look forward to hearing your views on these policies.

Cllr Helen Hayden  
Executive member for Infrastructure and Climate  
Leeds City Council

## 1 WHAT IS THE LOCAL PLAN AND WHY ARE WE UPDATING IT?

### What is the Local Plan?

The Leeds Local Plan currently comprises a number of documents that contain the long-term strategic planning policies that guide the amount and location of development in the Leeds district. It also includes more detailed topic-specific policies that guide different types of development, and makes sure that priorities such as design, green space, heritage, infrastructure, flood risk management etc. are considered during decision making.

### Why are we updating it?

We are required to review our planning policies every 5 years, to check they are still working, relevant and fit for purpose, and to identify any policy gaps that may have arisen in the meantime due to changes in local priorities or new Government legislation.

We undertook a review of our Local Plan in 2020 and identified a number of policies that required update. Due to the number of policies that required update it was considered that the Local Plan Update should be undertaken in at least 2 parts, with the first part focussing on the role of planning in helping the Council deliver its climate emergency ambitions.

### Why focus on climate change?

In March 2019 Leeds City Council declared a climate emergency with an ambition to work towards carbon neutrality by 2030. This decision was based on evidence from the UN Intergovernmental Panel on Climate Change, UK Government's legal commitments in the Climate Change Act as well as climate-related events, occurring both globally and locally.

To achieve our ambitions by 2030 and beyond, by reducing the impact of human activity on the climate and by adapting to the impacts of climate change to lessen harm, a rapid period of transition is necessary, along with big changes. Planning policies can help achieve this by supporting developments that shape places in ways that contribute to radical reductions in greenhouse gas emissions (e.g. reducing the need to travel by car), minimising vulnerability and improving resilience (e.g. by avoiding places that flood and dealing with water), encouraging more careful use of resources (e.g. by making homes more efficient) and supporting the move towards renewable and low carbon energy.

### What have we already done?

In summer 2021 we undertook a public consultation 'Your Neighbourhood, Your City, Your Planet' on some ideas for how planning policies could change in the future to take account of the climate emergency. We proposed a number of policy areas which fell under 5 overarching topic areas – Carbon Reduction, Flood Risk, Green Infrastructure, Placemaking and Sustainable Infrastructure. This was an early stage of plan making (Regulation 18 - Scoping) and we wanted people's ideas, opinions, local experiences and evidence to help us shape the plan.

### What was the outcome of this consultation?

Overall, 760 consultation responses were received. The vast majority of consultee responses made it clear that they supported the focus of the Plan on the climate emergency and were encouraged by the proposed direction the Plan will take.

### What is this consultation about?

Using the comments and suggestions from the Regulation 18 consultation, as well as further research and evidence, the supporting text and updated policies for the Local Plan have been drafted. Before this can be submitted to the Secretary of State for independent examination we need to undertake the next stage of plan-preparation, which is the public consultation on this pre-submission draft plan, or Regulation 19 consultation. As this is a planning document with specific policy recommendations for an area, the consultation process involves more formal and technical questions.

The following pages include a summary of the policies that we are consulting on, followed by details of how you can get involved in the consultation and view the full consultation material.

## TOPIC 1: CARBON REDUCTION

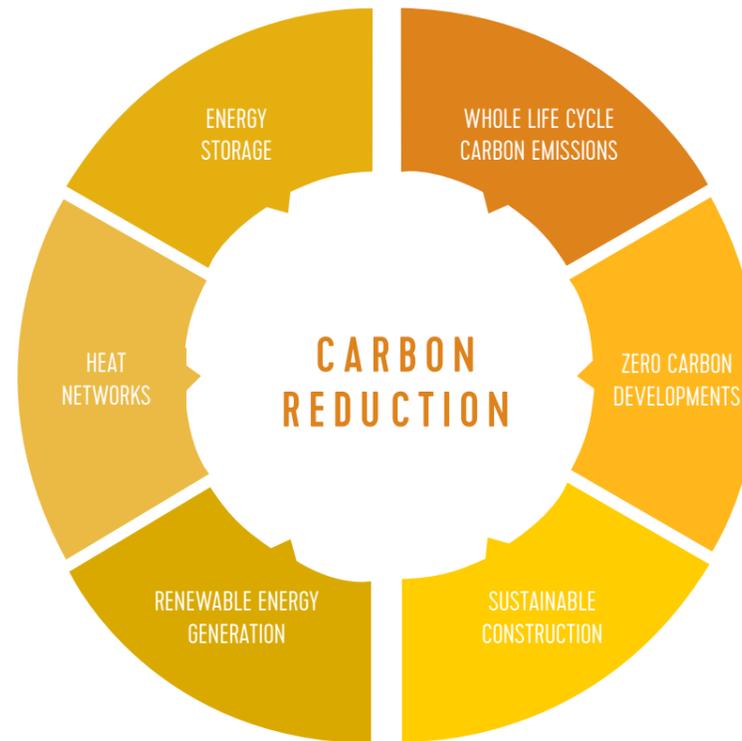


### OUR DRAFT POLICIES

- New buildings will be net zero carbon and highly energy efficient
- New developments will measure carbon emissions across the whole lifecycle of a building
- Higher standards of sustainable construction
- Identify opportunities for where renewable energy, like solar and wind, could be located
- Requiring better use of sustainable heating technology

#### WHAT IS THIS TOPIC ABOUT AND WHY IT IS IMPORTANT?

Leeds City Council is committed to taking significant action to mitigate and adapt to the impacts of Climate Change. Buildings use a lot of carbon, particularly when occupied and when under construction. Therefore, for Leeds to ensure that new buildings do not worsen the impacts of Climate Change, they will have to be energy efficient and make more use of renewable energy.



#### HAVE YOUR SAY

We need your views on whether our draft Local Plan Update policies are the right ones. You may wish to comment on whether they are justified by evidence, whether they are realistic and effective, and whether they will deliver sustainable development. If you disagree, what do you think the policies should say instead?  
[www.leeds.gov.uk/lpu](http://www.leeds.gov.uk/lpu)



## TOPIC 1: CARBON REDUCTION

### What is this topic about and why is it important?

#### Background

Leeds City Council is committed to taking significant action to mitigate and adapt to the impacts of Climate Change. Currently, new buildings will use carbon within the construction process, whilst the building is in use and during its demolition. Buildings are predominantly powered by fossil fuels, through the installation of gas boilers and reliance on national grid energy (which uses fossil fuels). Therefore, for Leeds to ensure that its new buildings do not contribute towards the impacts of Climate Change, new buildings will have to be as energy efficient and reliant upon renewable energy as they possibly can be.

This Local Plan update is introducing new planning policies that will make new developments consider their whole carbon impact, through whole life cycle carbon assessment and are net zero in their energy use. New developments will be expected to deliver their own renewable energy onsite and encouraged to connect to existing heat networks, such as Leeds Pipes. To ensure that new developments are high quality, not only in energy efficiency, they will be expected to meet nationally recognised standards of sustainability through BREEAM and Home Quality Mark accreditation.

And to ensure that Leeds plays its part in the generation of renewable energy at a local and national level, new policy will encourage the development of renewable energy generation schemes and their infrastructure.

#### The Policies

**EN1A :** The energy used by living and working within buildings is not the only way a building emits carbon. The materials used, the method of construction and the demolition of the building will all use carbon. This policy requires developments to consider and calculate the whole life cycle carbon emissions of a development so the Council can monitor those figures and set a reasonable target for developments to meet in the future.

**EN1B :** The energy used to run buildings is called the operational energy. This new policy will require new buildings to be net zero carbon in operational energy, which goes beyond national requirements. Developments are expected to do this through the delivery of highly energy efficient buildings that provide their own energy requirements through renewable energy.

**EN2 :** To ensure that new buildings are delivered to a high level of quality, new residential buildings will be built to Home Quality Mark Level (HQM) 4 and non-domestic buildings BREEAM Outstanding. This ensures that buildings are delivered to a high level that covers several sustainable credits, including the social and health impact of a development.

**EN3 :** Identifying areas where renewable energy schemes may be appropriate and providing clear criteria in order to deliver high quality schemes.

**EN4 :** Leeds currently has the Leeds Pipes District Heat Network which provides low carbon heat to connected buildings around the City Centre. This policy encourages connections to that network, and if not possible, ensures that the next best heating technology is used to ensure low cost and low carbon heat.



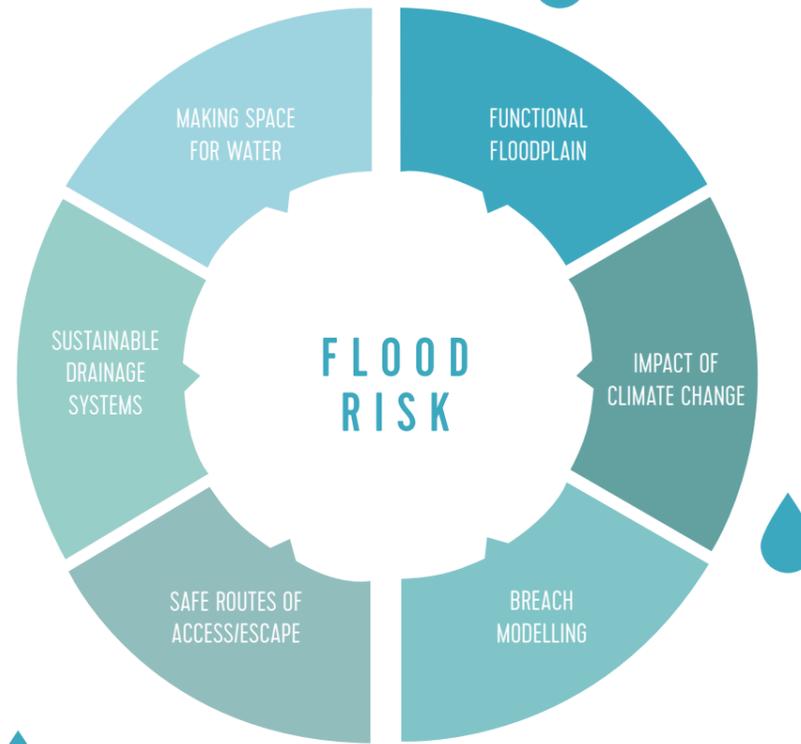
## TOPIC 2: FLOOD RISK

### WHAT IS THIS TOPIC ABOUT AND WHY IS IT IMPORTANT?

Nationally, the risk of flooding is increasing and Leeds has been hit particularly badly by flood events in recent years. Flood Risk is one of the most serious and direct impacts of climate change that Leeds faces. In combination with the delivery of Flood Alleviation Schemes our new policies are intended to stop new developments in flood areas, increase the resilience of new buildings to flooding and to make more space for water in new developments.



**Flood**



### OUR DRAFT POLICIES

- Protecting the functional floodplain from unsustainable development
- Requiring an assessment of the risk of flood defences failing
- Climate change scenarios considered in Flood Risk Assessments
- Safe routes for access and escape in times of flooding
- All proposals are expected to make adequate space for water
- Increased use of Sustainable Drainage Systems.

### HAVE YOUR SAY

We need your views on whether our draft Local Plan Update policies are the right ones. You may wish to comment on whether they are justified by evidence, whether they are realistic and effective, and whether they will deliver sustainable development. If you disagree, what do you think the policies should say instead?  
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## TOPIC 2: FLOOD RISK

### What is this topic about and why is it important?

It is predicted that by the 2050s, 2.6 million people will be living in areas that are at significant risk of flooding. In December 2015, parts of the UK were devastated by record-breaking levels of rainfall as a result of Storm Desmond and Leeds was hit particularly badly by Storm Eva. Britain experienced the wettest February on record in 2020, which left thousands of homes flooded and many more without power. The UK's exceptionally hot and dry summer in 2022 also led to increases in flooding throughout the country.

Leeds experiences flood risk from two main rivers and also from the tributaries that feed those rivers. As a large urban area, the network of buildings and roads increases the speed of surface water run off which can lead to flash flooding. Flood Risk is one of the most direct impacts of climate change that Leeds faces. We have updated the Strategic Flood Risk Assessment so that the latest flood risk modelling has been used to underpin policies that will help us to avoid the risk as far as possible and where it cannot be avoided to mitigate and reduce the risk.

### The Policies

**WATER 3:** Protecting the functional floodplain from unsustainable development. In areas of 'developed functional floodplain' only the existing building footprint can be redeveloped, where it can be demonstrated to exclude floodwater and where there will be no increase in the vulnerability of the use.

**WATER 4:** A revised policy amended to incorporate a requirement to consider the impact of climate change on future levels of flood risk.

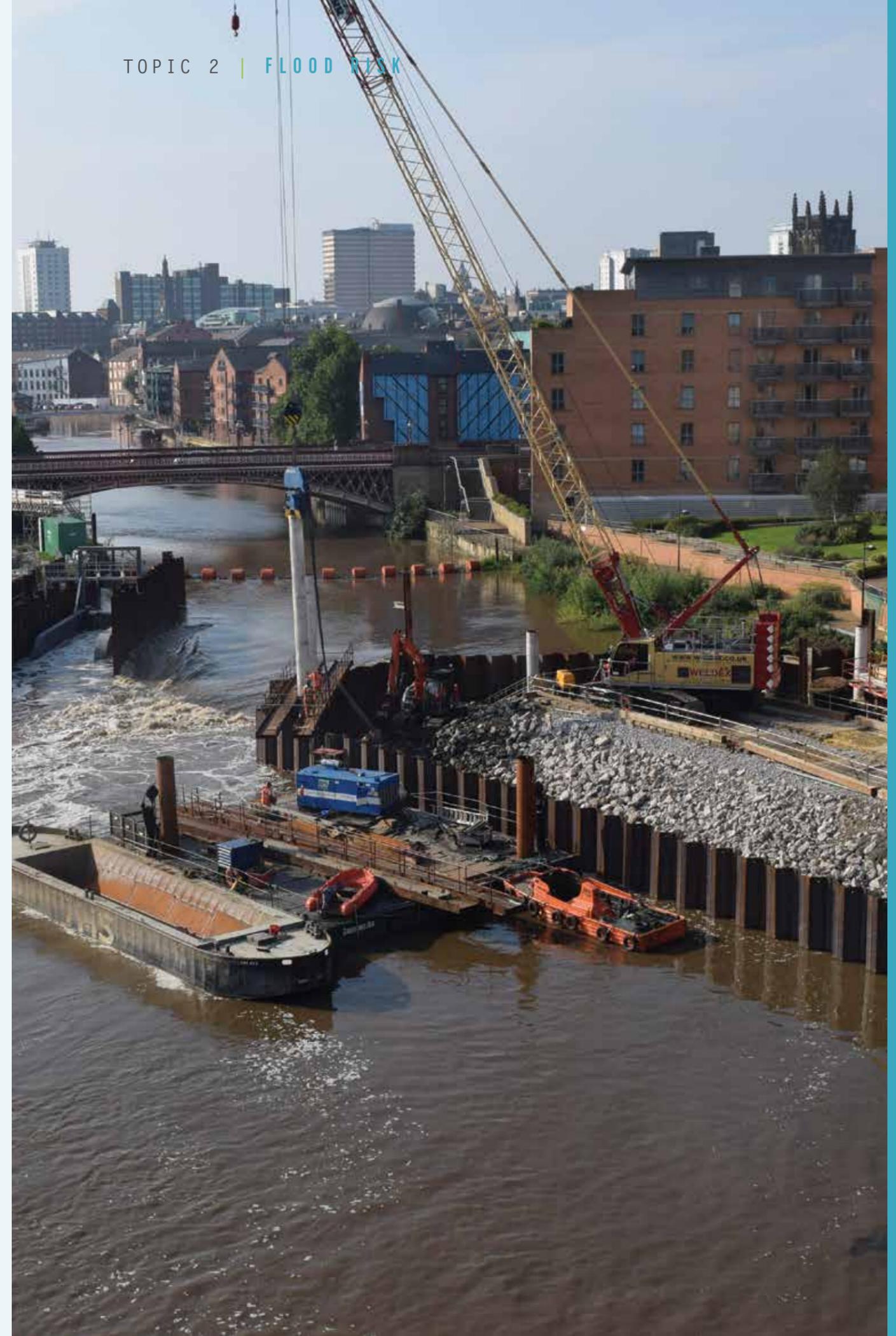
**WATER 5:** Requiring an assessment of the risk of flood defences failing. Where any new development benefits from a flood alleviation scheme, the developer must demonstrate that the development will remain safe and not adversely affect others in the event of breach or other failure of the flood alleviation scheme.

**WATER 6:** Recognising that it is not always possible to avoid development in high flood risk areas, when it has to go ahead there, we need to make sure it is suitably resilient and flood resistant. Amendments to policy will require that the latest Government climate change allowances are considered in Flood Risk Assessments that accompany new development.

**WATER 6A:** Ensuring that safe routes are available for occupiers of developments in times of flood.

**WATER 7:** Encouraging the delivery of sustainable drainage systems rather than traditional forms of drainage. They should be designed so as to demonstrate benefits to flood risk management, water quality, amenity and biodiversity.

**WATER 8:** Maximising natural drainage in urban areas. All proposals are expected to make adequate space for water and areas of hard standing should be constructed from permeable materials. The loss of porous landscaping provided as part of new development will be resisted.

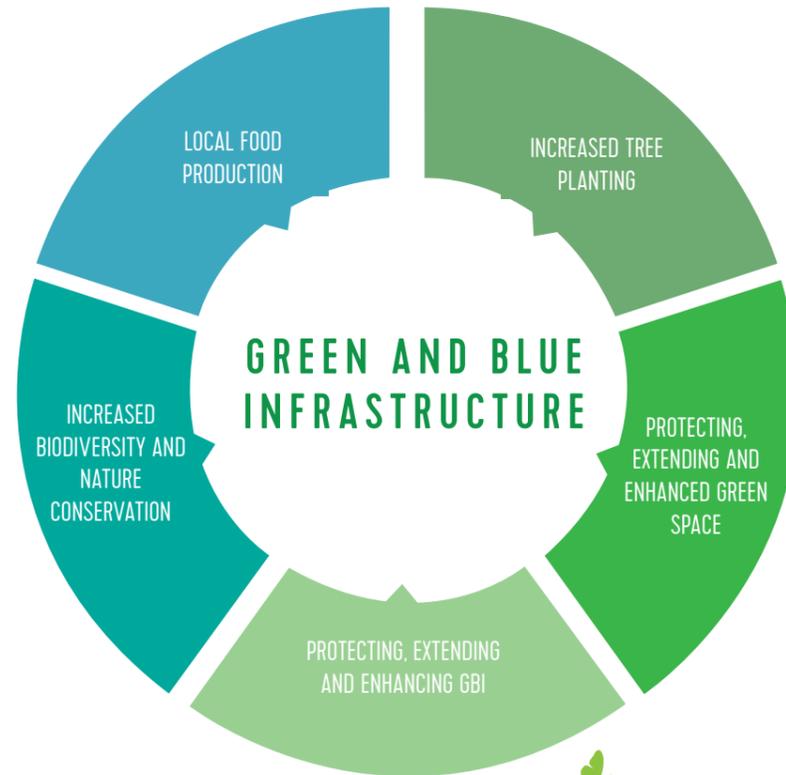




## TOPIC 3: GREEN AND BLUE INFRASTRUCTURE

### WHAT IS THIS TOPIC ABOUT AND WHY IS IT IMPORTANT?

Green and Blue Infrastructure (GBI) is a network of natural and semi-natural areas that spreads throughout the District, including parks, woodland, and river corridors. Protecting, maintaining, enhancing and extending GBI plays a vital role in protecting the environment, delivering the Council's strategies to improve the health and wellbeing of its citizens and to address the climate emergency, as well as creating high quality places for people and nature. Through the Local Plan Update we will adopt policies that will help strengthen the role of GBI to improve your quality of life.



### OUR DRAFT POLICIES

- Requirement to undertake a GBI assessment as part of new development
- Greater protection for trees
- Increasing tree replacement numbers, based on carbon sequestration values
- Clear requirements for the delivery of high quality greenspace
- Supporting community food growing and more trees as part of new development
- Requiring development to provide a +10% net gain in biodiversity.
- Requirement of increased provision of green space within the City Centre

### HAVE YOUR SAY

We need your views on whether our draft Local Plan Update policies are the right ones. You may wish to comment on whether they are justified by evidence, whether they are realistic and effective, and whether they will deliver sustainable development. If you disagree, what do you think the policies should say instead?

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## TOPIC 3: GREEN AND BLUE INFRASTRUCTURE

### What is this topic about and why is it important?

Protecting, maintaining, enhancing and extending Green and Blue Infrastructure (GBI) plays a vital role in delivering the Council's strategies to improve the health and wellbeing of its citizens and to address the climate emergency, as well as creating high quality places for people and nature. Through the Local Plan Update we will adopt policies that will help strengthen the role of Green and Blue Infrastructure to improve your quality of life.

### The Policies

**SP13 : Setting out a clearer definition of what GBI is and requiring its protection, maintenance, enhancement, and expansion.**

**G1 : Requiring all new development to carry out a Green and Blue Infrastructure assessment**

**G2A : Seeking the retention of all woodlands, trees and hedgerows and ensuring any loss is considered through development appraisal.**

**G2B : Clearer protection of ancient woodland and other irreplaceable habitats.**

**G2C : Significantly increasing tree replacement by recognising the vital role of trees in capturing carbon and establishing a methodology for calculating and requiring tree replacement (where necessary), based on carbon sequestration.**

**G4 : Clarification of the approach to the provision of greenspace, including ensuring that new greenspace in the City Centre is delivered at the same levels as the rest of the City.**

**G4A : Clear requirements for the delivery of high quality greenspace**

**G4B : Clear criteria for the maintenance of green space.**

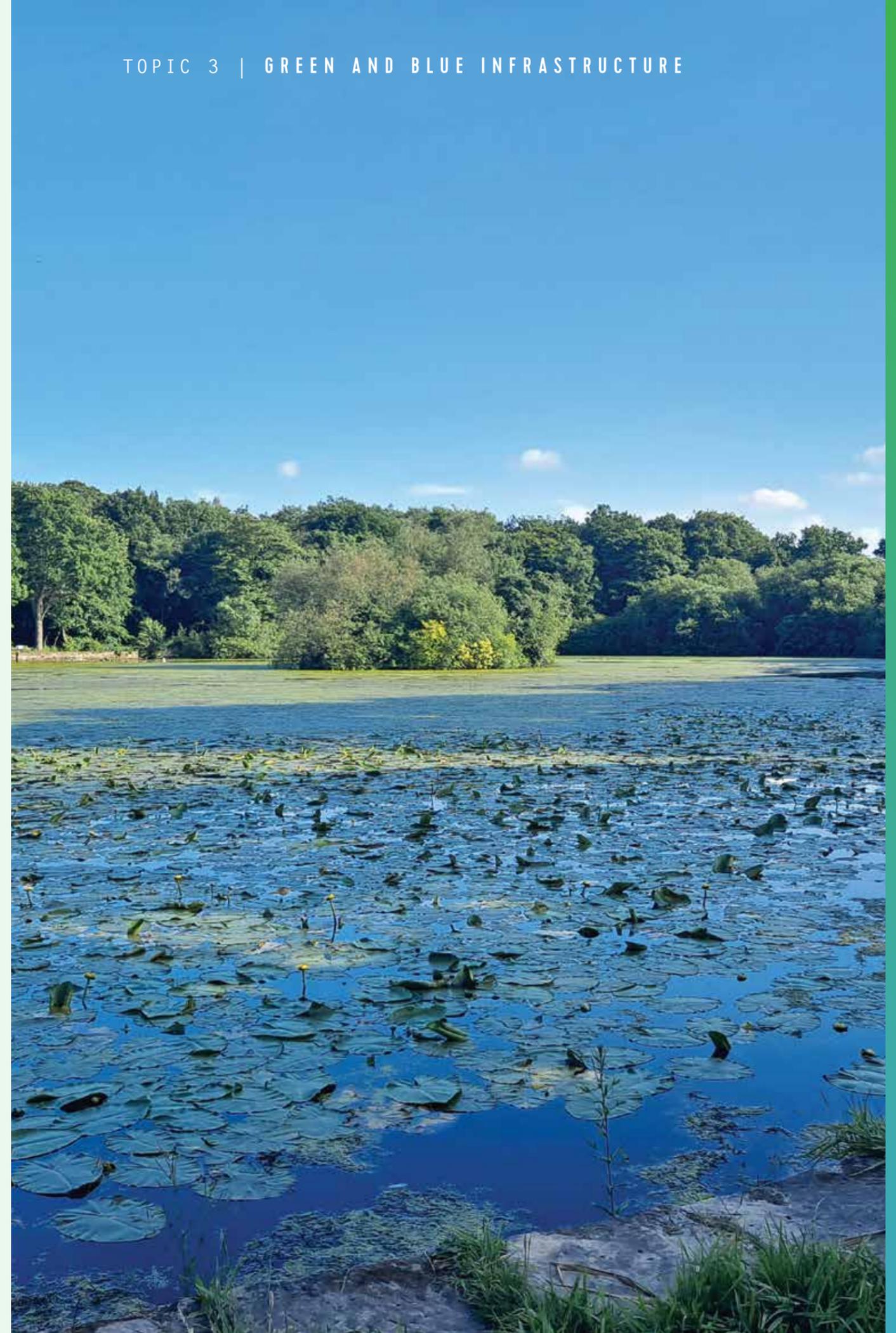
**G6 : A clear and robust definition and protection of green space.**

**F1 : Supporting community food growing opportunities as part of new developments and encouraging the planting of trees in gardens of new homes and public spaces.**

**G8A : Protecting the natural environment and an enhanced consideration of the implications of climate change upon the natural environment.**

**G8B : Defining and protecting the Leeds Habitat Network.**

**G9 : Requiring all new development to provide a +10% net gain in biodiversity.**





## TOPIC 4: PLACE-MAKING

**WHAT IS THIS TOPIC ABOUT AND WHY IS IT IMPORTANT?**  
 High quality design is a key aspect of sustainable development and is essential in creating places in which people can enjoy a high quality of life which is fulfilling and healthy. Our existing Plan encourages development in sustainable locations and supports high standards of design. However, these policies pre-date the climate emergency declaration and the wellbeing impacts of Covid-19, as well as the Connecting Leeds Strategy, with its ambitions for reduced private car dependence. Moreover, national guidance has changed to afford more weight to design largely as a result of what is considered to be poor quality design in many housing schemes. We think that now is the right time to refresh our plan to ensure it is suitably ambitious.



### OUR DRAFT POLICIES

- Embedding 20-Minute Neighbourhoods into planning policy by recognising how long it takes to walk to amenities and facilities
- Stronger and clearer guidance on how high quality design should be delivered as part of new development
- Ensuring healthier environments are created through the completion of Health Impact Assessments for large developments
- Resisting drive thru development due to its impact on air quality.

### HAVE YOUR SAY

We need your views on whether our draft Local Plan Update policies are the right ones. You may wish to comment on whether they are justified by evidence, whether they are realistic and effective, and whether they will deliver sustainable development. If you disagree, what do you think the policies should say instead?  
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## TOPIC 4: PLACE-MAKING

### What is this topic about and why is it important?

Our existing Plan encourages development in sustainable locations and supports high standards of design. However, these policies pre-date the climate emergency declaration and the wellbeing impacts of Covid-19, as well as the Connecting Leeds Strategy, with its ambitions for reduced private car dependence. Moreover, national guidance has changed to afford more weight to design largely as a result of what is considered to be poor quality design in many housing schemes. We think that now is the right time to refresh our plan to ensure it is suitably ambitious.

### The Policies

**SP1B:** Requiring the appraisal of environmental, economic, and social matters associated with the design and layout of new developments and quality of place.

**P10:** Establishing clear and precise requirements for the design of new developments from a development principles and high quality design perspective, for the purposes of climate change mitigation, adaptation and health and wellbeing.

**SP1A:** This policy embeds the 20 minute neighbourhood concept in planning policy by supporting the long-term sustainability of communities through encouraging windfall\* development in locations that are highly accessible to services including public transport and greenspace. It recognises the role of the provision of key services in serving a key function as well as reducing car use and promoting active travel.

**SP1:** Amendments that clarify the existing spatial strategy for Leeds by potentially reducing the level of development in smaller settlements outside of the main urban area and major settlements, that do not deliver the principles of 20 minute neighbourhoods.

**EN9:** Reducing 'Drive-thru' development outside of town centres, with the aim to reduce air pollution.

**P10A:** Reducing the causes of ill health and health inequalities by ensuring healthier environments and lifestyles through new development or development with a potentially adverse impact to health to be accompanied by a Health Impact Assessment.

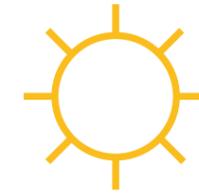
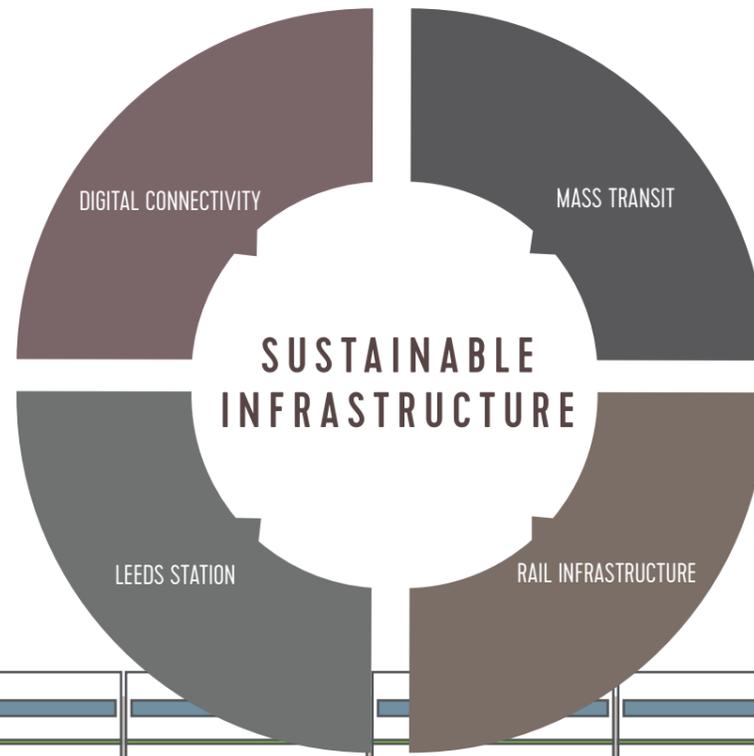
\*windfall development is a site not specifically allocated for development, but unexpectedly becomes available for development during the lifetime of a plan.



TOPIC 5: SUSTAINABLE INFRASTRUCTURE

WHAT IS THIS TOPIC ABOUT AND WHY IS IT IMPORTANT?

This topic is about supporting low carbon forms of transport and improved digital connectivity. This is important as it will help to reduce the number of journeys that need to be made by car, helping to reduce carbon emissions and ensuring that our communities are resilient to the impact of climate change. The Local Plan Update focuses on the ways that the planning system can be used to help deliver these types of infrastructure.



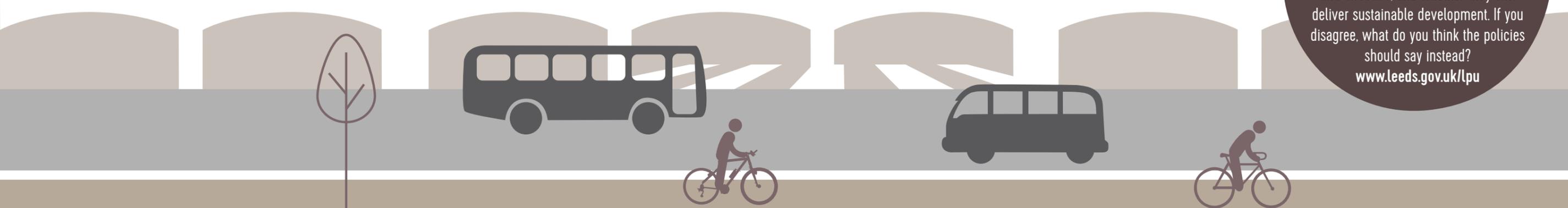
OUR DRAFT POLICIES

- Supporting a new mass transit network and new railway infrastructure in Leeds.
- Supporting the development of Leeds Station so that it has room for increased numbers of passengers and services.
- Requiring high-speed internet for new developments

HAVE YOUR SAY

We need your views on whether our draft Local Plan Update policies are the right ones. You may wish to comment on whether they are justified by evidence, whether they are realistic and effective, and whether they will deliver sustainable development. If you disagree, what do you think the policies should say instead?

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## TOPIC 5: SUSTAINABLE INFRASTRUCTURE

### What is this topic about and why is it important?

This topic is about supporting low carbon forms of transport and improved digital connectivity. This is important as it will help to reduce the number of journeys that need to be made by car, helping to reduce carbon emissions and ensuring that our communities are resilient to the impact of climate change.

The Local Plan Update focuses on the ways that the planning system can be used to help deliver these types of infrastructure. This means that they focus on improvements that will require planning permission, or which can be delivered as part of new development. Other Council strategies, such as the Connecting Leeds Transport Strategy, address wider issues such as the cost and reliability of transport services, how cyclists and buses can be prioritised on existing roads, and other measures to encourage people to use more sustainable forms of transport.

### The Policies

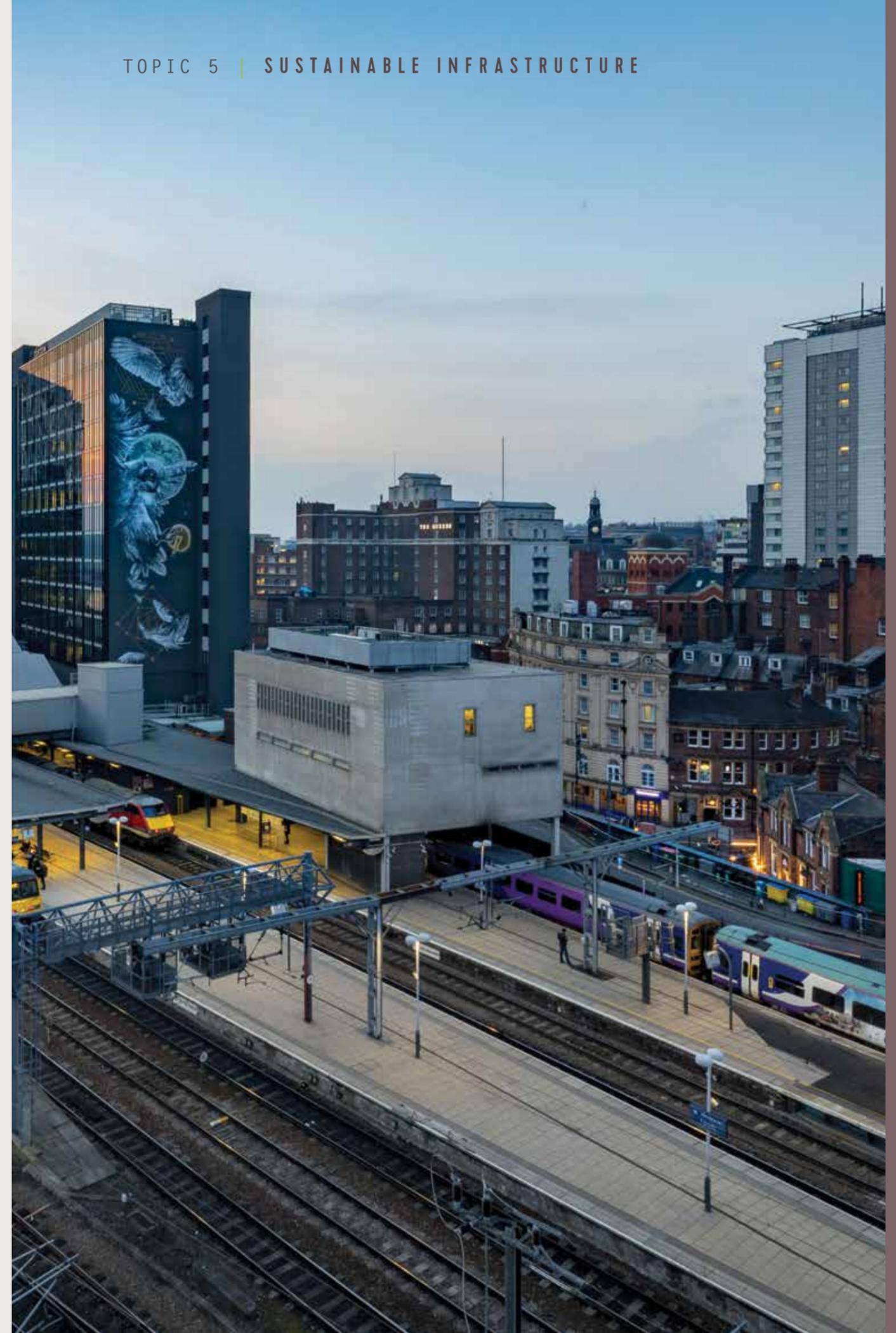
**SP11A: Mass Transit and Rail Infrastructure:** Supporting a new mass transit network and new railway infrastructure in Leeds. It includes a number of specific requirements for these types of developments, which will make sure that the benefits of these schemes are maximised and any potential negative impacts are minimised and addressed.

**SP11B: Leeds Station:** Supporting the development of Leeds Station so that it has room for increased numbers of passengers and services. It includes a number of requirements that will ensure that different phases of development come together creating a high-quality station that forms fitting entrance to our City.

**DC1: Digital Connectivity:** Supporting digital connectivity by setting out a requirement to provide gigabit-capable infrastructure for both residential and commercial development.

### What's changed?

At the initial scoping stage of the Local Plan Update we consulted on whether the policy for Leeds Bradford Airport should be updated. Since then there have been changes to the planning application status of the airport and delays to national guidance updates. As a result the Council has agreed to remove the airport from the scope of this Plan and revisit it at a future stage of plan-making.



## THE CONSULTATION

### How can people take part?

The views of local people and other stakeholders are crucial in shaping our work. We need residents and businesses to have their say on our draft policies.

Please visit our website [www.leeds.gov.uk/lpu](http://www.leeds.gov.uk/lpu) to:

- View the consultation material
- Complete an online response form
- Book your place at our webinars
- Find information on our drop-in events

### What can you influence?

We need your views, whether you support the Plan or wish to object to it. If you support the Plan, tell us what you like about it. If you object, what do you think the policies should say instead? Your objections will be strengthened if you can provide reasons and evidence to support them. Whether you support or object, you may wish to comment on whether you think the policies are justified by evidence, whether they are realistic and effective, and whether they will deliver sustainable development. These are known as the 'Tests of Soundness', which is the Government's way of assessing whether our draft Plan should be adopted or not. These tests are further explained on our website.

### What happens after the consultation?

The updated draft Local Plan and all comments received during the consultation are sent to the Secretary of State for the Department of Levelling Up, Housing & Communities. They will then appoint an independent Planning Inspector to undertake a 'public examination' of the draft Local Plan, who will use your comments to make a judgement on whether the Plan meets the 'Test of Soundness'. They may make recommendations to further improve the plan before it is adopted. The examination will include hearing sessions which are held in public so you will be asked when you submit your comments if you would like to attend one of these hearings.

For further information go to [www.leeds.gov.uk/lpu](http://www.leeds.gov.uk/lpu)

