



Leeds Local Plan 2042 Consultation Response Guide

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from the City Movement Building Team

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The Leeds Local Plan 2042

Introduction

The Local Plan Consultation

Leeds City Council is running a consultation on its Local Plan for the period up to 2042. This is a major document, setting out how the city should develop in the next 17 years (though the plan starts in 2024, so covers 18 years in total).

Previously, the Council was working on an update to its existing Local Plan to rewrite policies in recognition of the city declaring a Climate Emergency in 2019, and a new Local Plan 2040. The two have now been combined, so there will be no update to the existing Local Plan, and instead a new Local Plan will be produced to run up to 2042.

What this document is

The Council's consultation asks a number of questions on issues within the plan, and this document is a guide to responding. This guide has been produced by Climate Action Leeds – a community project focused on climate, nature and social justice. There are a number of important issues which will affect the future of the city, and as such we encourage you to participate.

The document is divided into the numbered sections of the consultation website at <https://leedslocalplan.commonplace.is/>, though only sections 2 to 13 contain questions. Some sections are skipped here as they need specialist knowledge or don't have an easily expressed key issue.

Each section contains a description of the key issue, an explanation, and our recommended response.

This guide was primarily written by Anzir Boodoo, City Plan Lead for Climate Action Leeds, with assistance from the City Movement Building team.

How to use this guide

Have this guide open alongside the Council's consultation website.

On the consultation website, navigate to a specific section, and read our recommended responses. Typically, we will suggest an option to click for the first question, and then suggested text responses for the text boxes that follow.

This does not contain answers to every section or question, and in some sections, there are questions relating to your own personal use of spaces or opinions, which are not included in here.

We would estimate that responding to this consultation could take anywhere from 20-90 minutes, depending on whether you answer every question.

Why this is important

New developments need planning permission, and planning applications are assessed according to the Local Plan and any Neighbourhood Plans, as well as the National Planning Policy Framework (NPPF) and supporting documents to all of those, which include specific local or national planning guidance. Planning applications need to comply with the Local Plan to be accepted, but there is a “presumption in favour of (sustainable) development” which means applications should be accepted unless they contravene the policies in the Local and Neighbourhood Plans. However, the Council does not have free rein - the plan needs to be robustly set out and approved after an Examination in Public, which will likely be in around 2 years. Applicants can appeal any rejected application, and the Council has to pay their legal costs if the application is accepted on appeal. Therefore, Councils are under pressure to make sure they have good reasons for rejecting planning applications.

There has been a lot of development in Leeds which has been detrimental to the local environment, to the transport network, or which has not contributed positively to the city. The Council would like to change this, and for this, they need public support.

The Council has stated its positions on each issue, and Climate Action Leeds is in support of most of them, but not all.

1 Vision & Objectives

This section has no questions.

2 Distributing Development

2a Distribution of Housing & Economic Growth

Key issue: Where should new houses be built?

The Council’s Housing Market Assessment predicts a high demand for housing in Leeds which would require increasing the number of homes in the city by nearly 20% (19.5%) in the next 18 years.

Where should they go? The Council would like to avoid using Green Belt land, and build entirely on previously used sites, but many of the sites which have been empty for years are now being built on, and the number of sites within the city boundary is fairly small. Other options have been put forward – to create new settlements, focus on mass transit corridors (particularly the proposed tram) and meeting needs locally:

- Create new settlements: Usually this has meant isolated housing developments with no or few local services and poor or no public transport links, but it doesn't have to be this way. Cities such as Freiburg in Germany and Newcastle-upon-Tyne have built "Sustainable Urban Extensions" as new walkable communities connected to the main city, with good public transport access.
- Focus on mass transit growth corridors: This connects to the proposed tram network, the idea being that we can build higher density (flats) close to tram stops and rail stations. New settlements or urban extensions can also follow this logic, as the tram network will reach out across West Yorkshire.
- Meeting needs locally: This focuses on the demand for housing in each area of Leeds, and providing for it locally to that area. This depends on there being sites for that housing within each area, and puts additional pressure on areas with high housing demand to accommodate yet more housing within them. This demand does not necessarily reflect which are the most sustainable or affordable areas to build or live in.

Our recommendation

The options we select are to:

- Maximise brownfield land / avoid green belt releases (1)
- Create new settlements (2)
- Focus on mass transit growth corridors (3)

("Add something else", then typing in 'combine options 1, 2 and 3')

Explanation: The city is running out of brownfield land, therefore we recommend that there is a Sustainable Urban Extension to the city. This is because we are at a stage where green spaces such as playgrounds, recreation space and allotments are being considered as potential sites for housing. This would be against local and national planning policy, so should not be allowed for development.

Comment about how development should be distributed: We suggest that this can use Green Belt land (preferably Grey Belt, as this is less valuable and have previously been developed), be connected to existing edges of city neighbourhoods, and on a major public

transport corridor into Leeds. An example of this is Newcastle Great Park in Newcastle-upon-Tyne.

2c Potential Opportunity Areas

Key issue: Where should development in the city be focused?

The council are proposing to identify “Opportunity Areas” for development, in particular along the proposed tram corridors from the city centre to Bradford, White Rose Centre and St. James’ Hospital. These are the City Centre, South Leeds and West Leeds area. The route from the city centre to St. James’ is covered under the West Leeds area.

The idea is that development should be encouraged in those areas, particularly along the tram corridors. There is an established principle known as “Transit Oriented Development” (TOD) in which development is focused around public transport hubs. However, we do not currently know where the tram stops will be, so this can only be applied on a general basis.

On the other hand, in both the city centre, and the area towards St. James’ Hospital (via Sheepscar), the suggestion is that the existing industrial units should be replaced by denser housing and commercial. While this helps provide more homes in accessible locations, this threatens existing community and arts uses such as art and music studios. In recent years, many of these in the area have closed down, and Leeds City Council have not recognised the value of the area to the city’s arts and culture and development of cultural businesses. Similar pressures are occurring in Birmingham, where the council recognise the importance of existing studios and workspaces who rely on the availability of affordable space.

Our recommendation

The Council should identify the opportunity areas. (Option 1)
However, the West Leeds and City Centre area extensions raise a number of concerns (see below).

Explanation: Development areas should recognise and support the special characteristics of their locality, especially in terms of providing affordable space for community and cultural uses and small and startup businesses. TOD will be difficult to achieve unless the locations of tram stops are known, those locations should both correspond with existing centres where possible, and help develop new ones in poorly served locations.

Have the right areas been identified: The extension of city centre and West Leeds opportunity areas towards St. James' Hospital, including Mabgate, Lovell Park and Sheepscar could put community and arts uses under threat, and has followed the closure of many arts venues and studios around Sheepscar. The Council should ensure these are considered an important part of the area and how they can be used to help attract complementary development in a way that recognises their value. An example is the Digbeth Prospectus in Birmingham, which recognises the value of the art, music and film studios in the area, alongside facilities such as the Custard Factory and FizzPop Makerspace, and that creative industries of all kinds in the area should be supported.

2d Approach to Green Belt and Rural Land

Key issue: Building on the Green Belt surrounding Leeds

The large amount of development proposed is likely to require that Leeds expands its outer boundary. At the moment, the ability of the city to expand out into the countryside is limited by a Green Belt, in which development is restricted. Though Green Belt land is fairly heavily protected, the Government have recently made two concessions for how development can occur in the Green Belt:

- **The Grey Belt:** Grey Belt is a new category of land in the Green Belt which is of poor quality, largely because it has already had farm or other development on it before, and as such doesn't have value for agriculture, ecology, leisure or the landscape. Government now allows this land to be identified and potentially developed.
- **Affordable Housing:** In order to develop Green Belt land, the Government requires a minimum of 50% affordable housing (though there is a get-out clause on this, the Council should be encouraged not to allow it to be invoked). The Council is proposing to adopt a requirement that 53% of affordable housing should be social housing (Council and Housing Association), and the rest "affordable rent", "First Homes" (for sale) and "discounted market sales", all of which offer a 20% discount on the market rate.

There are areas of land which were safeguarded for the HS2 line. However, the design for the cancelled section only allows trains to run south from Leeds, while the line northwards is inaccessible to trains calling at Leeds. A review could help reorientate any future line to better serve the city and integrate with any future new HS3 or Northern Powerhouse Rail route towards York and the north.

Our recommendation

A Green Belt review is required to identify Grey Belt land, and to determine whether any Grey Belt sites can be developed. (Option 1)

Explanation: Because the city is now running out of undeveloped brownfield sites (empty sites which have been developed before), there is a need to expand the city outwards, and it should be done by utilising Grey Belt where possible, but in a way which can deliver a “Sustainable Urban Extension”.

Views on reviewing the Green Belt: Having to prioritise affordable housing, and particularly council housing when using Green Belt land is a major benefit, which will help the affordability crisis in the city – but sites need to be accessible by walking, cycling and public transport, and not in the middle of nowhere.

Views on the approach to safeguarded sites: The safeguarding of land for the cancelled HS2 extension should be reviewed in tandem with HS2 Ltd and Northern Powerhouse Rail in order to integrate the two and better serve and connect Leeds in the future.

2e Achieving Complete, Compact and Connected Neighbourhoods

Key issue: Ensuring everyone has local services within a 10 minute walking distance

The Council uses the term “Complete, Compact and Connected” to refer to what are variously known as “walkable neighbourhoods”, “10/15/20 minute neighbourhoods” etc. The stated reason for this is that a number of conspiracy theories have emerged around the concept. The Town and Country Planning Association’s “20 minute neighbourhood” has become the most widely accepted term in the UK, although in other countries this would be called a “10 minute neighbourhood”.

The Council are seeking views on whether developments should be assessed according to whether they help deliver walkable neighbourhoods. This could be in two ways:

- Whether the neighbourhood is already walkable or close to walkable, providing a range of services, and the proposed development is within a walking distance of those services and facilities.
- Whether the development can add services and facilities the neighbourhood is currently lacking.

Our recommendation

The Council should adopt a policy for assessing developments which can help existing neighbourhoods become more Complete, Compact and Connected by requiring that missing facilities are provided in new developments. (Option 1)

Explanation: Only 80% of Leeds households are in 'good' or 'walkable' locations according to the Council, and the aim should be to get this to 100%. The Council should use Planning Gain from developments to help with this

Thoughts on principles for Complete, Compact and Connected Neighbourhoods: The principles behind the Complete, Compact and Connected Places are sound, and come with over 75 years of experience, having been a design principle for the New Towns and urban extensions built in the 20th century. However, in a city the size of Leeds, it would be helpful to have the defined "higher order" (larger) centres as their own category, containing services and facilities that can't easily be provided within 10 minutes walk of everybody, but that should be in easy to access locations across the city.

2f Density

Key issue: Should there be a minimum housing density for new developments?

The Council are asking whether they should have a new policy for minimum housing density, and whether there should be higher minimum densities around public transport hubs and the city centre.

In general, this is a very good idea, following the principles of "Transit Oriented Development" discussed above.

Higher densities mean more facilities within walking distance, better potential connection to public transport and cycleways, and less parking. It should mean better used and also better protected green space in developments.

Our recommendation

There should be a new policy for minimum densities, which are already in a Local Plan policy (H3), however, a new policy can better specify them in relation to the principles of Transit Oriented Development. (Option 1)

Specific Criteria for a Density Policy: There should be specific criteria in relation to:

- Identify a new density hierarchy tier for public transport hubs/corridors and/or other specific locations.
- Increase the minimum density in city centre and other tiers.
- Apply density policy to mixed use development.

Other observations: Dwelling units per hectare should be used, as they are a common and internationally recognised measure. Higher densities can be achieved and also support having fewer parking spaces per dwelling, as fewer people will need to use cars if more of their needs are met within easy walking distance.

3 Housing & Affordable Housing

3a Overall Housing Requirement

Key issue: How many new homes are needed in Leeds?

The identified housing need for Leeds is for 69,834 homes in the next 18 years, representing a 19.5% increase in the city's housing stock. This is a huge number, reflecting the demand for housing in the city (particularly from people on the Council housing list, which has about 26,000 people on it) and a calculated unmet need for 63,360 homes. The Government has also asked for the numbers to be inflated by 35% in the largest cities to accommodate more of the 1.5 million new homes they promised to deliver.

In addition, the Council have proposed to add another 10% buffer to the requirement, so as to secure enough land in case the demand for homes is greater still, and to help futureproof the plan.

The number of empty homes in the city is not stated in any of the supporting papers, though it is a much smaller number than that required, so while bringing empty homes back into use will help, there is still a need to build many more new homes.

The plan is to further divide that requirement into the 11 housing market areas that the Leeds City Council area is divided into. This takes into account the demand for homes in those areas, but the ability to supply those homes may be more limited. We would argue that homes should be built where they are more deliverable, and this will depend on a number of factors such as the availability of land, but also how well located sites will be for access to public transport and local services (are they "Complete, Compact and Connected"?).

In particular, the Housing Market Assessment says that there is a negative level of demand for homes in the city centre, based on the number that have been built over the last few years. The Council's policy has allowed for more homes to be built in the city centre, where it is easier to build at a high density, but equally a large proportion of that has been for student housing.

Our recommendation

The policy should be updated with no buffer. (Option 2)

Explanation: The required number of new homes is such that a more strategic approach is needed for where they should be built. We suggest that it takes the form of identifying where Sustainable Urban Extensions should be built, in relation to transport considerations (as well as the services, ecology and green space, community food production, water/drainage and materials considerations that a modern urban extension requires).

Do you want to answer more detailed questions about this topic? Yes

How do you feel about the scale of the need identified: We neither support or do not support the scale of need identified by the Government's Standard Method. There is a clear need to build more homes as well as bring empty homes back into use (middle selection)

Observations: Our observation on the Strategic Housing Market Assessment is that it asserts there is not a demand for 3 and 4 bedroom flats or apartments beyond those already in planning or under construction. Because land is constrained and there is more demand for housing than supply, consideration should be given to shifting more construction to flats and apartments rather than houses.

Views on where homes are needed in the District: A spatial strategy masterplan is required in order to balance the demand identified in each area by the Market Assessment with the potential to build new homes in those areas, and particularly to where new homes can be better connected to public transport routes.

Comments about the method for dividing housing need: The Market Assessment also suggests the level of demand for housing in the city centre is negative (that there is more

supply than demand). There have been efforts to supply more services to people living in the city centre, with a new school (Ruth Gorse) and another one in planning at the Climate Innovation District, and new dental surgeries having opened. There is, however, no doctor's surgery. Other cities have developed high density family housing in the centre with new parks and schools (such as Atwood Green in Birmingham), and this is also happening in Leeds at the Climate Innovation District and Aire Park, so we think it is possible to increase housing supply in the City Centre.

Do you agree with the approach to set a buffer on top of the target: We do not agree with setting a buffer for additional housing delivery in the absence of a spatial masterplan for where is most sustainable and best served to build housing. This would also be our answer to the approach the Council should take to housing distribution (No).

Other approaches to housing distribution: The distribution of new housing should be on the basis of the most advantageous locations for providing Compact, Complete, Connected Places with good access to green space and public and active travel infrastructure, and this should be the primary consideration. We suggest a distribution model that assigns some of the demand to Sustainable Urban Extension(s) placed in the best locations for delivery, rather than the demand per sub-area.

3b Affordable Housing

Key issue: What proportion of new homes should be "affordable"?

The Government defines affordable housing as being at most 80% of normal market rent or house price. This is a level which is still unaffordable to many people. It also includes Council and Housing Association ("Social Rent") housing, which is considerably cheaper than that.

The Council would like to update their housing policy to increase the number of affordable homes, and also to ensure that just over half of the "affordable" homes are for Social Rent, with around a quarter private rented at up to 80% market rent, and 20% as discounted homes for sale (again, at 20% discount).

They would also like to know where affordable housing development should be focused, and that is a similar issue to that above – particularly for affordable housing, development should be where it is more able to be accommodated and also provide the most accessible and well-served places. However, they also ask whether affordable housing

should be focused on areas which have the most expensive property, and therefore the largest affordability gaps.

The Council also asks if there should be a further level of affordability below 80% of market rent, in order to be more affordable, but be more than the level of social rent. This would make it more deliverable by the private sector.

Our recommendation

The Council should update affordable housing policy to increase the number of truly affordable homes. (Option 1)

Explanation: There are long waiting lists for council housing and a pressured private rental market. Social housing should make up the majority of affordable homes, as recommended by the Council's Strategic Housing Market Assessment. There should also be a level of affordability specified below the 80% level, as this is still unaffordable to many people.

Do you want to answer more detailed questions about this topic? Yes

Correct level and breakdown of need: We do not have evidence to challenge the identified breakdowns of need, though we suggest that family sized apartments are deliverable as part of the housing mix, especially as a contributor to increasing density.

Encompassing the recent changes in affordable housing policy to increase delivery:

The "Golden Rules" specified in the National Planning Policy Framework require a higher proportion of affordable housing in order to permit building on Green Belt, and this should be embraced. We suggest the Council could act as Master Developer and call on funding from the Public Works Loan Board to fund council housing development (which will pay back in perpetuity to repay the loan and generate a small profit).

What proportion should be affordable: The highest possible proportion of new housing should be affordable.

Location Across the City: New affordable housing should be focused on where it can be delivered most easily, in order to maximise the number of homes delivered.

Tenure Mix: We agree with the Strategic Housing Market Assessment's recommended split of 53% social rented, 27% affordable rented and 20% affordable home ownership (Yes)

Affordability: We agree that there should be a locally set rent level between social rent and “affordable” rent (80% of market level), as even 80% of market rent remains unaffordable to many people (Yes)

Deliverability: Social Rented accommodation should not be primarily delivered through registered providers and grant funding, it should be delivered by Leeds City Council / Housing Leeds directly.

3d Housing Mix

Key issue: What the mix of housing types should be

The Council is considering what the mix of different house types should be.

The Strategic Housing Market Assessment assumes a negative level of demand in the city centre (there are more homes than the number of people who want to live there) because it believes that families will not want to live in the city centre because they will not want to live in flats or apartments. There are already some family sized flats in the city centre, and recent developments have included a new city centre primary school, with a second one approved.

Atwood Green in Birmingham, a redeveloped area at the edge of the city centre, was designed for family apartment living, with a primary school, parks and playgrounds, only 10 minutes’ walk from the heart of the city centre. In Leeds, both the Climate Innovation District and Aire Park include family homes and apartments, indicating that demand for this kind of lifestyle exists in the city. People can easily live car free in these areas with easy access to the heart of the city.

The Council would like to know if you think the housing mix in the city centre should be specifically different from the rest of the city.

Our recommendations

The Council should set out broader ranges of property size within new policy (option 1)

Explanation: We are not certain whether the proposed mix is the correct one, there should be a broad range of property sizes, reflecting that Leeds is a large housing market.

Targets for provision of bungalows: There should be targets for bungalows and level access accommodation, and the proposed levels seem reasonable.

3e Density

Key issue: How densely should new housing be built?

With the large demand for housing in Leeds, and a preference for only building on previously developed land, there is a shortage of land needed for housing.

The Council are proposing to have a policy on minimum housing density, with tiers for different geographies, specifically, higher targets for town centres and transport interchanges.

The density targets proposed do not necessarily mean housing needs to be very high rise. The proposed density around town centres and transport interchanges is 75 dwellings per hectare. In contrast, the original target for Central Milton Keynes was 100 per hectare, with a maximum building height of 6 stories

Our recommendations

The Council should have a new policy to set out minimum densities with a geographical tier (Option 1)

Criteria for a Density policy: We think there should be specific criteria in a density policy to:

- Identify a new density hierarchy tier for public transport hubs/corridors and other specific locations.
- Increase the minimum density per hectare figures in the city centre and other tiers of density targets.
- Apply density policy to mixed use developments.

Observations: We do not support expressing targets as bedspaces per hectare.

We observe that the density targets seem reasonable in the light of the need to build homes and the shortage of land, and that 75 dwellings per hectare is not an overly high target for Transit Oriented Development.

3f Student Housing

Key issue: How should we build student housing?

The Housing Market Assessment identifies that Purpose Built Student Accommodation (PBSA) is primarily at the expensive end of the market, and that there would potentially be demand for lower cost PBSA. However, given the competition in the market, this is not

something which has emerged, and less wealthy students are priced out of these developments towards traditional student housing. We question whether the approach should be for students to live in expensive PBSA owned by a small number of property developers and not to retain at least some student housing among other homes around the universities, though not at the concentrations which have occurred in some parts of Hyde Park.

The section of the consultation questionnaire also considers Houses in Multiple Occupation (HMOs, aka shared houses) as if to conflate the two. Neighbourhood Plans in areas such as Headingley also do this, without noting that many young people are unable to afford to live alone and therefore share houses, living in HMOs sometimes for many years after university or otherwise as adults. HMOs are unpopular, but remain important as a source of affordable accommodation.

The Council asks whether there should be more mixed student accommodation, as well as whether HMOs should be restricted in areas where they are highly concentrated. There are already some restrictions on HMO approvals in some of those areas.

Our recommendations

The Council should restrict formation of HMOs in areas of high concentration (Option 2)

Observations about PBSA: The market provision of PBSA has clearly not met the demand, with little of it affordable to anyone other than wealthy (mostly international) students. Supporting a type of provision that has not delivered in the past, in the hope it will deliver in the future, when developers aim to maximise the rents they can charge, will not work. There should not be an assumption that the model of PBSA will deliver housing for a market that it has ignored thus far.

In addition, the Council should not conflate student and non-student HMOs, and recognise that HMOs fulfil a housing need, and should be regulated with the knowledge that they are a required and useful type of housing.

Observations about HMOs: HMOs should be recognised as not just a student tenure, but also supporting young professionals and others on low incomes who are unable to rent alone or wish to live with others.

3g Accessible and Adaptable Homes

Key issue: Providing sufficient accessible and adaptable homes

Nearly 20% of people in the UK report having a disability, and in addition, the population is ageing, meaning more people who may experience mobility challenges in the future.

At present, only 30% of new homes are required to be adaptable (including being able to fit a stairlift), and 2% built as fully wheelchair accessible. The council propose to increase this to 96% adaptable, and 4% built as accessible, meaning all new homes will be adaptable. Developments of 30 or more homes should include at least two wheelchair accessible ones.

Our recommendations

The Council should update the policy based on the Strategic Housing Market Assessment recommendations (Option 1)

Considerations for setting future housing standards: Consideration should be given to how flood evacuation can be carried out accessibly and independently. Consideration should be given to natural ventilation and measures to keep new homes cooler in heatwaves as this can disproportionately affect older and disabled people and people with chronic illnesses.

Should the policy be strengthened to seek conditions to require developments to advertise accessible and adaptable housing: Yes.

3h Older Person Housing

Key issue: Where should housing for older people be located?

The Council would like to know if people prefer that older people's housing is mixed into general housing sites or on single use sites. This may depend on the type of housing, as supported living may be easier to provide in a clustered format, whereas many independent older people may prefer to live amongst the general population.

The Council's proposed approach involves looking at specific needs - different older people will have wildly different needs from completely independent living to requiring specialist care.

Our recommendations

The Council should update the policy based on the Strategic Housing Market Assessment (Option 1)

Should older persons housing be provided as a mix on general housing sites, or as single use sites, or both? Both.

3i Co-Living

The Council would like to know if there should be minimum space standards for private rooms as well as internal and external minimum space standards for co-living, and whether there should be restrictions on it in certain locations.

Our recommendations

The Council should introduce a new policy for co-living space standards. (Option 1)

What a co-living policy should include: A co-living policy should include:

- minimum space standards for private rooms
- internal and external space standards per resident

3j Self & Custom Housebuilding

The Council would like to know if there should be requirements for self build plots in larger development sites, for example sites for over 100 homes.

Our recommendations

The Council should set new policy to set requirements for self and custom housebuilding plots, in new developments. (Option 1)

3k Gypsy, Travellers and Travelling Showpeople

Key issue: Provision of safe, dedicated pitch sites for Gypsies and Travellers

There is a shortage of specific sites for Gypsies, Travellers and Travelling Showpeople. These people typically live out of caravans and move around, so require pitches for caravans. A needs assessment was undertaken, and identified a need for a further 62 pitches in total.

The Council would like to know where these should be provided, whether that number is a reasonable assessment, and whether new housing allocations should include Gypsy and Traveller pitches.

Our recommendations

The Council should update policy to reflect the needs assessment for Gypsies, Travellers and Showpersons (Option 1)

4 Economic Development & Employment

4a Employment Land Needs

Key issue: How much land should be allocated to industrial uses?

Employment Land is generally of two types:

- offices, considered by the number of square metres of space.
- industrial and logistics, for factories and warehouses, considered by the number of hectares of land (on the assumption these are single storey).

The Council have identified a requirement for 540,000m² of office floorspace, but that existing land allocations are sufficient to deliver this. They have also identified that 2 million m² of industrial floorspace is needed, and that this requires 575 hectares of land, 300 hectares more than is currently allocated.

They would like to know if this should be the amount that needs to be allocated, whether it should be based on the takeup of land in the last few years, or if an allowance should be made for another 10% supply. This is on whether the land should be allocated, and the idea is that at least as much land is allocated over the next 18 years as will be needed.

Our recommendation

The recommended approach should be taken, as it is harder to allocate industrial land than housing land, and larger sites are needed. (Option 1)

Observations about employment land needs: A move to a Circular Economy will need new facilities, such as for deconstruction, material storage and repurposing. For the construction sector this will be a large need for industrial spaces, and for other sectors, new recycling and reprocessing facilities will be needed.

Some industrial uses are able to happen in proximity to homes, and an assessment of need for those should be carried out, so that space can be provided in mixed use developments.

4b Safeguarding Existing Employment Land

Key issue: Should office and industrial space be protected from being converted to other uses?

This section is concerned with the protection of office and industrial land from redevelopment, and asks about support for other uses in industrial areas. Industrial areas can cause noise, traffic and pollution issues, so industrial sites are normally located away from homes; but equally mixing land uses puts homes, jobs and other facilities in close proximity, which is beneficial in making it easier to walk and cycle between them. The classification of use types makes a distinction between industrial uses which can be carried out in a residential area without major issues (Class E, the same as shops and cafes and restaurants), and those that can't (Industrial Class B2 and Storage and Distribution Class B8).

At present, anything in Class E can be converted to residential without needing planning permission, though external changes to the building will need planning approval. Councils can ask for restrictions to block this, and therefore require planning permission for conversions, and this appears to be what they are asking to do. Because there is forecasted demand for offices and industrial space to support future employment, even if sites are not being used now, they may be needed in the future.

Much of the industrial land in Leeds is classified as Industrial Areas of Importance, and in those, the Council is asking which uses could be considered. Some of these are very close to the city centre and some, like Kirkstall Road, are in the process of conversion to primarily residential areas, though they are still identified on the map as being industrial. Many of the business uses around them will be under threat for conversion, but also be suitable to be located close to homes.

Our recommendation

Some industrial and office locations will be difficult to replace once they are lost, particularly in the city core or large, flat areas, so identifying and protecting office locations is also important (Option 2).

Explanation: Some industrial uses (such as workshops) fall under Class E, and can be accommodated in and around local centres and residential areas, meaning they are in proximity to homes, shops and schools, and could contribute to a “live-work” culture in mixed neighbourhoods (an example is BedZED in London).

It is difficult to safeguard office jobs, but at present planning permission isn't required for converting offices to residential if there are no external changes, and the Council can and should require planning permission for this to safeguard office space and reduce substandard conversions of offices to flats.

Should a similar approach be taken to safeguard office businesses: Yes

Uses of importance in industrial areas of importance:

- Fairly important:
 - Industrial premises,
 - Offices
 - Retail
 - Greenspace
- Neutral
 - Housing
 - Leisure
 - Education
 - Hotels
- Not important
 - Car parks

Would you like to answer some more detailed questions about this topic? Yes.

How far should the plan go in preparing for the transformation of key potential

growth areas: We believe some important uses have been mixed, notably that Kirkstall Road is under development for a lot of residential use, and north of Sheepscar Interchange has a variety of uses and is in close proximity to residential areas and a school. Areas such as around Sheepscar contain community and cultural uses that should be borne in mind. We also believe that the transformation of key potential growth areas should take account of those, as has been done in Birmingham with the Digbeth Prospectus and Big Creative Birmingham Conversation.

4c Visitor Economy and Culture

Key issue: The preservation of cultural facilities and where new overnight accommodation should be located.

The Council would like to support the retention of existing leisure, cultural and tourism facilities, only allowing redevelopment if a site has been vacant with no interest for over a

year. Within this time, it should be possible to get the site considered as an Asset of Community Value if there is local interest in doing so to prevent its redevelopment, unless there are other good reasons for not preserving it.

At present, overnight accommodation and short term lets (for example, Airbnb) are considered to be acceptable in local and main centres, with additional justification required on an individual basis for them to be sited away from centres (this is because centres are the most accessible places for public transport and other facilities such as restaurants). The Council propose setting out criteria for when overnight accommodation is acceptable outside a centre, for example a campsite, or associated with a tourist attraction, and how short term lets such as Airbnb are dealt with, so they do not cause a reduction in housing supply, as has happened in more touristic cities around the world. The Council would also like to know how people feel about different kinds of short term lets.

The question also asks what kind of cultural facilities people use, and where cultural and tourism development should happen (close to where it does already, close to centres or transport hubs, or within the key growth areas (West and South Leeds).

Our recommendations

The Council should update policy to support and retain leisure, cultural and tourism facilities. This will also hopefully help to protect cultural facilities which would be under threat from development, as outlined in the previous sections. (Option 1)

Explanation: The Council should introduce policy to suggest criteria for allowing overnight accommodation outside of the city and local centres, so that hotels and other overnight accommodation is easily accessible by public transport – unless there are reasons for them to be, for example, rural, or connected to another visitor attraction. This would also encourage overnight accommodation to be closer to other facilities useful to visitors, such as food shops or pharmacies.

We support new cultural and tourism development to take place adjacent to centres, existing attractions and adjacent to transport hubs, but not so much in the Green Belt.

5 Role of Centres & Commercial Development

5a Retail & Role of Centres

Key issue: Supporting and developing local centres.

The Council has existing policies around local centres, but they would like to update them. Partly, this is because of changes in national policy, which support more mixed uses and changes between uses without needing to apply for planning permission. National policy now requires Councils to identify a network and hierarchy of local centres (identifying which ones are more important), which the Council has done to an extent. In addition, the Council will require that ground floors in the city centre contain active uses, which has not always been the case in new developments.

The Council would like to ask whether retail use in centres should be prioritised over other uses such as restaurants, bars and offices.

Our recommendation

The Council should simplify and streamline existing policy, which is required since there have been changes to national policy (Option 1)

Explanation: The Council should adopt a more flexible approach to the priority of retail over other uses in local centres, because national policy now considers retail, financial and professional services (such as estate agents), cafés, restaurants and light industrial uses to all be the same class of use, meaning that premises can change between those uses without needing planning permission.

5b Leeds City Centre Boundary

Key issue: What is considered to be part of the city centre?

The Council proposes changing the definition of Leeds City Centre to encompass a wider area. This will expand the area in which commercial and town centre uses will be encouraged.

The proposal is to expand the area to include:

- the area from Clay Pit Lane to the Inner Ring Road motorway, including Lovell Park and the area around Regent Street, plus the area around Mabgate.
- the area between the City College Printworks campus and the Inner Ring Road, which is mostly industrial, but also includes the Climate Innovation District.
- the area between Armley Gyratory and Holbeck Viaduct, which is mostly industrial, but includes a small amount of new high rise apartments.
- the area along Canal Street / Armley Road, which is mostly industrial, with small residential pockets.

- the area along Kirkstall Road, up to the railway viaduct, which is partly industrial, with large amounts of high rise residential under construction.

Though the Council asserts that this area contains more city centre uses, large parts are in active industrial use, with cultural and community uses that could be under threat unless those uses are recognised and planned around. The existence of relatively cheap edge-of-centre space is critical to community and cultural use, and earmarking all of this area for potential redevelopment may see rises in rents and leases not being renewed in favour of potential redevelopment. The Council should review sites and uses within this area in order to identify individual sites for development, an approach taken in Digbeth, Birmingham, which similarly has a large number of community and cultural uses and startup businesses alongside empty or derelict sites earmarked for development.

Our recommendation

The Council should not update the city centre boundary until it has carried out a review of uses, particularly to identify and recognise community and arts facilities within the expanded area. (Option 2)

Observations: A lot of community and arts uses have been driven out of the expanded city centre in the last few years, particularly along Mabgate and Kirkstall Road. We recommend an approach similar to that in Birmingham, with the Digbeth Prospectus, that recognises that many of those community and arts facilities provide a draw for why people might want to develop in the area.

5c Commercial Need

Key issue: The need for commercial space.

This section asks about sites for retail shops, restaurants and entertainment venues. While there has been some decline in this area as more people shop online, previous surveys have shown that most people want more shops in their neighbourhoods, and want to protect shopping in the city centre.

The Council do not see a need for more retail space in the city centre, indeed, after a period of expansion, some retail space is being lost in favour of (mostly) student accommodation. However, they have identified a need for more neighbourhood shops, and some neighbourhoods have limited access to supermarkets. Four options are provided in the questionnaire, of which three are listed as already discounted. However, one of them, a district-wide review, would be useful in identifying where neighbourhoods

do not provide the requirements for “Complete, Connected and Compact” places, and so where new development can be encouraged to help improve neighbourhoods.

Specifically, the need for new supermarkets is discussed, especially where this may be provided outside of an existing local centre. Currently, guidance strongly prefers that supermarkets are in or close to existing centres and not in isolated, car-dependent locations.

The Council also wants to know whether there should be specific targets for retail in the city centre (this is unlikely to be needed given the existing scale of the city centre), and also whether local services should be provided as part of larger new developments. New developments should contribute to the places they are in, by improving the level of local services, and this should include community facilities, open and play space, as well as shops, cafes, bars and restaurants.

Our recommendation

We recommend that an external retail need study is carried out (Option 4)

Explanation: Although this was listed as a discounted option, and only one non-discounted option was provided, a district-wide need study will help identify where retail functions are required. The 20 minute neighbourhood paper provided as evidence shows some neighbourhood centres already lack important services, but also does not identify sub-neighbourhood scale retail, such as isolated shops or small parades which do not qualify as local centres.

Need for new supermarkets: The need for new supermarkets is particularly an issue in the small number of food deserts in the city (such as Richmond Hill). In many other areas, small and independent supermarkets fulfil many needs. There is already a “sequential test” which aims to prioritise local centres as the locations for supermarkets and other shops, and this should be followed. There are already several supermarket sites with poor public transport and active travel access (for example Asda and M&S at Owlcotes), and developments like this should not be encouraged.

5d Hot Food Takeaways

Key issue: Should there be more hot food takeaways?

The presence of large numbers of takeaways is associated with higher levels of obesity and health problems caused by unhealthy eating. The Council can restrict licences for

new takeaways close to schools, unless they are in a local centre (where they are part of the service a local centre provides).

Takeaways also often lead to higher levels of litter and potentially vermin (rats, pigeons etc.) in the vicinity.

The Council would like support to further restrict where takeaways can open, and whether they should use local characteristics such as obesity rates and the number of existing takeaways in an area to help determine where they should or should not be allowed to open.

They would also like to know if more locations should be added where young people congregate and therefore takeaways should be restricted, and how they can be restricted in areas where there is an adverse impact on health, pollution or anti-social behaviour.

A relatively new issue is the co-called “dark kitchen” where food is prepared for delivery, but there is no public access. The Council would like to know whether they should be considered as takeaway outlets or their own category.

Our recommendations

The Council should create a new policy to build on existing guidance. (Option 1)

Explanation: Creating a new policy signals that the issues around hot food takeaways are on the Council’s agenda.

Would you like to answer some more detailed questions about this topic? Yes.

How Paragraph 97(a) and (b) should be implemented: What constitutes “walking distance” isn’t specified, so potentially a distance-based metric could be introduced to clarify this. There also needs to be an assessment of whether takeaways are contributing to anti-social behaviour in a particular location, and whether additional street cleaning is required relative to similar places.

Locations where young people congregate: As well as schools, young people can congregate around parks, open spaces and community centres.

5e Land Based Gambling

Key issue: Should there be more gambling premises?

This topic is about betting shops, casinos, arcades and bingo halls.

Gambling premises are linked to mental harm and the exploitation of poverty. The rate of gambling-related harm in Leeds was estimated by Leeds Beckett University to be around double the national average. However, it's also possible that more people will continue to gamble online. The physical casino sector has not been growing, whereas online gambling has continued to, and many of the largest operators are run from Leeds.

The Council are proposing to set out areas of the city where there should not be new gambling premises, based on the cumulative impact of clustering of gambling premises, and are asking whether this is supported.

Our recommendation

The Council should introduce a policy that there should be no new gambling premises, based on the cumulative impact of having multiple premises in an area, this should begin with a cumulative impact assessment policy. (Option 1)

6 Minerals and Waste

6a Mineral Processing, Secondary and Recycled Aggregate and Buffer Zones

Key issue: Where aggregates (sand and stone) are delivered and processed.

The amount of new construction envisioned in Leeds means the city will need a lot more sand and stone to be delivered. It is better to move these huge amounts by train or barge, rather than by road, as this has much lower carbon emissions and causes less traffic and pollution effects in the city.

Secondary aggregates are recycled or reused from construction, demolition or excavation waste, and those available in Leeds can sometimes substitute for new aggregates. The Council and Combined Authority are aiming to develop and promote a circular economy where waste materials can be reprocessed into new products.

Our recommendation

Mineral Processing Facilities: The Council should continue to safeguard existing aggregate sites and allocate at least one new rail or canal connected site for mineral processing (Option 1)

Buffer Zones: Define buffer zones for mineral sites (Option 1)

Secondary and Recycled Aggregate: The Council should safeguard existing sites for recycling aggregate, and support provision of facilities for recycling aggregates (Option 1)

Explanation: We believe that new sites are needed for mineral processing, as the circular economy relies on having facilities to reprocess and store waste materials

Would you like to answer some more detailed questions about this topic? Yes

Should the plan safeguard existing mineral facilities: Yes

Is at least one additional site needed: Yes

Should sites be rail or water connected to minimise the amount to be moved by road:
Yes

Does Leeds need more facilities for aggregate recycling: Yes

6b Mineral Supply

Key issues: Where sand, gravel and crushed rock comes from.

Sand and gravel do not come from the immediate Leeds area, and are largely from the Yorkshire Dales and Derbyshire. Those produced in West Yorkshire are not as suitable for building roads and concrete.

The Council would like to move towards obtaining more aggregate from the North Sea. Although this creates its own environmental damage, it's already used outside of Leeds and accounts for about 20% of England & Wales' consumption.

A small amount of recycled aggregate is also produced in Leeds, and in addition, ash from the incinerator is already used in some instances to reduce the amount of cement in concrete, reducing carbon emissions.

There is potential for gravel extraction in the Wharfe Valley to the north of Leeds, though there are significant environmental reasons why this is being discouraged.

Our recommendation

The Council's preferred policy should be adopted, in which the use of marine aggregates will be permitted, and there would be a preference for this to arrive in Leeds by barge or train (Option 1)

Explanation: The Council should be supported in wishing to make better use of secondary aggregates, though there is a shortage of capacity for processing and washing

where this is needed. The Council have suggested safeguarding sites, of which only one is under consideration at present.

6c Sustainable Movement of Minerals, Waste and Other Freight

Key issue: Ensuring that there are rail and water freight facilities to maximise non-road freight transport.

Having alternatives to freight moving by road depends on having road and water port facilities. A wharf at Knostrop was used for sand and gravel until 2023, but with a lack of capacity at the site, the movement has gone back to road transport.

The Council would like to continue to have a policy to safeguard existing wharves, retain a site for a wharf at Stourton and encourage development of another existing site.

Our recommendation

The Council should retain a policy to safeguard wharves and rail sidings from alternative uses (Option 1)

Should the plan seek to encourage the transition of freight movement to rail and canal: Yes

Should wharves and sidings be safeguarded: Yes

Should the allocations for new rail and water freight facilities should be retained: Yes

6d Coal

Key issue: Whether coal resources in the area should be safeguarded for future use.

Coal is the highest emission fossil fuel, and the UK has stopped generating electricity from coal. Coal extraction is now only permitted by the Mining Remediation Authority if it is needed to make a site safe for development.

Because councils must assess greenhouse gas emissions from fossil fuel use before granting planning permission, the Council does not envisage granting permission for coal mining.

Leeds City Council would like to withdraw any safeguarding of coal resources, on the basis that it will not be mined now or in the future.

Our recommendation

The Council should remove mineral safeguarding for coal, allowing sites which had potential for coal mining to be given over to other uses. (Option 1)

Do you think Leeds should keep coal in the ground, unless it has to be removed for public safety reasons? Yes

6e Fracking

Key issue: Whether fracking should be banned in the Leeds district.

Hydraulic fracturing (fracking) for oil and gas is not yet banned nationwide, so Leeds is seeking to introduce a local ban, on the basis that there is little resource in the area and that the Council would like to cease fossil fuel usage.

This is an issue that Frack Free Leeds has campaigned on.

Our recommendation

The Council should introduce a policy to ban fracking in the Leeds City Council area (Option 1)

6f Waste

Key issue: How we deal with waste and recycling in the city.

The Council would like to make a few changes to waste policy:

- to safeguard existing waste management capacity
- to identify if additional sites are required for waste management
- to update policy on landfill now there is almost no waste landfilled from the city (this likely refers to domestic waste collections only)
- to introduce a requirement for buffer zones around waste sites to reduce negative impacts on surrounding uses
- to require consideration of the circular economy in waste management
- to support the use of incinerator waste as a secondary aggregate
- to require conditions for waste development in the Green Belt

Our recommendation

To support the Council's preferred approach to change waste policy in favour of a circular economy, the reuse of incinerator ash and continue to aim at zero waste to landfill (Option 1)

Explanation: We would also like to see sites allocated for more waste reprocessing and storage of construction materials in particular.

7 Transport & Connectivity

7a Accessibility Standards

Key issue: Making standards for how new developments connect with the transport network more useful.

Leeds City Council has accessibility requirements that new developments need to meet. They merely say that new development has to have some access to public transport and safe access for walking and cycling.

The Council would like to update this to take account of where you can get to by public transport from the proposed development.

Our recommendation

The Council should review accessibility standards to take account of where can be reached by public transport from developments (Option 1)

7b Transport in New Development

Some of the recent development in Leeds has continued to be car-dependent, with poor public transport connectivity.

Leeds City Council would like to change transport policy in order to:

- ensure new developments are accessible by public transport
- ensure there is provision for active travel (walking and cycling)
- review parking standards to allow car free development to take place
- support and develop rail and water freight
- define principles for "good" transport in new developments

This has a large number of elements, so the Council would like to know if this should be a single policy with different sections, or multiple policies.

The section has a number of questions asking about travel habits, what would make you travel more sustainably and whether you support car-free or reduced car development.

Our recommendations

The Council should update policy to require new development to promote sustainable transport and set out principles for “good” transport. (Option 1)

Explanation: The topic should be covered by a suite of policies, making it easier to track compliance than if the policies were all rolled together. Car-free and reduced car development should be particularly supported.

Should the topic become one policy: Multiple policies based on the separate elements.

7c Leeds Bradford Airport

Key issue: What should the new policy on the airport be?

Aviation is a rapidly growing source of carbon dioxide and other greenhouse gas emissions.

The Council would like for any development at the airport to align with principles of sustainability and minimise environmental impacts.

The carbon emissions from flights from the city are not considered as part of this, though clearly any expansion of the number of flights from the airport will lead to increased emissions, noise and air pollution.

For more detailed suggestions for responding to this section, please see this response guide produced by the Group for Action on Leeds Bradford Airport:

https://docs.google.com/document/d/1afRot4nDM_owkA65RaXQALsNvsirZSU31E51W-cK01s/edit

Our recommendations

The Council should update policy and ensure any development aligns with principles of sustainability and minimises environmental impact. (Option 1)

Explanation: Consideration should be given to the additional carbon emissions and air and noise pollution unlocked by the ability to accommodate more flights at the airport.

What do you think is a policy priority to make for Leeds Bradford Airport? To reduce the amount of carbon dioxide emissions for which it is responsible, both directly and through providing the opportunity for those emissions to occur.

Do you have any other observations? The Local Plan approaches to Leeds Bradford Airport do not adequately consider the wider environmental impacts the airport has on the city and region.

7d Mass Transit and Rail Infrastructure

Key issue: Support for a future mass transit system and the rail network.

The Council are proposing to:

- explicitly support the development of the West Yorkshire Mass Transit system
- safeguard land on the proposed routes
- ensure that rail and mass transit networks are integrated into existing and proposed developments
- establish principles for environmental, social and economic impact reduction, around placemaking, green and blue infrastructure (green and water spaces), heritage and flood risk

Our recommendations

The Council should include new policy on mass transit and rail infrastructure (Option 1)

Observations: The new policy should safeguard land along the corridors, for depots and servicing, and look to integrate stations with other public transport modes, bikesharing and surrounding development.

The Local Plan needs to be clearer about preferred locations for stops, and to guide development to the principles of “Transit Oriented Development”.

7e Park and Ride

Key issue: Park & Ride as an incentive to drive.

Leeds currently has three Park & Ride sites at Elland Road, Temple Green and Stourton, and potential for a fourth at Alwoodley Gates.

The Council claim that 9,000 cars a week are removed from the city's roads by Park & Ride, though the number of city centre parking spaces has not been reduced as a result of Park & Ride, meaning the provision of Park & Ride has resulted in additional parking for the city centre, and generated additional car journeys overall.

Park & Ride is popular with many car users, as it lets them continue to drive to and from the city centre and benefit from subsidised bus fares which are lower than what non-drivers pay.

Our recommendations

The Council should review existing Park & Ride facilities and assess needs (Option 1)

Explanation: The reason for this is that, in Leeds, Park & Ride provision is in addition to city centre parking rather than replacing it, and Park & Ride users are subsidised and incentivised to drive to Park & Ride instead of using buses for their whole journey. New Park & Ride spaces should replace those in the city centre instead of adding to them, as the number of parking spaces restricts car travel to the city centre.

Routes and corridors that would benefit: There are no further corridors that will benefit from Park & Ride unless city centre spaces are removed.

Observations: The Leeds Local Plan approaches Park & Ride as a benefit to the city, when it is subsidising people to drive rather than use the bus for their whole journey, and generates additional car trips overall.

7h Drive Thru's

Key issue: The expansion in the number of drive thru sites.

Drive thru sites exacerbate pollution levels in the surrounding area, and act in opposition to the promotion of sustainable travel modes. The sites usually serve takeaway food, which is in itself a cause of negative health issues.

The Council are proposing a new policy to restrict new drive thru's outside of local centres, where it is more difficult to refuse them on planning grounds.

Our recommendations

The Council should introduce a new policy to restrict new drive thru developments (Option 1)

What it should seek to do: Restrict all new drive thru's.

Observations: Drive thru locations promote car dependence and often also unhealthy eating, as well as leading to high air pollution from idling.

8 Landscape & Rural Development

8a Landscape

Key issue: Protection of landscape character.

Leeds has a number of Special Landscape Areas which have been defined as areas with a high quality of landscape. These are beyond the edge of the built up areas of Leeds, Otley, Wetherby, Garforth and Rothwell.

The Council would like new policies to support and strengthen landscape character.

These have not been set out, but the Council is proposing that new development will have to:

- consider the landscape setting of the site, and the distinctiveness of the area
- protect existing vegetation and landscaping
- incorporate landscape, ecological and architectural features into developments
- provide access for all
- protect landscaping
- provide temporary landscaping or a “meanwhile use” when sites are cleared

Our recommendations

The Council should adopt a new policy with development principles in the Special Landscape Areas (Option 1)

Observations: “Meanwhile uses” should include native and/or pollinator-supporting planting, and offering of space to local food growing or Community Supported Agriculture groups, who could use it for growing food.

8b Open Land

Key issue: Spaces with protected views and protected value.

There are seven locations in the city which are protected from development because of important public views and their contribution to public amenity.

The Council have not set a preferred approach, but are seeking views on what people think of the Open Land areas. These are:

- Owlcotes Hill, Pudsey;

- Coal Hill, Rodley;
- Haigh Wood, West Ardsley;
- Outer Ring Road, Weetwood;
- Outer Ring Road, Moortown;
- Kirkstall Valley
- Meanwood Valley

Our recommendations

Please use the box below if you want to tell us anything about open land: The distinction between Open Land and Special Landscape Areas should be made clear.

8c Countryside

Key issue: Protection of rural land.

Leeds District contains a large rural area within it. 61% of this rural area is Green Belt, which is protected from development.

Leeds does not have planning policies for rural tourism and renewable energy in rural areas.

The Council are proposing to assess how rural land functions according to the Green Belt purposes, including protecting gaps between settlements, and to produce specific principles for development in rural areas.

However, with development pressures in the city, and the new category of Grey Belt (for Green Belt land of poor quality or which has been developed in the past) a review should be carried out of where Rural Land and Green Belt should potentially be removed so that the city's area can be expanded in a more sustainable way through a "Sustainable Urban Extension".

Our recommendations

The Council should introduce a new headline policy with general principles for development in the countryside (Option 1)

Explanation: Both Green Belt and Rural Land should be assessed to identify land which would fall under the new category of Grey Belt, and therefore be more suitable for development.

Issues for a countryside policy to cover include:

- where there is good access by public transport and active travel to support a potential “Sustainable Urban Extension” to Leeds
- what uses can be considered for Grey Belt land to maintain the rural character of the area

Should there be a policy to maintain important gaps: No

Explanation: Many settlements have merged already (most notably Leeds and Bradford). There are likely to still be important gaps between settlements which need preserving, for example between Leeds and Otley, which should be investigated on a case-by-case basis. There is potential for a “Sustainable Urban Extension” to fill in a gap between settlements if it improves service provision or does not cause the identity of the newly joined settlement to be lost.

9 Placemaking

9a Achieving Complete, Compact and Connected Neighbourhoods

The Council are proposing principles that new development will have to comply with, including:

- higher densities of housing (to support better local services and public transport)
- better connections for walking and cycling
- safe and easy access to public transport
- high quality built environments with open green spaces, play and nature
- a diverse mix of housing types including affordable housing
- a mix of uses to provide services and a recognisable centre

These are fairly well known and understood principles for building sustainable neighbourhoods. Among the documents setting out principles for sustainable neighbourhoods is the 20 minute neighbourhood guide by the Town and Country Planning Association, which is referenced in the supporting papers.

Our recommendations

The Council should adopt a new policy to assess new developments according to principles of complete, compact and connected neighbourhoods (Option 1)

Notes on Principles: Providing access by walking, cycling and public transport is not enough by itself to reduce car use and encourage people to travel sustainably. There also needs to be some level of restricting car use through neighbourhood design, as has been done in parts of the Netherlands with the Woonerf “home zones”.

Observations: Areas should connect with each other by walking and cycling routes, and not be isolated, enabling people to walk and cycle between places.

9c Achieving Well-Designed and Sustainable Places

Key issue: The design of new developments.

Currently, the Council has fairly good design guidance, based around “Neighbourhoods for Living” in 2003, but it has not been well applied in new developments. It also does not respond to the Climate Emergency, and more recent thinking on making places healthier for their residents, so this needs updating.

Our recommendations

The Council should update policy to provide relevant signposting to existing and proposed technical guidance (Option 1)

Observations: One of the key issues is how the policies will be implemented, as a number of poorly designed developments have been approved since the original guidance was released, ending up as car-dependent with poor walking environments and isolated from shops and services within walking distance.

9d Health Impact Assessments

Key issue: Ensuring new developments aren’t bad for the health of people who will live there.

Leeds has made commitments to improving public health following the Marmot Review in 2020, which focused on inequality in health and life expectancy. There are five key areas which are being looked at for how planning can make healthier places:

- neighbourhood design
- housing
- food environments
- natural environment

- transport

The Council would like new developments to incorporate a Health Impact Assessment, if there will be 100 or more homes or over 10,000m² of non-residential space.

Our recommendations

The Council should introduce a new policy covering the health impacts of developments (Option 1)

What scale of development should they apply to: We think the type and scale of development they should apply to is broadly appropriate, though we would like to see a smaller threshold of when they are required, but this depends on the cost and difficulty of conducting a Health Impact Assessment.

9e Heritage

Key issue: Protecting heritage assets in new developments.

The Council has some policies relating to heritage, such as listed buildings and conservation areas. However, it is important to update them to align with the National Planning Policy Framework (NPPF).

Demolishing and replacing buildings has a high carbon impact, so it is more sustainable to retrofit and refurbish older buildings rather than knocking them down.

There have been new guides to show how to retrofit old and listed houses to reduce their energy use without destroying their heritage nature.

Our recommendations

The Council should rationalise and update language to align with the NPPF and introduce new policies (Option 1)

Explanation: It is important for our approach to heritage buildings to address the Climate Emergency and changed national guidance.

Heritage priorities: The priorities for Leeds should be to protect heritage buildings from redevelopment, especially as there are new techniques for retrofitting them with better insulation and heating.

Observations: Any existing building on a development site that is planned to be demolished should have a Pre Demolition Audit carried out which should focus on how

the materials in the building will be reused, preferably on-site (promoting a circular economy for building materials).

9f Child Friendly Planning

Key issue: Meeting the needs of children and young people in new developments.

Leeds is aiming to be a child-friendly city, and there are a number of impacts that new developments can have on children, particularly on play and child development.

Almost a quarter of the population of Leeds are children and young people, and over recent years, children's outdoor play and independence has declined. In countries like the Netherlands, with safe walking and cycling routes, children tend to be more independent. This impacts on journeys to school, where children travel independently by walking, cycling or public transport, which can reduce road traffic levels at school peak times.

The Council would like to introduce new policy to address the needs of children and young people in new development, including their views, their health and wellbeing, green spaces, play spaces, independent mobility and reducing the dominance of cars on streets to facilitate play.

Environments that are easier for children to move around in and be independent in are also easier for everyone, including disabled people.

Our recommendations

The Council should introduce a new set of principles and priorities for child-friendly development in Leeds (Option 1)

Explanation: Child-friendly development principles benefit wider society as well – to have more independent child travel, we need safer walking and cycling routes, which benefit everyone, and to have visibility of streets from different heights, calmer streets and more green spaces means having a more accessible environment for disabled people. Children also have more pollution exposure from cars, as they breathe air in from much closer to the exhaust height of vehicles.

Is Child Friendly Cities an important issue to address: Yes

9g Play & Recreation

Key issue: Creating nature-based play opportunities.

The Council would like to introduce a policy for all children to have access to outdoor play opportunities of various types.

Many of these could double up as green space, and the Council have indicated that this would include nature-based play. This could create areas within biodiversity corridors and other spaces that have wildlife value as well as play value.

Our recommendations

The Council should require new development to have indoor and outdoor playful elements (Option 1)

Explanation: Nature-based play, especially if it is informal, can have value of nature and ecosystems as well as providing play space that helps connect children to nature,

Focus areas: New policy should increase the amount and quality of play and recreation areas, to be more varied, inclusive and include more natural playful equipment.

9h Community Facilities

Key issue: Improved protection for community facilities.

The Council wants to connect policies about community facilities to those about Complete, Compact and Connected neighbourhoods. They also want to provide some protection against loss of community facilities, that other uses for a community facility would have to be identified and it demonstrated there is no demand for it for over 12 months.

Community facilities include schools, health centres, community centres, convenience shops and pubs.

Our recommendations

The Council should update policy relating to Complete, Compact and Connected Communities (Option 1)

Should the plan set out the types of facilities to be protected: Yes

Observations: The protections are a good idea, but some community facilities have been subject to an asset transfer from the Council or another organisation, leaving the community group to bear costs of running a building which are sometimes too much for them to afford.

9i Gender Inclusive Urban Planning

Key issue: Ensuring the needs of women and girls are met in planning.

Certain aspects of the built environment have not been designed inclusively, and the negative impacts often affect women more than men.

There are two main categories of issues concerning women and the built environment:

- safety and feelings of safety
- travel patterns, and the ability to meet needs without a car

Traditionally, planning has had a gender bias of assuming nuclear families in which a man commutes to work and a woman undertakes childcare duties within the neighbourhood. This is considerably less true now. Women with childcare responsibilities often have complex travel patterns to multiple schools, work and for meeting children's other needs, and public transport networks are less well designed for these complex travel patterns.

Also, some aspects of the layout and isolation of many housing developments mean people feel less safe walking around them. Even if an area appears quite safe from crime statistics, women in particular may feel unsafe walking around at night unless there is adequate lighting and visibility of people and places.

Our recommendations

The Council should ensure new developments are inclusive of the needs of women, girls and gender-diverse people (Option 1)

Please use the box below if you want to tell us anything else about gender and the built environment: It is important to ensure that cities and neighbourhoods are designed inclusively. Women with childcare needs have different travel patterns that, for example, most public transport networks are not designed to meet. Also, places should be designed for overlooking and active frontages so that they feel less unsafe.

If you think gender inclusive urban planning should be a priority for the Leeds Local Plan, what should the priorities be?

- well lit public areas
- safety
- play areas with adequate seating and facilities

9j Accessibility in New Development

Key issue: Ensuring new development is accessible to disabled people

Around 18% of people in Leeds have a disability (similar to the country as a whole), and disabled people make fewer trips and experience more problems in travelling.

The Council want to adopt a dedicated policy for accessible planning.

Our Recommendations

The Council should adopt a dedicated policy for accessible planning, and ensure that the recommendations of studies of disabled people's mobility are followed (Option 1)

Explanation: Disabled people have wildly differing needs, from being unable to drive to being unable to use public transport, and can easily walk or have limited mobility even with an aid such as a scooter or wheelchair. Accommodation for one kind of impairment can conflict with another, so there needs to be thought to how to manage differing needs (for example raised kerbs for blind people with canes make movement more difficult for wheelchair users). Principles of Inclusive Design should be followed, which benefit non-disabled people as well as disabled (for example people pushing pushchairs or prams, or people with luggage).

Observations: The accessibility of buildings and spaces is often poor, especially in older and heritage buildings, and there should always be as much improvement in accessibility as possible within the constraints of the buildings.

9k Leeds Design Code

Key issues: Guiding the kinds of buildings that can be built, how they fit into existing areas, as well as issues around parking, environmental design and facilities in residential areas.

Leeds has a number of documents, going back several years, based around the "Neighbourhoods for Living" guide, but including a Tall Buildings Guide and Shop front design guides.

A lot has changed in the types of development happening in Leeds, and the Government now requires Councils to produce Design Codes.

The questions around the Leeds Design Code relate to:

- how it is laid out

- broad categories of area types (character types)
- density of development (higher densities use less land and promote more sustainable neighbourhoods)
- parking
- street trees
- low carbon heating, sustainable drainage and material usage
- play and garden facilities around buildings

The Character types being considered are:

- City Centre
- Inner Residential
- Outer Residential
- Villages
- Traditional Centres
- Retail Parks
- Office, Science and Innovation Parks
- Institutional
- Industrial

Inner and Outer Residential may need to be broken down into different kinds (such as back-to-back neighbourhoods and terraces), and some areas with “Inner” characteristics may be in outer areas, and vice versa, due to the complex urban pattern of the city.

Our recommendations

The Council should develop a Design Code for Leeds (Option 1)

Explanation: A single Design Code would replace the disparate Design Guides with something easier to navigate and more consistent.

Other design related policy to be incorporated: The Design Code should reference guidance around community facilities, play and accessibility, adaptation to climate change.

Structure: The proposed structure of the code seems reasonable, with Part A dealing with issues across Leeds, B pertaining to the City Centre, and C consisting of individual codes for different areas.

Character types: The proposed character types are generally acceptable, but would need more clarification as to what “Inner” and “outer” refer to, as there are for example areas of back-to-back housing in outer areas and some suburban style houses in inner areas.

Many of the following questions are of personal preference, however, we would like to support:

- taller houses (bearing in mind that many back-to-back and terraced houses in Leeds have 4 storeys)
- increased numbers of apartments (land is running out for building houses)
- mixed uses, allowing ground floors of apartment buildings to house shops, cafes and community facilities
- reducing residential parking, meaning lower car usage
- more terraced houses to make better use of land and enable houses with gardens at higher densities

Residential Parking Solutions: Removing parking from houses into further away locations is practiced in the “Car Free” housing developments in Germany, and means the car is not immediately in front of the house, making people consider walking or cycling for short trips more easily, as the car is itself a short walk away. “Alternative Parking Solutions” include things like underground car parks, where homes may still have parking for the same number of cars.

Street Trees: We encourage support for street trees, but fruit trees require management and the help of organisations such as Leeds Urban Harvest to make sure less of the fruit produced goes to waste.

We strongly support:

- renewable and low carbon heating rather than gas boilers
- increased fabric efficiency (insulation)
- Sustainable Urban Drainage Systems (SUDS)
- green and biodiverse roofs

- the use of low carbon construction materials
- passive design (making use of orientation and calculated shading)
- natural ventilation options designed into buildings up front rather than added later as energy consuming machines
- reuse and adaptation of existing buildings
- climbing plants rather than engineered green walls

Buildings other than dwellings: We support the inclusion of non-residential buildings in the Design Code

Private and shared amenity in high density development: We support general amenities in development, but shared amenities can end up unmaintained if there is no clear responsibility for maintenance and cleaning.

Integration or distribution of Outdoor play spaces: Play spaces should be well distributed so that there is overlooking directly from homes. In some areas such as Atwood Green (Birmingham) and many New Town neighbourhoods, many homes directly overlook a play space.

10 Carbon Reduction

10a Whole Life Carbon Cycle Assessments

Key issue: Requiring developments to consider the carbon impact over the lifecycle of the building.

The Council has cited evidence that shows the carbon dioxide impact of producing the materials (embodied carbon) represents around 50% of the total emissions over a typical building lifetime. Accounting for this is not required by current policy, but since the city is aiming to reduce its carbon footprint, the impact of the materials should be considered.

Our recommendations

The Council should promote the reuse of buildings (as this has the lowest carbon impact) and require a whole lifecycle carbon assessment for all planning applications (Option 1)

Explanation: We recommend that a Pre Demolition Audit is requested if demolition is proposed, so that the demolition is justified and the materials can be reused for a new building or refurbishment, preferably on-site.

Should planning policy seek to reduce the embodied carbon emissions across the lifecycle of developments: Yes

10b Operational Energy

Key issue: Energy usage in buildings.

This theme is about the energy use in a building. The Council would like to introduce a policy to control energy demand and maximise onsite renewable generation.

Our recommendations

The Council should introduce a policy for improving fabric efficiency, minimising total energy demand and maximising onsite renewables (Option 1)

Should energy requirements be balanced with renewables generated on site: No preference

Should allowable solutions be imposed if developments are unable to deliver onsite:

The Council are able to request payment for off-site solutions such as energy generation (“Allowable Solutions”), but these should only be used where there is no other alternative to meet requirements for on-site generation, and not to avoid the reduction of energy demand.

10c Sustainable Construction Standards

Key issue: Should Leeds require the use of a sustainable construction standard?

There are sustainable construction standards, such as Home Quality Mark, or (for non-residential buildings) BREEAM. Adopting one of these standards would make it easier and more transparent to assess designs according to agreed criteria. Commercial buildings already need to meet the BREEAM Excellent standard.

Our recommendations

The Council should require new development to achieve a specific sustainable construction standard (Option 1)

If Leeds should adopt a standard, should we use one of the established sustainable construction rating systems such as the Home Quality Mark or create our own set of standards? Home Quality Mark

10d District Heating Network

Key issue: Prioritising heating technologies for premises unable to connect to the District Heating Network.

Leeds has a “District Heating Network” (Leeds PIPES) which supplies heat from the incinerator in Cross Green to homes and businesses in and close to the city centre.

The Council is proposing to prioritise low-carbon heating technologies to be used in buildings which can’t be connected to the heat network. Sometimes this is because they are not near the network, and other times there may be other technical reasons why another technology may work out cheaper or with lower carbon emissions.

Our recommendations

The Council should prioritise low-carbon heating technologies such as heat pumps for buildings that can’t be connected to the heat network (Option 1)

Explanation: This should reduce and aim to eliminate the use of gas boilers in new buildings.

How do you feel about The Leeds District Heating network: It should be extended

Explanation: The network should be extended so that more buildings can benefit from it. A number of areas with high levels of fuel poverty are close to the city centre and hospitals, and people there can benefit from cheap, low-carbon heat.

10e Renewable Energy and Infrastructure

Key issue: Defining locations for renewable electricity generation.

The Council would like to introduce a new policy to guide where renewable energy and infrastructure should be located.

The alternative options that are presented are to only use locational criteria to make decisions , or to rely on existing local and national policy.

Our recommendations

The Council should introduce a criteria based policy to guide locations for renewable energy and infrastructure (Option 1)

Explanation: A location and criteria based policy better fits with the locations where renewable development is most suitable.

Locations: Locations for local renewable generation are suggested in the evidence paper, but ground-based solar farms should not be encouraged as they stop land being used for other purposes.

11 Flood Risk

11a Water Efficiency

Key issue: Water efficiency standards in new developments.

Residential developments of 10 or more homes need to consume a maximum of 110 litres per day.

The Council would like to extend this to all residential development, and combine the water consumption policies together.

Our recommendations

The Council should combine the Water 1 and EN2 policies to put water consumption policies together (Option 1)

Explanation: Combining the policies will make it easier for them to be complied with.

Should The Leeds Local Plan seek to minimise water consumption in new development: Yes

11b Functional Floodplain Zone 3b

Key issue: Development on the flood plains of rivers.

The “functional floodplain” is land with a 3.3% or greater chance of flooding each year.

The Council would like to only permit water compatible uses and essential infrastructure in the functional floodplain. Where there is already a building in the functional floodplain, any replacement would have to be within the footprint of the old building.

Our recommendations

The Council should ensure that only water compatible uses and essential infrastructure are permitted in the functional floodplain (Option 1)

Should the Council should restrict development in the functional floodplain so only the footprint of existing buildings can be developed: Yes

11c Land at Increased Risk of Flooding

Key issue: Recognising the impact climate change is having on flooding

Climate change is increasing the frequency of flooding, and as a result the impact of climate change on future flood risk needs to be considered.

Our recommendations

The Council should amend existing policy to incorporate a requirement to consider the impact of climate change on future levels of flood risk (Option 1)

11d Flood Risk Assessments

Key issue: Incorporating the impacts of Climate Change in flood risk assessments.

Proposed development in flood risk areas already requires a Flood Risk Assessment, demonstrating safety during floods and that it won't increase flood risk elsewhere.

The Council would like for Flood Risk Assessments to incorporate Climate Change allowances which take account of the increase risk of flooding due to Climate Change.

Our recommendations

The Council should require that the latest Government Climate Change Allowances are used in Flood Risk Assessments (Option 1)

Do you agree with the proposed update to require Flood Risk Assessments to consider the impact of Climate Change: Yes

11e Safe Access and Escape

Key issue: Whether new developments should have an evacuation plan for flooding.

Previously, developments have been approved on the basis that residents would "stay put" in their homes when there is a flood. However, it can also be dangerous for people to be trapped in their homes during a flood.

Our recommendations

The Council should introduce a policy to ensure safe escape routes are available during floods (Option 1)

11f Residual Risk

Key issue: Developing in flood-prone areas behind flood defences.

There is a major flood alleviation scheme which protects buildings along the River Aire. However, there is now a planning requirement to consider what the risks would be if the flood defences fail.

The Council would like to require that development in areas with flood protection needs to consider the risks of the flood defences failing.

Our recommendations

The Council should require an assessment of residual risk for all areas where there is a flood defences (Option 1)

Key issues regarding residual risk: The key issues regarding residual risk will be around evacuation to higher ground.

11g Sustainable Drainage

Key issue: Encouraging use of Sustainable Urban Drainage Systems (SUDS) as opposed to piped drainage. This reduces flood risk, and improves water quality and biodiversity.

The Council would like to encourage use of SUDS, rather than piped drainage, and require that they show benefit to flood risk management, water quality, amenity and biodiversity.

Our recommendations

The Council should introduce a strategic policy that encourages delivery of sustainable drainage systems rather than drainage through a pipe (Option 1)

Sustainable Drainage Schemes should benefit all 4 of the areas.

Observations: In some situations, it may be useful to consider balancing ponds, where drained water flows into a pond that is then drained slowly. This also helps to store rainwater, and provides ponds or lake environments for wildlife as well as recreational use.

11h Porous Paving and Loss of Front Gardens

Key issue: Paving over front gardens, which worsens flooding.

Paving over front gardens means water can't soak into the ground during heavy rainfall, so the water runs into storm drains and rivers more quickly, raising river levels.

Householders have Permitted Development rights to put in a driveway or similar, but porous materials should be used so that water can still soak into the ground. Because of this, the Council's powers are limited, but there is guidance.

The Council would like to introduce a new policy to maximise urban drainage. Where larger changes happen that require planning permission, the Council wants to only permit parking on front gardens if at least 50% of the area is soft landscaping.

Our recommendations

The Council should introduce a policy to maximise natural drainage in urban areas (Option 1)

Explanation: We would also like to see Permitted Development rights limited for new developments to ensure open areas needed for flood risk management are retained.

Opinions on front gardens being paved: Front gardens being paved over increases rates of water runoff, which can worsen flooding by directing more rainwater directly into rivers rather than running slowly through the ground. This should be discouraged.

11j Culverts

Key issue: Whether culverted rivers should be opened up.

Several rivers and streams in Leeds are culverted, meaning they run in underground channels. These can cause problems with flooding due to blockages in the channels and, if opened up, can support wildlife that lives near rivers.

The Council would like to introduce a policy to not build over culverts, so that they can be opened up in the future. This has been done in some areas around Sheepscar.

Our recommendations

The Council should ensure that culverts are not permitted as part of new development and where there are existing culverts they should not have buildings on top of them (Option 1)

Should The Leeds Local Plan should permit any more culverting of watercourses: No

Should The Leeds Local Plan prevent development on top of culverts: Yes

Should The Leeds Local Plan should encourage existing culverts to be opened up: Yes

12 The Environment

12a Protecting and Enhancing Green and Blue Infrastructure

Key issue: Updating the city's policies to recognise the value of green and blue (water) infrastructure.

The Council would like to update the city's policies on green and blue infrastructure for wellbeing, nature and sustainability, and provide statutory protection for green and blue infrastructure, connect it together, and enhance it.

Our recommendations

The Council should update policies to ensure protection and deliver new and improved infrastructure (Option 1)

The Local Plan should deliver all of the achievements listed.

12b Green Space Standards

Key issues: Ensuring good access to green spaces for residents, and protecting green space.

The Council would like to conduct a review of green spaces, looking at the importance of green spaces of various types and how accessible they are to people.

Our recommendations

The Council should carry out a review of green spaces (Option 1)

Explanation: The review should look at a hierarchy of different types of green space, from local playgrounds and pocket parks up to more regional scale parks and woodlands.

Issues with access, quality and maintenance: Access, quality and maintenance of green spaces should include "no-mow" policies for many grassed areas to encourage biodiversity.

Issues in the city centre: The city centre needs an approach to connecting green spaces and tree-lined streets to create biodiversity corridors.

12c Biodiversity Net Gain

Key issue: Improving biodiversity in developments.

There is a legal requirement that new developments should result in a minimum of 10% gain in biodiversity (Biodiversity Net Gain or BNG).

The Council are not looking to apply a higher target, though that is one of the options listed, but they are proposing to identify priority locations for off-site BNG and require details of long term monitoring, maintenance and management.

BNG is a legal requirement, so the Council are also asking what should be specifically required by the Council.

Our recommendations

The Council should create a new policy on BNG that sets out how the requirements of the Environment Act and the accompanying regulation and guidance will be applied in Leeds (Option 1)

What should the Leeds Local Plan cover: It should cover any target species and a requirement to connect habitat sites to the Leeds Habitat Network.

12d Habitats and Species

Key issue: The protection of habitats and species in Leeds.

The Council are proposing to give the Leeds Habitat Network more recognition and protection, and for new developments to enhance the network (as referred to in the previous section). Key elements will be to encourage or require the provision of swift boxes and bat boxes in new developments. This can have its own issues if not designed properly - swift and bat boxes should not be installed in ways that worsen the insulation in houses.

The Council would also like to prevent development that harms important nature sites.

Our recommendations

The Council should create a policy that contains up to date terms and will better protect, increase and improve nature and wildlife in Leeds (Option 1)

Important issues to address: An important issue is connecting habitats, and ensuring there is a connected green and blue network in the city. Swift and bat boxes will also need to be provided in ways which are not detrimental to the insulation performance of buildings.

12e Trees and Woodland

Key issue: Protection of trees and replacement of felled trees.

The Council would like to protect important existing trees and hedgerows, especially Ancient Woodland, Ancient Trees and Veteran Trees (for which new development would have to leave a buffer of up to 50 metres).

The Council would also like to replace the current 3 for 1 replacement ratio, as evidence suggests that replacing mature trees with smaller new ones will require a lot more trees in order to match the amount of carbon dioxide the old trees absorb from the atmosphere.

There is support for planting street trees, and both on-site (of the development) and off-site planting as part of the White Rose Forest.

Our recommendations

The Council should create policies that recognise the importance of trees and hedgerows in storing carbon (Option 1)

Important issues to address: tree planting should contribute to a connected habitat network, and also that planting fruit and nut trees as street trees can contribute to food system resilience (see below), but only if there are ways for the trees to be harvested, such as by supporting Leeds Urban Harvest, Fruit Works or an equivalent project.

12f Cemeteries and Crematoriums

Key issue: Ensuring there is sufficient burial and cremation capacity in the city.

The Council considers that there is sufficient cremation capacity in the city until at least 2042, but that there is likely to be a need for additional burial sites. They are proposing not to have a specific policy on the provision of new cemetery or crematorium capacity in the Local Plan.

The Council currently set criteria for new burial and cremation sites to be accessible without a car, accessible by disabled people, to not harm the character of the surrounding area and to be scaled appropriately.

Our recommendations

The Council should continue to have a criteria-based policy (Option 2)

Explanation: A criteria-based policy should be retained for allocating the new or extended burial sites that will be required by 2042.

12h Food System Resilience

Key issue: Protecting land for local food growing.

The Council would like to support local food growing and encourage community gardens and allotments, and protect existing locations for food growing in the urban area. This is following the Leeds Food Strategy, which was developed with Climate Action Leeds' Food Transition Partner.

The Site Allocation Plan includes possible allocations of community orchard and allotment sites for development, so it is critical those sites have protection so they are not lost.

Our recommendations

The Council should prepare planning policy which places weight and support for local food growing, urban agriculture and local food supply chains (Option 1)

Explanation: There are local food sites which require protection from development, the Site Allocation Plan should not include any existing food growing site as a proposed development site unless it can be replaced close to its existing location.

13 Supporting the Delivery of the Plan

13a Approach to Allocations

The Council has allocated a number of sites for potential development in its Site Allocation Plan (SAP). They would like to know how they should be allocated.

The preferred approach is to allocate specific, deliverable sites in the SAP to meet at least the next 5 years of development, identify broad locations for growth (South Leeds, West Leeds and the City Centre), and allowing for "windfall" development, which is when an unallocated site comes forward for development.

The Council has stated that there has been a fairly reliable stream of windfall sites in the past, though there is no guarantee that will continue. Relying on windfall sites means less of a strategic approach to where development happens.

The aim is to prioritise the most sustainable sites, the ones that best help achieve the overall goals of the Local Plan, and prioritising the use of brownfield (previously developed land), as well as environmental impact and flood risk.

We believe that a more strategic approach is required to sites, given the aim to increase Leeds' housing stock by nearly 20%. This should include consideration of a large greenfield site, possibly by reallocation of Green Belt, to deliver a large-scale Sustainable Urban Extension.

Our recommendations

The Council should allocate specific, deliverable sites, allocate more deliverable sites and identify broad locations for growth (Option 1)

Explanation: We do not believe that a reliance on windfall sites is a good idea, and that these should be additional to the plan, to ensure development can still occur if windfall sites do not become available.

Instead of allocations of smaller sites across the city, we favour the development of a Sustainable Urban Extension large enough to provide services and facilities, with a good public transport connection to Leeds. This could justify use of Green Belt land to help preserve green spaces within the built up area.

Observations about how the Local Plan identifies land to 2042: There are too many sites allocated which function as green, amenity or food growing space, and these should be protected rather than allocated for potential development.

Our views on the approach to mixed use sites are that there should be an expectation for a development to provide a mix of uses, to meet the needs of its residents and to make a contribution to making the locality a Compact, Complete and Connected Place. Having a range rather than a set proportion means developments can be judged more on the needs of their location than having to meet criteria that don't relate to where they are.

Conclusion

The proposals for the Local Plan are mostly positive, but there are a number of areas in which the Council's proposed solution could be potentially damaging environmentally or socially.

Your help will be appreciated in helping to make sure Leeds' Local Plan can be the best it can be for addressing the Climate Emergency while meeting the development and other pressures facing the city.

Please visit <https://leedslocalplan.commonplace.is/> to fill in the consultation form online.

Thank you,

Anzir Boodoo, City Plan Lead, Climate Action Leeds

On behalf of the Climate Action Leeds City Movement Building Team