

Responding to Leeds City Council's 'Local Plan'...

Contents

Introduction	4
What's at stake?	4
Our response	4
About us	5
Topic 1: Carbon Reduction	6
Overview	6
Whole life cycle carbon emission	6
Operational energy carbon reduction	7
Sustainable construction	8
Resilience to heat	9
Renewable energy generation	10
Heat networks	11
Energy storage and distribution	12
Topic 2: Flood Risk	13
Overview	13
Avoiding development in flood-risk areas	13
Functional floodplain	14
Surface water flooding and sustainable drainage	14
Resilience	15
Permitted development rights and porous paving	16
Topic 3: Green Infrastructure	17
· Overview	17
Identification, protection, enhancement and extension of	
green infrastructure	17
Trees	18
Green space	19
Nature conservation	19
Biodiversity	20
Local food production	20
Topic 4: Place-making	23
Overview	23

Strategic place making
High quality, resilient and healthy places
Topic 5: Sustainable Infrastructure
Overview
Leeds Station and HS2
Mass transit
Leeds Bradford Airport
Digital connectivity
Comments

Introduction

The Leeds Local Plan lays out the criteria used in approving or rejecting planning applications, and ultimately guides development in Leeds. Recently, Leeds City Council published their consultation document for an update to the Local Plan, entitled 'Your Neighbourhood, Your City, Your Planet'. This update is designed to help the Council in delivering on its commitments to addressing the climate emergency.

What's at stake?

The new Local Plan will shape our city over the next twenty years - encompassing the crucial period from now to 2030, when we need to get to zero carbon - so it is vital that the climate emergency is central to any update.

What's more, the climate crisis means every decision is environmental especially those regarding energy, water, buildings, and transport, which impact on every aspect of the city, including across leisure, work, retail, food and education. These topics should not be seen in isolation, but require complex, interconnected and transformative interventions across the planning, infrastructure, politics, culture, and economy of Leeds over the next generation.

We are in a climate and nature emergency. The rate of change is accelerating and, in some aspects, is worse than the worst case predictions. We need full disclosure of the climate facts to the population of Leeds followed by real participatory democracy to properly address the challenge.

As set out in the Århus Convention, in environmental matters, government at all levels has a duty to inform the public, to involve them in decisionmaking, and to ensure access to environmental justice. Therefore, Local Plan policies must ensure that citizens' rights, in respect to the convention, are not only upheld, but proactively facilitated so that they are fully engaged in environmental decision making. This is paramount to creating a zero carbon, nature friendly and socially just Leeds.

Our response

We present this response to city leaders with the aim of highlighting the immediate need to act to ensure Leeds becomes zero-carbon by the 2030s.

We strongly support the Local Plan Update's focus on the climate emergency, but believe the ambition must be raised to deal with the challenges ahead.

Below, we provide our thoughts on the important consultation questions for each of the five main topics of the Local Plan Update (Carbon Reduction, Flood Risk, Green Infrastructure, Placemaking, Sustainable Infrastructure) with the intention of supporting Leeds in responding to these urgent issues in a manner that reflects the severity of the climate emergency.

About us

Our Future Leeds is a people-led organisation - we connect, support and empower individuals, groups and communities across Leeds to take meaningful action in addressing the climate and ecological emergencies.

We are a response to the failure of the political system to address these issues, as well as the social injustice, poverty, and the exclusion of ethnically and socially marginalised communities, that are exacerbated by the climate crisis.

We believe everyone should have a voice in directing the changes necessary to achieve a zero carbon, nature friendly and socially just Leeds.

Topic 1: Carbon Reduction

Overview

Given the severity of the Climate Emergency it is essential Leeds becomes zero-carbon in the immediate future. To achieve this, changes must be made to the way buildings are constructed and renewable energy generated. Our Future Leeds believes the ambitions laid out within *Carbon Reduction* should be raised.

We believe all new developments should be zero- or negative-carbon across their whole life cycle, meet the most stringent energy efficiency standards to reduce energy demands, and be resilient to the impacts of a hotter climate. Moreover, Leeds should go beyond zero-carbon, and that by 2050 the city generates all its energy needs from within the municipal boundaries using community-owned renewable technologies.

Whole life cycle carbon emission

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

Yes. This is essential. It must apply especially to the material, operational and end-of-life phases. Moreover, given the severe nature of the climate emergency, developments must be zero- or negative-carbon across their whole life cycle. This must be achieved using natural materials able to naturally sequester carbon, and zero-carbon materials.

The supply chain of these materials must also be localised to reduce carbon emissions from the development phase – this can be achieved through a more community-led housing approach, and support for approaches such as straw bale, roundwood construction, adobe/rammed earth construction, and use of hemp building products (boards and hempcrete).

Strenuous efforts must be taken to block attempts to 'offset' missed zero carbon targets. Schemes like carbon trading or tree planting do not equate to zero embodied carbon in construction procurement and operations. Carbon saved in another sphere of activity must not be regarded as a commodity which can be sold - all carbon reductions must have the planet as the sole beneficiary.

Finally, prior to the consideration of any new development, we believe retaining potential existing buildings and/or structures on site should always be considered first. This is particularly in terms of the embodied carbon already present, and the social and historical value they hold within a community. This can encourage existing built structures to be valued beyond 'operational energy' alone.

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

The carbon emissions from all developments must be assessed and then approved or rejected against the city carbon budget. As noted elsewhere most new-build houses in recent years have been EPC A or B rated. To make a significant improvement requires life-cycle carbon reduction targets. To reduce the risk of catastrophic climate breakdown the radical reductions in carbon emissions must start at once.

Operational energy carbon reduction

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

Yes. Given the drastic nature of the climate emergency and the carbon reductions needed, the operational phase will require new development to achieve net zero and, where possible, net negative emission features. For example, they should use natural, carbon sequestering materials and have capacity to produce renewable energy which exceeds requirements of the development/buildings.

However, whilst we fully support the whole life cycle and operational carbon reduction of new development, the main thing missing is retrofit for existing homes. We appreciate this has typically been outside of the remit of the Planning System, but we believe the scale of the climate emergency challenge requires us to consider all possible avenues for action.

ONS projections suggest that homes built between now and 2030 will account for just 5% of the housing stock at best. Moreover, 84% of new homes in England built last year already had an Energy-Efficiency Ratio (EER) of A or B. Enhancing the standards required for new build will only have a marginal impact when compared to a retrofit programme that could focus on existing homes with an EER lower than C.

By focusing on new developments, we will miss 95% of the housing stock - dwellings we will still be occupying in ten years' time, many of which are poorly insulated, draughty and tenanted by people who can ill afford to heat them.

Retrofitting poorly insulated properties through a Better Homes Programme should be a priority if the city wishes to be zero carbon by 2030. There is a clear link between this work and the eradication of Fuel Poverty. Nationally this has been assessed as 13% of the UK population. This can also deliver significant cost savings for the NHS, estimated at £0.42 for every £1 spent.

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

Developments must be required to meet the most stringent energy efficient standards, therefore reducing energy demands to a minimum. This low energy demand can then be completely provided by on-site renewable energy production. High energy efficiency standards, like Passivhaus, can be used to support this.

Moreover, given the scale of the climate emergency, developers should be required to install renewable capacity, which will generate more than the development will consume. The local renewable capacity must also be under community ownership, which will provide further co-benefits.

Sustainable construction

Do you think that Leeds should set a standard for sustainable construction of new residential development? If so, do you think we should use one of the established sustainable construction rating systems such as BREEAM Residential or create our own set of standards?

Yes. We think Leeds should develop its own standard for sustainable construction which delivers negative carbon emissions across the whole life cycle of a development, including the design, materials, construction, operational, and end-of-life phases. This policy should be holistic and sit within wider policies for landscaping, water management and social integration. Exeter Council have developed useful policies that we can further develop which have led to over 100 Council-developed Passivhaus social houses. The architects, Gale and Snowden, are permaculture trained and have incorporated important landscaping features This integrated approach is a model for development that meets carbon, biodiversity and social needs.

New standards like the Living Building Challenge (LBC 4.0) standard and Passivhaus standard can be used here to enable Leeds to create its own set of standards which surpass existing requirements.

Resilience to heat

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

Yes. All homes must include full adaptation measures. We are destined for a hotter climate, so for the health and safety of residents, buildings must be constructed to come in line with temperature increase predictions for mid-century.

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

Leeds can ensure homes are more resilient to overheating using key measures including:

- Appropriate shading (including increased tree canopy cover)
- Appropriate window glazing and shutters
- Passive cooling
- Appropriate natural materials which offer heating and cooling effects
- Brise soleil (sun canopy) to manage passive solar gain
- Reduced use of tarmac and other impermeable surfaces

Whilst not within the scope of the Local Plan, it is important to note that there are many strategies that can and need to be adopted within existing homes. This will require public education campaigns, including through public health, in advance of heatwaves.

All householders, new and existing, need to be given information about how they can keep their houses warm with less energy, and cool during heatwaves, using simple and affordable measures. Measures to address resilience to heat should not include air conditioning.

Renewable energy generation

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

Yes. In the context of the climate emergency, Leeds should take inspiration from cities such as Vancouver, which have already committed to generating 100% of their energy from renewable sources by 2050; Växjö, which is already close to zero carbon, and is aiming to be 100% renewable for power, energy, heating and cooling by 2030; and Copenhagen, which is seeking to be carbon neutral by 2025. We believe Leeds should seek to generate all city energy needs from renewable sources by 2030 and from within the municipal boundary by 2050.

Emphasis should also be on municipal/local energy utilities. The municipal owned energy of the Stadtwerke Model in Germany is a good example, with the Stadtwerke Müchen GmbH, in particular, aiming to meet Munich's energy demands from renewables by 2025.

This work only makes sense within the context of concerted efforts to reduce energy demand, which will make the goal of energy self-sufficiency much easier to achieve. The Climate Commission has set out comprehensive proposals for how Leeds could increase local energy production, and reduce energy demand, and these recommendations could be incorporated within updated planning policy and guidance.

Do you have any views about where facilities for local renewable energy generation, such as wind and solar farms, should be located?

Local renewable energy generation should be located on land that cannot be used for anything else (if agricultural, grades 4 or 5). For Solar PV we suggest using the existing urban form, such as every available rooftop. The more local the usage of the electricity the less demand there is on the existing infrastructure to redistribute it. There would also be fewer losses from the transmission cables.

For mass wind generation, Leeds' large hinterland of remote or less developed parts is suitable. However, this must not be at the expense of important land for rewilding and food production, indeed, this can often be combined. An ideal place for renewable energy generation is brownfield land such as would be available at a repurposed Leeds & Bradford Airport. It may also be possible to place wind turbines in wide spaces at motorway and dual carriageway junctions, on motorway reservations and beside motorways, as is common in Europe.

Agroforestry, silvopasture, hedges and increased coppice planting and management can provide multiple agricultural and biodiversity benefits, and significant (and genuinely sustainable) forms of biomass production for heat and electricity, ideally through pyrolysis, with additional benefits of the production of biochar, which can be added to soil to sequester carbon and increase its water holding capacity (thus reducing flood risk).

Anaerobic Digestion (AD) from food waste and other organic matter should be part of the renewable energy mix adopted by Leeds. Yorkshire Water have successfully run AD plants at their sewage works for many years and Plan to increase the amount of electricity they produce for their own use. The AD Trade Association has suggested that some 20% of the UK gas demand could be generated from the 100 million tonnes of food waste the UK creates.

An integrated landscape management plan/permaculture-style design is required to optimise the Leeds landscape for energy production (wind, solar, biomass), water management and biodiversity benefits.

Heat networks

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

Leeds must move away from the use of burning waste for energy.

New developments should be developed to a standard where they do not need a heat network connection. However, the heat network is ideal for retrofitting properties that cannot be brought up to a sufficient low-energy standard, given that carbon from the heat network is sequestered.

We support the existence of a heat network but the challenge over the next decade is to ensure heat is generated from renewable sources and not energy from waste. Therefore, renewable heat networks should be prioritised for existing buildings and go alongside other retrofitting initiatives, but not be offered to new developments, which should be designed to a high energy efficiency standard.

Energy storage and distribution

Do you think that a new policy is required to guide the location of energy storage proposals, including electricity and hydrogen?

Yes. However, we do not think Leeds should be following a hydrogen policy for home heating because it cannot be generated in a zero-carbon way at the scale required. Hydrogen may have a role in balancing the grid - however, if hydrogen is to be used, it must be green hydrogen generated from renewable sources.

We agree with the need for a new policy on electricity storage which focuses on local smart grids. A new policy is needed to enable the balancing of energy supply with demand within the boundaries of Leeds.

The Climate Commission proposes that industry moves towards the use of compressed air for many of its operations (an old technology that was widespread in many places, including Leeds Polytechnic!). Compressed air is a significant form of energy storage that is being heavily researched, so should be considered within the new policy.

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

The target should be set to deliver an amount of storage which enables Leeds to balance energy consumption and generation within Leeds' municipal boundaries. In addition, home energy (electrical and thermal) storage should be maximised wherever possible through domestic scale batteries.

Again, energy storage requirements will be much easier to meet, once energy demand has been reduced, so this continues to be a vitally important task.

Topic 2: Flood Risk

Overview

Flooding is a primary example of how Leeds is being directly impacted by climate change, with flooding incidents increasing in both severity and number as local rainfall continues to increase. We believe, therefore, that the Local Plan Update must go further in its policies to protect residents against flooding.

The Local Plan Update should introduce policy which prohibits any development in flood risk areas, and prioritises the incorporation of natural flood management in these areas. New development should also be required to be developed with natural flood-reducing approaches.

In addition, the Local Plan Update should set new standards ensuring developments keep residents safe through resilience to the impending increase in flooding.

Avoiding development in flood-risk areas

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

Yes. An approach to development in flood risk areas is absolutely essential in the Local Plan update. Not only should there be zero development in flood risk areas, a priority must be for appropriately designed and managed farming systems which can reduce flood risk through good soil management, and alleviate flooding through water holding at times of high water. Other natural flood management (NFM) approaches should be incorporated into these areas and further upstream (see the latest work on Natural Flood Management by University of Reading).

All developments must be developed with natural flood-reducing approaches, such as tree planting, swales, Sustainable Urban Drainage, and permeable materials to manage the flood risk across the city of Leeds. Again, NFM solutions (including the planting of trees, hedges and shelterbelts) should be used across the Aire Valley, and access and amenity value should be enhanced wherever possible.

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

Currently the balance is incorrect. High flood risk areas should be subject to natural flood management techniques, sustainable agriculture and rewilding, which will not only naturally sequester carbon, but will also provide essential access to the city's green spaces. We must stress that defensive and containment strategies, whilst necessary, are not adequate management techniques on their own and need to be complemented by 'soft engineering' of landscape development, soil enhancement and the restriction of uses within high risk flood areas.

Functional floodplain

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

Yes. Flood risk will increase dramatically and we now need to plan for higher levels of flooding than we are currently seeing. Nature-based solutions should be adopted wherever possible.

Surface water flooding and sustainable drainage

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

Yes. All external surfaces at new developments must be permeable and all new developments over 5 units should include a natural SuDS system to harvest and collect rainwater.

Do you agree with our suggested approach to increasing the use of sustainable drainage systems in new development?

Yes. We agree that these systems should be used in new developments. A range of blue-green infrastructure techniques should be used including rain gardens, swales, permeable paving, rainwater collection, green space, tree cover and wildlife ponds.

However, we should go beyond the merely technical approach. Leeds should be aiming to become a water-friendly city that seeks to hold as much water within its boundaries (in soil, ponds, reservoirs, plants and city fabric.) We are inspired by the Regnlekplatsen (rain playground) in Gothenburg, which uses rain to create exciting play spaces for children! They are working to become "the best city in the world when it's raining" - something we could learn much from.

Other inspiration and serious research comes from the Sponge City work, which has transformed nearly 200 Chinese cities to date. This is now being adopted by Berlin.

Water retention is also a mechanism to increase cooling during summer months, as evaporation cools the air. An integrated water strategy and policy for Leeds could have many benefits.

Do you think identifying and implementing additional measures at source locations would be an appropriate approach to managing surface water run off?

Yes. A priority must be to implement additional measures to stop loss of permeable gardens and drives, and to prohibit the use of tarmac and other non-permeable surfaces.

The greatest source location for water run-off is poorly managed agricultural land. Leeds could drastically reduce flood risk through enhanced soil management practices/agroecological practices, and simultaneously increase carbon sequestration and secure future food production capacity. Another reason for proactive engagement with farmers and land managers working within the Leeds boundary.

Resilience

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

Given the dramatic increase in flooding, we are likely to see that new standards for flood resilient housing are going to be essential for keeping Leeds' residents safe. Measures need to include quality of build (walls, roof, windows and doors), as well as features to protect and defend ground floor dwellings.

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

Vulnerable people should not be located in areas which will subject them to further vulnerabilities. At the heart of the local plan should be social justice where the needs of vulnerable groups are prioritised.

Permitted development rights and porous paving

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

We suggest a Local Plan Update that does not offer any development rights for new development in areas of flood risk. Instead, inner city and suburban areas need to be further densified, especially looking at creative re-use of shops and offices that are no longer required post-COVID.

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

Evidence suggests that the loss of soft and natural landscaping in existing households is a major contributor to increased urban flood risk. Therefore, we need stringent new measures to prohibit their loss, in addition to enhanced guidance for householders.

Topic 3: Green Infrastructure

Overview

Green Infrastructure (GI) plays an important role in carbon sequestration, water storage and biodiversity, and will aid Leeds in reaching its zero-carbon ambition. Leeds should ensure its green spaces and natural environment are fully utilised to meet this ambition, as well as to improve the health and well-being of all citizens.

We believe the Local Plan Update should require all new developments to provide enhanced Green Space, with the introduction of higher requirements for tree canopy cover with an obligation to preserve trees over their lifetime. New developments should also be obligated to contain food production opportunities, as local food production becomes more essential in a hotter climate. The planning process must also necessitate the reallocation of existing land currently given over to city parking, road network, and the oversupply of high-cost housing, to green space.

To finance these changes the Local Plan Update may introduce a Section 106-style fund which all new developments contribute to.

Identification, protection, enhancement and extension of green infrastructure

Do you agree that enhanced policy for the protection, improvement and enhancement of green infrastructure should be included in the Local Plan Update?

Yes. The Local Plan Update must include the most ambitious policies for green infrastructure. These should include:

- A nature recovery plan to connect and extend all existing green spaces
- The reallocation of road space and its conversion into green infrastructure and new cycling lanes
- A forestry policy to support further mass tree planting in areas acceptable to local community needs with community consultation and engagement playing an important role in site selection and delivery (this should be used to accelerate work on the White Rose Forest)
- Planning policy and guidance to support the accelerated use of green roofs and walls on existing and new developments

- Identifying areas for rewilding and carbon sequestration through reallocating unproductive and marginal lands
- The rapid roll-out of urban community gardens
- Engagement with farmers to increase soil health, and develop silvopasture, agroforestry and other agroecological and tree-based systems (which have huge potential for sequestration and biodiversity enhancement)

Do you think the Green Space protection Policy (G6) should be extended to all Green Infrastructure?

Yes, as a minimum. However, new developments must provide additional and enhanced Green Space.

Trees

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

All existing trees must be protected and preserved rather than just relying on the existing 3-to-1 replacement strategy. Existing planting regimes of small tree whips are currently not proving effective in increasing the city's tree stock in the timescales needed given the severity of the climate emergency.

All retail, housing and business developments need to comply with much higher requirements for tree canopy cover with requirements to preserve the trees over their lifetime. In addition, zones for the natural regeneration of trees should be designated.

Planning Guidance should be provided to community-led and commercial developers to show the many ways that trees can be incorporated into new sites, from street trees, to orchards, forest garden plantings and hedges. Careful consideration must be given to enhancing biodiversity and the use of native species wherever possible.

Again, Leeds has a huge amount of agricultural land, and whilst every effort must be made to increase urban planting, innovative ways also need to be found to engage agricultural holdings through the planning system.

Tree planting should also be considered along existing streets where they can improve local amenity, increase heat resilience and act as traffic calming

measures.

Green space

Do you agree that the Local Plan Update should consider new policies to enhance green space provision within the City Centre? If yes, how should policies best achieve this?

It is essential that the Local Plan Update introduces new policies to increase City Centre green space, in particular a major new city centre urban park needs to be implemented with connectors to existing green spaces outside the city centre. This would require a major reallocation of existing city centre land currently given over to car parking, road network, and the oversupply of high-cost housing and business uses. For example, major developments such as South Bank and the Eastgate Quarter (formerly known as Victoria Gate Phase 2) need to be urgently reprioritised as green spaces. This would not only combat the urban heat island effect but also provide public access to green space, help with carbon reduction, and contribute to improved public health.

New green space provision can be financed through Section 106 / Community Infrastructure Levy arrangements.

Nature conservation

Do you agree that the Local Plan Update should consider a revised policy for the protection of nature conservation designated sites and species? If so, what would you like to see a revised policy contain?

This policy must protect and enhance nature and biodiversity within the city boundaries. This policy needs to be based on an approach which measures the stock of biodiversity with the aim of increasing it. A number of Leeds parks should be redesignated as nature conservation spaces (at least compartments within the parks) and their use changed accordingly. In particular, the council should move to a policy of rewilding roadside verges and small green neighbourhood areas, converting them into meadow plans where possible.

Biodiversity

Do you agree that the Council should revise its policy on biodiversity and biodiversity net gain, linking to the Leeds Habitat Network? If so, what would you like updated policy(s) to contain?

All new developments need to be able to demonstrate a genuine and realistic plan for net biodiversity gain, and how they would contribute and connect to a Leeds Habitat Network. In particular, the Local Plan Update needs to commit to connected biodiversity corridors throughout the metropolitan area.

Net biodiversity gain is controversial with many researchers providing clear evidence that replacing old or very well established planting/woodland/meadow, with new green space and some saplings is not true net gain, but actually net loss of established habitats. The policy should have a presumption against the destruction of any established habitats, confining new development to brownfield sites and low grade agricultural land.

Local food production

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

Yes. Local food production is going to become ever more essential in a disrupted and unpredictable climate. As detailed by the latest IPCC report, we can expect periods of flood, drought, heatwave, intense frosts, large and devastating hail storms and strong winds to affect UK food production as well as major supply chain problems due to the temporary disruption or complete collapse of key food production zones around the world. As the climate rapidly changes, local food production needs to be urgently prioritised in the Local Plan Update. Indeed Leeds needs to put resilient food production as a key emergency preparedness priority.

Do you think all new housing should deliver such opportunities or do you think they should be more strategically focussed?

All new housing developments should contain on-site food production opportunities for residents; preferably through designated on-site allotments and rooftop gardens. In addition, strategically focused food production areas should be enhanced through the planning system by redesignating currently underutilised land for new growing and allotment sites. This may include the mass reallocation of car parking spaces in major retailing sites.

Home and community food production will help, and should be greatly encouraged, however, it will not be a replacement for a substantial increase in local food production at a smallholding and farm scale. Therefore new housing and other developments should deliver food production opportunities, and we also need a strategically focussed agricultural policy for Leeds as a whole.

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

The council can support the development of new community supported agriculture schemes (CSA) which connect food growers to consumers. In addition, rooftop gardens, edible landscaping and micro-farms should be promoted through the planning system as a way to increase local food production.

The 'Space Left Over After Planning' (SLOAP) runs to many thousands of square metres within the city, and policy to ensure that this land is either planted with low maintenance edible forest garden style plantings, or made available for local community growing, could open up many new opportunities for local residents. Incredible Edible groups are an excellent example of utilising the existing urban landscape for growing food and fostering community.

There is a need and opportunity for the council to also support the development of new council owned tenanted farms and smallholdings, or to support similar developments by groups such as the Ecological Land Cooperative. Key to the success of small mixed farms is access to affordable housing at or very close to the farm holding. New council owned tenanted farms, with tied agricultural dwellings, or similar setups managed by not-for-profit local cooperatives are needed in order to expand local fruit and vegetable production.

This has been enormously difficult to achieve nationally, as the presumption is always against development that is not close to other dwellings. However, there are enough successful examples, for example from the Welsh Government's One Planet Development policy (adopted since 2011) to show that this is a viable and sustainable way to support new agricultural enterprises that increase the provision of local food, create jobs, enhance biodiversity, and make land available to less financially wealthy citizens.

If more land is needed for local food production, which it is, then new tied agricultural dwellings should also be permitted within existing farm complexes, allowing additional workers to be housed and new food enterprises to form that help to diversify food production (particularly fruit and vegetables), and increasing the proportion of food that is grown in Leeds is also consumed in Leeds. With many farm workers reaching retirement in the next ten or so years, it is essential that we support succession planning and routes for new entrants into farming.

Updates to Local Plan policies and site allocations, could allow for a major expansion of local food production within peri-urban and rural sites around Leeds, increasing food resilience and providing a wealth of biodiversity and new livelihoods.

Topic 4: Place-making

Overview

Placemaking is key to guiding Leeds to become a zero carbon, socially just, nature friendly city, as it ensures development is only in the most appropriate and sustainable locations, creating neighbourhoods that are accessible to all. Moreover, placemaking can aid the development of close-knit communities which will only become more important as the climate inevitably changes.

We believe that Local Plan Update should introduce policies which prioritise community wealth building, living within our planetary boundaries, and responding to the climate emergency in a socially-just way.

20-minute neighbourhoods must become a planning priority, with a reorientation towards Leeds becoming a zero-car city as developers are required to fund an enhanced active travel network.

Strategic place making

Does Leeds need a local policy definition of sustainability?

Yes, it does, and this needs to incorporate additional elements building on the original Brundtland Definition. We suggest there is a particular focus around shifting towards a local economy where growth is deprioritised, and community wealth building becomes the focus, alongside living within the planetary boundaries, as proposed by models such as the Doughnut Economy Framework.

A further priority must also be responding to the climate emergency and rapid carbon reduction in a socially just way by prioritising the needs of those most at risk of climate impacts.

Whilst updated technical definitions are helpful, it is also helpful to create a popular narrative, easily remembered that many groups can get behind. We would suggest that the goal of the Climate Action Leeds project of a 'Zero Carbon, Nature Friendly, Socially Just Leeds by the 2030s' could be a useful collective goal.

Any updated definitions must include references to the UN Sustainable Development Goals, and reflect the urgency of change as exemplified by the UN IPCC's latest report, which makes clear that rapid and radical changes are needed, now.

What does a '20-minute neighbourhood' mean to you?

A '20-minute neighbourhood' is an area where residents can meet all their basic daily needs in terms of goods and services within a 20-minute walk.

Do you agree that Leeds should aim to create 20-minute neighbourhoods?

We strongly support the vision for Leeds to be "a city where you don't need a car", as set out in the draft <u>Connecting Leeds Transport Strategy</u> - and 20-minute neighbourhoods are a vital part of moving away from the need for private car ownership.

We want to see the introduction of 20-minute neighbourhoods, where local amenities are easily - and safely - accessible to all, with priority given to walking, cycling, and other vehicles for those with disabilities. This would drastically reduce the need to travel by car for most residents, significantly altering our current emissions-heavy commuter and rush-hour patterns.

Not only would 20-minute neighbourhoods allow us to tackle the climate emergency, improve air quality and reduce the numbers of deaths on our roads, they would also make our spaces more liveable, support healthy communities, and create sustainable local employment.

How might planning policy support living in a City where you do not need to own a car?

Planning policy must be fundamentally reoriented around the reallocation of road and car parking space. This means all new developments should be as near zero-car as possible. The city centre must be car free as soon as possible and no later than 2025, but with the exception of those with mobility needs.

Developers must be required to fund an enhanced active travel network as they provide alternative active travel infrastructure, including cycling facilities such as bicycle storage, and shower and changing facilities, rather than car parking spaces.

Developers must also contribute to a Section 106-style fund that will focus on active travel rather than car-based infrastructure. Please see the Our Future Leeds response to Leeds City Council's Connecting Leeds Transport Strategy for much more on this.

How would you prioritise the users of residential streets? (Pedestrians, cyclists, cars, buses)?

We need an urgent reallocation of road space away from cars and towards pedestrians and cyclists. All residential streets should only offer access to local traffic with filtered access for active travel users with non-local traffic on all residential streets across Leeds being prohibited.

In addition, a 20mph speed limit on all none A-roads should be introduced in the whole metropolitan area.

Should Leeds introduce a presumption against car dependent development - aiming to encourage independent mobility, by bike, public transport or on foot for all users?

Leeds should introduce a very strong presumption against all car dependent developments. This includes residential, commercial, and retail. This needs to be supported by a city-wide integrated and fully connected bike, public transport, and pedestrian infrastructure.

High quality, resilient and healthy places

The Council's well established and well used Neighbourhoods for Living and Building for Today Tomorrow Sustainable Construction Supplementary Planning guides can also be refreshed as part of the LPU. Should these (or alternative document/policy) introduce the need for a Sustainable Development Assessment/checklist to ensure consideration of health and well-being and climate change issues are fully addressed in all development proposals?

Yes. It is vital these documents are refreshed to take account of the climate and ecological emergency. A Sustainable Development Assessment/checklist will support developers to take appropriate action, and it is essential that this is enforced robustly.

Topic 5: Sustainable Infrastructure

Overview

In order for Leeds to become zero-carbon it must be able to provide sustainable transport opportunities that allow us to move away from the need for private car ownership.

The current Local Plan includes policies for airport growth, whilst the Local Plan Update is to introduce policies for HS2, Leeds Station and Mass Transit. However, we strongly believe that current policy attitudes towards airport growth must change, and proposed policies for HS2, Leeds Station and Mass Transit must be reconsidered.

It is paramount the Local Plan Update does not encourage expansion of Leeds Bradford Airport, and new climate-focused policies in relation to the airport must be included. There should be policies for managed passenger numbers reductions, and the reallocation of airport land to rewilding, carbon sequestration, and other sustainable uses.

The Local Plan Update should also have a new policy focus for Leeds Station - one that does not support regeneration of the South Bank or consider HS2. Instead, focus should be on Leeds Station becoming an integrated hub at the centre of a connected, sustainable mobility system that works for all, with land allocated to HS2 routes being immediately redesignated to affordable housing, rewilding, urban food growth and community enterprise.

In addition, the Local Plan Update must not prioritise Mass Transit, but rather focus on more flexible and affordable options - such as a free electric bus service - which offer immediate benefits to all.

Leeds Station and HS2

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

In the context of the uncertainty regarding the HS2 link to Leeds, a new policy should focus on Leeds Station as a centre for active travel. In addition, all land previously designated to the HS2 route should be redesignated to climate-positive and redistributive projects, including affordable housing, ecologically sensitive rewilding, urban food growing, and community enterprise, which will provide a much broader range of co-benefits for the city in the long run.

Implementation of a second local city station should be considered to increase the local rail network in the metropolitan area.

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

The vision for the Leeds Station area should be as an integrated hub at the centre of a connected, sustainable mobility system. This would bring together bus, rail, tram, bike and foot travel. In particular, a renewed bridleway network should be conceived across the metropolitan area, connecting the urban area with the large rural hinterland, especially to maximise leisure opportunities.

Mass transit

Do you agree that the Local Plan Update should include policy on Mass Transit?

Our view is that a Local Plan must prioritise more flexible and affordable options, especially a free electric bus service, which offers immediate benefits in the context of the climate emergency. While a Mass Transit System, which is sensitive to the needs of the local population and of existing green infrastructure, is a good idea in principle, it cannot offer the benefits needed in the timescales required.

Transport is also, and fundamentally, an issue of justice. Considerations of gender, ability, and discrimination in our neighbourhoods, recognises that simple but vital measures can make a huge difference to supporting people to give up their cars. These include: feeling safe at bus stops and on buses, dropped kerbs and pavements which are free from obstructions, and a transport network which is not solely focused on travel in and out of the centre. Therefore, the different demographic make-up of Leeds has to be approached with a range of solutions.

If so, what elements of the scheme would you like to see new planning policy focus on?

We would like to see the mass reallocation of the radial A-roads into the city centre towards more flexible and affordable transport options which are sensitive to the different demographic make-up of Leeds.

Leeds Bradford Airport

Do you agree that the Local Plan Update should contain new or updated policies for Leeds Bradford Airport?

Under no circumstances should the Local Plan Update encourage the expansion of Leeds Bradford Airport.

New climate-focused environmental policies in relation to LBA should be included in the updated Local Plan. The consultation document notes that the council's current policy was adopted in 2014. That is, it was adopted:

- before the 2015 Paris Agreement to cut global emissions to net zero by 2050
- before the 2016 special report by the Intergovernmental Panel on Climate Change (IPCC) highlighted the urgent need to halve global emissions by 2030 in order to reach net zero by 2050
- before the UK government's 2019 amendment of the Climate Change Act to require 100% emissions reduction by 2050 from 1990 levels
- before LCC's own declaration of a climate emergency in 2019 and commitment to make Leeds net zero by 2030
- before the UK Climate Change Committee's 2020 recommendation to immediately introduce measures to limit the growth of flying, includ-ing the prevention of airport expansions
- before the government's 2021 decision to include all UK aviation emissions from flights in UK carbon budgets
- before the IPCC's 2021 'code red' warning to humanity, which reiterated the urgent need to cut emissions by 45% by 2030 from 2010 levels.

These developments illustrate the need to update LCC's Local Plan with new climate-focused environmental policies in relation to LBA.

The consultation document claims: "The government's approach to climate emissions from flights is for action at a global level as the best means of securing reductions in carbon from flights. Indeed, the Climate Change Act (2008) does not include international aviation emissions in the carbon reduction target set by the act." However, we believe this is no longer correct as, in April 2021, the government announced the inclusion of UK international aviation emissions, alongside domestic aviation emissions, within UK carbon budgets. This means that the GHG emissions from all UK flights are now included within the UK's legally binding target to reach net zero by 2050. The government's Jet Zero draft strategy to make UK aviation net zero by 2050 acknowledges this fact and makes proposals (albeit not credible ones) as to how UK aviation can reach net zero by 2050 without being dependent on international climate policy decisions. This means LCC should now also accept its responsibility for the emissions from flights originating within its own boundaries.

The consultation document lists environmental issues that are relevant when "considering whether the policy should be within scope of the Local Plan update and what elements may be its focus." The single most important environmental impact (for which there are no feasible mitigation measures) is the climate damage caused by the GHG emissions from aircraft using LBA. As these emissions are now included in UK carbon budgets and part of UK emissions reduction policy, they cannot be excluded from this update.

The consultation document also lists strategic issues that are relevant to consider in relation to LBA. However, it omits the urgent need to facilitate the local economy's transition from high carbon to zero carbon jobs, and how this will affect LCC's policy towards LBA and its workers. These considerations must be included in the update.

National policy refers to the importance of achieving sustainable development in environmental, economic and social terms. Should changes be made to airport policies within the Local Plan Update to improve the balance between these three aspects of sustainability?

Yes. Over the next decade any approach to airport expansion will compromise all three aspects of sustainable development. It will do nothing to address the city's environmental, economic and social challenges. The only way the airport could contribute to achieving sustainable development is through a policy of managed passenger numbers reductions.

Over the longer term, the airport land should be reallocated to rewilding, carbon sequestration, local sustainable employment opportunities, renewable energy generation, and leisure.

If so, do you have any views on what new or updated policies should contain?

Any policy should be in line with the UK's legally binding commitment to achieve net zero by 2050, which includes GHG emissions from UK domestic and international flights.

Policies should seek to reduce GHGs from LBA's ground and air operations by 45% by 2030 (from 2010 levels), and by 100% by 2050 (from 1990 levels), with airport land being reallocated to rewilding, carbon sequestration, local sustainable employment opportunities (including a 'just transition' for workers in the aviation industry), renewable energy generation, and leisure.

Digital connectivity

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

Yes. All new housing should promote digital connectivity and the local plan update should promote an affordable city-owned digital infrastructure. This is especially important to provide citizens of Leeds with equal opportunities for work, leisure and communication.

Greater digital connectivity is also essential to meet the requirements of the changing nature of work, as has been seen during the COVID-19 pandemic, where a greater emphasis on home working has been adopted by many businesses.

However, digital connectivity must be considered as a key part of an integrated economic strategy, which focuses on localising work, leisure and retail, stimulating community economies through workspaces, and supporting city-centre businesses to relocate to district centres.

Please see the Our Future Leeds response to Leeds City Council's Connecting Leeds Transport Strategy for much more on our vision for an integrated economic strategy.

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

Yes. Policy should focus on ensuring equal access to the fastest digital connectivity speeds and eliminate competition between private providers.

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

Both. Digital connectivity for both residential and commercial developments should be considered as a key part of an integrated economic strategy, which focuses on localising work, leisure and retail, stimulating community economies through workspaces, and supporting city-centre businesses to relocate to district centres.

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

Yes. All developments must set out how they will deliver sustainable, affordable, and high speed digital connectivity for all residents.

Comments

Do you have any further comments, ideas or anything you consider we may have missed?

The topics covered in this consultation are all important and will make a useful contribution to re-orientating Leeds towards a zero carbon and nature enhanced Leeds.

However, given the scale and urgency of the emergency, we need to go beyond the usual process of planning. We know from the recent IPCC report that extreme weather is here to stay. We must act fast if we are to avoid future food riots, increasing food poverty, and deaths and exacerbated poor health from heatwaves in Leeds and around the world. To do this we need to bring citizens, community groups, civil society, business and academia into a process of pro-active planning, not just a response to market-led development.

For this reason, we urge the council to press for powers to support pro-active planning development of existing neighbourhoods, farmland, woodland and other land. We need a participatory process of co-production that can ensure that retrofit, low traffic neighbourhoods, local food production, biodiversity enhancements, and new housing where needed, can be delivered quickly and with the support of the Leeds community. It is uncharted territory, so its hard to know how to frame this, but it would essentially be a 'proactive participatory, community led development policy'.

Planning has a critical role to play in re-shaping Leeds, and we urge you to seek enhanced powers from Government that give you the tools to do the job.