



Local Plan Update

Leeds Local Plan

OVERALL CLIMATE CHANGE BACKGROUND PAPER

Development Plan Document

September 2022

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1 Introduction

- 1.1 In March 2019 Leeds City Council, like many other Local Government organisations across the world, declared a climate emergencyⁱ and committed to action to reduce carbon emissions, mitigate damage to the environment and help communities adapt to the effects of climate change.

2 Progress of Local Plan Update 1

- 2.1 One of the ways that the Council is delivering on its commitment to a climate emergency is by updating its Local Plan, because the land use planning system plays a critical role in mitigating and adapting to climate change. Specifically, it can shape places in ways that contribute to reductions in greenhouse gas emissions, it can minimise vulnerability and improve resilience; encourage the more prudent use of existing resources and support the move towards renewable and low carbon energy and associated infrastructure. To that end, Full Council in September 2019 approved that it would commit to updating its Local Plan to address the Council's climate emergency declaration.
- 2.2 A Climate Conversation was also launched in 2019 because of the declaration of the Climate Emergency and nearly 8,000 people responded to the Council with the overwhelming majority agreeing with the scientific consensus that the climate is changing due to human activity, that they are worried about it and that tackling the climate emergency, becoming a carbon-neutral city and protecting wildlife diversity should be priorities for the Council.
- 2.3 The majority of responses to the Climate Conversation also considered that more should be done around the following issues:
- transport, especially suggestions for a mass transit system;
 - building 'greener' developments, e.g. requiring stricter energy efficiency standards, the installation of renewables;
 - making it harder to develop on green field sites;
 - planting more trees.
- 2.4 Throughout 2020 the Council's Development Plan Panel (DPP) considered in more detail the possible scope of an update to the Local Plan¹ to address these sorts of issues. The views expressed by DPP (including at climate change policy workshops) made clear that the priority is to consolidate and move beyond existing local planning policies to help address climate change and increase resilience to its impacts, through the establishment of new policies and guidance which help address the climate emergency declaration.
- 2.5 Throughout these discussions it was noted that the Climate Emergency affects Leeds in a number of ways from the inner city and the City Centre to the outer areas, some of which are specific to the nature and character of Leeds and that the inner areas are especially vulnerable to the impacts of climate change. Leeds has to be ready to deal

¹ The Local Plan comprises the following documents: Core Strategy (2014), Core Strategy Selective Review (2019), Site Allocations Plan (2019), Aire Valley Leeds Area Action Plan (2017), Natural Resources and Waste Local Plan (2013), saved Policies of the Unitary Development Plan (2006)

with and adapt to a changing climate in the following ways:

- **Keeping within our carbon budget.** The climate emergency declaration sets the Council on a path of carbon accounting so that as a Metropolitan District Leeds is playing its responsible role in the UK and globally.
- **Building on good practice.** It is recognised that Leeds – as the second largest authority outside of London – is well placed to use the examples of good low carbon developments that are already being delivered to help generate new ways of thinking about development for all investors in the City. It is also recognised that many business are on that journey e.g. 60 of the UK's FTSE 100 companies have signed up to the United Nation's Race to Zero campaign – the largest ever global alliance committed to achieving net zero carbon emissions by 2050 at the latest². Because of Leeds' strong economic foundation at the heart of the City Region it is well placed to demonstrate how this can be achieved on the ground.
- **Learn from the 3 pillars approach of the Council.** The City Council's City Ambition is supported by 3 pillars: Net Zero, Health and Well-being and Inclusive Growth. The Council's proposed planning policies in the LPU reflect that "net gains" approach to development where economic growth must be achieved alongside wider societal and environmental benefits. In this regard the work of Nicholas Stern, the economist³ who advocates recovery and rebuilding in a way that creates sustained economic growth and transforms our economies while tackling the social and ecological stresses caused by our current economic models.
- **Preparing for heat waves and their impacts.** It is recognised that as a large urban area Leeds will experience an increase in temperature fluctuations. The health impacts of heatwaves can be significant, particularly for vulnerable people, when excess deaths can occur. Therefore it is crucial that we make places ready for extremes of temperature to ensure they are resilient. In Leeds the urban heat island effect will affect those who are most vulnerable, including the elderly, those with respiratory conditions and those in built up high density areas, particularly those with little shade.
- **The inner areas are less resilient than the outer areas.** As a result of work of the University of Leeds and their climate vulnerability tool, it is understood that lack of green spaces, relative deprivation, health indicators and location in general make the inner areas of Leeds more vulnerable to higher summer temperatures and wetter winters
- **Planning for flood risk.** Leeds with its two main rivers and many smaller tributaries is well aware of the issues that flooding brings e.g. the damage caused by Storm Eva in 2015, will increase as the global and local climate changes.
- **Protecting our infrastructure** which will need to be built to higher specifications and new nature-based infrastructure solutions help not only deal with the effects of climate change, they can also support biodiversity.
- **Protecting our water resources** which will need to be used more wisely in development and in activities such as agriculture.
- **Supporting nature** Temperature changes won't just affect people and there will be a need to plan for better biodiversity and resilient local habitats for our species. Leeds has significant environmental and habitat resources which need protecting

² [COP26 sees UK businesses lead the world in climate change commitments - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/cop26-sees-uk-businesses-lead-the-world-in-climate-change-commitments)

³ and author of the 2006 government study into the costs of climate change

and promoting. The Council has also focused on the ecological crisis that is being faced, with a loss of 70% of insects over the last thirty years across Europe.

- **A need for resilient places** has also been heightened during the past 2 years by the global pandemic, its localised impacts on Leeds communities in “lock down” with a greater understanding of what their local environments are offering them and its impacts on the economy.

2.6 Having set the broad scope of the Local Plan Update (LPU) Members of DPP considered potential policy approaches on topics related to carbon reduction and renewable energy, green infrastructure and place-making, flood risk, sustainable infrastructure and strategic place-making and endorsed detailed consultation material. These themes and topics were also considered and influenced by the Climate Emergency Advisory Committees (CEAC) for Planning, Building and Energy and Food and Biodiversity with the former advocating for more energy efficient homes and the latter group keen to see alignment with the Council’s emerging policies on local food production.

2.7 There remain areas of the Local Plan that *could* be updated but were not part of the LPU. The Council’s Executive Board on 23rd June 2021 noted that the policies identified as in need of updating are wide in scope (and for different reasons) but that to reflect Council immediate priorities and resources available, the LPU must focus initially on policies for the Climate Emergency in Leeds⁴. This is in line with the Council’s published Local development Scheme, which sets out the timetable for plan-making in the District.

2.8 As a result, the Council determined to progress a Local Plan Update 1 called “Your Neighbourhood, Your City, Your Planet” and address other planning topics in a subsequent Local Plan Update 2, which will progress as a separate plan-making process and subject to its own consultation stages. Within this material references to LPU are taken to mean LPU1.

2.9 At Executive Board on the 23rd June 2021 the initial scope of the LPU was agreed as follows:

“Update and create new policies; make consequential changes, within the Adopted Leeds Core Strategy (amended 2019), the Natural Resources and Waste Local Plan (2013) and Unitary Development Plan (2006), which focus on: carbon reduction, flood risk, green infrastructure, place-making and sustainable infrastructure in order to adapt to and mitigate the impacts of climate change and ensure the delivery of sustainable development within the Leeds Metropolitan District for a period of at least 16 years from Adoption”.

2.10 Following public consultation⁵ from July to September 2021, this scope has seen minor amendments, supported by Development Plan Panel (DPP) in January 2022, to include “Blue Infrastructure” and biodiversity more explicitly within the scope of the plan.

2.11 The LPU re-visits 19 key policies in the adopted Local Plan⁶ and proposes 16 new ones. These policies have been positively prepared to help deliver development outcomes that: contribute to reductions in carbon emissions, better address the climate emergency

⁴ (LCC 2021) [Executive Board Report 23rd June 2021](#) para 2.5

⁵ Under Regulation 18

⁶ Affecting both the Core Strategy and the Natural Resources and Waste Local Plan as well as the saved Policies of the Unitary Development Plan

in the District and increase the District's ability to adapt to the changing climate and become more resilient. The revised policies also emphasise support for the infrastructure and renewable development needed to realise this transition.

3 Policy SP0: Climate Change Adaptation and Mitigation

3.1 Given the importance placed on the LPU objectives in helping to address the climate and ecological emergencies in Leeds it has been necessary to introduce a new policy at the beginning of the Core Strategy which sets a strategic framework for the subsequent LPU policy amendments. This is called Policy SP0 – Climate Change Mitigation and Adaptation.

4 Why is the policy needed?

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

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

4.2 Policy SP0 is set out at pages 5 to 10 of the LPU consultation draft policies document. The evidence on climate change mitigation and adaptation warrants a strategic policy in the Core Strategy which works explicitly & holistically alongside the other strategic policies to deliver more sustainable development and ensure carbon neutral developments so as to assist in the carbon trajectory of the Council.

5 Policy Objectives

5.1 The overall plan objectives for the Local Plan Update are:

- **Carbon reduction:** For new development, Leeds will seek to minimise energy demand and meet all demands for heat and power without increasing carbon emissions, to allow Leeds to meet its climate emergency commitment of zero carbon by 2030.
- **Flood Risk:** Leeds will ensure that new developments are located and designed to avoid, reduce and mitigate flood risk, increase biodiversity and reduce the carbon footprint of risk reduction schemes through natural flood solutions.
- **Green & Blue Infrastructure (including Biodiversity):** Leeds will create new Green and Blue Infrastructure (GBI) (including Green Space and Natural Environment) through the planning process, and identify, improve, protect and extend existing GBI to address the challenges of climate change and create a healthy city.
- **Place-making:** Leeds will work in the public interest, prioritising the safety and well-being of people within a framework of long-term sustainable development by

allowing development that promotes safe, healthy, and resilient places, reflects the issues associated with inclusive growth and an environment which leaves a positive legacy for all people.

- **Sustainable Infrastructure:** Leeds will ensure the delivery of an accessible and integrated transport system which focuses on public transport and active travel, is worthy of its role at the heart of the Leeds City Region and supports communities and inclusive growth.

5.2 Policy SP0 is a strategic policy, which sets out the ways in which the planning system in Leeds can achieve these overall objectives by reference to:

- a carbon trajectory and carbon target
- a statement of ambition for net zero in Leeds, whilst tackling the biodiversity emergency and promoting health and well-being.
- clarity on which amended and new LPU policies work towards achieving these objectives
- clarity on which existing Local Plan policies, that are not part of the LPU, also serve to assist in the objectives

5.3 A Carbon Trajectory and Carbon Budget

5.4 For the planning system to support the transition to a low carbon future in a changing climate and make radical reductions in greenhouse gas emissions⁷ it is necessary to measure what that looks like locally. Otherwise, this critical national and local objective will not be delivered. To that end, framing both the Council's Carbon Budget and its science-based targets within the Local Plan is a fundamental amendment and sets the focus for the relevant policies that follow. In other words, the policies referred to in Policy SP0 are those which are relevant to the "mitigating and adapting to climate change, including moving to a low carbon economy" objectives as set within the NPPFs approach to achieving sustainable development in mutually supportive ways⁸.

5.5 Given that the Leeds Carbon Budget and its science-based transition to net zero are scientifically based it also follows that they form part of the District's "objectively assessed needs". This is important as objectively assessed needs are a key part of the planning system e.g. for ensuring the right levels of housing and employment are delivered. They are also part of the NPPFs Presumption in Favour of Sustainable Development (PFSD)⁹. Therefore, to plan more effectively for climate change, including making sense of the NPPFs approach to sustainable development and the PFSD, carbon use and local carbon budgets must sit alongside these factors in any strategy, which aims to achieve sustainable development and net gains in line with the UN Sustainable Development Goals.

5.6 Clarity on wider policies

5.7 Policy SP0 also seeks to provide a strategic underpinning for the LPU1 policies which are set out in sum below:

⁷ As required by the NPPF

⁸ NPPF para 8

⁹ NPPF para 11

5.8 Carbon Reduction

5.9 The current local plan (which includes the Core Strategy, the Site Allocations Plan, the Natural Resources and Waste Plan, and the Aire Valley Leeds Area Action Plan) has many effective policies on carbon reduction and renewable energy generation and they have resulted in real improvements in the way development is built and delivered in Leeds. However, they currently don't go far enough to ensure the zero carbon ambitions are delivered by 2030, consequently the Council needs to go further.

5.10 The Publication draft policies (outlined below) therefore set ambitious but achievable standards, for new development to reduce carbon emissions as far as possible. They do this by:

- Requiring that most new applications (with stated exceptions) achieve a net zero standard in their operational use, by maximising energy efficiency, reducing energy demand and making use of renewable energy.
- Requiring that all major applications calculate the whole life cycle carbon emissions of their proposals, to understand the impacts of all stages of development, rather than just its occupation and operation.
- Requiring that all major development meet a sustainable construction standard, therefore allowing for high standards of construction.
- Identifying opportunity areas for renewable energy generation and establishing criteria for the successful determination of planning applications for such uses, as well as energy storage facilities.
- Encouraging developments to make use of a range of sustainable energy and heating technologies, where connections to the District Heating Network are not possible.

5.11 This will be achieved through the following summarised policies:

- REPLACEMENT POLICY EN1: CARBON REDUCTION: A new strategic policy that requires a) new development to be net zero for operational carbon and b) that whole life cycle calculations of carbon will be carried out by developers.
- REPLACEMENT POLICY EN2: SUSTAINABLE DESIGN AND CONSTRUCTION: A new strategic policy that requires new development to meet a high-quality sustainable construction standard of Home Quality Mark 4 or BREEAM Outstanding.
- REPLACEMENT POLICY EN3: RENEWABLE ENERGY GENERATION: A new strategic policy that seeks to identify and support opportunities for renewable sources of energy generation and energy storage within the district in the context of national planning policy. The policy identifies opportunity areas for renewable energy on a map and requires that all applications within this area are assessed so that they limit impacts on ecology and landscape.
- AMENDED POLICY EN4: DISTRICT HEATING: The Amendments to this existing policy prioritise low carbon heat solutions for new developments that lie outside of district heating network zones.

5.12 More detail is provided in the draft policies and text document and the Carbon Reduction Background Paper.

5.13 Flood risk:

5.14 As part of the Council's aspiration to make Leeds zero carbon by 2030, the Council is committed to ensure that all communities are resilient to the impact of climate change. Flood Risk is one of the most direct impacts of climate change that Leeds faces. It is therefore necessary that up to date evidence, best practice and guidance are used to avoid, reduce and mitigate that risk. New policy seeks to achieve this by:

- Reflecting the latest Strategic Flood Risk Assessment (SFRA) modelling and avoiding development in areas at highest risk of flooding, whilst recognising that these are often brownfield sites with existing buildings which are already developed. The policy goes further than the current policy in resisting new development in vulnerable areas based on our updated flood risk evidence.
- Ensuring that all developments consider flood risk via carrying out a flood risk assessment and to reflect climate change allowances, which are mapped and available for developers to use.
- Ensuring that in circumstances where flood risk to development is unavoidable, the safety of the development and its users is secured.
- Ensuring that where areas of the City are protected by flood defences, developers have regard to residual risks associated with a potential breach and overtopping of the flood alleviation scheme or other defence, whichever is the worst case scenario.
- Requiring that all developments manage water sustainably, through the establishment of a surface water drainage discharge hierarchy.

5.15 This will be achieved through the following summarised policies:

- AMENDED WATER 1 AND WATER 2: A re-packaging of existing Natural Resources and Waste policies to be incorporated into the amended Core Strategy, covering water efficiency and the protection of water quality.
- REPLACEMENT NATURAL RESOURCES AND WASTE POLICY WATER 3: FUNCTIONAL FLOODPLAIN: A new strategic Core Strategy policy providing an approach to protecting the functional floodplain from unsustainable development.
- AMENDED POLICY WATER 4: LAND AT INCREASED RISK OF FLOODING: A revised policy amended to incorporate a requirement to consider the impact of climate change on future levels of flood risk.
- AMENDED NATURAL RESOURCES AND WASTE POLICY WATER 6: FLOOD RISK ASSESSMENTS: Amendments require that the latest Government climate change allowances are considered in Flood Risk Assessments that accompany new development
- NEW POLICY WATER 6A: SAFE ACCESS AND EGRESS: A new strategic Core Strategy policy ensuring that safe routes are available for occupiers of development in time of flood
- REPLACEMENT NATURAL RESOURCES AND WASTER POLICY 5: RESIDUAL RISK: A new strategic Core Strategy policy requiring an assessment of residual risk (e.g. of defences failing) for development in defended land
- REPLACEMENT NATURAL RESOURCES AND WASTE POLICY WATER 7: SUSTAINABLE DRAINAGE: A new strategic Core Strategy policy associated with the design of new developments and managing surface water discharge via a hierarchy of storage, infiltration and attenuation before any discharge into water courses. It also requires Sustainable Drainage that benefits biodiversity.
- NEW WATER POLICY 8: POROUS PAVING AND LOSS OF FRONT GARDENS

5.16 More detail is provided in the draft policies and text document and the Flood Risk Background Paper.

5.17 Green and Blue Infrastructure (GBI)

5.18 The following suite of policies seeks to further protect, enhance and increase provision of green and blue infrastructure by:

- Requiring planning applications to consider GBI at the earliest stage with the aim of protecting, maintaining, enhancing and extending GBI where appropriate.
- Requiring applications to include GBI assessments.
- Enhancing protections for existing trees and hedgerows.
- Requiring ambitious targets for tree replacement and additional planting to ensure that Leeds overall tree canopy is increased.
- Requiring a further consideration of new Green Space provision to ensure it is being directed to the right locations and in the right form.
- Establishing clear criteria for how the quality of Green space should be considered as part of new planning applications.
- Establishing clear policy on how applications should adequately consider the future maintenance of new GBI provision.
- Establishing clearer definitions of green space and how it will be protected through development.
- Requiring local food production and wider encouragement for sustainable food production.
- Establishing further protections for the Leeds Habitat Network and a locally specific clarification of how Biodiversity Net Gain should be addressed in Leeds.

5.19 This will be achieved through the following summarised policies:

- REPLACEMENT SPATIAL POLICY 13: PROTECTING, MAINTAINING, ENHANCING AND EXTENDING GREEN AND BLUE INFRASTRUCTURE: A new strategic policy that sets an ambition for the protection, maintenance, enhancement, and expansion of green and blue infrastructure (including green space networks).
- REPLACEMENT POLICY G1: PROTECTING, ENHANCING AND EXTENDING GREEN AND BLUE INFRASTRUCTURE: A new strategic policy that requires all new development to carry out a green and blue Infrastructure assessment
- AMENDED POLICY G4: GREEN SPACE IMPROVEMENT AND NEW GREEN SPACE PROVISION: Amended part of policy clarifies the approach to the provision of greenspace, explaining the consideration regarding delivery on-site, off-site or as commuted sums.
- NEW POLICY G4A: A strategic policy associated with the design and quality of new green space.
- NEW POLICY G4B: MAINTENANCE OF GREEN SPACE: A strategic policy establishing clear criteria for the maintenance of green space.
- REPLACEMENT POLICY G6: PROTECTION OF EXISTING GREEN SPACE: A new strategic policy associated with the definition and protection of green space.
- NEW POLICY F1: FOOD RESILIENCE: A strategic policy that supports food resilience and food growing opportunities as part of new developments.

- NEW POLICY G8A: PROTECTION OF IMPORTANT SPECIES AND HABITATS: This new policy specifically looks at protecting the natural environment and includes references to the implications of climate change upon the natural environment.
- NEW POLICY G8B: LEEDS HABITAT NETWORK: This policy clarifies the role of the Leeds Habitat Network and establishes the requirements of new development with regard to the protection, enhancement and expansion of the network.
- NEW POLICY G9: BIODIVERSITY NET GAIN: This policy specifically looks at protecting the natural environment and applying measures within the Environment Act 2021, by clarifying how the application of the 10% biodiversity net gain requirement will apply in Leeds.
- NEW POLICY G2A: PROTECTION OF TREES, WOODLAND AND HEDGEROWS: A strategic policy which seeks to retain all woodlands, trees and hedgerows or ensure that their loss has been considered through development appraisal. Recognises the role of trees in capturing carbon as well as amenity and habitat.
- NEW POLICY G2B ANCIENT WOODLAND, LONG ESTABLISHED WOODLAND, ANCIENT TREES, VETERAN TREES: A strategic policy which seeks to protect ancient woodland, long established woodland, ancient trees and veteran trees and avoid loss of irreplaceable habitats. Recognises the role of trees in capturing carbon as well as amenity and habitat.
- NEW POLICY G2C: TREE REPLACEMENT: A strategic policy which recognises the role of trees in capturing carbon and establishes a methodology for calculating and requiring tree replacement (where necessary), based on carbon sequestration.

5.20 More detail is provided in the draft policies and text document and the Green and Blue Infrastructure Background Paper.

5.21 Placemaking

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

5.23 The following suite of policies seek to address these issues by:

- Establishing a broad consideration of good design to ensure that the highest design standards are being achieved in Leeds.
- Establishing clear principle for high quality placemaking.
- Embedding the 20-minute neighbourhood concept into planning policy by defining its meaning in Leeds and requiring that new development be directed to sustainable locations.
- Ensuring that the wider determinates of health (housing, employment, education, green space, air quality, transport, climate change and social and community networks) are taken into account in development so as to increase life expectancy and narrow health inequalities.

5.24 This will be achieved through the following summarised policies:

- NEW POLICY SP1B: ACHIEVING WELL-DESIGNED PLACES: A strategic policy associated with the design and layout of new developments and quality of place achieved through appraisal of environmental, economic, and social matters.
- REPLACEMENT POLICY P10: DEVELOPMENT PRINCIPLES FOR HIGH-QUALITY DESIGN & HEALTHY PLACE MAKING: This policy established clear and precise requirements for the design of new developments from a development principles and high quality design perspective, for the purposes of climate change mitigation, adaptation and health and wellbeing, as well as environmental harmony.
- NEW POLICY SP1A: ACHIEVING 20 MINUTE NEIGHBOURHOODS IN LEEDS: This strategic policy relates to supporting the long-term sustainability of communities through encouraging growth in locations that are highly accessible to services including public transport and greenspace i.e. 20 min neighbourhoods. It recognises the role of the provision of key services in serving a key function as well as reducing car use and promoting active travel. The policy complements the current spatial strategy as set out in the Core Strategy 2019.
- AMENDED SPATIAL POLICY 1: LOCATION OF DEVELOPMENT: Amendments that clarify the existing spatial strategy for Leeds by potentially reducing the level of development in smaller settlements outside of the main urban area and major settlements, that do not deliver the principles of 20 minute neighbourhoods.
- NEW POLICY EN9 – DRIVE THRU DEVELOPMENT: A strategic policy which seeks to reduce ‘Drive-thru’ restaurants development, outside of town centres to reduce air pollution and encourage active travel.
- NEW POLICY P10A: THE HEALTH IMPACTS OF DEVELOPMENT: A strategic policy which seeks to reduce the causes of ill health and health inequalities by ensuring healthier environments, lifestyles and impacts that development can deliver including access to services. The policy is concerned with the design and assessment of new developments and requires development proposals for large-scale development to be accompanied by a Health Impact Assessment.

5.25 More detail is provided in the draft policies and text document and the Placemaking Background Paper.

5.26 Sustainable infrastructure

5.27 As part of our aspiration to make Leeds zero carbon by 2030, we want to ensure that our communities are resilient to the impact of climate change. This includes policies that aid the delivery of low emissions transport and improved digital connectivity, to help reduce journeys by car. This involves policies to:

- Help plan for significant investment in transport infrastructure in Leeds (including supporting the Combined Authority’s vision for Mass Transit and subsequent business case to Government, as well as helping plan for the outcome of the Government’s study on how HS2 trains will arrive at Leeds from the East Midlands as outlined in the Integrated Rail Plan), which is proposed over the coming years, by facilitating and supporting these works, and in ensuring that they come forward in a manner with maximises their potential benefits and minimises or mitigates any potential adverse impacts.
- Enhance digital capability and allow Leeds to realise its potential in moving forward and develop as a modern and future proofed District, that offers its citizens the best

digital connections for work, education, access to services and running of a household.

5.28 This will be achieved through the following summarised policies:

- NEW POLICY SP11A: MASS TRANSIT AND RAIL INFRASTRUCTURE: A strategic policy setting ambition and support for a Yorkshire mass transit system and rail infrastructure improvement schemes which will deliver improved connectivity by public transport. The policy is supportive of mass transit in principle and sets conditions to ensure that environmental impacts are minimised, but does not identify a preferred route.
- NEW POLICY SP11B: LEEDS STATION: A strategic policy which supports growth of the station and sets criteria for it to be developed in a manner which is well designed and fits within its surroundings and historic environment.
- NEW POLICY DC1: DIGITAL CONNECTIVITY: strategic policy which ensures that new development is digitally enabled.

5.29 More detail is provided in the draft policies and text document and the Sustainable Infrastructure Background Paper.

6 Evidence

6.1 The justification to Policy SP0 at pages 5 to 9 of the LPU consultation draft policies document sets out the background behind the policy. This is supplemented below.

6.2 The starting point for justifying and evidencing Policy SP0 is that although the world's climate has always varied, in recent history the rate and extent of the changes are now attributed to human activity rather than to natural processes. The Intergovernmental Panel on Climate Change (IPCC) notes that each of the last four decades has been successively warmer than any decade that preceded it since 1850 and state that: *"It is unequivocal that human influence has warmed the atmosphere, ocean and land."*¹⁰

6.3 The strong evidence-based link between human activities and impacts on the climate provides an overriding justification for policy makers to shape those activities. This is recognised by the Climate Change Act 2008.

National and International Evidence

6.4 The Climate Change Act 2008 is the statutory basis for the UK's attempt to meet the problem of climate change. The Act recognises that there is a need to reduce greenhouse gas emissions and provides a framework of legal obligations by which the level of those reductions can be calculated, identified, and achieved over a specific period.

6.5 The Climate Change Act¹¹ requires the UK Government to reduce its greenhouse gas emissions by 100% on 1990 levels by 2050. This is commonly referred to as the Net Zero Target because if 100% of the emissions reductions are achieved then the net emissions compared to 1990 levels will be zero. The act states:

¹⁰ [AR6 WGI Headline Statements from the Summary for Policymakers \(ipcc.ch\)](https://www.ipcc.ch/summary-for-policymakers/)

¹¹ Most recently updated by the Climate Change Act 2008 (2050 Target Amendment) Order 2019.

“The target for 2050

(1) It is the duty of the Secretary of State to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline.

(2) “The 1990 baseline” means the aggregate amount of—(a) net UK emissions of carbon dioxide for that year, and (b) net UK emissions of each of the other targeted greenhouse gases for the year that is the base year for that gas.”

- 6.6 The percentage reduction in the Climate Change Act reflects wider international consensus as to the need to limit global temperature rise to at most 2°C above pre-industrial levels, and more recently 1.5°C¹², in order to avoid the most serious existential threats of climate change.
- 6.7 Indeed, it is noted that the Climate Change Act has been highly responsive to this wider international consensus and increased the percentage reduction both through its passage through parliament at the time (rising from 60% to 80%) and through the most recent amendment to 100%. This demonstrates that the international evidence and consensus has developed rapidly throughout the period leading up to and beyond the Climate Change Act and indeed continues to develop.
- 6.8 In order to meet the target the Climate Change Act requires that carbon budgets are set to provide shorter term targets to aim at as stepping stones on the journey to achieving the overall goal of net zero by 2050. The Act requires the Government to set these carbon budgets for periods of 5 years and ensure that the UK does not exceed these budgets.
- 6.9 The Act also established the Climate Change Committee whose role is to advise the Government on what these budgets should be based on the scientific data that is collected at any specific time and to give annual reports on progress towards meeting individual carbon budgets and overall targets. The Committee has found that the government’s policies and plans are not enough to meet carbon budgets and that the policy gap has widened. Therefore, in order to close the policy gap and ensure compliance with their individual carbon budgets it will be necessary for some local authorities to go beyond current government policy.

Local Evidence

- 6.10 Full Council declared a climate emergency in March 2019, with the stated ambition of working towards a net zero carbon city by 2030. The council has accepted that very urgent action is required to make our contribution to containing global temperature rises within 1.5C. Beyond this limit, there is a strong scientific consensus that there will be catastrophic consequences for both humanity and the natural world. At a meeting of its Executive Board in April 2019¹³ the Council agreed the recommendations of the Leeds Climate Commission for science-based emission reduction targets for the city, together with the accompanying roadmap.
- 6.11 Leeds’ share of the ‘carbon budget’ to 2050 on a per capita basis is estimated at circa 31 million tonnes and Leeds is emitting 4m tonnes of carbon per annum. If we continue

¹² Based on the most recent IPCC research

¹³ [Cutting Carbon Annual Report Executive Board](#)

business as usual the budget will have been used up by 2029. The Climate Commission demonstrate that by 2030 the world will have locked itself into a greater than 1.5°C global temperature rise unless efforts are made to remain within budget. The LPU has a plan period of 2022 to 2040 and therefore it is essential for the Plan to consider how it can best protect the carbon budget and make it last until 2050 so as to be in line with the IPCC forecasts of keeping global temperatures to within 1.5°C of warming.

- 6.12 The Leeds Climate Commission and City Council have worked to clarify what efforts are needed to reduce carbon locally to remain within budget. The initial focus is on Scope 1 and 2 carbon emissions generated within Leeds (i.e. the fuel and electricity directly used within the District boundary). These are the emissions which are of most relevance to the planning system and the grant of planning permission. Scope 3 emissions - concern consumption and personal choices (e.g. owning a pet, buying lots of clothes with a high carbon footprint as well as long distance travel). In Leeds Scope 1 and 2 emissions have fallen by 40% since 2000. With on-going decarbonisation of grid electricity and considering population and economic growth within the city region, it is projected that the District's 2000 level of annual emissions will have fallen by a total of 45% in 2030 and 49% in 2050. If it is to stay within its carbon budget, the District needs to add to the emissions reductions already achieved to secure significant further reductions. The Leeds Climate Commission Roadmap follows the Government's roadmap of aiming for net zero by 2050 but recognises on the basis of the IPCC evidence that further reductions are needed sooner.
- 6.13 The Climate Commissions analysis includes assessment of the potential contribution of approximately 130 energy saving or low carbon measures for:
- Households and for both public and commercial buildings (including better insulation, improved heating, more efficient appliances, some small scale renewables)
 - Transport (including more walking and cycling, enhanced public transport, electric and more fuel efficient vehicles)
 - Industry (including better lighting, improved process efficiencies and a wide range of other energy efficiency measures).
- 6.14 The Leeds Climate Commission demonstrates that it is technically and economically possible for Leeds to become a carbon neutral city and to meet ambitious carbon reduction targets in line with the global targets set out by the United Nations. The roadmap makes clear that no single innovation will resolve the climate crisis or put the District on the right path to zero carbon but that a combination of activities is essential. This means that no-one and no sector can afford to not play their part or to leave it to someone else to make the efforts. This is critical to the approach to the LPU as the policies within in will assist in primarily supporting the necessary measures for households and public and commercial buildings as well as transport. The planning system cannot remedy this alone and achieving the Leeds Carbon Roadmap relies on other innovative measures as well as activities beyond the control of planning. This is why it is important to note that the LPU the plan has the means to deliver new development *in line with* the Carbon Roadmap and Leeds' Carbon Budget (as noted by the wider evidence base, including on viability).
- 6.15 The Leeds Carbon Roadmap is available [here](#). The original roadmap was published in 2019. The Climate Commission has been responsive to the data and this was refreshed

in 2021 and a new infographic showing the pathway to net zero was also produced.

- 6.16 It is also noted that the City Council's declaration was made at a time when the average UK domestic electricity bills had been £672 and average gas bills had been £646. In August 2022, the energy regulator Ofgem announced an 80% increase in the UK energy cap, meaning that a typical household could be paying an annual bill of £3,549 from October 2022. The regulator also warned prices could get significantly worse through 2023. Reducing carbon emissions in the City through better home insulation will also reduce home energy bills. This is explored more in the Carbon Reduction Background Paper.

7 Definitions

- **Intergovernmental Panel on Climate Change (IPCC):** the United Nations body for assessing the science related to climate change. Created in 1988 by the World Meteorological Organization and the United Nations Environment Programme, the objective of the IPCC is to provide governments at all levels with scientific information that they can use to develop climate policies.
- **Leeds Climate Commission:** established in 2017 and was the very first climate commission, providing a blueprint for the growing number of other climate commissions that have developed since. It was inspired and informed by the work of the UK's Climate Change Committee and is an independent voice in the city, providing authoritative advice on steps towards a low carbon, climate resilient future to inform policies and shape the actions of local organisations and stakeholders. It monitors progress towards meeting the city's carbon reduction targets, celebrates success stories and recommends actions to keep the city on track.
- **Climate change adaptation:** Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.
- **Climate change mitigation:** Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
- **Net-Zero:** refers to the balance between the amount of greenhouse gas produced and the amount removed from the atmosphere. We reach net zero when the amount we add is no more than the amount taken away.
- **Carbon Neutral:** means having a balance between emitting carbon and absorbing carbon from the atmosphere in carbon sinks. Removing carbon dioxide from the atmosphere and then storing it is known as carbon sequestration.

8 Planning Law and NPPF Consistency

- 8.1 The need to reduce carbon emissions is set in law by the Climate Change Act 2008 which provides the mechanisms for assessing how much carbon to be reduced and by when. This has generated the Leeds Roadmap in Policy SP0 with ambition to make significant progress to get to net zero by 2030. Section 19(1A) of the Planning and Compulsory Purchase Act 2004 provides that: *'Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.'* This obligation on local authorities was introduced at the same time as the Climate Change Act 2008 and cements the importance of both pieces of legislation working together.

- 8.2 There are further requirements in national planning guidance. These are important because what we build to day will be with us in 2030 and 2050 and if it is not net-zero it will be making the job of achieving net zero harder e.g. by increasing the amount of carbon needing to be reduced i.e. reducing our carbon budget more quickly than it needs to be and by placing more financial burdens on future generations (including home owners) to retro fit properties built now over the coming years.
- 8.3 Government guidance states that the development plan is at the heart of the planning system with a requirement set in law that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise. Plans set out a vision and a framework for the future development of the area as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places. It is essential that plans are in place and kept up to date¹⁴.
- 8.4 The Planning Practice Guidance¹⁵ states that *“Depending on the issues and opportunities that exist locally local planning authorities should, in consultation with their local community, consider the most appropriate way to plan for the needs of their area”* and that flexibility is allowed in the way that plans may be produced. A Local Development Scheme is required under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended) to help clarify the Council’s intentions and the Leeds Local Development Scheme June 2021¹⁶ set out that as part of keeping the Local Plan up to date the Council intends to update specific parts of the Local Plan in the following order: first the Leeds Local Plan Update 1 with an initial focus on the climate emergency and second the Leeds Local Plan Update 2 with a subsequent focus on other policies.
- 8.5 The NPPF was last updated in July 2021 and as part of this update there were some updates around the climate change agenda:
- Paragraph 7 links the purpose of the planning system to the United Nations 17 Global Goals for Sustainable Development in the period to 2030, which include ‘climate action’.
 - Paragraph 11 places climate mitigation and adaptation at the heart of plan-making: *‘plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects’*
 - Paragraph 153 requires local planning authorities to take a proactive approach to mitigating and adapting to climate change, and for the first time refers to the provisions and objectives of the Climate Change Act 2008
 - other minor changes include paragraph 93 which now recognises that well-designed open spaces can help efforts to address climate change
- 8.6 It is noted that the NPPF was not updated in a comprehensive manner and did not include a response to the Government’s Net Zero Strategy: Build Back Greener (2021). This document produced in advance of COP26 hosted by the UK, was prepared after the NPPF was updated. The NPPF has not been updated since because the planning reforms and the Government’s response to COP26 have not yet been published.

¹⁴ Planning Practice Guidance Paragraph: 001 Reference ID: 61-001-20190315

¹⁵ Planning Practice Guidance Paragraph: 004 Reference ID: 61-004-20190315

¹⁶ [Local Development Scheme 2021](#)

However, the Net Zero Strategy confirmed that the Government:

- recognise the importance of the planning system to common challenges like combating climate change and supporting sustainable growth (para 28)
- is considering how the planning system can further support our commitment to reaching net zero (para 31)
- will make sure that the reformed planning system supports our efforts to combat climate change and help bring greenhouse gas emissions to net zero by 2050. (para 31)
- will embed transport decarbonisation principles in spatial planning and across transport policy making (para 48)

8.7 In the meantime the NPPF clearly recognises that the planning system has a key role to play in tackling climate change. As noted above para 7 of the NPPF links the purpose of the planning system to the UN goals for sustainable development one of which is climate action.

8.8 Para 8 confirms that the environmental objective of the planning system is to mitigate and adapt to climate change and that this should be part of net gains for all development.

8.9 The NPPF states that strategic policies should look ahead over a minimum 15-year plan period. Policy SP0 and the policies of the Local Plan Update look ahead to 2040. At this point the Country will be only 10 years away from its goal of net zero and potentially 60,000 more homes will have been build in Leeds increasing the population by over 100,000 people.

8.10 Chapter 14 is a dedicated section of the NPPF to Climate Change

- Para 152 states that the planning system should support the transition to a low carbon future in a changing climate and recognises the need for radical reductions in greenhouse gas emissions
- Para 153 states that Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. And in a footnote adds “In line with the objectives and provisions of the Climate Change Act 2008”.

8.11 The Planning Practice Guidance confirms:

Why is it important for planning to consider climate change?

In addition to supporting the delivery of appropriately sited green energy, effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases. In doing so, local planning authorities should ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment. Planning can also help increase resilience to climate change impact through the location, mix and design of development.

Addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both plan-making and decision-taking. To be found sound, Local Plans will need to reflect this principle and

enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework. These include the requirements for local authorities to adopt proactive strategies to mitigate and adapt to climate change in line with the provisions and objectives of the Climate Change Act 2008, and co-operate to deliver strategic priorities which include climate change.

In addition to the statutory requirement to take the Framework into account in the preparation of Local Plans, there is a statutory duty on local planning authorities to include policies in their Local Plan designed to tackle climate change and its impacts. This complements the sustainable development duty on plan-makers and the expectation that neighbourhood plans will contribute to the achievement of sustainable development. The National Planning Policy Framework emphasises that responding to climate change is central to the economic, social and environmental dimensions of sustainable development.¹⁷

8.12 In line with the direction of travel in the Government's most recent White Paper on Planning there is a desire in the Local Plan Update to be clear on what development will look like in these new and amended policies. This is important as it creates certainty for local people and investors. It is also important in the climate change agenda as whilst there is a high degree of influence that can be given at the plan making stage the NPPF currently contains fewer policies to provide that influence at the decision making stage. It is therefore imperative that the Local Plan Update policies are prepared in a detailed manner now as there is a lack of NPPF policy that relates to specific developments.

9 Monitoring

9.1 The individual LPU policies all have their own monitoring framework associated with them as set in their respective background papers. However, Policy SP0 sets out a trajectory to net zero in Leeds and highlights the need to remain within budget.

9.2 In sum and as estimated by the Leeds Climate Commission:

- Dividing the global carbon budget up by population gives Leeds a total carbon budget of just 31 million tonnes from 2020, which means an annual budget of c. 1 million tonnes per annum up to 2050
- Based only on the fuel and electricity directly used within its boundaries (i.e. its Scope 1 and 2 emissions), Leeds currently emits c.4 million tonnes of carbon a year, and as such it would use up its carbon budget by 2029
- If it is to stay within its carbon budget, Leeds needs to add to the emissions reductions already achieved to secure 70% reductions on its 2000 level of emissions by 2025, 85% by 2030, 95% by 2035, 97% by 2040, 99% by 2045 and 100% by 2050.
- Without further activity to address its carbon emissions, the Leeds Climate Commission project that Leeds' annual emissions will exceed its carbon budget by 4 million tonnes in 2030, and 3.5 million tonnes in 2050.

9.3 The Climate Commission analysis shows that Leeds could close the projected gap to net-zero emissions through the adoption of options that are already available and that although it can achieve significant reductions in emissions by focusing on established cost-effective and technically viable measures (such as those within this LPU), Leeds

¹⁷ Paragraph: 001 Reference ID: 6-001-20140306

still has to identify other more innovative interventions that could deliver the shortfall between projected emissions and a net-zero target. Therefore, achieving the policies in the LPU will not get Leeds to net zero, however:

- Reducing carbon emissions through buildings “lock in” budget savings through the fabric and operation of buildings which will last beyond the plan period
- Leeds can’t afford to emit more carbon from those sectors where there are feasible, achievable and viable measures, as to do so would make the remaining gap even more difficult to remedy
- The District must reduce the carbon budget annually from 4 million tonnes to 1 million tonnes because the very difficult to reduce sectors will need to use up the carbon budget rather than the easier sectors to reduce

Indicator	Reason
Zero-Carbon emissions from new development	To assist in reducing the annual carbon budget of c. 4 million tonnes per annum down to 1 million tonnes per annum up to 2050
Leeds Carbon Roadmap	Emissions will have been reduced by 97% by 2040 with significant progress made by 2030

10 Implementation

10.1 Policy SP0 will be implemented through the policies that are referenced within it and more detail can be found in the relevant policies within the Leeds Local Plan Update: new and amended policies document and the relevant background papers.

ⁱ (Leeds City Council, 2019) Proceedings of the Meeting of the Leeds City Council held Civic Hall, Leeds on Wednesday, 27th March, 2019

That this Council notes that many Leeds residents are demanding action on climate change as demonstrated through actions such as the recent ‘Youth Strike.’ Council accepts that in order to limit the effects of global warming it is necessary for the world population to reduce its annual carbon emissions from the current 6.5 tonnes per person to less than 2 tonnes as soon as possible.

Council recognises that individuals cannot be expected to make this reduction on their own. Society needs leadership at international, national and local level. Council is aware that current plans and actions are not enough. The world is on track to overshoot the Paris Agreement’s 1.5°C limit before 2050. All governments nationally and locally have a duty to limit the negative impacts of global warming. Local councils should not wait for their national governments to change their policies. It is important for the residents of Leeds and the UK that cities commit to carbon neutrality as quickly as possible.

Council notes through collaboration with the Leeds Climate Commission how it is now one of the leading local authorities in the country in this area. This is underlined by the unprecedented scale of investment prioritised by this Council towards carbon reduction measures. This includes our innovative Leeds PIPES district heating scheme, our investment to improve the energy performance of council housing and in area-based regeneration schemes to support both private and council housing improvements, and our investment to become the leading authority in the country for changing our fleet to Electric Vehicles.

Council therefore resolves to:

1. Declare a 'Climate Emergency'.
2. Sign up to a science-based carbon reduction target that is consistent with achieving the Paris Agreement of no more than 1.5°C global temperature increase.
3. Work to make Leeds Carbon neutral by 2030 and call on central government to provide the funding and powers to make this possible.
4. Work with other organisations and governments within the UK and internationally to determine and implement best practice methods to limit Global Warming to less than 1.5°C.
5. Bring a report to April Executive Board setting out how we can work with the Leeds Climate Commission to run a conversation with residents, Trade Unions, public sector organisations, businesses and the third sector on developing a plan with the actions and milestones required to reach this target and report the outcome to Executive Board by the end of 2019.