Leeds Local Plan (formerly LLP2040)

Leeds Local Plan

Development Plan Document

Draft Report of Consultation

June 2025

1 INTRODUCTION

1.1 This document sets out how Leeds City Council has involved the community and other stakeholders in the early stages of preparation ("Scoping") of the Leeds Local Plan 2040 ("the Plan"). It shows how the Council has complied with Regulation 18 of the Town and Country Planning (Local Development) (England) 2012 Regulations and how it has undertaken engagement is accordance with the 2012 Regulations.

1.2 In accordance with regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, this document set out:

(i) Which bodies and persons the Council invited to make representations
(ii) How those bodies and persons were invited to make representations
(iii) A summary of the main issues raised by the representations made; and,
(iv) How any representations made have been taken into account.

1.3 This document summarises the process involved in preparing and conducting consultation on the Plan. This document covers the engagement and consultation undertaken at Regulation 18 stage on the scope of the Plan between 10th February and 24th March 2023. It also provides a summary of the outcomes of this stage of consultation, and how the representations received informed the next stage in the Plan preparation process, namely "Issues & Options".

1.4 The Council's Statement of Community Involvement (SCI) sets out how Leeds City Council should undertake consultation and engagement on Local Plan documents, detailing how we will comply with statutory requirements and to help ensure that the consultation and engagement that we undertake is inclusive.

1.5 An overview of the consultation and engagement undertaken to date are set out in the table below:

Consultation/engagement undertaken	Dates	Consultation material/documents
SCOPING PUBLIC CONSULTATION (REGULATION 18)		
Dedicated Web Campaign page - LINK	10th February – 24th March 2023	All sections of LLP2040 documents (including Topic Papers) in accessible format. Link to Call for Sites portal. Link to Smart Survey to collect responses.
Topic Based YouTube Videos - LINK	10th February – 24th March 2023	Short bitesize video presentation introducing each topic area.
Targeted workshops/meetings with boards and groups with established relationships with stakeholders and communities, including Parish Councils, Neighbourhood Forums, Leeds College of Building, Influencing Travel Behaviour Team, University of Leeds Masters in Sustainable Consultancy, Culture & Economy Connect.	10th February – 24th March 2023	Strategic overview and Topic based detail face to face presentation with Q&A.

A series of Public Drop-In sessions (Merrion Centre, Kirkgate Market, Trinity Leeds, Otley Town Hall)	10th February – 24th March 2023	Face to face interaction, background documents, summary document, flyers, paper copies of the survey.
Email outreach with Universities, Localities Team, Equality Hub, Leeds Youth Council, Age Friendly Leeds, Leeds Planning & Development Forum, Leeds Climate Commission, Leeds Chamber, Duty to Co-operate Group etc.	10th February – 24th March 2023	Strategic overview and Topic based detail presentation with Q&A.
Young person engagement at Garforth Academy (Sixth Form)	23rd February 2023	Face to face interaction, summary document, young person's survey, flyers.
Neurodiversity event with Leeds Involving People	15th March 2023	Face to face interaction, summary document, survey, flyers.
Outer Northwest Youth Summit	24th March 2023	Face to face interaction, summary document, young person's survey, flyers.
Leeds DEAForum meeting	13th April 2023	Presentation with Q&A

1.6 To aid informed consultation and engagement the Council published a range of background papers and resources. These included:

Early Scoping Public Consultation (Regulation 18)
Topic 1 – Spatial strategy https://www.leeds.gov.uk/planning/planning-policy/leeds-local-plan-2040/spatial-strategy
Topic 2 – Housing https://www.leeds.gov.uk/planning/planning-policy/leeds-local-plan-2040/housing
Topic 3 – Economic development https://www.leeds.gov.uk/planning/planning-policy/leeds-local-plan-2040/economic-development
Topic 4 – Role of city and local centres https://www.leeds.gov.uk/planning/planning-policy/leeds-local-plan-2040/role-of-centres
Topic 5 – Minerals & waste https://www.leeds.gov.uk/planning/planning-policy/leeds-local-plan-2040/minerals-and-waste
Topic 6 – Transport & connectivity https://www.leeds.gov.uk/planning/planning-policy/leeds-local-plan-2040/transport-and-connectivity
Topic 7 – Other topic areas https://www.leeds.gov.uk/planning/planning-policy/leeds-local-plan-2040/other-topic-areas
Leeds Local Plan 2040 Scoping Consultation Document pdf https://www.leeds.gov.uk/docs/Leeds%20Local%20Plan%202040%20Scoping%20Consultation%20Document.pdf
Leeds Local Plan 2040 Sustainability Scoping Report pdf https://www.leeds.gov.uk/docs/Leeds%20Local%20Plan%202040%20SA%20Scoping%20Report.pdf
Leeds Local Plan 2040 Scoping Consultation Summary Document pdf https://www.leeds.gov.uk/docs/Leeds%20Local%20Plan%202040%20summary.pdf
Leeds Local Plan 2040 Call for Sites https://www.leeds.gov.uk/planning/planning-policy/leeds-local-plan-2040/call-for-sites

2 BACKGROUND

2.1 The Leeds Local Plan sets the land use and spatial planning framework for how Leeds will develop. The current Leeds Local Plan is a set of five Development Plan Documents (DPDs):

a. The Core Strategy (2014), with selective review (2019).
b. Site Allocations Plan (2019)
c. Aire Valley Leeds Area Action Plan (2017)
d. Natural Resources and Waste Local Plan (2013)
e. Saved policies of the Unitary Development Plan Review (2006)

The Local Plan and 20 made Neighbourhood Plans together form the Statutory Development Plan, which is used, alongside the National Planning Policy Framework, to guide the amount and location of development in the Leeds district. It also includes more detailed topic-specific policies that will guide different types of development, such as housing, employment, minerals and waste etc., and make sure that priorities such as design, green space, heritage, infrastructure and flood risk management are considered during decision making.

2.2 Local Authorities are required by the Town and Country Planning Act (England) Regulations 2012 to review the policies that make up the Local Plan, every five years.

2.3 In 2019/2020 Leeds Local Plan Review was carried out, focusing on the out-of-date policies in the adopted Leeds Local Plan and considering whether they were still relevant (in line with the updated National Planning Policy Framework), whether the evidence base had changed or needed refreshing or whether changes in local circumstances related to the Council Priorities around the Climate Emergency, Leeds Inclusive Growth Strategy, Health and Well-being and infrastructure (e.g. HS2) needed to be reflected. The policies identified as in need of updating were wide in scope. See **Appendix 1 – Local Plan Review Report 2020.**

2.4 Following this Local Plan Review and informed by declarations made at Full Council, the review of policies and detailed discussions with the Development Plan Panel, it was proposed that the Local Plan for Leeds should be updated in 2 stages:

1) Policies that directly relate to addressing the climate emergency (including carbon reduction, flood risk, green and blue infrastructure, place-making and sustainable infrastructure) are being addressed through the Local Plan Update - Your Neighbourhood Your City Your Planet.

2) Other policy areas regarding the future growth of the City and where sustainable development should best take place will be addressed through the Leeds Local Plan 2040.

2.5 It is intended that there are 3 main stages of consultation for Leeds Local Plan 2040:

1) Regulation 18 'Scoping' – A high-level consultation, detailing the issues as we see them, some possible ways we think we could address these issues, and asking people whether they agree. This includes a Call for Sites, targeted at both landowners and communities, to see what sites may be available and any suggested uses. Some potential topic areas were suggested in the consultation material, based on policies that the Local Plan Review identified as requiring update, as well as possible policy gaps which were

suggested in previous consultations. Little detail/evidence was presented at this stage to leave it open for views, comments and suggestions.

2) Regulation 18 'Issues & Options' – Based on the comments received from the Scoping Consultation more detailed policy areas and potential options will be presented for consultation, along with some of the evidence base and potential sites from the Call for Sites.

3) Regulation 19 'Publication Draft' – All comments received during both Regulation 18 consultations, as well as evidence and research undertaken, will be used to shape proposed policies and potential allocations which will then be put forward as a Publication Draft for comments before submission and examination in public.

3 CONSULTATION PRINCIPLES

3.1 Involving local people, businesses, and other stakeholders and partners is essential for good planning and to achieve the city that we all want. Topics such as the spatial strategy, housing, economic development, transport and green belt are important to everyone who lives, works and has an interest in Leeds. These considerations were at the heart of the planning, delivery and assessment of consultation on the Leeds Local Plan 2040. The stakeholders we engaged with during the Regulation 18 Scoping consultation period were:

Specific Stakeholders	General Stakeholders
Ancient Monuments Society	Those who had already expressed an interest in planning consultations (on the 'Consultation Database')
Archaeological Trusts	Members of the public
Canal & River Trust	Landowners
Chamber of Commerce	Developers
Civil Aviation Authority	Local businesses
Council for the Protection of Rural England	Community groups and resident groups
Crown Estates	Neighbouring Local Planning Authorities
Utilities Companies (Gas, electricity etc.)	Voluntary organisations
Environment Agency	Groups representing protected characteristics e.g. ethnicity, race, age, religion, disability etc.
Fire & Rescue Authority	Climate interest groups and Environmental Organisations
Forestry Commission	Town / Parish Councils, Neighbourhood Forums
Freight Transport Association	Leeds City Council Ward Members and Officers
Gypsy & Traveller Community	Education Establishments
Health & Safety Executive	Housing Associations and Registered Providers
Highways England	Local Members of Parliament
Historic England	
Homes England	

Specific Stakeholders	General Stakeholders
Home Builders Federation	
Leeds Chamber of Commerce	
Leeds Civic Trust	
Marine Management Organisation	
National Grid	
National Health Service / Leeds Teaching Hospitals Trust	
Natural England	
Network Rail	
Office of Rail Regulation	
Police & Crime Commissioner	
Ramblers Association	
Relevant Bus and Rail operators	
Royal Society for the Protection of Birds	
Sport England	
Telecom and Mobile operators	
The Coal Authority	
West Yorkshire Combined Authority	
West Yorkshire Archaeology	
Woodland Trust	
Yorkshire Water	

3.2 Leeds City Council adopted a new Statement of Community Involvement in November 2022, and this document was used to undertake consultation on the Leeds Local Plan 2040. A combination of face-to-face opportunities and online resources were used to appeal to the variety of different stakeholders. We also embedded the use of plain English, accessibility, inclusion and choice within the consultation, in line with guidance contained in the SCI.

3.3 Our aims for this consultation were:

- Ensuring that the consultation represents value for money and that we are making the best use of officer time.
- Removing barriers to consultation so we can support participation from individuals, groups and neighbourhoods right across the city.
- Make sure the information we provide leads to 'quality' comments that will influence the direction of travel for the Leeds Local Plan 2040.
- Consider how we can achieve the 3 targets set out in the Statement of Community Involvement during this consultation.
- Look to simplify the Leeds Local Plan, reducing the number of development plan documents to make it easier for officers, developers and communities to understand what is and isn't acceptable for new development in the district.
- Provide confidence to everyone taking part in the consultation that their feedback will be fully considered and responded to in a timely manner.

3.4 In accordance with the SCI and consultation good practice, the following principles were used to guide consultation on the Leeds Local Plan 2040 throughout the plan preparation process to help us hear as many views as possible and use those views to influence the Plan:

Trust

- Commitment to working with partners and communities in a blended way
- There will be honesty about what can and can't be influenced and achieved
- Officers will consult with residents/other stakeholders in a respectful manner

Timely

- Local Plan consultations will be at a time when proposals are at a formative stage to give people maximum opportunity to influence outcomes ('frontloading')
- An adequate length of time will be allocated for the consultation period
- All relevant information will be provided in a timely fashion

Visible

- There will be clarity about the aims, purpose and scope of the consultation
- The use of plain English at all times will ensure accessible consultations
- Consultation and engagement activity will be promoted as widely as possible, as well as targeted to those most affected where necessary

Inclusive

- Consultations will be open and accessible to engage with different sectors of the community
- There will be a commitment to eliminating discrimination and advancing equal opportunities

Transparent

- The results of each consultation will be used to show how it has influenced decisions
- The findings of the consultation, meaningful feedback and outcomes will be easily accessible
- Value for money will be achieved by ensuring that consultation is effective and proportionate to the issues being considered and the communities affected

3.5 For the first time the SCI also introduced targets to enable us to assess whether we are increasing our reach with engagement within different communities around the district. These targets were used to help us plan our consultation activity during Leeds Local Plan 2040 preparation, as well as facilitating reflection on the success of different approaches during the consultation period and making changes where necessary:

Target 1 – To achieve responses from every Ward on district-wide plan-making consultations.
Target 2 – To receive positive feedback on consultations that we undertake on plan-making (feedback will be used to help secure a positive trend in people's satisfaction levels over the 5-year SCI period).
Target 3 – There will be a year-on-year increase in consultation and engagement by young people (under 25's) between 2022 and 2027.

Equality

3.6 We directly targeted a range of community groups and organisations, including organisations representing a range of social groups including people from minority backgrounds, faith groups, gypsies / travellers / travelling show people, people with disabilities. These groups were wider and more diverse than the protected characteristic groups identified in the 'Equality Act 2010'. The aim of the consultation was to allow all an opportunity to participate in and have access to the Local Plan process. Equality considerations have also been an integral part of policy formulation from the outset.

3.7 A range of engagement techniques were used, to ensure that the consultation was as inclusive as possible including:

- Translation/other formats available for all documents on request
- The use of accessible venues
- Ensuring consultations were advertised using a wide range of ways, via social media and more traditional methods to make it more accessible for all.
- Use of different formats such as web videos, face to face and smart surveys for consultation.
- Involvement with trusted ambassadors, such as Leeds Gypsy and Traveller exchange.

4 SCOPING CONSULTATION (Regulation 18)

Consultation Summary

4.1 The first regulatory milestone in the preparation of a Development Plan Document such as the Leeds Local Plan 2040, is an initial stage of public consultation known as 'Regulation 18' or 'Scoping' consultation. The purpose of this stage is to ascertain views on what matters the Plan will need to consider and address i.e. its scope to achieve its identified objectives. The regulations specify that, as part of the plan preparation process, we must invite representations (comments/suggestions) on what the Plan ought to contain.

4.2 The scoping consultation was an opportunity for the Council to share its proposed direction of travel with the public, businesses and consultation bodies and ask for people's ideas, opinions, local experiences and evidence to help us shape the plan. Whilst being mindful of the need not to pre-judge the outcome of the consultation, it was considered that it would be helpful to respondents if there was some direction provided by the Council based on the policies areas that we knew required updating, with provision of some initial topics as a means of generating responses to the Plan at this early stage. It was hoped that this approach would help focus comments and help stimulate debate. However, it was made clear that these were initial topic areas and the consultation provided opportunity to agree /disagree with any part of the material and raise other views, suggestions and evidence.

4.3 The Leeds Local Plan 2040 (LLP2040) Regulation 18 Scoping consultation took place for 6 weeks, **between 10th February and 24th March 2023**. Well in advance of the start of the consultation an engagement strategy was prepared where we considered how we could ensure that the methods used for promotion, information and consultation were as effective, far-reaching and inclusive as possible. We also looked at the feedback and lessons learned from previous planning consultations and made sure we acted upon those during the LLP2040 consultation. Several objectives were used to focus our activity during the consultation period:

- Reflect on what has worked well or not in recent planning consultations to refine our online and offline methods.
- Develop digital content which provides an improved user-experience, including clear, accessible and informative web pages, videos and surveys that cater for all needs, whether people are knowledgeable about planning issues or not.
- Provide engaging 'offline' events that are easily accessible to help people get involved who are not digitally connected or comfortable using this medium to inform themselves or submit comments.

- We will actively seek comments from all wards across the district to achieve Target 1 of the SCI. This will include considering the best ways to engage with different communities.
- By considering Plain English in all documents, and providing choice in our consultation material, response forms and events we will try to increase the positive feedback we receive in line with Target 2 of the SCI.
- We will actively seek comments from all groups across Leeds and from those that are typically under-represented in planning consultations e.g. young people in line with Target 3 of the SCI, but also members of inner-city/more deprived communities, BAME communities, Gypsy Traveller community etc.
- We will demonstrate, in a form that is readily accessible and easily understood by the whole community, how the plan reflects the views and opinions expressed during the consultation process, and where those views cannot legitimately be considered, explain why that is the case.

Consultation Material

4.4 The consultation material used to inform people included the Scoping Consultation Document presenting the range of topics we thought should be considered through the Leeds Local Plan 2040. These were also condensed down into a 'Summary' version, to give people choice over how much time they wished to commit to learning about the Plan. The material was accessed via a campaign webpage in two formats:

- HTML format – an accessible web-based format which can be used on e-readers and translated into different languages using the relevant software. The html format is also mobile phone/tablet-friendly, which means the text fits the size of the screen and can be easily scrolled.
- Pdf format – a graphically designed version of the full and summary material was produced that could be downloaded and printed. The material was designed to be more engaging and visually appealing with the use of colour, photographs and other graphics.

There were 4650 unique views of the webpage over the campaign duration. Paper copies of the material were also made available at libraries and community hubs around the district.

Material/Resource	**Where Available?**
Consultation Campaign page with an Introduction, separate section for each Topic and Have your Say section	Webpage (in accessible html format) - LINK
Scoping consultation document with Sustainability Appraisal	Webpage (pdf format) Paper copy on deposit in Merrion House and in all libraries / community hubs in Leeds District Paper copy available for individuals / groups upon request
Scoping Consultation summary	Webpage (pdf format) Paper copies on deposit in Merrion House and all libraries / community hubs in the Leeds District
'Call for Sites' with interactive mapping tool and guidance note	Webpage
Statement of Representation	Webpage (pdf)

Material/Resource	Where Available?
	Paper copies on deposit in Merrion House and all libraries / community hubs in the Leeds District
Eight 'bitesize' explanatory videos covering each topic	Youtube with link on webpage - LINK Videos had 1350 views

Publicity

4.5 There was a detailed publicity and communications strategy which used a clear graphic across the campaign and printed material for consistency and branding. The methods used to publicise the consultation included:

Publicity/Communication method	Targeting / Reach
GovDelivery bulletin to everyone on the Planning consultation database (including residents, businesses, Council Officers, Ward Members, statutory consultees, neighbouring authorities etc.)	Local Plan Update bulletins were delivered, reaching 2054 contacts
Press releases.	Two media releases were issued at different stages of the campaign, signposting to the website Coverage was secured in a number of local media websites and newspapers including Yorkshire Evening Post, Leeds Live, Wharfedale Observer, Leeds Star, Caring Together, Leeds Climate, Doing Good Leeds, South Leeds Live and The Telegraph & Argus
Posters were designed and printed	Posters were distributed to all libraries and Community Hubs around the Leeds district, as well as Kirkgate Market. E-posters were made available for groups / forums who were willing to distribute
Email bulletins via Youth Council, Youth Parliament, Voice & Influence Networks, Localities Networks, Equalities Network, the Universities	Using these networks to reach diverse communities in Leeds.
Use of Leeds City Council social media channels/networks for promotion (Facebook, Twitter, LinkedIn)	Included Equality Network, Community Committees, Children & Families, Age Friendly Network. Total reach of 1,026,139
Paid for/organic social media posts via Facebook, Twitter, LinkedIn Paid for digital advertising	Targeting all adult population of Leeds boosted Facebook posts were used to target specific Wards in advance of webinars and consultation events. Users across Facebook and Instagram within Leeds reaching just under 200,00 unique users. Generating 8132 click throughs to the survey/ website.

Publicity/Communication method	Targeting / Reach
Promotion of consultation during any public meetings taking place during the consultation period	Neighbourhood forums / Parish & Town Councils Community committees etc.

Consultation Programme

4.6 A variety of different face to face events were organised to reach a range of different stakeholders throughout the district:

Event	Type of event	Targeting
Drop-in events booked in areas with very high footfall around the city. Merrion Centre 24th February 2023 Kirkgate Market 4th March 2023 Trinity Leeds 11th March	In person	All (largely residents) Officers handed out flyers to raise awareness of the consultation, had paper copies of the consultation material and surveys and were on hand to aid and answer questions.
Internal department meetings Transport Strategy 15th March 2023 Influencing Travel Behaviour Team 16th March 2023 Cultural Programmes Team 28th March 2023 Culture and Economy Connect 30th March 2023	In person	Discussions with internal teams to establish their issues/priorities, answer questions and encourage promotion of the consultation through their networks.
Attendance at meetings with various Parish Councils and Neighbourhood Forums	In person	Residents Raising awareness of the consultation, answering any questions and encouraging promotion of the consultation through their networks
Leeds College of Building	In person	Raising awareness of the consultation, answering any questions and encouraging promotion of the consultation through their networks
Garforth Academy Sixth form engagement	In person	16–18-year-olds Officers handed out flyers to raise awareness of the consultation, had conversations about the consultation, answered questions and encouraged students to complete the young person's survey
Neurodiversity event with Leeds Involving People	In person	Neurodiverse people Officers handed out flyers to raise awareness of the consultation, had paper copies of the consultation summary and survey and were on hand to aid and answer questions.

Event	Type of event	Targeting
Outer Northeast town & Parish Council forum	In person	Residents/elected members Raising awareness of the consultation, answering any questions and encouraging promotion of the consultation through their networks
University of Leeds Masters in Sustainability Consultancy talk	In person	Raising awareness of the consultation, answering any questions and encouraging promotion of the consultation through their networks
Outer Northwest Youth Summit	In person	Children/young people Officers handed out flyers to raise awareness of the consultation, encouraged young people to fill out the survey and were on hand to aid and answer questions.
Leeds DEAF Forum	In person	Residents with hearing loss Raising awareness of the consultation, answering any questions and encouraging promotion of the consultation through their network
Otley Town Hall	In person	Residents/elected members Raising awareness of the consultation, answering any questions and encouraging promotion of the consultation through their networks

Consultation Responses

4.7 There were several ways for people to make comments on the Scoping material:

- A full response form, and 7 separate topic response forms if someone is only interested in one or two topics. The full response form also has 'skip logic' embedded which allows people to skip some of the more technical questions if they wish.
- A young person's survey, available online or by paper copy taken to various events
- Via the dedicated LLP2040 email address.
- A postal address was provided.
- Officers recorded informal comments at online / in-person events.
- A telephone number was made available for queries.

All comments received were entered into a database to enable analysis.

4.8 In total **1004** submissions were made during the consultation period which related to the Leeds Local Plan 2040 Scoping consultation stage. The method in which people chose to submit their comments is set out below.

Method	Submissions	%
Smart Survey	747	75
Email Responses	225	22
Young person's survey	32	3
Total	**1004**	**100**

4.9

4.10 The vast majority of responses were submitted directly through the Council's online Smart survey platform.

4.11 A broad range of respondents submitted comments to the consultation. Of the 1004 submissions received by the Council a significant number were from residents:

Representor	Submissions	100%
Comments from individuals	706	70
Community / Resident groups, Neighbourhood Planning forums, Town and Parish Councils	19	2
Statutory, Non- statutory and Private sector Organisations (Housebuilders, Consultants etc)	279	28
Total Submissions	**1004**	**100**

Summary of Representations

See Appendix 1 – LLP Scoping Reps

APPENDIX 1: LLP2040 Scoping Consultation Reps

Statutory Consultees

SCOPE

Consultee	Rep	Response
WYCA	Support focus on health & wellbeing, inclusive growth and zero carbon. Plan should seek to align with the Strategic Economic Framework, Mayors Pledges and WY Climate & Environment Plan and the principles of the WY Transport Strategy 2040	Support welcomed.
Canal & River Trust	Suggest new policies – waterfront design, land stability, biodiversity, ecology	?
Environment Agency	Support focus on the 3 pillars	Support welcomed.
Forestry Commission	Support proposals	Support welcomed.
Natural England	No specific comments. Consult NE when preferred sites identified	Comment noted.
North Yorks County Council	Support scope. Potential to give rise to cross boundary strategic matters	Support welcomed. Cross-boundary issues to be prioritised.
Selby District Council	Note scope. No further comments at this stage	Comments noted.
Wakefield Council	No comment at this stage	Comment noted.

SPATIAL STRATEGY

Consultee	Rep	Response
WYCA	Support CCC approach – higher densities to support viability of business & public transport. Consider implications for mix of dwelling types, tenures & freedom from car dependency	Support welcomed.
Environment Agency	Support CCC but infilling needs to be done with consideration of need for 'stepping stones' in wildlife corridors	Support welcomed. 'Stepping stones' to be...
LTH NHS Trust	CCC potentially unrealistic as tool for identifying growth opportunities – aligning different budgets, priorities and timescales to deliver healthcare in CCC neighbourhood very challenging	?

HOUSING

Consultee	Rep	Response
WYCA	Support ambition to address housing need across Leeds district, and planning for most effective and sustainable patterns of development. Recognition of increased demand for self-build plots and community-led housing is supported, along with addressing needs of an aging population, and G&T community. Particularly support increasing delivery of affordable homes using range of mechanisms to boost delivery.	Support welcomed.
Environment Agency	It is critical that the flood risk Sequential Test is applied in a robust fashion, with development avoided in flood zones. An up-to-date assessment of the flood risks posed will need to be made for proposed and previously identified sites.	Priority and importance recognised.

ROLE OF CITY AND LOCAL CENTRES

Consultee	Rep	Response
WYCA	Centres should be focus for new commercial and leisure development. Consideration should be given to public transport accessibility and planning contributions to provide additional infrastructure for new/expanded centres	Comment agreed.
Environment Agency	Centres should feature green and blue infrastructure corridors to aid cooling, noise reduction and reduce exposure to air pollution	Opportunity to be explored.

ECONOMIC DEVELOPMENT

Consultee	Rep	Response
WYCA	Support brownfield land first policy, and allocations in sustainable locations with good access. Support consideration of different sectors and specific spatial requirements. Expand 'centres first' approach beyond just office. Integration of sustainable transport and active travel welcomed. Requirement for remote employment sites to provide services	Support welcomed.
Canal & River Trust	Opportunities for new visitor moorings to encourage boater visits. Waterfront development to promote economic activity	Opportunity to be explored.

Environment Agency	Spatially plan for the preference to always locate development in lowest flood risk areas where possible. Consider the individual and district wide-costs (financial, health & wellbeing) of developing in areas that subsequently flood.	Importance agreed.

MINERALS & WASTE

Consultee	Rep	Response
WYCA	Importance of existing rail freight transfer facilities around Leeds which serve important role for transport of aggregates.	Importance agreed.
Canal & River Trust	Aire & Calder Navigation is a 'Priority Freight route.' NRWLP safeguards two CRT sites for waterborne freight – CRT to be involved with discussions for safeguarded sites	Importance agreed. Opportunity to consider further at consultation and beyond.
Environment Agency	EA can assist with establishing whether all current safeguarded waste sites are still appropriate for that use, and provide details of any complaints in relation to existing sites. EA will continue to work with waste facility operators to improve quality and timeliness of waste returns. Detailed hydrogeological risk assessment to be produced for any onshore oil or gas activity, including impacts to groundwater at all depths, including mitigation measures. Requirement to address risks posed to water resources during the life of a minerals site and deploy protection/mitigation measures. Secondary aggregates from C&D waste must be recycled, and recycled secondary aggregate to be given higher priority. Ecological value of canals must be protected when used for freight transport/offloading.	Comments and advice welcomed.
Forestry Commission	FC should be consulted on any significant infrastructure projects that could affect forests and woodlands, and conditions on the after-use of minerals sites for forestry	FC to be consulted.
North Yorks County Council	Support the call for additional minerals and waste sites in Leeds which will allow the district to be more self-sufficient and less reliant on neighbouring authorities, especially for aggregates. Refer to Policy M16 in recently adopted NYCC Minerals and Waste Joint Plan – key spatial principles for hydrocarbon development	Support welcomed.

TRANSPORT & CONNECTIVITY

Consultee	Rep	Response
WYCA	Welcome commitment to safeguarding mass transit routes. Bus – consider requirements in relation to land use and road hierarchy (potential overlap with Mass Transit) Rail – evidence base covering multiple factors in WYCA rail strategy	Support welcomed.
Canal & River Trust	Towpath network as car-free route to City Centre. Discussions of mass transit should consider impact on bridge crossings	Opportunity agreed. Opportunity to consider further at consultation and beyond.
Environment Agency	Support for green road hierarchy and principles of reducing car dependency. Special consideration for active travel networks which overlap wildlife corridors and blue infrastructure	Support welcomed.

OTHER POLICY AREAS

Consultee	Rep	Response
WYCA	WYCA working on Local Nature Strategy – opportunities to identify and enhance green ecological corridors. Feed into LLP2040 evidence base	Support welcomed.
Canal & River Trust	Need to reduce the risk of pollution to water environment from redevelopment of contaminated sites	Priority agreed.
Environment Agency	LCC's Health & Wellbeing Strategy needs updating with definitions of all typologies of green space Risk of pollution of groundwater from contaminated land should be recognised in plan and remediation promoted	Importance of suggestions agreed and to be explored.

What you told us

About Spatial Strategy: Distribution of Housing and Economic Growth

- General agreement that the Plan should be aiming to meet local needs, with many noting that affordable housing is a particular priority.
- Strong support for prioritising brownfield land and re-use of empty buildings or derelict sites, though some noted these sites can sometimes be challenging to redevelop.
- Strong support for making sure development is in places with good access to services and facilities, with some noting that development can bring new facilities.

- The majority of people had concerns about building on Green Belt. However, some felt the need for development would justify this, and others considered this would be more acceptable if the development was meeting specific local needs (such as for affordable housing or housing for older persons).
- A significant number of people said they would be concerned about new development taking place in their area, with the particular concerns being raised about loss of habitats, the capacity of infrastructure, the impact on green space and the impact on green belt.
- The majority of people said they would be more likely to support new development if it delivered improvements to their area.
- Some commented that the City Centre is well placed to accommodate further high-density residential development, whilst others felt that focussing on the city centre and inner areas may not provide enough variety and choice or meet all needs.
- Some raised concerns about the principle of new settlements, noting that they face high upfront infrastructure costs, may be less sustainable and take a long time to be delivered. The majority of people did not think that a new settlement would be the best location for new development.
- Some suggested that the Plan should prioritise development and investment in 'run down' areas of the City.

About Spatial Strategy: Approach to Green Belt and Rural land

- The majority of people had concerns about building on Green Belt.
- Some people felt that the need for development would justify releasing Green Belt for development, and others considered this would be more acceptable if the development was meeting specific local needs (such as for affordable housing or housing for older persons).
- Some people highlighted that a review of the Green Belt and the Rural Land designation should be undertaken as part of the evidence base for the Plan.
- Some people said that the uplift in land value that would result in Green Belt land being allocated would enable that development to deliver wider benefits, such as additional affordable housing or infrastructure provision.

About Spatial Strategy: Opportunity Areas

- Some commented that the City Centre is well placed to accommodate further high-density residential development, whilst others felt that focussing on the city centre and inner areas may not provide enough variety and choice or meet all needs.
- Some noted that, as well as considering what places are currently like, there is also a need to consider what new development can bring to improve places.
- Some raised concerns about the principle of new settlements, noting that they face high upfront infrastructure costs, may be less sustainable and take a long time to be delivered.
- Some suggested that the Plan should prioritise development and investment in declining / underdeveloped areas of the City.
- The majority of people did not think that a new settlement would be the best locations for new development.

About Spatial Strategy: The Settlement Network

- The majority of people felt that the City Centre and the main urban area / suburbs would be good locations for new development.
- There was a relatively even split between people who thought that major settlements were a good location for new development, and those who disagreed.
- The majority of people did not think that outer areas and rural villages would be the best locations for new development.
- Many felt that development is needed in all parts of the district to provide choice and meet needs in both urban and rural areas.
- Some noted that there is a need for a wide range of sites in a variety of places to meet different local needs.
- Some suggested that the settlement network could be informed by the compete, compact and connected places approach
- Some thought that the settlement network should be the starting point for developing the strategy of the Plan.

About Employment land needs

- 62% of respondents agreed that there is a need to identify new employment sites
- Need to update evidence base to reflect current needs
- The factors agreed to be the most important for new sites were good access to public transport (91.7%), local job opportunities close to where people live (81.6%), affordable space for small and medium businesses (81.3%) and within close distance to other services (75.5%). Comments also note needs for modern occupier requirements and close to transport network
- Current policy inflexible and needs to reflect market changes

About Employment land safeguarding

- Mixed overall opinion on whether we should seek to prevent losses to other uses: 37% agreed, 36% neither agreed or disagreed, and 27% disagreed
- Loss of existing employment sites creates greater pressure on allocating additional land
- Right balance needed between building new houses and losing business space
- General support for the expansion of existing industrial areas and allow changes of use of existing businesses not located in the right areas
- Allow other uses (i.e. housing, community) if no longer in use, viable or fit for purpose, but also depends on case-by-case basis
- 58% thought creative / cultural spaces should be protected, with 55% for space in centres. Lowest was for offices in the city centre (33%) and industrial areas (34%)
- Flexibility is a key consideration and should also depend on local need
- Need to consider Permitted Development rights and whether we actually need policy to protect businesses

About Overall Housing Requirement by Sub-areas/settlements

- Need to increase delivery of housing across all markets and locations to balance out house prices and affordability
- Need to increase delivery of housing to balance out house prices for first time buyers, young professionals, and the working population
- Need to allocate housing in the most sustainable locations close to key services
- Need to address the deficiency in delivery of family housing that has resulted from the concentration of supply in the City Centre and Inner Areas
- Brownfield land and reuse of existing buildings should be prioritised for new housing
- Greenbelt land should be protected from development
- New transport infrastructure could facilitate housing growth

About Accessible & Specialist Housing

- Most people with additional needs want to stay in their own homes with some support.
- Housing should also include options for 'rightsizing' and bungalows, providing more choice of homes in later life.
- It is difficult to find appropriate accommodation for people with accessibility needs and who are vulnerable, which has a significant impact on their health.
- New policy for accessible homes should increase the amount and percentage for both M4(2) 'accessible and adaptable dwellings' and M4(3) 'wheelchair user dwellings.'
- People who are living in housing that they are unable to maintain see properties falling into disrepair.
- There is a historic under delivery of specialist housing for older people, which places increased pressure on the NHS and social care sector – need a specific policy dedicated to specialist housing for older people with need versus supply figures and plan to address any shortfall.
- Consider expanding accessible home requirements to include other bespoke needs (e.g. mental impairments). Consultation needed with key stakeholders.
- Accessible housing and specialist housing should not be lumped together.

About Affordable Housing

- Affordable housing must aim to meet local needs, be allocated to local people and consider Right to Buy.
- Priority for UK taxpayers.
- Need to maximise delivery across the whole city and provide a mix to meet the variety of needs of households in terms of locations, markets, types (including co-housing), tenure and sizes
- There should be 'downsizing' options including bungalows
- Houses in Multiple Occupation should be converted to family homes and affordable housing.
- Need to increase housing delivery to balance out house prices and improve affordability for all, including first time buyers, older and younger professionals, families, older people, minority groups, vulnerable groups and those working.
- Affordable housing should have good access to employment and services, or new services should be provided to facilitate housing growth.

- Need to find a mechanism other than an affordable element within every housing development.
- 'Not for profit' Registered Providers and the Council should have more stock
- Priority should be given to bringing empty properties back into use.
- New homes should be high quality and energy efficient
- Tenants with a good payment record should not have to pay a deposit for a mortgage.
- Park homes should be considered as a potential solution to housing delivery.
- People should be able to stay near family networks and support
- Student housing inflates prices and results in families leaving student areas.

About Housing Mix

- Proposals for housing must provide a mix suitable for different household types and sizes and that priority must be given to, the most vulnerable, families, low rise, high density and affordable.
- There should be a bungalow requirement added to the Housing Mix policy.

About Density

- General point relating to housing supply and past reliance on CC and high-density development not reflecting community needs
- Services and Infrastructure should be considered when determining the strategy for housing delivery across the city, for example high density development could be directed to locations around transport hubs
- Look at regeneration of low-density interwar housing estates to consider renewal and high density

About Older Persons Housing

- Addressing the needs of an aging population aligns with the early stages of developing a West Yorkshire Housing Strategy.
- During preparation of Neighbourhood Plans a lot of communities identify a need for bungalows and retirement properties.
- New housing developments should consider the needs of older people, particularly in terms of local amenities, public transport and community support.
- Older people also want access to affordable housing.
- Accessible housing and allowing people to stay longer in their own homes is not, in itself, an appropriate way of meeting the needs of older people. The Local Plan needs to identify housing need for older people, and allocate specific sites that are in the most sustainable locations close to key services. Include a standalone policy actively supporting the delivery of specialist older person's housing with good access to services and relevant facilities.
- Viability for older person's housing is more finely balanced and should be fully assessed in the LP Viability Assessment. Affordable Housing is not appropriate.
- The requirement for affordable housing must not be applied to C2 uses in order to enable developers to compete for land and deliver much needed schemes.

- Welcome a more localised approach to assessing housing needs for different groups.
- Should be more emphasis on flats designed specifically for older people.
- There is a lack of smaller properties that are cheaper and easier to run for older population to 'downsize' into, that could potentially free up some family housing.
- Options for multi-generational living.
- Park homes offer affordable small homes for a variety of people, including the elderly. More sites should be considered as a potential solution to housing delivery.
- Housing for the elderly should be included within the general community, not in estates solely for the elderly.
- Consider building terraced bungalows with communal gardens enabling older people to interact with neighbours.
- Lifetime accommodation appropriate for an aging population is often an afterthought as not as viable. Certain location may support this type of accommodation though.

About Gypsy & Traveller and Travelling Showpeople policy

- Some support for meeting the needs of all communities

About Self & Custom Build Housing

- Prior to rationalisation of the register, The Leeds Self Build register had the 7th highest level across 328 local authorities. This figure is still high when compared to similar authorities.

- Leeds has not been able to meet the obligation to provide sufficient planning consents compared to the demand on the register.

About Student Housing & PBSA

- The increase in student accommodation provided in recent years has exceeded capacity
- New build PBSA studio flats are too expensive
- Student accommodation should be provided on campus
- Increase in student accommodation provided in recent years in the city centre should continue to free up existing stock in outer areas currently in use as HMOs
- The concentration of student populations in outer areas in HMOs is detrimental to the community and prevents homes for families
- HMOs should be returned to use as family homes and affordable housing

About Co-Living

- Co-living was identified through comments received during the Scoping consultation as having the potential to improving housing options in the city.

About Regeneration Priority areas

In our previous consultation we didn't specifically focus on regeneration as a topic in itself, but there were questions related to what regeneration seeks to achieve. Here's what you said:

- 81% agreed that we should make the most of our brownfield land and existing urban areas for new growth – many additional comments stressed the importance of this
- 84% agreed that we should be seeking to deliver new infrastructure alongside new development
- 80% agreed that the new Local Plan should focus on areas of the district which need regeneration and how we can achieve this
- Some people were concerned that there are a lot of new buildings that are too expensive for those on lower incomes, therefore a key focus for regeneration should be on securing affordable housing

About Leisure, Culture & Tourism

- 76% agreed the plan should explore how tourism grows in Leeds, although some concerns on the priority and importance that should be given to tourism
- Range of commercial, leisure, cultural and sporting uses helps support tourism
- Issues and opportunity on accessibility and access to public transport network
- Opportunities for visitor moorings and waterfront development
- Main focus appears to be on City Centre (shopping and leisure)
- Regulation might be needed on short term holiday lets
- Conflict between support or oppose of Leeds Bradford Airport expansion

About Hot Food Takeaways

- There needs to be more controls around Hot Food Takeaways (HFTs) as they create issues with littering, highways and obesity.
- Current policy is stringent enough and not all HFTs are inherently unhealthy. HFTs can be important destinations.

About Active Travel

- 73% of respondents told us that they wanted us to increase opportunities for local people to participate in active travel
- 82% of respondents told us they want the Council to encourage development in sustainable locations and to promote sustainable transport
- There was concern that prioritising active travel could alienate some road users that rely on cars for transport, such as disabled people and the elderly
- Get Set Leeds: to improve the environment to encourage more people to be physically active local people say we need to improve infrastructure, provide better safety measures and more activities

About Leeds Bradford Airport

- 79% of respondents agreed that we should consider updating our planning policies to manage growth at Leeds Bradford Airport
- Many comments related to LBA raise concerns over the idea of airport expansion due to the potential impact on our environment
- Further, many respondents who stated they live within the flightpath of the airport raised concerns that airport growth could lead to increased flights, which would be a further nuisance to their mental and physical health.
- Alternatively, there were many comments which stressed the importance of LBA to the Leeds economy in terms of tourism and creating jobs at LBA
- Many people wanted to see sustainable transport links to LBA
- Some respondents supported the growth of LBA under the constraint that growth was sustainable

About Mobility Hubs

- 68% of respondents agreed that mobility hubs would support our ambition to be a city where you don't need a car to meet your everyday needs
- A lot of comments were concerned about the capacity of the public transport network

About Public Transport

- 67% of respondents told us their major concern of new development in their area is the capacity of transport infrastructure
- 92% of respondents said that good access to public transport should be an important factor to determining where a site is suitable for employment use
- Some people were sceptical of the Council's ambition for Leeds to be a city where you don't need a car to meet your everyday needs due to infrequent and unreliable public transport

About Transport in New Development

- A major concern about new development is the capacity of existing transport infrastructure
- 73% of respondents wanted us to increase opportunities for local people to participate in active travel
- 88% of respondents agreed that we should be exploring how we can ensure that new developments and places are accessible to all
- 82% of respondents agreed that we should be encouraging development in locations which promotes sustainable forms of transport
- A few respondents raised concerns that our transport ambitions would alienate some users who are more reliant on cars, such as disabled people and older people

- There is a general concern over the quality of play spaces across Leeds, and a major concern over the lack of play spaces in the city centre
- New developments seem to include blank green space, with not a lot of play spaces
- There is a desire for more educational and cultural facilities in the city centre

About Waste

- Kerb-side collection of both glass and food waste is a missed opportunity in Leeds.
- The reduction of waste and further encouragement of recycling (including education) is supported.
- Some respondents want more incinerator sites to produce cheaper energy, others do not consider incinerators to be sustainable and don't want more.
- Need to understand why we have so much fly-tipping of larger items.
- More transparency wanted on what happens to the District's waste and recycling.
- Require waste facilities to publish whole life cycle details for sites, including end of life plans when no longer required.
- Provide industrial recycling facilities where material from demolished buildings can be re-used.
- People should be able to use nearest waste management facility, even if over Authority boundary, to reduce journey time.
- More local waste centres required for those who don't drive. Ensure they are in convenient locations and comprehensive in the provision they offer.
- The target for reducing the amount of waste should be separate from planning policy.
- Don't give waste licences to companies who breach them.
- Change public waste collection to be "sort off site", so more is recycled.
- More street bins, including recycling ones, and they should be emptied more frequently.
- Student waste needs to be dealt with more effectively.
- Allow businesses to pay at tips for unloading their vehicles to generate income.
- More furniture collection for free.
- Support for additional waste sites which would allow the Council to be more self-sufficient and less reliant on neighbouring authorities for extra capacity.
- There is a balance to be struck between accommodating extra waste disposal and minimising the impact on the environment and local communities.
- Commitment from a development industry member that new development deals with construction waste in a sustainable manner and ensure opportunities for recycling.
- Consider reviewing existing arrangements, particularly those that have created negative living conditions for local people.
- Some support expressed for buffer zones around sites to minimise waste management impact.

About Minerals

- 78% of respondents think that minerals should be moved around in the most sustainable way.
- Overall support for ensuring that we minimise the impact of mineral extraction on the environment and the amenity of communities.
- 67% of respondents had no opinion of whether aggregate came from the seabed or land-based quarries, but of those that did have an opinion, more preferred land-based extraction because it was largely considered that dredging the seabed is more environmentally harmful.
- Once quarrying is complete sites can be remediated and used for community uses, such as green space.
- Support for transportation of minerals via waterways or rail rather than road network.

- Comments from industry include requesting sites to be close to the market to reduce transport requirements, and support for the introduction of buffer zones to minimise negative impacts.

About Fracking

- 58.43% support a ban on fracking in all circumstances
- 14.61% support a policy that resists fracking unless absolutely necessary
- 18.89% support a policy that encourages fracking, subject to requirements
- 8.33% support no new policy or have no views
- Climate change, pollution, impact on protected species and earthquakes were the top 4 reasons given to support a ban on fracking. A common theme was that fossil fuels should stay in the ground and it was mentioned that this is no longer debatable due to the scientific consensus on climate change
- Concerns about energy security and jobs were given by those who supported a policy encouraging fracking. Concerns were raised about possible misinformation and about the ethics of renewable energy manufacturing potentially involving child labour and other worker violations
- Fracking was also mentioned in response to questions on green belt and minerals supply, including the fear that the consultation was attempting to mislead members of the public, suggesting that opposition to fracking is very strong

About Community Facilities

- Community facilities are critical
- Pubs have served local communities for hundreds of years but are seeing a demise.
- Facilities for children & young people should be made a priority
- The City Centre needs to have the same level of community facilities and green spaces/parks/GPs as suburban areas.
- Multicultural/diversity needs to be reflected.
- The plan should, alongside the 'Complete, Compact, Connected' neighbourhoods proposals, seek to give much higher profile in the plan to the role and protection of community facilities. The plan needs to define community amenities as these will differ between different groups.
- The protection of community facilities such as libraries and sports centres are vital for both mental and physical health.
- Community facilities are of a much higher priority to some groups - e.g. disabled people than others.
- Part of the issue is that there is very little space left in certain areas, or under certain plans - so if planning for everything else at a granular level, the modern "village hall" or multipurpose community space should be provided for as well.
- The council can perhaps be most effective by encouraging the delivery of community service and facilities by encouraging social enterprises including Development Trusts and asset based charitable organisations. Where possible the council should locate its local services within buildings owned by these social enterprises thereby providing an income stream for them through the rent the council would pay.
- Consider the role of mixed use developments, particularly in CC and Town and Local centres where community facilities should be located – with focus on ground floor uses.

About Heritage

- Welcome the review of heritage policies to bring them up to date.
- Strong recognition to the importance of heritage to local communities - past, present and future.
- Recognition that the value of Leeds heritage and culture helps drive the economy (including tourism)
- Recognition that the plan should promote and secure re-use of heritage buildings making them fit for the present and for future but retaining character and identity and celebrating the diversity in culture and heritage.
- Some arguments against protection of heritage in favour of new growth and utilising previously development land.
- Would welcome inclusion of a detailed policy relating to historic mills as a proactive means to managing this resource

About Child Friendly Cities / Play & Recreation

In the last local plan consultation, we did not ask any specific questions relating to children and young people and that was rightly raised as a concern. This is because we were still in the research stage of this topic and did not have a clear view of how this was going to work.

Here are some comments relating to children and young people:

- People were concerned about children's access to play spaces and facilities dedicated to their needs
- Parents wanted their children to cycle, but feared for their safety on busy roads

About Gender Inclusive Urban Planning

Whilst the Scoping consultation did not directly ask questions about this topic, there were comments submitted regarding gender-related issues:

- Women's transport behaviour is focused on a caregiving role, which is more reliant on cars.
- Other comments referred to women's safety and the need for the local plan to consider this.

About Agricultural & Forestry works dwellings/Countryside policies

- Some support for taking a new look at the policies and streamlining.
- Agreement with protecting agricultural land and providing support for farmers (farm buildings and farm workers dwellings)

About the Countryside

- Some support for taking a new look at the policies and streamlining the number of policies and protecting agricultural land and providing support for farmers (farm buildings and farm workers dwellings).