

---

**Report of the Director of City Development**

**Report to: Development Plan Panel**

**Date: 26<sup>th</sup> September 2012**

**Subject: LDF Core Strategy Consultation Responses in Relation to Miscellaneous Topics (including Soundness, NPPF compliance, General Environment & Economy, Consultation, Habitat Regulations Assessment, Sustainability Appraisal, Equality Impact Assessment and Health Impact Assessment).**

Are specific electoral Wards affected? If relevant, name(s) of Ward(s):	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

---

**Summary of main issues**

1. The key issues which have arisen in response to this part of the Core Strategy including comments on Soundness, NPPF compliance, General Environment & Economy, Consultation, Habitat Regulations Assessment, Sustainability Appraisal, Equality Impact Assessment and Health Impact Assessment.

**Recommendations**

Development Plan Panel is requested to:

- i). note and comment on the contents of the report and the course of further action (as detailed in Appendix 1 to the report).

## **1.0 Purpose of this Report**

- 1.1 Within the context of the Core Strategy Initial Report of Consultation (6<sup>th</sup> June), the purpose of this report is to review consultation responses in relation to a number of Miscellaneous topics (including Soundness, NPPF compliance, General Environment & Economy, Consultation, Habitat Regulations Assessment, Sustainability Appraisal, Equality Impact Assessment and Health Impact Assessment.) for which consultation responses have been received. Appendix 1 attached, summarises the representors, key issues raised, the City Council's view and proposed action. The suggested changes to the Core Strategy text arising from this analysis has been included in Appendix 2.

## **2.0 Background Information**

- 2.1 Following Consideration by the Development Plan Panel and Executive Board, a 6 week period of public consultation has been undertaken, commencing on 28<sup>th</sup> February to 12<sup>th</sup> April 2012. Consistent with the LDF regulations, this is a targeted stage of consultation, with emphasis upon requesting responses in relation to the "soundness" of the plan. Within this context, the consultation material comprised of a range of documents, which were subsequently made available on line or as paper copies, including:

- Core Strategy Publication Draft (Main Document)
- Sustainability Appraisal (& Non Technical Summary)
- Habitats Regulations Assessment Screening
- Equality Impact Assessment Screening
- Draft Infrastructure Delivery Plan
- Draft Core Strategy Monitoring Framework
- Health Topic Paper
- Report of Consultation on Preferred Approach (October – December 2009)

Links were also incorporated to the consultation web pages to the evidence based material, which has been prepared to help inform the emerging document (including the Employment Land Review, Leeds City Centre, Town and Local Centres Study, Housing Growth in Leeds, Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment and the Leeds open space, sport and recreation assessment.

## **3.0 Main Issues**

- 3.1 The main issues on these topics relate to comments including Soundness, NPPF compliance, General Environment & Economy, Consultation, Habitat Regulations Assessment, Sustainability Appraisal, Equality Impact Assessment and Health Impact Assessment.

## **4.0 Corporate Considerations**

As noted above, the Core Strategy, forms part of the Local Development Framework and once adopted will form part of the Development Plan for Leeds.

## **4.1 Consultation and Engagement**

- 4.1.1 As outlined in this report, the Core Strategy Publication draft has been subject to a further 6 week period of consultation. This has been undertaken in accordance with the LDF Regulations and the City Council's adopted Statement of Community Involvement (SCI).

## **4.2 Equality and Diversity / Cohesion and Integration**

- 4.2.1 An Equality Impact Assessment Screening was undertaken on the Core Strategy Publication draft, prior to consultation (see Core Strategy Executive Board Report, 10<sup>th</sup> February 2012). This concluded that equality, diversity, cohesion and integration issues had been embedded as part of the plan's preparation. For information and comment, the Screening assessment has also been made available as part of the supporting material for the Publication draft consultation. Within this overall context, it will be necessary to continue to have regard to equality and diversity issues, as part of the ongoing process of preparing the Core Strategy, including considering representations and next steps.

## **4.3 Council Policies and City Priorities**

- 4.3.1 The Core Strategy, plays a key strategic role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to the 'the best city in the UK'. Related to this overarching approach and in meeting a host of social, environmental and economic objectives, where relevant the Core Strategy also seeks to support and advance the implementation of a range of other key City Council and wider partnership documents. These include the Leeds Growth Strategy, the City Priority Plan, the Council Business Plan and the desire to be a 'child friendly city'.

## **4.4 Resources and value for money**

- 4.4.1 The DPD is being prepared within the context of the LDF Regulations, statutory requirements and within existing resources.

## **4.5 Legal Implications, Access to Information and Call In**

- 4.5.1 The DPD is being prepared within the context of the LDF Regulations and statutory requirements. The DPD is a Budgetary and Policy Framework document and as such this report is exempt from call-in by Scrutiny.

## **4.6 Risk Management**

- 4.6.1 The Core Strategy is being prepared within the context of the LDF Regulations and the need to reflect national planning guidance. The preparation of the plan within the context of ongoing national reform to the planning system and in responding to local issues and priorities, is a challenging process. Consequently, at the appropriate time advice is sought from a number of sources, including legal advice and advice from the Planning Advisory Service and the Planning Inspectorate, as a basis to help manage risk and to keep the process moving forward.

## **5. Conclusions**

- 5.1 This report provides an overview of the issues raised in relation to a series of Miscellaneous topics. Following consideration of representations received, recommendations for a number of minor changes have been made and have been consolidated in Appendix 2, to this report.

## **6. Recommendations**

- 6.1 Development Plan Panel is requested to:
- i). note and comment on the contents of the report and the course of further action (as detailed in Appendix 1 to the report).

## **7. Background documents<sup>1</sup>**

- 7.1 A substantial number of documents are available representing various stages in preparation of the DPD and the background evidence base and Equalities Impact Assessment Screening. These are all available on the City Council's web site (LDF Core Strategy Pages) web pages or by contacting David Feeney on 247 4539.

---

<sup>1</sup> The background documents listed in this section are available for inspection on request for a period of four years following the date of the relevant meeting. Accordingly this list does not include documents containing exempt or confidential information, or any published works. Requests to inspect any background documents should be submitted to the report author.

**Appendix 1:****Core Strategy Publication Draft - Analysis of Consultation Responses****MISCELLANEOUS COMMENTS**

<b>Representor/Agent</b>	<b>Representor Comments</b>	<b>LCC Initial Response</b>	<b>Action</b>
<b>General Comments on Soundness</b>			
(0025) Kippax Parish Council	The whole plan is sound	Support Welcome	No change.
(1029) University of Leeds	Overall sound	Support Welcome.	No change.
(4825) Morley Town Council	Core Strategy is unsound, is unnecessarily harmful to the city's green setting and internal environment, is not supported by reliable evidence or reasonable argument, and is not compliant with NPPF.	Concerns are noted. As set out in the Core Strategy's Spatial Vision & Objectives, the plan is seeking to deliver necessary urban regeneration and growth, whilst seeking to maintain the local distinctiveness and character of Leeds and associated settlements. As set out in the opening sections of the plan, achieving all of these objectives at the same time is a key challenge but necessary to deliver the principles of sustainable development as advocated by the NPPF. The plan has been subject to a Sustainability Appraisal, which has appraised the plan against a series of interrelated environmental, economic and social objectives and adjustments to policies have been made where necessary.  In terms of the 'green environment' more generally, this has a high priority across the plan, including specific policies for Green Infrastructure and Greenspace protection and enhancement.	No change.
<b>Compliance with National Planning Policy Framework (NPPF)</b>			
(0806) Aviva Life & Pensions (UK), and The Crown Estate (via Indigo Planning) (1027) Gaunts Ltd (via Peacock and Smith) (1186) T G M F Emsley (via ID Planning)	The Core Strategy is unsound as does not demonstrate full compliance with the NPPF, the document needs to be reviewed.  The Core Strategy has not been prepared with regard to the NPPF and has been prepared with only the original three tests of soundness, not the current four tests set out in NPPF	In order to check compliance with the NPPF, the City Council has assessed the Core Strategy using the Planning Advisory Service (PAS) NPPF checklist. Using this checklist, the City Council is satisfied that the Core Strategy is in compliance with the NPPF. Where adjustments have been considered necessary a number of changes have been made to the document, which will be subject to further consultation prior to formal submission.	No change.

<p>(1743) Taylor Wimpey UK (via Turley Associates)  (2663) Spawforths  (2663) Miller Strategic Land (via Spawforths)  (2956) Cllr Thomas Leadley  (5024) CDP Limited  (5671) ELE Northern Quadrant Consortium Great North Developments Ltd c/o Evans Property Gr, Consortium of Housebuilders, Barratt David Wilson Homes, Great North Development Edmund Thornhill, Thornhill Estates (via ID Planning)  (5681) The Ledston Estate, AR Briggs and Co,  5681 The Hatfield Estate, The Diocese of Ripon and Leeds, Lady Elizabeth Hastings Estate Charity, Jonas), The Bramham Park Estate, Meadowside Holdings Ltd  (via Carter Jonas)  5719 Scarborough Development Group  (via RED Property Services)</p>	<p>Need public consultation to make sound against NPPF.</p> <p>The Core Strategy does not consider development viability in the round and lacks consideration of this issue in depth. Unsound. To make the plan sound, the Core Strategy needs to consider viability in the round and should provide a framework for site assessment as and when site allocations are considered.</p>	<p>In relation to viability issues, the City Council is continuing to develop its evidence base and to progress a Community Infrastructure Levy (CIL) charging schedule. Within this context, further work has been commissioned on Economic Viability. This will take into account the Council's current and potential future policy requirements, such as for affordable housing, greenspace, Code for Sustainable Homes, and other relevant assumptions. This includes the policy requirements for new development in the emerging Core Strategy.</p>	<p>No change.</p>
---	---	--	-------------------

<b>General Environment</b>			
(0046) Environment Agency	<p>Raise a number of points regarding the Management of Water Resources and the relationship with the Natural Resources and Waste DPD.</p>	<p>As noted in the response from the Environment Agency, the City Council has prepared a Natural Resources and Waste DPD, which is nearing adoption. This Policy document includes a series of detailed Policies regarding the management of water resources including Water Efficiency, Water Quality, the Functional Flood Plain, Development in Flood Risk Areas, Zones of Rapid Inundation, Flood Risk Assessments and Surface Water Run Off. These Policies in turn, provide a robust framework for the City Council's and its partners to manage water resources effectively and to manage responsibilities under the Water Framework Directive. In order to emphasise this further, it is accepted that the Core Strategy text could be strengthened to make the appropriate cross references.</p>	<p>Change:</p> <p>Add additional wording to the final sentence of Para. 5.5.52.:<i>Further details on the actions identified in Policy EN5 and detailed Policies in relation to the efficient use, quality &amp; effective management of water resources are in the Natural Resources and Waste DPD. These Policies in turn provide a basis for the City Council and its partners, to help manage responsibilities under the Water Framework Directive.</i>"</p>
	<p>With regard to the Leeds Flood Alleviation Scheme (FAS), it is considered that the Core Strategy and related documents need to be updated to reflect the latest position and a specific Policy for the FAS, needs to be included.</p>	<p>Reference is made to the Leeds Flood Alleviation Scheme in Core Strategy Policy EN5 (viii) and the project is also included within the Core Strategy's draft Infrastructure Delivery Plan. Whilst noting that specific details of the proposal may be subject to change, it is considered that the Policy references in both the Core Strategy and Natural Resources and Waste DPD are sufficient.</p>	
	<p>Further clarity is also requested regarding the status of save policies (Culverting and Sustainable Urban Drainage).</p>	<p>Unless replaced as a consequence of the Core Strategy or related DPD, the City Council in tends to retain saved policies, where they remain consistent with national guidance. The Natural Resources &amp; Waste DPD in Policy Water 7 covers Surface Water Run Off, which makes reference in the supporting text to retained City Council Supplementary Planning Guidance SPG22. Saved UDP Policy N39B is a detailed Policy for Culverting (not covered in the Core Strategy or NRWDPD) and will continue to be saved.</p>	
	<p>It is recommended that the Council look to update the Leeds Strategic Flood Risk Assessment (SFRA 2007), in the light of additional modelling.</p>	<p>Comments are noted. The City Council is in receipt of regular modelling/mapping updates from the Environment Agency, which are used when considering Planning Applications and for Development Plan updates. It is not therefore considered necessary to update the SFRA at this stage.</p>	

<p>(0058) Natural England Consultation Service</p>	<p>Notes that previous representations appear to have been taken forward by the City Council and considers the publication draft of the Core Strategy to be legally compliant and in accordance with the relevant tests of soundness.</p> <p>In the light of the NPPF, Natural England request that they are consulted on any further Core Strategy changes.</p>	<p>Comments welcomed.</p> <p>Comments noted.</p>	<p>No change</p> <p>No change</p>
<p>(2560) Mr Lee Davidson</p>	<p>The Main Document refers to walking and cycling 9 times and makes about 50 references to 'green infrastructure', often linked with the term 'network' but it never shows that it understands the crucial role which Public Rights of Way play in that network and how they relate to the rest of the network, substantial parts of which may be informal.</p> <p>Table of Contents (4.9) needs to be corrected, 'Integration' should read 'Integrating' which is the word used later in the document heading.</p> <p>Glossary should include Public Right of Way, Public Footpath, Public Bridleway and Permissive Footpath/Bridleway</p>	<p>The need to strengthen reference to Public Rights of Way has been acknowledged in proposed additional text to Para. 2.39 (iii) Our Green Environment – in the Analysis of Spatial Vision responses.</p> <p>Need for correction noted and will be corrected through final editing.</p> <p>Agree, it would be useful for these to be added to the Glossary</p>	<p>See changes to 2.39.</p> <p>Make correction through final editing.</p> <p>Change to add Public Right of Way, Public Footpath, Public Bridleway and Permissive Footpath/Bridleway to Glossary.</p>
<p>(5051) West Yorkshire Archaeology Advisory Service</p>	<p>Detailed comments regarding the interpretation of the NPPF in relation to the role of 'local plans' and the natural and historic environment. It is noted that equal weight is given to the natural and historic environment; within this context it is proposed that the Core Strategy includes a strategic Policy on the historic environment. The representation also covers the key role</p>	<p>These comments have been noted and addressed through changes to the Urban Design &amp; Conservation section of the document to strengthen the supporting text and Policy wording. Within the context of these changes and the coverage of the Spatial Vision and Objectives, the introduction of a further strategic policy is not necessary.</p>	<p>See changes proposed in relation to Urban Design &amp; Conservation.</p>



	of the WYAS in respect of commenting on planning applications.		
<b>General Economy</b>			
(3410) Gareth Brown	Considered that there is little mention in the document to 'marquee developments' i.e. attracting big national projects such as relocation of a National Museum/relocation of a Government Dept/Attracting Blue Chip companies/Hosting big events.	These comments are noted. The focus of the Core Strategy is to provide a spatial planning framework to deliver the Vision for Leeds and is primarily concerns with the scale, location and broad distribution of development. Within this context, the Core Strategy reflects the priorities set out as part of the Leeds City Region and Leeds Growth Strategy. Within this context, the Core Strategy provides a broad framework to attract major projects and companies and to promote such programmes, over the lifetime of the plan.	No change.
(1029) University of Leeds	The Innovation City Leeds building and bio-incubator project has been cancelled and due to changing funding arrangements and the closure of Yorkshire Forward. Consequently, delete reference to the scheme in the Draft Leeds Infrastructure Delivery Plan at section 4.35 and in the Kirkstall and Headingley Area table on p.57.	Comments noted.	Update the Draft Infrastructure Delivery Plan to reflect these changes.
<b>Development Management &amp; Policy Implementation</b>			
(0420) White Young Green Planning	It is understood that the CC will not seek to promote a Development Management document through which specific normal development control policies will be reflected. Unclear as to the clarity for the implementation of some policies. The potential to change use of office in the City Centre to mixed use for a bar/restaurant and residential is not reflected in SP3 or CC1. The document should make clear support to encourage flexibility within the CC to enable diversity of uses which respond to market demand when these uses will assist in the regeneration and vitality of local areas.	This point is addressed in Policy CC1, which allows for some flexibility.	No change.
<b>Consultation Process</b>			
(0065) Oulton Civic Society	Concern with the consultation process, there is little feedback/representation from individual members of the public due to lack	Consultation on all LDF documents is undertaken in accordance with the adopted Statement of Community Involvement and statutory regulations. Within this context,	No change.

	<p>of awareness that the consultation is taking place, difficult to understand and are therefore unable to make comment, the consultation process is poor or they are simply not interested.</p> <p>The Core Strategy is clearly justified and necessary but to be effective it will rely on the Site Specific Proposals being acceptable to the local community under the Localism Act.</p>	<p>Leeds is a large and complex City, with challenging issues and opportunities to address. Within this context, whilst every effort is made to present documents in a variety of accessible formats, it can be difficult to effectively engage with communities and members of the public. The Core Strategy is about broad strategic issues and it is therefore likely that higher level of engagement will be experienced through the preparation of the Site Allocations DPD and Neighbourhood Plans, when the implications of the strategy are applied to site specifics and local areas.</p>	
(1930) Lawrence Walker	<p>Unsound due to the fact that previous versions of the plan are not publicly available, and that the principle of releasing green belt land has not been put forward until this version of the plan. Further consultation should be undertaken in order to bring forward a plan that is representative of the needs of residents and will secure a sustainable city for the future.</p>	<p>Through early engagement work in 2007, Consultation of Issues &amp; Options in 2007, Preferred Approach in 2009 and the Publication Draft in 2012, all emerging versions of the Core Strategy have been subject to public consultation and have therefore been made available. Throughout this process, housing issues have been integral to the preparation of the plan and how the District might grow and develop in the future. Within this overall context, the RSS was adopted in 2008 (which set a housing requirement for Leeds) and work has been ongoing in the preparation of the Leeds evidence base for housing (including the Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment). Further consultation on housing growth principles was also undertaken in summer 2011. This work combined to inform the Publication Draft Consultation document (February 2012). Further changes to the document arising from this phase of consultation, will be subject to further consultation on the document prior to formal submission.</p>	No change.
(2703) Cllr John Illingworth	<p>The consultation period is too short and this makes it difficult for voluntary organisations to convene a meeting and agree a collective response before the deadline.</p>	<p>Comments noted, consultation on the Core Strategy has been undertaken in accordance with the adopted Statement of Community Involvement and statutory regulations. Whilst difficult, within this context a balance needs to be struck between allowing sufficient time for comment (consistent with these requirements) and in moving the Core Strategy production programme forward to Examination and Adoption.</p>	No change.
(5852) WARD (Wharfedale & Airedale Review Development)	<p>Comment that they wish to participate in the consultation process but insufficient time is allowed. Note in response that Aireborough is non parished.</p>	<p>Comments noted, consultation on the Core Strategy has been undertaken in accordance with the adopted Statement of Community Involvement and statutory regulations. Whilst difficult, within this context a balance needs to be struck</p>	No change.

		between allowing sufficient time for comment (consistent with these requirements) and in moving the Core Strategy production programme forward to Examination and Adoption.	
(5873) Mr Paul Evans	Regarding this consultation it is wholly unfair to the people of Otley as the Otley library has no hard copy of the proposals, nor do any of the staff have any knowledge of its existence. This is wholly weighted against older people or anyone without a computer or anyone who is not computer literate. The on-line introduction to this consultation procedure specifically states a copy will be available at libraries across Leeds. This situation is utterly unacceptable.	A paper copy of the Core Strategy Main document was placed in all City Council Libraries and 'One Stop Centre'. The City Council makes LDF documents available in a variety of formats, including electronic.	No change but will check availability of documentation for future consultations.
(5879) Mr Martin Fox (5880) Mrs Lisa Fox	I do not consider there to have been sufficient consultation, indeed any consultation with residents in Barwick regarding the selection of potential sites for development feeding in to the City Council's SHLAA. Promises have been made that after the last round of development in our village, including infill on greenfield garden sites, there will be no more development in Barwick. The selection of sites in Green Belt land around our village totally undermines these promises. Without consultation with affected residents, the Core Strategy looks to have been largely a desktop exercise. I have seen no information about proposed development sites as a resident until the Parish Council sent out a flyer in December 2011 saying that Leeds City Council has selected sites in Green Belt land around Barwick to develop 500 houses. This cannot be fair!	Comments noted, consultation on the Core Strategy has been undertaken in accordance with the adopted Statement of Community Involvement and statutory regulations. Whilst difficult, within this context a balance needs to be struck between allowing sufficient time for comment (consistent with these requirements) and in moving the Core Strategy production programme forward to Examination and Adoption.  As emphasised in the Core Strategy document, it is the role of the Site Allocations DPD, to identify specific sites, consistent with the overall approach of the plan. Information derived from the SHLAA will help inform this process, which in turn will be subject to public consultation.	No change
<b>Document Format</b>			
(5693) NHS Leeds	We note that the full Core strategy is 158 pages long and would benefit from being more concise and arranged in a framework that can be effectively used to affect delivery	Comments noted and the fact that there are a variety of ways of presenting such documents. The Leeds Core Strategy is relatively concise and is presented in a structured and accessible style. The document is also supported by a	No change.

	and steer policies. Without this there is the danger of many of the actions and recommendations being lost and never being implemented	monitoring framework, infrastructure delivery plan and will be subject to review, to ensure effective implementation.	
<b>New Homes Bonus</b>			
(5864) Mr Andrew Hepworth	My understanding of the New Homes Bonus Scheme is that Government will give £1 for every £1 of Council Tax receipts on new homes and that further financial incentives are available for vacant properties to be brought back into use. Any monies received under this scheme are not ring fenced and may be spent outside of the locality at which the properties were located. Is my understanding correct? Is the financial incentive the same for empty properties as new build? If not, what is it? Are empty properties brought back into use eligible for New Homes bonus incentive? Are new homes built by Housing Associations considered under the scheme? What is Leeds City Council's definition of sustainable development? What are the requirements of providing supporting infrastructure? Will the full cost of providing supporting infrastructure be met by developers? If more housing is built in Morley, where does the City Council propose any additional schools, nurseries, health centres and the like to be sited? Morley Academy is already over subscribed.	<p>The New Homes Bonus is a Central Government initiative to help support housing delivery and improvements to the housing stock and infrastructure. As a means of delivery, Core Strategy Policy ID1: Implementation &amp; Delivery Mechanisms makes reference to the New Homes Bonus. The detailed mechanism for this however lay outside the Core Strategy process.</p> <p>The NPPF sets out a definition for sustainable development and the Core Strategy through it's Spatial Vision, Objectives and Policy Framework, reflect this definition in meeting environmental, economic and social objectives at the same time.</p> <p>In terms of infrastructure delivery, a draft Infrastructure Delivery Plan has been prepared in support of the Core Strategy and the City Council is currently developing its approach in the preparation of the Community Infrastructure Levy, to help fund new infrastructure in association with development.</p>	No change.
<b>Habitat Regulations Assessment</b>			
(0058) Natural England Consultation Service	Taking into account Regulations 102 of The Conservation of Habitats and Species Regulations 2010, Natural England agrees that the Core Strategy will not lead to a likely significant effect on any European site. Therefore an Appropriate Assessment is not required.	Comments welcomed.	No change.
<b>Sustainability Appraisal Comments</b>			

<p>(0099) English Heritage</p>	<p>Note factual errors in the Number of Conservation Areas included and comments that there is no indication of the relative scale or importance of the District's heritage assets compared to other Authorities (Leeds has the third highest total of Listed Buildings of any Authority in Yorkshire and the Humber, the second highest number of Conservation Areas, and the second-highest number of Historic Parks and Gardens). This information helps to justify the need for a robust strategy within the Core Strategy for the management of this resource.</p> <p>Since 2009 English Heritage has produced a national "Heritage at Risk Register" which has provided information on the state of all designated heritage assets in Leeds (with the exception of Grade II Listed Buildings). It would be more appropriate to use the information contained in the 2011 Register (perhaps as a separate Section after Scheduled Monuments) since it contains a more accurate picture of the condition of all the designated heritage assets in the District. In 2011, Leeds had the greatest number of Buildings at Risk in Yorkshire and the Humber. 8 of the 11 buildings had been on the "at risk" Register since its inception in 1999.</p> <p>Historic Environment: This Section should also make reference to non-designated heritage assets. West Yorkshire Archaeology Service should be able to provide information on the scale of this resource.</p> <p>Comparison of Core Strategy Objectives against SA Objectives. It would have been</p>	<p>English Heritage make a number of very useful and detailed comments regarding the Sustainability Appraisal. These can be addressed as follows:</p> <p>The factual error relating to the number of Conservation Areas can be rectified by amending the figure in future baselines. Importantly, it should be noted that the figure used in the Core Strategy Publication draft SA, does not affect any of the conclusions drawn from the SA.</p> <p>The advice and updated information relating to the 2011 heritage at risk register is useful. This can be included within future baseline reports.</p> <p>With regard to the comments concerning the consistency of the SA objectives in the assessment, in relation to Table 2. It is not clear what this means (and no example has been given), as they are the same objectives on page 10.</p> <p>With regard to the number of Objectives appraised, these comments are noted but can confirm that all Objectives were appraised.</p> <p>The detailed comments regarding alternative scores are noted. It would that none of the suggested alternative scores lead to negative score and as a consequence, do not necessarily weaken the sustainability of the Core Strategy. However, it would be useful to consider the assessments made by English Heritage, within the context of the SA Addendum of further changes, at which point recommendations can be made.</p> <p>A number of suggestions are made as to improving the SA indicators. As part of an ongoing process, the City Council is in the process of updating the SA for future DPDs.</p>	<p>Check and update SA baseline with number of Conservation Areas.</p> <p>Incorporate the 2011 heritage at risk register, in future baseline reports.</p> <p>No change.</p> <p>Check consistency of Objectives.</p> <p>Consider the assessments made within the context of the SA Addendum of further changes, as a basis to make any further recommendations.</p> <p>Consider updates to SA indicators, in updating the SA for future DPDs.</p>
--------------------------------	--	--	--

	<p>helpful to have included a key denoting what the various symbols used on this table mean.</p> <p>SA Objectives: The Sustainability Appraisal Objectives used in this Assessment are not the same as shown on Table 2 on page 10. Therefore need to set out why they were amended It would be helpful to set out why they were amended.</p> <p>Core Strategy Objectives: This Table assesses the SA Objectives against 25 Core Strategy Objectives. However, there are only 24 Core Strategy Objectives in the DPD.</p> <p>Comparison of Core Strategy Objectives against SA Objectives: Core Strategy Objective 19 against SA Objective 21 – low carbon and energy efficient heat and power schemes could, potentially, result in harm to the significance of heritage assets. The actual effects will depend upon how and where such proposals are developed. Consequently, it would be more appropriate to record the effects as “D”.</p> <p>Policy PS6 against SA Objective 21 and Appendix 3 p. 195: Whilst the inclusion of a requirement that opportunities are taken to enhance local distinctiveness would have a positive impact against SA Objective 21, nonetheless, accommodating 70,000 new homes could have a significant impact upon a number of the District’s heritage assets or their settings. Consequently, it would be more appropriate to record the effect as “+/D” and to note the potential for harm to Leeds’ historic environment. significant impact upon local character and could affect the significance of heritage assets (e.g. if the</p>		
--	--	--	--

site is in a Conservation Area). Therefore, there is a relationship between this Policy and both SA Objective 20 and SA Objective 21. The precise impact upon both will depend upon the nature of the scheme and the area in which it is developed. However, the Policy does include a caveat relating to the character of the area and to Conservation Areas so the effects upon both SA Objectives is probably “D/+”.

P108 Policy G6 against SA Objectives 20 and 21 and Appendix 3 p. 281:  
Greenspaces make an important contribution to the character of Leeds’ settlements and, in many cases, to the character and setting of its heritage assets. A Policy which safeguards these elements could, potentially, have a positive impact against SA Objectives 20 and 21 – although the Policy would have to be amended to protect areas of amenity value (as indicated in our representation on this Policy in the Core Strategy).

Appendix 4, p. 312 Objective 12: Indicator 12d – It would be preferable to use an Indicator based upon the national “Heritage at Risk Register” which considers the “state” of all the designated assets in the plan area. It is suggested that this Indicator is amended to read:- “Number of designated heritage assets in Leeds identified as being at risk on the English Heritage “Heritage at Risk Register”

Appendix 4, p. 327 Policy P11: Indicator 12b – It would be preferable to use an Indicator based upon the national “Heritage at Risk Register” which considers the “state” of all the designated assets in the plan area. It is

	suggested that this Indicator is amended to read:- "Number of designated heritage assets in Leeds identified as being at risk on the English Heritage "Heritage at Risk Register"		
(2522) Rob Murphy	<p>Comments on the number of buildings at risk to be removed, these needs to reflect the latest Leeds Buildings at Risk Strategy.</p> <p>The phrase "Heritage Assets" should be used instead of "Heritage at Risk Register", to reflect English Heritage advice.</p> <p>Under Decision Making Criteria in Sec 21: 21a should read "historic" instead of "historical".</p> <p>21b should read "other designated heritage assets" instead of "other designated historic features".</p> <p>As a consequence, the Indicators in Section 21 should be amended to read "No. of Heritage Assets: scheduled monuments, listed buildings, listed places of worship, conservation areas, registered parks and gardens, and registered battlefields", and, "No. &amp; % of the above (six) types of heritage asset that are At Risk".</p>	<p>Comment noted and the need to update.</p> <p>Comment noted and the need to update. It should be noted that reference to the 'buildings at risk register' in Policy P11 has previously been updated as a change (Development Plan Panel 7<sup>th</sup> August), to refer to 'register of historic assets'. The detailed comment to text and indicators are noted for improving the SA indicators. As part of an ongoing process, the City Council is in the process of updating the SA for future DPDs.</p>	<p>Need to update in future baselines to reflect the latest position.</p> <p>Need to update in future baselines to reflect the latest position.</p> <p>Consider updates to text and SA indicators, in updating the SA for future DPDs.</p>
(2560) Mr Lee Davidson	Page 21 - Correct 'public right of ways' to 'public rights of way'.	Need for correction noted and will be corrected through final editing.	Make correction through final editing.
(0058) Natural England Consultation Service	Natural England has no further comments to make in relation to the Core Strategy Sustainability Appraisal.	Noted.	No change.
<b>Equality Impact Assessment Comments</b>			



(2560) Mr Lee Davidson	The document mentions that women who make more journeys on foot have a greater need for footpaths. This claim which needs to be supported by research and opens up questions on the attitudes and needs of pedestrians/walkers which are simply not acknowledged in the main document. The equalities issue is important but it is only one corner of a much larger set of questions. Unsound 1B.	Comments noted. The EIA reflects City Council information on accessibility. These findings may prompt further detailed questions. However, the Core Strategy is a broad strategic document which is seeking to enhance and improve accessibility in broad terms, rather than address attitudes/needs in specific detail. Such issues can be addressed more effectively outside of the Core Strategy process, for example the Rights of Way improvement Plan.	No change.
(5693) NHS Leeds	The Core Strategy would benefit from a greater emphasis on Children in the main document. The Equality Impact Assessment only mentions children when it refers to women as mothers. More explicit links could also be made with work being developed to create a Child Friendly City. Under the Local Policy Framework (section 4 in the Health Background Paper) the implications of the Leeds Children's and Young People's Plan (2011-2015 should be noted).	Comments noted. The Core Strategy is seeking to plan for all of the current and future population of the District, within its overall framework and within the plan period. Within this overall context, acknowledgement is made within the document to a number of 'population drivers' including an ageing population, as well as planning for young people. Following from this, a number of Policy areas, including housing and environmental resources are seeking to put in place the interventions, which reflect priorities for Children (as well as other sectors of the population, where these are relevant to the planning process.	No change.
<b>Draft Infrastructure Delivery Plan</b>			
(0099) English Heritage	<p>Comments on the importance of the cultural infrastructure and the importance of heritage assets as economic assets.</p> <p>The intention for the plan to improve the quality of existing open spaces, is welcomed. The historic environment and heritage assets can make a valuable contribution to green infrastructure networks and its wider functions, as for example in providing leisure and recreation opportunities, encouraging walking and cycling and strengthening local character. Historic places such as historic parks and gardens, archaeological sites, the grounds of historic buildings and greenspaces within conservation areas can form part of a green infrastructure network as well as underpin</p>	Support welcomed.	No change.

	<p>the character and distinctiveness of an area and its sense of place.</p> <p>The intention to create a network of improved greenspaces and public realm throughout the City Centre, is welcomed.</p> <p>With regard to CIL, a wide definition of infrastructure continues to be promoted in terms of what can be funded by the levy and is needed for supporting the development of an area. This can include: · Open space: as well as parks and green spaces, this might also include wider public realm improvements, possibly linked to a Heritage Lottery Fund scheme, conservation area appraisal and management plan, and green infrastructure; · ‘In kind’ payments, including land transfers: this could include the transfer of an ‘at risk’ building; · Repairs and improvements to and the maintenance of heritage assets where they are an infrastructure item as defined by the 2008 Act, such as cultural or recreational facilities. The Localism Act also allows CIL to be used for maintenance and ongoing costs.</p> <p>It is advised that Infrastructure Delivery Plans and or supporting Supplementary Planning Guidance on Developer Contributions identify the ways in which CIL, planning obligations and other funding streams can be used to implement the historic environment strategy and policies within the Local Development Framework.</p> <p>P49 Draft Infrastructure Schedule Area D, Green Infrastructure: Support for the intention for improvements to greenspace quality as a result of new housing</p>	<p>Support welcomed.</p> <p>These comments are noted, the City Council is the process of developing CIL, which will be subject to public consultation at the appropriate time.</p> <p>Comments noted</p>	<p>No change.</p> <p>No change</p> <p>No change.</p>
--	--	--	--

	<p>developments. A number of areas within the Green Infrastructure network are either designated as being of historic importance, contribute towards to the character of the District's Conservation Areas, or provide a setting for its Listed Buildings.</p> <p>P56 Draft Infrastructure Schedule Area CW, Regeneration: Support for proposals for the refurbishment of the group of Listed Buildings this historic part of the settlement with Armley Town Centre.</p> <p>P60 Draft Infrastructure Schedule Area CN E, Regeneration: Support the proposals for a Town Centre Improvement Programme for Chapel Allerton. This lies at the heart of the Chapel Allerton Conservation Area and includes a number of Listed Buildings.</p> <p>P62 Draft Infrastructure Schedule Area CE, Regeneration: Within the regeneration initiative for this part of Leeds mention should be made of refurbishment of the Grade II* Hunslet Mills - a significant landmark lying at the heart of the Urban Eco Settlement area and which is a building which has been identified as being at risk since 1999.</p> <p>P64 Draft Infrastructure Schedule Area CS, Regeneration: Inclusion of the heritage-led regeneration schemes in this part of the City (such as the Tower Works scheme within Holbeck Urban Village), welcomed. These demonstrate how investment in heritage assets can assist in the wider regeneration of an area. Should the reference to "Granary Works" be "Granary Wharfe"?</p> <p>P65 Draft Infrastructure Schedule Area CS,</p>	<p>Comments noted.</p> <p>Comments noted.</p> <p>Comments noted.</p> <p>Support welcomed, agree to update text.</p> <p>Support welcomed.</p>	<p>No change</p> <p>No change.</p> <p>Change supported to update Infrastructure Delivery Plan.</p> <p>Change supported to update Infrastructure Delivery Plan.</p> <p>No change.</p>
--	---	--	--

	<p>Culture: The intention to undertake restoration of the Grade II* Listed Central Library and the Grade II Listed Art Gallery – two key cultural assets on The Headrow, welcomed.</p> <p>P67 Draft Infrastructure Schedule Area CS, Regeneration: We support the proposed refurbishment of the streetworks in this historic part of the City. As part of the package of infrastructure measures for the Holbeck area mention should be made of the refurbishment of Temple Works - a significant landmark of the area and which has been identified as being at risk since 1999. We welcome the proposed investment in the Grade I Listed Kirkgate Market, for the funding towards the restoration of the Grade II* Listed First White Cloth Hall (two of the most important buildings within this part of the City Centre), and for the refurbishment of Kirkgate (the oldest street in Leeds which links the Parish Church to the City Centre). However, it might be more appropriate if the Scheme referred to “Kirkgate Regeneration” rather than simply identifying one of the elements of that regeneration package.</p>	<p>Support welcomed, agree to update text.</p>	<p>Change supported to update Infrastructure Delivery Plan</p>
<b>Health Impact Assessment</b>			
(2560) Mr Lee Davidson	<p>This paper makes 17 references to walking, emphasising the need to improve the other documents so that they display a proper understanding of the infrastructure required to support walking.</p>	<p>Comments noted, within the context of the Core Strategy, the need to strengthen reference to Public Rights of Way has been acknowledged in proposed additional text to Para. 2.39 (iii) Our Green Environment – in the Analysis of Spatial Vision responses.</p>	<p>See changes to Para. 2.39.</p>
(5693) NHS Leeds	<p>Identify key health issues for the population of Leeds: Reducing health inequalities, Changing lifestyle behaviour- in particular increasing physical activity, reducing alcohol consumption, and improving nutrition, Improving mental health, Reducing social isolation, Securing better access to services</p>	<p>These comments are noted and are reflecting in the Core Strategy through reference to Deprivation and Health Inequalities (paras. 2.30 – 2.32). With the completion of the Joint Needs Assessment, there is clearly a wealth of detailed information on this topic. In strategic terms, the Core Strategy is seeking to improve quality of life through a range of policies including design, regeneration, the provision of</p>	<p>No change.</p>

	<p>and facilities , particularly in those areas with greatest health needs. It is suggested that these themes are used throughout the Core Strategy so that every development (and transport systems) can be assessed as to it's impact on the health and wellbeing outcomes.</p> <p>The 2010 Marmot strategic review recommendations could be used to address reducing health inequalities in Leeds as a principle through out the Core Strategy.</p> <p>In terms of national policy, the Health Background Topic Paper could also note the document "Improving Outcomes and Supporting Transparency- A Public Health Outcomes Framework for England 2013-2016." This includes a focus on the determinants of health. The involvement of the views of stakeholders including communities is described within the separate paper on the consultation process. However, the Health Background Topic</p> <p>Empowering communities to become involved in place shaping and planning decisions is itself inherently health promoting, and strengthening this as part of the Core Strategy process has the potential to contribute to health improvement.</p> <p>2.2 Joint Strategic Needs Assessment (JSNA) The Health Background Topic Paper cites the Joint Strategic Needs Assessment (JSNA). However we feel that the JSNA needs to be emphasised more both here and throughout the Core Strategy as a key evidence base for policy.</p>	<p>services and infrastructure, new homes etc. The themes identified are reflected in the Core Strategy objectives and are integral throughout the plan. The plan has been supported and improved through the completion of a sustainability appraisal, which assesses the plan against a series of economic, environmental and social objectives. Consequently, where these issues can be addressed through the Core Strategy, they are embedded within the plan.</p> <p>These recommendations are a useful source of reference but where they can be addressed by planning, they are reflected in the above approach.</p> <p>Comments noted and can be included in future updates to the HIA.</p> <p>Comment noted. This is inherent as part of the Core Strategy Consultation process and will also be reflected in the preparation of the Site Allocations DPD and the CITY Council's role in facilitating the preparation of Neighbourhood Plans.</p> <p>As commented above the JSNA provides a wealth of detailed information. In broad terms, the strategic approach of the plan reflects the need to tackle deprivation and health inequality issues and through specific policies, seeks to make improvements, where these can be achieved through the planning system.</p>	<p>No change.</p> <p>Change to include in future updates to the HIA.</p> <p>No change.</p> <p>No change.</p>
--	---	--	--

	<p>Mental Health and wellbeing is mentioned but it is recommended that it should be noted more explicitly in the National Policy section of the Health Background Topic Paper and the implications of key strategic direction in “No Health without Mental Health”.</p>	<p>Comment noted, and can be included in future updates to the HIA.</p>	<p>Change to include in future updates to the HIA.</p>
--	---	---	--

## **APPENDIX 2 - CHANGES TO CORE STRATEGY TEXT**

### **Flood Risk**

5.5.52 In recent years Leeds has also experienced problems created by surface water flooding. Smaller watercourses and drains are far more susceptible than the larger river systems to flash flooding as a result of localised intense rainfall. With changing climate patterns it is expected that storms of this nature will become increasingly common, potentially increasing the risk posed to properties situated in close proximity to local water courses. Policy EN5 has been developed in order to manage both fluvial and pluvial sources of flooding. Further details on the actions identified in Policy EN5 *and detailed Policies in relation to the efficient use, quality & effective management of water resources* are in the Natural Resources and Waste DPD. *These Policies in turn, provide a basis for the City Council and its partners, to help manage responsibilities under the Water Framework Directive.*