



Leeds Core Strategy Selective Review

Leeds Local Plan

Proposed Main Modifications

April 2019

PROPOSED MAIN MODIFICATIONS TO THE PUBLICATION PLAN (APRIL 2018)

This table sets out those Main Modifications, agreed by the Inspector, that are necessary to make the Plan sound. They are subject to public consultation for a period of 6 weeks.

The main modifications are all listed as changes to the Publication Draft Plan (February 2018). They are drawn from those set out the Proposed Modifications of November 2018 (**EX6** and **EX6a (including the tracked changes to the Publication Plan set out in the Submission Draft Plan)**), those arising from the hearing sessions (**EX16b**) and the Inspector's post hearing note. Where there has been more than one modification to the same part of the Plan, only the latest modification is shown. In other words earlier modifications are superseded by the latest ones.

The modifications are listed in plan order in the table below.

Main Modifications are those considered by the Inspector to have implications for soundness.

Where paragraphs are deleted/added re-numbering of the Plan will be carried out at the end of the process. These are considered to be additional modifications.

Where modifications amend text this is shown as ~~tracked changes~~ as follows:

New text in	red bold
Deleted text in	red strikethrough non-bold
Existing text in	black non-bold

Draft Mod. No.	CD ref and Page No.	Site Ref. / Reference in Plan	Proposed modification	Reason
MM1	CD2-1 Page 1	Explanatory updates to the Core Strategy Text will be inserted after the Contents Page and before the Introduction of the Adopted Core Strategy	<p>Updating the Core Strategy</p> <p>i. The Core Strategy was originally adopted in November 2014</p> <p>ii. An update of the Core Strategy was adopted in 2019, which focussed on the following selected areas of policy:</p> <ul style="list-style-type: none"> • Reviewing the housing requirement in Policy SP6 and housing distribution in SP7, with a Plan period of 2017 - 2033 • Introducing new minimum space standards for new housing in Policy H9 and new accessibility standards in Policy H10 • Updating policy requirements for affordable housing by amending Policy H5 • Reviewing the requirement for greenspace in new housing developments by amending Policy G4 and making minor amendments to Policies G5 and G6 • Incorporating new national policy regarding Code for Sustainable Homes by updating the wording of Policies EN1 and EN2 and a consequential change to EN4 • Introducing a new Policy for Electric Vehicle Charging Infrastructure EN8 <p>iii. The updated policies and text have been incorporated into this single updated Core Strategy Document</p> <p>iv. It should be noted that the Plan period of 2017 - 2033 applies to Policy SP6. The percentages relating to the distribution of housing land and allocations contained in Policy SP7 apply to the period 2012 to 2033. Other Policies of the plan adopted in 2014 continue to work to the original plan period of 2012 - 2028. These include policies SP9 and EC2 which set out the required quantities of general employment and office space; policy H7 which sets the quantity of accommodation required for Gypsy and Travellers and Travelling Showpeople and policy EN6 which sets out quantities of waste to be planned for.</p>	<p>For effectiveness and clarity by providing an explanation at the beginning of the Core Strategy of how it was updated by the CSSR.</p> <p>Modification was included in the Submission Draft Plan (EX6)</p>
MM2	CD2-1 Page 3	Para 4.6.1	It is anticipated that the population of Leeds will rise from 784,458 in 2017 to 856,819 in 2033 755,136 in 2010 to 860,618 in 2028.	To be positively prepared by updating the population projection. Included in EX6
MM3	CD2-1 Page 3	Para 4.6.3	Spatial Policy 6 sets out the housing requirement for Leeds over the period 2017 – 2033. The requirement draws upon evidence of the Strategic Housing Market Assessment 2017 and Government consultation paper “Building the Right	To ensure that the Plan is positively prepared and justified by clarifying the relationship

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			<p>Homes in the Right Places". The policy will be implemented through the identification of land supply in the Site Allocations Plan and a Housing Implementation Strategy. Regard will be had also to past delivery of housing within each HMCA between 1st April 2012 and 31st March 2017.</p>	<p>between Policies SP6 and SP7 as they are intended to operate within the revised plan period for future housing distribution</p> <p>From Hearing Sessions Week 1 (EX16b)</p>
MM4	CD2-1 Pages 3-4	Para 4.6.4, Para 4.6.5 and Policy SP6	<p>Para 4.6.4: The net requirement of 51,952 dwellings is converted to a gross requirement by taking account of the anticipated loss of dwellings over the plan period, estimated as 150 dwellings per annum based on recent trends of demolition in Leeds. To account for demolitions and other dwelling losses of 150 dwellings per annum (2,400 over the plan period) the gross housing requirement for the plan period of 2017 2033 is 54,352 53,856 dwellings.</p> <p>Last sentence of Para 4.6.5: This stock of supply reduces the level of land to identify from 54,352 53,856 dwellings (gross) to 46,352 45,856 dwellings (gross).</p> <p>Third sentence of Policy SP6: Guided by the Settlement Hierarchy, the Council will identify 46,352 45,856 dwellings (gross) to support the distribution in Spatial Policy 7</p>	<p>For effectiveness by correcting figures. Included in Submission Draft Plan (EX6)</p>
MM5	CD2-1 Page 4	After Para 4.6.5 insert a new paragraph	<p>New paragraph 4.6.6: In reflecting the wider and longer term aspirations of the District (and its City Region role) the housing requirement takes into account the benefits of economic uplift. However, the Council will need to closely monitor the delivery and implementation of the housing requirement, including the roles and responsibilities of house builders throughout Leeds, seek to ensure effective build-out rates and assess any causes of under-delivery. Notwithstanding this, departure from the European Union, could potentially impact upon these aspirations, requiring a local solutions approach. This overall approach is intended to ensure that the City is as resilient as possible in delivering agreed priorities whilst managing unforeseen change against the context of national planning policy and its penalties for under delivery.</p>	<p>To be positively prepared and effective by explaining the importance of understanding causes of any future under-delivery of housing. Included in Submission Draft Plan</p>

Draft Mod. No.	CD ref and Page No.	Site Ref. / Reference in Plan	Proposed modification	Reason
MM6	CD2-1 Page 4	Policy SP6	Revision to criterion vii: Avoiding areas of flood risk and only where this is not possible, then mitigating flood risk Generally avoiding or mitigating areas of flood risk.	To be consistent with national policy by setting out the sequential preference of avoiding flood risk before mitigating flood risk in response to comment from the Environment Agency. Included in Submission Draft Plan
MM7	CD2-1 Page 8	Para 5.2.20	Applicants may choose to submit demonstrate via individual viability appraisals to verify that there are exceptional site circumstances which mean the affordable housing target cannot be met on specific schemes . In such cases, where evidence in accordance with the National Planning Guidance principles for carrying out a viability assessment is submitted, a departure from the affordable housing provision may be reduced accordingly policy may be justified . Where developments are expected to take more than five years to complete, the Council will normally expect permitted schemes to make provision for a review of the scheme's viability, to determine whether the level of affordable housing being provided across the scheme as a whole is appropriate. The Government currently expects Local Plan policies to be reviewed after 5 years and the minimum targets set out in Policy H5 are likely to be reviewed in any event as part of this process.	To ensure consistency with national planning policy. From Inspector's Post Hearing Note
MM8	CD2-1 Page 9 Policy H5	Policy H5	Add a paragraph after iii) Departures from this policy should be justified by evidence of viability considerations	To ensure consistency with national planning policy. From Inspector's Post Hearing Note

Draft Mod. No.	CD ref and Page No.	Site Ref. / Reference in Plan	Proposed modification	Reason
MM9	CD2-1 Page 9	Policy H5: Affordable Housing	<p>POLICY H5: AFFORDABLE HOUSING; On major housing developments of 10 or more new dwellings, affordable housing provision should be provided on-site at the target levels specified in the following zones:</p> <p>And insert foot note; * Major development means either: <ul style="list-style-type: none"> • provision of 10 or more dwellings (or where the number of dwellings is not known, development is to be carried out on a site having an area of 0.5 hectares or more) or • provision of a building or buildings where the floor space to be created would be 1,000 square metres or more; • or development on a site having an area of 1 hectare or more; </p>	<p>To ensure consistency with national planning policy.</p> <p>Included in Submission Draft Plan</p>
MM10	CD2-1 Page 9 Policy H5	Policy H5	<p>Change policy wording below as follows:</p> <p>ii) on-site, the percentage of affordable housing specified for zones 1-4 and mix of Intermediate and Social Rented types of affordable housing set out in the first paragraphs of this Policy at affordable housing benchmark rents administered by either a registered provider or a management company with appropriate arrangements for identifying households in need, including City Council nomination rights, which apply in perpetuity or</p>	<p>For the purposes of clarity and to ensure effectiveness.</p> <p>From Hearing Sessions Week 2</p>
MM11	CD2-1 Page 11	Insert at end of para 5.2.46	<p>Insert 'Any future changes to Government Guidance on NDSS will be taken into account in decision making in Planning applications'</p>	<p>For effectiveness and clarification.</p> <p>Included in EX6 (Council's Draft Schedule of Proposed Modifications Nov 2018)</p>

Draft Mod. No.	CD ref and Page No.	Site Ref. / Reference in Plan	Proposed modification	Reason
MM12	CD2-1 Page 12	New paragraph after 5.2.46	Applicants may choose to demonstrate via individual viability appraisals that there are exceptional site circumstances which mean the minimum space standards cannot be met on specific schemes. In such cases, where evidence in accordance with the National Planning Guidance principles for carrying out a viability assessment is submitted, a departure from Policy H9 may be justified.	To ensure consistency with national planning policy From Inspector's Post Hearing Note
MM13	CD2-1 Page 12 Policy H9	Policy H9 wording	Change policy wording as below: POLICY H9 MINIMUM SPACE STANDARDS All new dwellings should must comply with the following standards:	For the purposes of clarity and effectiveness. From Hearing Sessions Week 2
MM14	CD2-1 Page 12	Policy H9 wording	Insert paragraph after criteria a. – i. Departures from this policy should be justified by evidence of viability considerations	To ensure consistency with national planning policy From Inspector's Post Hearing Note
MM15	CD2-1 Page 12 Page 13 Page 13	Policy H9 table column 3, row 2 and footnote Policy H9 note iii Policy H9 note iv	Replace 39 (37) ² with 39 (37)* Insert footnote reference*; *Where a one person flat has a shower room rather than a bathroom, the floor area may be reduced from 39m² to 37m². Delete footnote iii Any other area that is used solely for storage and has a headroom of 900-1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900mm is not counted at all Delete footnote iv Built-in wardrobes and en-suite bathrooms count towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. The built-in area in excess of 0.72m² in a double bedroom and 0.36m² in a single bedroom counts towards the built-in storage requirement	To correct typographical error and provide clarification which makes the plan effective. Included in EX6 (Council's Draft Schedule of Proposed Modifications Nov 2018) For effectiveness and clarity to delete duplicated part g and part h in the preceding part of Policy H9.

Draft Mod. No.	CD ref and Page No.	Site Ref. / Reference in Plan	Proposed modification	Reason
MM16	CD2-1 Page 15	5.2.52	Insert at end of para 5.2.52, In most cases it is expected that market housing for sale and specific affordable dwellings provided through planning requirements will be wheelchair adaptable. Only where Leeds City Council is nominating a wheelchair user as an occupier will be wheelchair accessible dwellings be required.	For effectiveness. Clarification in response to consultation comments highlighting confusion around policy requirements for dwellings to be wheelchair accessible and when they should be wheelchair adaptable. Included in Submission Draft Plan.
	Page 16	Policy H10	Change policy wording as below: 2% of dwellings meet the requirement of M4(3) 'wheelchair user dwellings' of Part M volume 1 of the Building Regulations wheelchair user dwellings', wheelchair adaptable or accessible dwellings. Wheelchair user dwellings should meet the M4(3) wheelchair adaptable dwelling standard unless Leeds City Council is responsible for nominating a person to live in the dwelling.	From Hearing Sessions Week 2
MM17	CD2-1 Page 16	New paragraph after 5.2.57	Applicants may choose to demonstrate via individual viability appraisals that there are exceptional site circumstances which mean the accessible housing requirements cannot be met on specific schemes. In such cases, where evidence in accordance with the National Planning Guidance principles for carrying out a viability assessment is submitted, a departure from Policy H10 may be justified.	To ensure consistency with national planning policy From Inspector's Post Hearing Note
MM18	CD2-1 Page 16	Policy H10	30% of dwellings meet the requirements of M4(2) volume 1 of Part M of the Building Regulations 'accessible and adaptable dwellings' of Part M Volume 1 of the Building Regulations. 2% of dwellings meet the requirement of M4(3) of Part M volume 1 of the Building Regulations 'wheelchair user dwellings', wheelchair adaptable or accessible dwellings of Part M Volume 1 of the Building Regulations.	For effectiveness and consistency with terminology of Part M of the Building Regulations Included in Submission Draft Plan

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MM19	CD2-1 Page 16	<p>Policy H10</p> <p>Policy H10</p> <p>Policy H10</p>	<p>Any requirement above 0.5 would require a single dwelling for both M4(2) and M4(3)</p> <p>Where the scale of development would generate more than one accessible dwelling, the mix of sizes, types and tenures of M4(2) and M4(3) dwellings accessible housing should reflect the mix of sizes, types and tenures of the development as a whole as closely as possible (unless there is evidenced need for additional accessible housing in one particular tenure).</p> <p>The required number and, mix and location of accessible dwellings should be clearly illustrated on drawings and via planning condition.</p>	<p>For effectiveness and clarity by deleting repetition as is addressed in paragraph 5.2.54 of supporting text. Included in Submission Draft Plan.</p> <p>For effectiveness and consistency with terminology of Part M of the Building Regulations. Included in Submission Draft Plan</p> <p>For effectiveness and clarification to assist implementation of policy Included in Submission Draft Plan</p>
MM20	CD1-2 Page 16	Policy H10 wording	<p>Change policy wording as below:</p> <p>Where the scale of development would generate more than one accessible dwelling, the mix of sizes, types and tenures of M4(2) and M4(3) dwellings should reflect the mix of sizes, types and tenures of the development as a whole as closely as possible (unless there is evidenced need for additional accessible housing in one particular tenure). (unless the applicant can demonstrate an evidenced need locally to provide accessible housing in dwellings of a particular size, type and / or tenure). Locally will normally mean the Designated Neighbourhood Area, or where this is not defined, will mean relevant settlement, or ward if the site lies within the main urban area.</p> <p>Insert paragraph at end of policy:</p> <p>Departures from this policy should be justified by evidence of viability considerations</p>	<p>For the purposes of clarity and effectiveness. From Hearing Sessions Week 2</p> <p>To ensure consistency with national planning policy. From Inspector's Post Hearing Note</p>

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MM21	CD2-1 Page 22	Policy G4 Text	<p>Add footnote to end of paragraph.</p> <p>'Residential developments of 10 dwellings or more will be required expected to provide the following quantities of on-site green space per residential unit or where this quantity of green space is unachievable or inappropriate on-site, equivalent off-site provision, financial contribution or combinations thereof should be sought¹.'</p> <p>1. Where conflict arises between the requirements of Policy G4 and any specific green space site requirements in either the Site Allocations Plan or Aire Valley Leeds Area Action Plan, then the specific site requirements within the Allocations Plans will take precedence</p>	<p>For the purposes of clarity and to ensure that the policy is effective in so far as plan users understand how it relates to other DPDs.</p> <p>From Hearing Sessions Week 2</p>
MM22	CD2-1 Page 22	<p>Para 5.5.14</p> <p>Policy G4</p>	<p>5.5.14 Factors favouring requiring on-site provision include one or more of the following:</p> <ul style="list-style-type: none"> i) Local deficits of existing green space, ii) sufficiently large, suitably shaped and reasonably level sites to accommodate green space, iii) distances from existing green spaces exceeding the standards of Policy G3. The quality of existing green space will also need to be taken into account, iv) lack of other residential development sites nearby that could deliver green space, v) the development generating a need for play facilities that does not currently exist in the locality, or, vi) potential to combine green space provision with requirements for Sustainable Urban Drainage Systems. <p>Where the factors of paragraph 5.5.14 require expect green space to be provided on site:</p>	<p>For the purposes of clarity and to ensure effectiveness. From Hearing Sessions Week 2, including wording from the Inspector's note of 26/3/19</p> <p>For effectiveness by correcting paragraph number cross reference in Policy G4.</p> <p>For the purposes of clarity and effectiveness "expect" changed</p>

Draft Mod. No.	CD ref and Page No.	Site Ref. / Reference in Plan	Proposed modification	Reason
				to "require". From Hearing Sessions Week 2
MM23	CD2-1 Pages 28 - 34	Para 5.5.38 – 5.5.45. NB this is the same modification as set out in document EX6a	<p>Delete proposed amendments to Policy EN1 and supporting text of the Core Strategy Selective Review (proposed paras 5.5.38 to 5.5.44 of CD2/1) so that Core Strategy remains as follows (showing current Adopted CS numbering):</p> <p>Climate Change</p> <p>5.5.31 The Climate Change Act 2008 established a new approach to managing and responding to climate change in the UK. The Act created a legally binding target to reduce the UK's emissions of greenhouse gases to at least 80% below 1990 levels by 2050. This is delivered through a series of five year 'carbon budgets', designed to ensure that the Council make steady progress towards this long term target. A carbon budget is a cap on the total quantity of greenhouse gas emissions emitted in the UK over a specified time. Under a system of carbon budgets, every tonne of greenhouse gas emitted between now and 2050 will count. Where emissions rise in one sector, corresponding falls in another sector will have to achieved</p> <p>5.5.32 In May 2009, the Government introduced legislation creating the first three legally binding carbon budgets. The budgets are 2008-2012 (22% reduction in CO₂ emissions below 1990 levels), 2013-2017 (28% reduction) and 2018-2022 (34% reduction).</p> <p>5.5.33 These carbon budgets, whilst owned and delivered at a national level, will have a profound effect on all activities at a local level. Policy tools and financial incentives have been put in place to drive down emissions from transport, housing and business across the country. Building Regulations have introduced tighter CO₂ targets and a trajectory has been put in place to reduce emissions from new housing to zero by 2016, and from non-domestic development to zero by 2019. As Leeds is forecast to grow both in terms of housing numbers and new business premises, it is particularly important to</p>	<p>The effect of this modification is to retain existing Policy EN1 of the Core Strategy 2014. The modification will make the plan justified, effective and in line with national guidance. The Government has confirmed that it has no current intentions to enact Section 43 of the Deregulation Act, therefore the Council is now of the view that local planning authorities may set their own energy efficiency standards. To be in line with national guidance and justified the Council therefore needs to delete proposed changes to Policy EN1 in the Core Strategy Selective Review. The practical result of this Main Modification will be for the existing Adopted Core Strategy Policy EN1 and its supporting text (paras 5.5.31 to 5.5.38 of the Adopted Core Strategy) to remain extant. The Council will review the Policy as part of a further Core Strategy review, once the intentions of national policy have been further clarified on the issue of</p>

Draft Mod. No.	CD ref and Page No.	Site Ref. / Reference in Plan	Proposed modification	Reason
			<p>ensure that these are as close to zero emission as possible, as soon as possible, to avoid the need for deeper cuts in other sectors.</p> <p>5.5.34 The Leeds Climate Change Strategy (2009) was developed through the Leeds Initiative in partnership with the public, private and third sector. This contains a target to reduce emissions from Leeds by 80% between 1990 and 2050. In 2010, the Council adopted a further target to reduce emissions by 40% between 2005 and 2020. In the four years to 2009, the City reduced emissions by 14.4%, requiring a further reduction of approximately 2.5% per year until 2020. Leeds is a growing City and all new development that is not carbon neutral adds to total emissions from Leeds (both on site emissions and emissions associated with transport). Therefore, there is a strong policy imperative to constrain emissions from all development as soon as possible.</p> <p>5.5.35 The Core Strategy climate change Policies are designed so that new development contributes to our ambitious carbon reduction targets. However, the Council aim to do this in a flexible way that supports developers to achieve carbon reductions at lowest cost and in a way that benefits future building occupants. Building Regulations set a minimum energy efficiency standard applicable to all buildings, and in order to keep on track to achieve the 2050 target, the Government will increase this standard over the next decade. Developers currently have to demonstrate that proposed developments are within the Target Emissions Rate. However, because of the need to maintain a decent standard of living in the face of significant growth, the Council is seeking a 20% CO₂ reduction beyond the Building Regulation standard. Energy efficient buildings also reduce household fuel bills (and support initiatives for 'affordable warmth'), improve business competitiveness and create jobs in the energy service sectors. Economies of scale mean that energy efficiency measures are less costly on larger developments, and the policies are, therefore, only applied to 'major development.' It is important to note that Policy EN1(i) is highly flexible, allowing developers to choose the most appropriate and cost effective carbon reduction solution for their site. We would expect developers to take a 'fabric first' approach and, over time, supplement this with increasing levels of on-site District heating and low/zero</p>	<p>energy efficiency. From Hearing Sessions Week 1 (EX16b). Also proposed in EX6a.</p>

Draft Mod. No.	CD ref and Page No.	Site Ref. / Reference in Plan	Proposed modification	Reason
			<p>carbon technologies. It must be remembered that the cost implications of installing carbon reduction measures are much lower when included in a new building than when they are retrofitted.</p> <p>POLICY EN1: CLIMATE CHANGE – CARBON DIOXIDE REDUCTION All developments of 10 dwellings or more, or over 1,000 square metres of floorspace, (including conversion) where feasible), will be required to: (i) Reduce total predicted carbon dioxide emissions to achieve 20% less than the Building Regulations Target Emission Rate until 2016 when all development should be zero carbon, and (ii) Provide a minimum of 10% of the predicted energy needs of the development from low carbon energy. Carbon dioxide reductions achieved through criteria (ii) will contribute to meeting criteria (i). Criteria (ii) will be calculated against the emissions rate predicted by criteria (i) so reducing overall energy demand by taking a fabric first approach will reduce the amount of renewable capacity required.</p> <p>If it can be demonstrated that decentralised renewable or low carbon energy generation is not practical on or near the proposed development, it may be acceptable to provide a contribution equivalent to the cost of providing the 10%, which the council will use towards an off-site low carbon scheme. The opportunity to aggregate contributions to deliver larger scale low carbon projects would be implemented independent of the development. Wherever possible, the low carbon projects would be linked with local projects that would bring local benefits.</p> <p>It is likely that the approach of pooling off-site contributions through planning obligations will be replaced by CIL in April 2014.</p> <p>Applicants will be required to submit an Energy Assessment with their application based on expected end user requirements to demonstrate compliance with this Policy. Where end user requirements change significantly, an updated EA should be submitted prior to construction.</p>	

Draft Mod. No.	CD ref and Page No.	Site Ref. / Reference in Plan	Proposed modification	Reason
MM24	CD2-1 Page 32	Para 5.5.45 New paragraph after para 5.5.46 NB this is the same modification as set out in document EX6a	Amend para 5.5.45 of CD2/1 to read as follows: “...For residential development, requirements for energy efficiency are contained within the Building Regulations and Policy EN1 of the Core Strategy. ” Insert the following paragraph after paragraph 5.5.46 of the Plan ‘5.5.47 Growth in Leeds means extra demand for water. Additionally, climate change predictions indicate an increasingly erratic weather pattern which is likely to lead to extreme weather events including droughts. For these reasons Leeds expects all major residential development to meet the tighter optional water standard in building regulations as required by Policy EN2.’	For effectiveness to reflect retention of Adopted CS Policy EN1 and provide clarity to plan users. To introduce commentary to the CSSR policy EN2 for clarity and to ensure that the policy is effective. From Hearing Sessions Week 1 (EX16b). Also proposed in EX6a.
MM25	CD2-1 Page 34	Para 5.5.49 Policy EN4	Delete proposed amendment to Policy EN4 which makes reference to Policy EN1 so that the final part of Policy EN4 is unchanged from the Adopted CS and reads as follows: Carbon savings and renewable energy generation achieved under this policy will contribute to EN1(i) and EN1(ii).	For effectiveness to reflect retention of Adopted CS Policy EN1 and provide clarity to plan users.

Draft Mod. No.	CD ref and Page No.	Site Ref. / Reference in Plan	Proposed modification			Reason
			affordability for lower decile earners in Leeds.		for Affordable Rent	
			Intermediate or equivalent tenures. This is housing made available at below market rents or prices which are generally affordable to households in the lower quartile of earnings. Benchmark transfer prices and rents are published annually to reflect affordability for lower quartile earners in Leeds.	Intermediate or submarket rent – the intermediate affordable units are rented out at rents above those of social rent but below market rents.	a) Affordable housing for rent. (a) Or is at least 20% below local market rents (including service charges where applicable)	
				Shared equity/shared ownership – the occupier buys part of the house and pays a discounted rent on the remaining part, which is owned by a RSL.	c) Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households. d) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price	
				Low cost homes for sale / discounted sale – the occupier buys the house at a fixed percentage below its cost on the open market. When the house is sold on, this same percentage discount is passed on to the next buyer.		

Draft Mod. No.	CD ref and Page No.	Site Ref. / Reference in Plan	Proposed modification		Reason
				<p>equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.</p>	



Leeds Core Strategy Selective Review

Leeds Local Plan

Sustainability Appraisal Addendum (Proposed Main Modifications stage)

May 2019

SUSTAINABILITY APPRAISAL ADDENDUM (PROPOSED MAIN MODIFICATIONS)

NON-TECHNICAL SUMMARY

Introduction

1. Leeds City Council is preparing the Core Strategy Selective Review (CSSR) which has been subject to statutory Sustainability Appraisal (SA) at each stage of the plan preparation process so far, in accordance with the Planning & Compulsory Purchase Act 2004 and the Environmental Assessment of Plans and Programmes Regulations 2014. SA is a tool used to appraise planning policy documents in order to promote sustainable development. Social, environmental and economic aspects are all taken into consideration.
2. Following the examination hearing sessions for the CSSR in February 2019 the Inspector is proposing a number of changes to the CSSR which are called the Proposed Main Modifications. As part of the iterative process of SA, further sustainability appraisal has been carried out on these modifications and the results of this work is documented in this Addendum and should be read in conjunction with the previous SA documents, which are listed below:

[CD1/4](#) **Sustainability Appraisal, Submission Draft Plan July 2018**

[CD1/5](#) **Sustainability Appraisal, Non-Technical Summary, Submission Draft Plan, July 2018**

[EX16c](#) **CSSR SA Addendum: Policy Alternatives**

[CD2/1](#) **Publication Draft CSSR, February 2018**

[CD1/1](#) **Submission Draft CSSR, July 2018**

[Link](#) **Proposed Main Modifications, April 2019**

Methodology

3. This Addendum provides an assessment of the Proposed Main Modifications against the existing SA framework¹ in two steps:
 - i. Screening of the modifications to identify where the change may require an alteration to the original SA scoring and results;
 - ii A detailed assessment of the modifications against the SA framework where the “screening exercise” determined that the modification may have potential to alter the SA scoring and results. This assessment considers the modification in the context of scoring the policy as a whole.
4. Where there is considered to be a need to revise the results of the SA, the Addendum then considers whether this alters other SA conclusions already reached: including impacts on the cumulative effects of the plan (all proposals considered together), any proposed mitigation measures, which are designed

¹ The SA Framework is set out in Appendix 6 of **CD1/4**

to reduce likely negative effects of the CSSR and proposed monitoring arrangements.

Results of the Sustainability Appraisal

5. The screening exercise shows that most of the proposed Main Modifications would have a negligible impact on the scoring of CSSR policies in **CD1/4**. Some of these concerned clarifications and re-wordings to help aid the understanding of policy intention and implementation. Others concerned clarifications to better reflect national planning policy which would not change the operational application of the policy in practice and therefore would not alter sustainability appraisal outcomes.
6. Two proposed main modifications were considered to have the potential to materially affect the scoring of the original policies.
 - i. Modification 3 concerning Policy SP7 expects regard to be given to past delivery of housing during the period 2012-17. In practice, this means that less housing land may need to be allocated for the period 2017-2033 in Housing Market Characteristic Areas (HMCAs) that experienced housing development during 2012-17. This re-appraisal resulted in reduced negative effects on Efficient & prudent use of land (SA9), Climate Change adaption (SA12) and Flood Risk (SA13)
 - ii. Modification 23 deletes proposed changes to Policy EN1 with the effect that the original Policy EN1 of the Core Strategy adopted in 2014 is retained. This means that the Policy will continue to apply standards to residential development. The latest SA reveals that single negative scores become single positive scores for Housing (SA6), Social Inclusion and Community Cohesion (SA7), Climate Change mitigation (SA11) and Energy and Resource efficiency (SA23).
7. With regard to cumulative impacts of the CSSR, the overall findings of the Submission Draft SA Report remain unchanged as a result of the Proposed Main Modifications.
8. No change is proposed to the identified mitigation measures or monitoring arrangements as a result of the Proposed Main Modifications.
9. The Proposed Main Modifications were also not found to have any adverse impact under the Habitats Regulations.

MAIN REPORT

1. Introduction

1.1 This addendum has been prepared to accompany the Proposed Main Modifications for the Core Strategy Selective Review (CSSR) following the examination hearing sessions in February 2019. The modifications respond to the actions raised during the hearing sessions and the Inspector's post hearing notes. They also consolidate the modifications that reflect the changes to the CSSR Submission version (July 2018) compared with the Publication Version (February 2018) as these have not previously been subject to public consultation.

1.2 The addendum should be read in conjunction with the SA documents produced as part of the preparation of the CSSR which include the following:

[CD1/4](#) **Sustainability Appraisal, Submission Draft Plan July 2018**

[CD1/5](#) **Sustainability Appraisal, Non-Technical Summary, Submission Draft Plan, July 2018**

[EX16c](#) **CSSR SA Addendum: Policy Alternatives**

[CD2/1](#) **Publication Draft CSSR, February 2018**

[CD1/1](#) **Submission Draft CSSR, July 2018**

[Link](#) **Proposed Main Modifications, April 2019**

1.3 The purpose of the addendum is to assess whether the Proposed Modifications affect the outcomes of the Sustainability Appraisal process.

2. Methodology for Assessing Proposed Main Modifications

2.1 The assessment of the Proposed Main Modifications has been undertaken in two steps:

i. Screening of the Proposed Main Modifications

Each Proposed Main Modification has been 'screened' to establish whether or not it materially changes the effects of the policy on the SA objectives and therefore changes any of the assumptions of the SA assessments undertaken for the SA Report. **Appendix 1** provides the results of the screening process. The wording of each modification is summarised in the table. The Proposed Modifications consultation document provides the full wording of each modification and the reason for the modification and should be read alongside this SA Addendum

ii Where necessary, further SA assessment work of proposed Main Modifications

Where the screening exercise confirmed that the Proposed Main Modification required further attention under the SA, the modification has been assessed fully against the SA framework in order to identify potential effects and inform the proposed modifications and their future

implementation. This further assessment work is provided at **Appendix 2**. This has been assessed against the SA objectives listed at **Appendix 3**.

- 2.2 The screening process identified that all but two of the Proposed Main Modifications had such insignificant effects on the Sustainability Objectives and the outcome of the Sustainability Appraisal that stage ii assessment would not be necessary. Some of these concerned clarifications and re-wordings to help aid the understanding of policy intention and implementation. Others concerned clarifications to better reflect national planning policy which would not change the operational application of the policy in practice and therefore would not alter sustainability appraisal outcomes.
- 2.3 The “screened-in” modifications have been subject to further appraisal in section 3 below, including cumulative impact.

3. **Assessment of Proposed Main Modifications “Screened-in” against the SA Framework**

- 3.1 The screening process identified two modifications requiring further SA assessment on account of material impacts:

Modification 3 Additional sentence to Para 4.6.3 to say that regard will be given to past housing delivery before the revised plan period.

Modification 23 Delete proposed amendments to Policy EN1 and supporting text.

- 3.2 The appraisals of modifications 3 and 23 are set out in **Appendix 2**. The results are broadly positive. Most of the neutral impacts of the original appraisal remain neutral. Where there are effects, several of these have become more positive than before.
- 3.3 Modification 3 expects the process of allocating land for housing in accordance with the percentage targets for different Housing Market Characteristic Areas (HMCAs) to have regard to past delivery of housing during the period 2012-17. This latest SA reveals that three double negatives of the original SA are reduced to single negatives. This is on the assumption that fewer housing allocations will be required for the period 2017-2033 because account can be given to delivery 2012-17. This affects Efficient & prudent use of land (SA9), Climate Change adaption (SA12) and Flood Risk (SA13).
- 3.4 Modification 23 deletes proposed changes to Policy EN1 with the effect that the original Policy EN1 of the Core Strategy adopted in 2014 is retained. This means that the Policy will continue to apply standards to residential development in contrast to the proposed changes to Policy EN1 which would have resulted in standards not being applied to residential development. The latest SA reveals that single negative scores become single positive scores for

Housing (SA6), Social Inclusion and Community Cohesion (SA7), Climate Change mitigation (SA11) and Energy and Resource efficiency (SA23)

4. Consideration of cumulative impacts

- 4.1 Section 5.2 and Appendix 8 of the Submission Draft SA Report (**CD1/4**) considered the cumulative impacts of the CSSR against the 23 SA objectives. Although the SA scores of Policies SP7 and EN1 are made slightly more positive as a result of the proposed modifications, the change is not considered significant enough to affect the cumulative effects. Therefore, the overall findings of that assessment remain broadly unchanged.

5. Proposed mitigation measures

- 5.1 Section 5.3 and Appendix 9 of the Submission Draft SA Report (**CD1/4**) set out mitigation measures to prevent, reduce or offset significant adverse effects of implementing the CSSR. As the effects of the modifications on scoring is slight, no change is proposed to these identified mitigation measures as a result of the Proposed Main Modifications.

5.2 Proposals for monitoring

- 5.3 Section 7.1 of the Submission Draft SA Report (**CD1/4**) referred to updating the monitoring framework of the Adopted Core Strategy, which was provided at Appendix 10 of the SA Report. No change is proposed to this monitoring framework as a result of the Proposed Main Modifications.

6. Habitat Regulations Assessment Update

- 6.1 The Council has undertaken ongoing screening and Appropriate Assessment, which concludes that there will be no adverse effect on the site integrity of Special Protection Areas (SPAs) and Special Areas of Conservation (SACs).

Appendix 1: Screening assessment of proposed Main Modifications

The table below shows the results of the screening of proposed Main Modifications. It assesses each modification to determine whether it has the potential to change the SA outcome:

Main Mod No.	Policy or Paragraph subject to change	Potential to change SA outcome	Reasoning
1	Addition of text at beginning of Core Strategy to explain how the CSSR changes have been incorporated into the plan.	No	The text is to help users of the Core Strategy see how the Core Strategy has been altered by the CSSR. No effect on SA outcomes.
2	Change in population rise over the new plan period of 2017-2033 in Para 4.6.1.	No	The modification is to update the population figure to give context, and has no effect on SA outcomes.
3	Additional sentence to Para 4.6.3 to say that regard will be given to past housing delivery before the revised plan period	Yes	Past delivery of housing will be taken into account within each HMCA. This means that the past delivery could be deducted from the HMCA target with the effect that a future SAP will not need to allocate SP7 policy requirement. This could potentially have effects on SA Objectives.
4	Numbers in Para 4.6.4, Para 4.6.5 and Policy SP6 have been changed in accordance with the new housing requirement figure.	No	The dwelling figures (for allocation) in Para 4.6.4, Para 4.6.5 and Policy SP6 were calculated incorrectly in the Publication Draft. This modification is a correction so has no effect on SA objectives because the housing requirement remains the same.
5	Addition of Para 4.6.6 explaining the importance of understanding causes of any future under-delivery of housing.	No	The additional text is for explanatory purposes. No effect on SA outcomes.
6	Revision to criterion vii in Policy SP6 setting out the sequential preference of avoiding flood risk before mitigation.	No	The revision gives preference but does not change the premise of the criterion of the policy. No effect on SA outcomes.
7	Modifications to Para 5.2.20 regarding viability appraisals in regards to affordable housing to ensure consistency with national planning policy.	No	A change of wording and additions in line with national planning policy that does not affect SA outcomes.
8	Additional paragraph after iii) of Policy H5: "Departures from this policy should be justified by evidence of viability considerations."	No	The additional paragraph ensures consistency with national planning policy and does not affect SA outcomes.

Main Mod No.	Policy or Paragraph subject to change	Potential to change SA outcome	Reasoning
9	Addition of foot note to Policy H5 giving a definition of major development.	No	The additional foot note is to ensure consistency with national planning policy and does not affect SA outcomes.
10	Additional sentence to ii) Policy H5 in regards to affordable housing benchmark rents	No	Additional sentence is for clarity and effectiveness. No effect on SA outcomes.
11	Insert at end of Para 5.2.46 to future-proof against any changes to Government NDSS	No	Insert is for effectiveness and clarification and does not affect SA outcomes.
12	New paragraph after 5.2.46 in regards to viability appraisals and minimum space standards.	No	The new paragraph is to ensure consistency with national planning policy and does not affect SA outcomes.
13	Change of wording in Policy H9 from "should" to "must".	No	Wording change is for effectiveness and does not affect SA outcomes.
14	Insert paragraph after criteria a. – i: "Departures from this policy should be justified by evidence of viability considerations.	No	The additional paragraph ensures consistency with national planning policy and does not affect SA outcomes.
15	Insertion of new footnote and deletion of footnotes iii and iv in Policy H9.	No	The insertion and deletion is for clarity and to delete duplication and does not change the premise of the policy. No effect on SA outcomes.
16	Insertion of paragraph at the end of Para 5.5.52 and change in wording of Policy H10 regarding wheelchair accessible and wheelchair adaptable dwellings.	No	Addition and changes to provide clarification. No effect on SA outcomes.
17	New paragraph after 5.2.57 regarding viability appraisals and accessible housing.	No	New paragraph to ensure consistency with national planning policy. No effect on SA outcomes.
18	Rewording of Policy H10.	No	To be consistent with terminology of Part M of Building Regulations. No effect on SA outcomes.
19	Deletions and rewording of Policy H10.	No	Changes to delete repetition, and for effectiveness, clarification and consistency with terminology of Part M of Building Regulations. No effect on SA outcomes.
20	Change of wording and additional paragraph to Policy H10.	No	Changes for clarity and effectiveness, and to be consistent with national planning policy. No effect on SA outcomes.
21	Add footnote to end of paragraph in Policy G4 text concerning green space site requirements of the Site Allocations Plan	No	To ensure clarity and so users understand policy status in relation to other DPDs. No effect on SA outcomes.

Main Mod No.	Policy or Paragraph subject to change	Potential to change SA outcome	Reasoning
22	Change of 'favouring' to 'requiring' and addition of 'one of more of the following' to Para 5.5.14. Change of 'expect' to 'require' in Policy G4.	No	Changes for clarity and effectiveness. No effect on SA outcomes.
23	Delete proposed amendments to Policy EN1 and supporting text.	Yes	Effectively, the CSSR proposed changes to Policy EN1 and supporting text are being abandoned. Policy EN1 therefore remains the same as was adopted in 2014. Therefore, there may be differences in SA outcomes of the CSSR.
24	Addition at end of Para 5.5.45 and new paragraph after 5.5.46.	No	This modification provides further explanation of why a higher standard is necessary and therefore has no effect on the requirement of Policy EN2 for higher water consumption standards. No effect on SA outcomes.
25	Deletion of proposed amendment to Policy EN4.	No	Deletion to reflect retention of Policy EN1. No effect on SA outcomes.
26	Wording changes to Policy EN8 i), and addition to Policy EN8 iii).	No	Changes to aid implementation and to future proof the policy. No effect on SA outcomes.
27	Changes to Appendix 2 Glossary – Affordable Housing.	No	Changes for purposes of clarity, effectiveness and consistency with national guidance. No effect on SA outcomes.

Appendix 2: Assessment of Proposed Changes “Screened-in” against the SA Framework

Modification 3: Additional sentence to Para 4.6.3 to say that regard will be given to past housing delivery before the revised plan period. Effect on Policy SP7			
SA Obj	Original Score	New Score	Appraisal Summary
1	+	+	<p>The scoring is for the effect of the Policy on the SA objectives. The new score takes into account the effect of the modification on the impacts that the policy will have on the SA objectives.</p> <p>By having regard to past delivery of housing 2012-2017 means the amount of housing to be allocated in certain HMCAs may be reduced for the period 2017 – 2033 (compared with a position where no regard is given to past delivery).</p> <p>The effect on the SA scoring is to reduce the double negatives for Efficient & prudent use of land (SA9), Climate Change adaption (SA12) and Flood Risk (SA13) to single negatives.</p>
2	+	+	
3	-	-	
4	N	N	
5	N	N	
6	+	+	
7	+	+	
8	N	N	
9	--	-	
10	-	-	
11	N	N	
12	--	-	
13	--	-	
14	-	-	
15	N	N	
16	N	N	
17	-	-	
18	N	N	
19	N	N	
20	N	N	
21	-	-	
22	N	N	
23	N	N	

**Modification 23: Delete proposed amendments to Policy EN1 and supporting text.
Effect on Policy EN1**

SA Obj	Original Score	New Score	Appraisal Summary
1	N	N	<p>The scoring is for the effect of the Policy on the SA objectives. The Original Score was from the Sustainability Appraisal of the submission version of Policy EN1. The New Score is of Policy EN1 as adopted in the original Core Strategy of 2014.</p> <p>The effect of modification 23 reverting Policy EN1 to the original wording of the Core Strategy 2014 is to bring positive effects for housing (SA6), Social Inclusion and Community Cohesion (SA7), Climate Change mitigation (SA11) and Energy and Resource efficiency (SA23)</p>
2	N	N	
3	-	+	
4	N	N	
5	N	N	
6	N	+	
7	-	+	
8	N	N	
9	N	N	
10	N	N	
11	-	+	
12	N	N	
13	N	N	
14	N	N	
15	N	N	
16	N	N	
17	N	N	
18	N	N	
19	N	N	
20	N	N	
21	N	N	
22	N	N	
23	-	+	

Appendix 3: Sustainability Objectives

These are set out here for ease of reference. More detail on the sustainability objectives is contained within Section 3 of **CD1/4**

Ref	Name
SA1	Employment
SA2	Business investment / economic growth
SA3	Health
SA4	Crime
SA5	Culture
SA6	Housing
SA7	Social inclusion and community cohesion
SA8	Green space, sports and recreation
SA9	Efficient and prudent use of land
SA10	Bio / Geodiversity
SA11	Climate Change mitigation (Greenhouse Gas Emissions)
SA12	Climate Change adaption
SA13	Flood risk
SA14	Transport network (infrastructure)
SA15	Accessibility to employment, services and facilities
SA16	Waste
SA17	Air Quality
SA18	Water Quality
SA19	Land/soil Quality
SA20	Amenity
SA21	Landscape & Townscape Quality
SA22	Historic environment
SA23	Energy / resource efficiency