



Leeds Local Plan Update

Leeds Local Plan

Draft Report of Consultation

Development Plan Document

September 2023

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1 INTRODUCTION

- 1.1 This document sets out how Leeds City Council has involved the community and other stakeholders in the preparation of the Local Plan Update (“the Plan”). It shows how the Council has complied with Regulation 18 and Regulation 19 of the [Town and Country Planning \(Local Development\) \(England\) 2012 Regulations](#) and how it has undertaken engagement in accordance with the 2012 Regulations.
- 1.2 In accordance with regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, this document set out:
- (i) Which bodies and persons the Council invited to make representations
 - (ii) How those bodies and persons were invited to make representations
 - (iii) A summary of the main issues raised by the representations made; and,
 - (iv) How any representations made have been taken into account.
- 1.3 This document summarises the process involved in preparing and conducting consultation on the Plan. This document covers the engagement and consultation undertaken at Regulation 18 stage on the scope and options for the Plan between 19th July and 13th September 2021 and Regulation 19 on the proposed policies between 24th October and 19th December 2022. It also provides a summary of the outcomes of each stage of consultation, and how the representations received informed subsequent stages in the Plan preparation process.
- 1.4 The Council’s [Statement of Community Involvement](#) (SCI) sets out how Leeds City Council should undertake consultation and engagement on Local Plan documents, detailing how we will comply with statutory requirements and to help ensure that the consultation and engagement that we undertake is inclusive.
- 1.5 An overview of the consultation and engagement undertaken to date are set out in the table below:

Consultation/engagement undertaken	Dates	Consultation material/documents
PRE-EXISTING CONSULTATION PRIOR TO THE START OF PLAN PREPARATION		
Big Leeds Climate Conversation	Over 80 events between July – November 2019	Online questionnaires, in-person conversations, focus groups and social media, targeted at every community in Leeds
Leeds Climate Change Citizens Jury	September – November 2019	25 randomly selected Leeds residents were recruited to deliberate over the course of 8 weeks to answer the question – “What should Leeds do about the emergency of climate change?”
SCOPING PUBLIC CONSULTATION (REGULATION 18)		
Dedicated Web Campaign page - LINK	19th July until 13th September 2021	All sections of LPU documents (including

Consultation/engagement undertaken	Dates	Consultation material/documents
		Topic Papers) in accessible format. Link to Smart Survey to collect responses.
Topic based Webinars - LINK	3 - 24 August 2021	Topic based detail presentation with Q&A
Topic Based YouTube Videos - LINK	19th July until 13th September 2021	Short bitesize video presentation introducing each topic area
Targeted workshops with boards and groups with established relationships with stakeholders and communities. Age Friendly Leeds, Leeds Youth Council, Leeds Planning and Development Forum, Leeds Climate Commission, Leeds Chamber, Leeds Clean Air Alliance, RTPi NW Conference, University of Leeds, WYCA (West Yorkshire Combined Authority) Directors of Development. Duty to Co-operate Group	19th July until 13th September 2021	Strategic overview and Topic based detail presentation with Q&A
Planning Aid England Workshops organised with to engage harder to reach/rarely heard groups.	19th July until 13th September 2021	Strategic overview and Topic based detail presentation with Q&A
Outreach with Universities, Localities Team, Equality Hub, Neighbourhood Forums, and Leeds Festival	19th July until 13th September 2021	Strategic overview and Topic based detail presentation with Q&A
PUBLICATION DRAFT POLICIES FOR PUBLIC CONSULTATION (REGULATION 19)		
Dedicated Web Campaign page - LINK	Monday 24 October until 19 December 2022	All sections of Local Plan Update documents (inc. Proposed new and amended policies, background and evidence base documents) in accessible format. Link to Smart Survey to collect responses.
Webinar of Proposed new and amended policies	Monday 24 October until 19 December 2022	Presentation of Proposed new and amended policies by topic with Q&A
YouTube Videos of Proposed new and amended policies - LINK	Monday 24 October until 19 December 2022	Video presentation of Proposed new and amended policies by topic.
Public drop-in Sessions (Horsforth Library, Burley Lodge Centre, White Rose Shopping Centre, Crossgates Library, Little London Community Centre, Leeds Central Library)	9 Nov – 1 st Dec 2022	Face to face interaction, proposed new and amended policies documents, Summary document and flyers.
Youth Engagement, Voice and Influence Leeds	Monday 24 October until 19 December 2022	Promotion of consultation, particularly the summaries and videos.

Consultation/engagement undertaken	Dates	Consultation material/documents
Leeds University, Leeds Beckett University		Advertise consultation and hosted material in Priestley Centre. Guest lecture slot.
Bespoke Neighbourhood Plan and Pilot group		Attendance at forum meetings.

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

Early Scoping Public Consultation (Regulation 18)
Topic 1 - Carbon reduction - https://www.leeds.gov.uk/planning/planning-policy/local-plan-update/carbon-reduction
Topic 2 - Flood risk - https://www.leeds.gov.uk/planning/planning-policy/local-plan-update/flood-risk
Topic 3 - Green infrastructure - https://www.leeds.gov.uk/planning/planning-policy/local-plan-update/green-infrastructure
Topic 4 – Placemaking - https://www.leeds.gov.uk/planning/planning-policy/local-plan-update/placemaking
Topic 5 - Sustainable infrastructure - https://www.leeds.gov.uk/planning/planning-policy/local-plan-update/sustainable-infrastructure
The Leeds Local Plan Update Scoping Consultation 2021 (PDF LPU)

Publication Draft Policies for Public Consultation (Regulation 19)
Background Papers
Carbon Reduction Background Paper
Flood Risk Background Paper
Green and Blue Infrastructure Background Paper
Green and Blue Infrastructure Mapping
Placemaking Background Paper
Sustainable Infrastructure Background Paper
Overall Climate Change Background Paper
Evidence Base Documents
Study On the Carbon Reduction of Buildings
Renewable Energy Study
Renewable Energy Mapping
20-Minute Neighbourhood Study
20-minute neighbourhood Mapping
Strategic Flood Risk Assessment (SFRA)
Tree Replacement Report
Climate Emergency Local Plan Update Economic Viability Study (EVS)

2 BACKGROUND

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

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

The Local Plan and 20 made Neighbourhood Plans together form the Statutory Development Plan, which is used, alongside the National Planning Policy Framework, to help direct decisions on planning applications in the Leeds district.

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

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

2.4 In 2019 Leeds City Council declared a [Climate Emergency](#) and announced its aspiration for the district to be carbon neutral by 2030. The land use planning system plays a critical role in mitigating and adapting to climate change, as championed in the National Planning Policy Framework and guidance, such as the RTPI's [Rising to the Climate Crisis](#), and Leeds Climate Commission's [Net-Zero Carbon Roadmap for Leeds](#).

2.5 Whilst the existing Leeds Local Plan already had a broad suite of adopted policies that address many climate-related issues, these pre-dated the climate emergency declaration, and it was considered that overall these do not go far enough to ensure the zero carbon ambitions are delivered by 2030.

2.6 Informed by declarations made at Full Council, the review of policies, and detailed discussions with Development Plan Panel, it was proposed that the objective of the first stage of Local Plan Update should be the introduction of new planning policies, and enhancement of existing planning policies, to help address the climate emergency priority. Undertaking a partial update initially with a fairly narrow scope would enable a more focussed and manageable plan-making process to be undertaken at greater speed. A second Local Plan Update would be required to cover other policy areas, including town/local centres, affordable housing, minerals and waste etc. (this update was subsequently named Leeds Local Plan 2040).

Who we engaged with

2.7 The decision to propose a scope that focused the Local Plan Update on climate related policies was taken as a result of pre-existing internal and external consultation, including:

Engagement	Who was involved	Outcome
Big Leeds Climate Conversation	7,835 individual residents from across Leeds participated in one of the two official questionnaires. There were also in-person conversations, focus groups and social media.	97.1% agreed that the climate is changing, with 93.4% of the view that this is down to human activity. 94% agreed that tackling climate change should be a priority for Leeds, as well as becoming a carbon neutral city (91.6%) and protecting biodiversity (95.5%). Proposals receiving overwhelming support included improving energy efficiency in homes and businesses, planting new trees, minimising waste, investing in sustainable travel infrastructure, and supporting public transport and active travel.
Leeds Climate Change Citizen's Jury	25 randomly selected residents from across the Leeds district who deliberated to answer the question 'What should Leeds do about the emergency of climate change'.	The recommendations included taking action to reduce the use of private cars, increasing the energy efficiency of housing, future-proofing new housing and creating more green spaces in Leeds.
Full Council / Development Plan Panel	Cross party consensus of Ward Members	Based on the results of the Big Leeds Climate Conversation and Leeds Climate Change Jury, it was proposed that the objective of the first stage of Local Plan Update should be the introduction of new planning policies, and enhancement of existing planning policies, to help address the climate emergency priority. Undertaking a partial update initially with a fairly narrow scope would enable a more focussed and manageable plan-making process to be undertaken at greater speed. A second Local Plan Update would be required to cover other policy areas, including town/local centres, affordable housing, minerals and waste etc. (this update was subsequently named Leeds Local Plan 2040).

2.8 Taken together, these issues as raised by residents and other stakeholders in Leeds, along with research carried out, helped set the scope of the Local Plan Update to deliver more sustainable and carbon neutral development, as well ensuring that all communities are resilient to the impacts of climate change, with the inclusion of 5 headline objectives:

- (1) Carbon Reduction – for new development, Leeds will seek to minimise energy demand and meet all demand for heat and power without increasing carbon emission, to allow Leeds to meet its climate emergency commitment of zero carbon by 2030.
- (2) Flood risk - Leeds will ensure that new developments are located and designed to avoid, reduce and mitigate flood risk, increase biodiversity and reduce the carbon footprint of risk reduction schemes through natural flood solutions.
- (3) Green Infrastructure and Biodiversity - Leeds will create new Green Infrastructure (GI) (including Green Space and Natural Environment) through the planning process, and identify, improve, protect and extend existing GI to address the challenges of climate change and create a healthy city.

- (4) Place-Making - Leeds will work in the public interest, prioritising the safety and well-being of people within a framework of long-term sustainable development by allowing development that promotes safe, healthy and resilient places, reflects the issues associated with inclusive growth and an environment which leaves a positive legacy for all people.
- (5) Sustainable Infrastructure - Leeds will ensure the delivery of an accessible and integrated transport system which focuses on public transport and active travel, is worthy of its role at the heart of the Leeds City Region and supports communities and inclusive growth.

2.9 Involving local people, businesses, and other stakeholders and partners is essential for good planning and to achieve the city that we all want. The climate emergency and how planning can address aspects of climate change and the district's resilience to its impacts is important to everyone who lives, works and has an interest in Leeds. These considerations were at the heart of the planning, delivery and assessment of consultation on the Local Plan Update. The stakeholders we engaged with during both the Regulation 18 and Regulation 19 consultation periods were:

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

Specific Stakeholders	General Stakeholders
Natural England	
Network Rail	
Office of Rail Regulation	
Police & Crime Commissioner	
Ramblers Association	
Relevant Bus and Rail operators	
Royal Society for the Protection of Birds	
Sport England	
Telecom and Mobile operators	
The Coal Authority	
West Yorkshire Combined Authority	
West Yorkshire Archaeology	
Woodland Trust	
Yorkshire Water	

3 CONSULTATION PRINCIPLES

- 3.1 The Regulation 18 ‘Scoping’ consultation was guided by the principles set out in the Interim Statement of Community Involvement (“ISCI”), which allowed us to undertake consultations online whilst the Covid-19 rates remained high and social distancing restrictions were in place nationally. Whilst the ISCI curtailed face-to-face meetings that would normally be held, these were replaced by a number of other communication methods, such as digital advertising, social media and online webinars. We also embedded the use of plain English, accessibility, inclusion and choice within the consultation, in line with guidance contained in the ISCI.
- 3.2 Our vision for the consultation was:
- “We want everyone to take part in the consultation, whether they live in the inner-city, a village or a town and whether they feel confident and knowledgeable about the issues that we are consulting on or not. As a result of taking part in the consultation we want participants to feel listened to, valued and to have learnt about how climate change can be tackled city-wide and locally.”*
- 3.3 Following the end of Covid-19 restrictions nationwide and a return to more ‘normal’ consultation practices a new full [Statement of Community Involvement](#) (“SCI”) was adopted in November 2022, and this document was used to undertake consultation on subsequent stages of the Local Plan Update.
- 3.4 In accordance with the SCI and consultation good practice, the following principles were used to guide consultation on the Local Plan Update throughout the plan preparation process to help us hear as many views as possible and use those views to influence the Plan:

Trust

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

Timely

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

Visible

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

Inclusive

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

Transparent

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

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

Target 1 – To achieve responses from every Ward on district-wide plan-making consultations.

Target 2 – To receive positive feedback on consultations that we undertake on plan-making (feedback will be used to help secure a positive trend in people's satisfaction levels over the 5-year SCI period).

Target 3 – There will be a year-on-year increase in consultation and engagement by young people (under 25's) between 2022 and 2027.

Equality

- 3.6 We directly targeted a range of community groups and organisations, including organisations representing a range of social groups including people from minority backgrounds, faith groups, gypsies / travellers / travelling showpeople, people with disabilities. These groups were wider and more diverse than the protected characteristic groups identified in the 'Equality Act 2010'. The aim of the consultation was to allow all an opportunity to participate in and have access to the Local Plan process. Equality considerations have also been an integral part of policy formulation from the outset.
- 3.7 A range of engagement techniques were used, to ensure that the consultation was as inclusive as possible including:
- Translation/other formats available for all documents on request
 - The use of accessible venues
 - Ensuring consultations were advertised using a wide range of ways, via social media and more traditional methods to make it more accessible for all.
 - Use of different formats such as web videos, face to face and smart surveys for consultation.

4 SCOPING CONSULTATION (Regulation 18)

Consultation Summary

- 4.1 The first regulatory milestone in the preparation of a Development Plan Document such as the Local Plan Update, is an initial stage of public consultation known as 'Regulation 18' or 'Scoping' consultation. The purpose of this stage is to ascertain views on what matters the Plan will need to consider and address i.e. its scope in order to achieve its identified objectives. The regulations specify that, as part of the plan preparation process, we must invite representations (comments/suggestions) on what the Plan ought to contain.
- 4.2 The scoping consultation was an opportunity for the Council to share its direction of travel with the public, businesses and consultation bodies and ask for people's ideas, opinions, local experiences and evidence to help us shape the plan. Whilst being mindful of the need not to pre-judge the outcome of the consultation, it was considered that it would be helpful to respondents if there was clear direction provided by the Council given the critical and urgent nature of the climate emergency, with some initial options for what potential policies could contain, as a means of generating responses to the Plan at this early stage. This scope was based on previous engagement across the Council whilst seeking to ensure consistency with documents such as the Connecting Leeds Transport Strategy and the White Rose Forest Strategy as well as further research and evidence-gathering. It was hoped that this approach would help shorten the timescale for preparation, focus comments and help stimulate debate.
- 4.3 It was considered important to invite a frank debate with consultees on the viability and deliverability of our preferred approach to reducing carbon emissions, however it was made clear that these were initial ideas and the consultation provided opportunity to agree /disagree with any part of the material and raise other views, suggestions and evidence.

4.4 The Local Plan Update Regulation 18 consultation ‘Your Neighbourhood, Your City, Your Planet’ took place for 8 weeks, **between 19th July and 13th September 2021**. Due to nationwide restrictions on face-to-face engagement the consultation was largely undertaken digitally, but well in advance of the start of the consultation an engagement strategy was prepared where we considered how we could ensure that the methods used for promotion, information and consultation were as effective, far-reaching and inclusive as possible. We also looked at the feedback and lessons learned from previous planning consultations and made sure we acted upon those during the Local Plan Update consultation. Three objectives were used to focus our activity during the consultation period:

- To secure a significant number of responses which are clearly informed by or related to the consultation materials.
- To secure feedback and responses from every neighbourhood in Leeds, particularly where communities and groups are typically under-presented in planning consultations of this nature.
- To develop web and digital content which provides a much-improved and more accessible experience for users.

Consultation material

4.5 The consultation material used to inform people included detailed ‘Topic Papers’ presenting the range of issues we thought should be considered through the Local Plan Update. These were also condensed down into ‘Summary’ versions, as well as a graphically designed ‘Plan on a page’ to give people choice over how much time they wished to commit to learning about the Plan. The material was accessed via a campaign [webpage](#) in both accessible HTML format and an engaging graphically designed PDF. There were 10,345 unique views of the webpage over the campaign duration. Paper copies of the material was also made available at libraries and community hubs around the District.

Material/Resource	Where Available?
Scoping ‘Topic Papers’	Webpage (in accessible html and pdf formats) Paper copy on deposit in Merrion House and in all libraries / community hubs in Leeds District Paper copy available for individuals / groups upon request
Topic summaries	Webpage (html) Paper copies on deposit in Merrion House and all libraries / community hubs in the Leeds District
‘Plan on a Page’	Webpage (pdf)
Statement of Representation	Webpage (pdf) Paper copies on deposit in Merrion House and all libraries / community hubs in the Leeds District
Five ‘bitesize’ explanatory videos covering each topic	Youtube with link on webpage - LINK Videos had 351 views

Publicity

4.6 There was a detailed publicity and communications strategy which used a clear graphic across the campaign and the slogan 'Your Neighbourhood, Your City, Your Planet.' The methods used to publicise the consultation included:

Publicity/Communication method	Targeting / Reach
<p>GovDelivery bulletin to everyone on the Planning consultation database (including residents, businesses, Council Officers, Ward Members, statutory consultees, neighbouring authorities etc.)</p> <p>Links were also provided on some more general resident bulletins on Covid / essential information updates</p>	<p>Three Local Plan Update bulletins were delivered, reaching 2054 contacts</p>
<p>Press releases.</p>	<p>Four media releases were issued at different stages of the campaign, signposting to the website</p> <p>Coverage was secured in a number of local media websites and newspapers including Yorkshire Evening Post, Leeds Live, Wharfedale Observer, Leeds Star, Caring Together, Leeds Climate, Doing Good Leeds, South Leeds Live and The Telegraph & Argus</p>
<p>Posters were designed and printed</p>	<p>Approximately 80 posters were distributed to all libraries, Community Hubs, and leisure centres around the Leeds district, as well as Kirkgate Market. Laminated posters were placed on lampposts in Leeds City Centre</p> <p>E-posters were made available for groups / forums who were willing to distribute</p>
<p>Email bulletins via Youth Council, Youth Parliament, Voice & Influence Networks, Localities Networks, Equalities Network, the Universities, Leeds Climate Commission and other Climate interest groups</p>	<p>Using these networks to reach diverse communities in Leeds.</p>
<p>Use of Leeds City Council social media channels/networks for promotion (Facebook, Twitter, LinkedIn)</p>	<p>Included Equality Network, Community Committees, Children & Families, Age Friendly Network.</p> <p>Total reach of 1,026,139</p>
<p>Paid for/organic social media posts via Facebook, Twitter, LinkedIn</p> <p>Paid for digital advertising</p>	<p>Targeting all adult population of Leeds</p> <p>Boosted Facebook posts were used to target specific Wards in advance of webinars and consultation events</p> <p>166,693 people reached through Facebook adverts</p> <p>66,645 devices reached through digital advertising</p>

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

Consultation Programme

4.7 Due to national Covid-19 restrictions during the consultation period most of the events held during the consultation period to raise awareness of the consultation, provide information and where possible give the opportunity for discussion and / or Q&A, had to be online.

Event	Type of event	Targeting
10 public online webinars with Q&A, 2 per topic (daytime and evening sessions)	Online	All The webinars were recorded and made available on YouTube - LINK . There were 504 subsequent views.
6 online workshops organised to be facilitated by Planning Aid England	Online	Initially targeted invites were sent to young people, inner city residents / groups and members of groups with protected characteristics. Later workshops were widely advertised. Very low uptake with only 1 workshop going ahead.
Leeds Planning & Developers Forum presentation and Q&A	Online	Business
Chamber of Commerce Environment Group presentation and Q&A	Online	Business
Leeds Clean Air Alliance presentation and Q&A	Online	Climate Group
Leeds Youth Council presentation and discussion	Online	Young people
Leeds Climate Commission presentation and Q&A	Online	Climate Group
Age Friendly Leeds presentation and Q&A	Online	Older people
Stall at Age Proud Leeds festival	In person	Older people

Consultation Responses

4.8 There were a number of ways for people to make comments on the Scoping material:

- 5 detailed topic-based SmartSurveys, accessed through the website. See Appendix 5
- 5 short summary SmartSurveys, made available via the webpage.
- 'Our Future Leeds' Postcards, capturing views on-street
- Via the dedicated Local Plan Update email address.
- A postal address was provided.
- Officers recorded informal comments at online / in-person events.
- A telephone number was made available for queries.

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

In total 760 submissions were made during the consultation period which related to the Local Plan Update Scoping consultation stage. The method in which people chose to submit their comments is set out below.

Method	Submissions	%
Smart Survey	655 (including 417 summary responses)	86%
Email Responses	65	9%
Postcard	40	5%
Total	760	100%

Overview of the issues raised

4.10 Of the online responses, **88% of people agreed or strongly agreed with the scope of the plan.** The vast majority of representations made it clear that they supported the Plan focussing on the climate emergency, and where respondents sought to broaden the scope of the Plan, they were still overtly supportive of the inclusion of the climate emergency as the key driver for the Local Plan Update and were seeking additions to the scope rather than deletions.

4.11 Some of the suggested additions to the scope of the Plan, included:

- Housing policies and allocations.
- Reassessing the housing requirement to include the Governments standard method and 35% urban uplift.
- Reviewing the spatial distribution of housing.
- Reassessing needs for affordable housing and its delivery in order to fully address the UN Sustainability Goals.
- Employment land requirements and provision.
- Consideration of the important contributions Leeds’ mill buildings make to the urban and historic environment.
- Review and update policy on specialist housing for older people

4.12 The priority for the Local Plan Update is to update and improve existing policies, and make new policies, to address climate change and mitigate impacts, and reduce carbon emissions, in line with the climate emergency declaration. Preparation has begun on Leeds Local Plan 2040 which covers the remaining policy matters, including:

- 1) Spatial Strategy
- 2) Housing, including affordable housing, housing mix, specialist housing
- 3) Economic Development
- 4) Role of Centres
- 5) Minerals & Waste
- 6) Transport & Connectivity
- 7) Other topic areas, including Heritage, Rural/Open Land, Landscape, Community Facilities and others
- 8) Call for Sites

- 4.13 There were also a range of contributions from consultees to help the Council refine the policy areas and progress towards draft policies within a Publication Draft. These included:
- The “Ecological Emergency” should be added to the scope,
 - “Blue Infrastructure” should be explicitly added to the scope to maximise the benefits of our waterways,
 - Health equity and addressing other inequalities should be an explicit goal,
 - The Plan should consider the role of communities within the process,
 - A clearer commitment to the ‘Circular Economy’, by decoupling economic activity from the consumption of finite resources by keeping materials in use for longer, e.g. more use of recycled and recyclable materials.
 - Inclusion of Public Rights of Way
 - Inclusion of Protection of soil
- 4.14 A detailed Report of Consultation for Regulation 18 which provides more information about the consultation methods, representations and our response to these reps can be found at **Appendix 7 – Regulation 18 Scoping – Report of Consultation.**

5 PUBLICATION DRAFT CONSULTATION (Regulation 19)

Consultation Summary

- 5.1 The formal Regulation 19 Publication Draft consultation period took place between 24th October and 19th December 2022. This stage of plan-preparation involves consultation with the public on the draft policies and supporting text. As this is a planning document with specific policy recommendations for an area, the consultation process involves more formal and technical questions. We were not inviting new suggestions at this stage, rather seeking support for what we were trying to achieve, or request reasons and/or evidence for any objections.
- 5.2 In order for comments to be taken into account we needed people to comment on whether our policies were ‘legally compliant’ and ‘sound.’ Local plans are considered ‘sound’ if they are:
- **Positively prepared** – The Plan should be prepared to meet our social, economic and environmental requirements.
 - **Justified** – The Plan is based on reasonable and proportionate evidence.
 - **Effective** – The Plan should be deliverable over the Plan period, up to 2040.
 - **Consistent with National Policy** – The plan seeks to deliver sustainable development and is consistent with national policy.
- 5.3 Unlike during the Regulation 18 consultation period, Covid-19 restrictions had been fully lifted nationally by time the Regulation 19 consultation period began, so one aim for the consultation strategy was to continue the progress that had been made digitally in ensuring that online material was accessible and engaging, whilst combining with a range of face-to-face events to suit a range of different stakeholders.

Consultation material

- 5.4 As well as the Consultation Draft document and supporting information we made other resources available to give people choice in how they informed themselves. These were centred around a dedicated consultation [webpage](#) that contained links to all the relevant information.

Material/Resource	Where Available?
Publication Draft Document – proposed new and amended policies and supporting text.	Webpage (in accessible html and pdf formats) Paper copy on deposit in Merrion House Paper copies made available at all in person events.
Consultation Report	Webpage (pdf) Paper copy on deposit in Merrion House
Duty to cooperate table	Webpage (pdf) Paper copy on deposit in Merrion House
Habitat Regulations Assessment	Webpage (pdf) Paper copy on deposit in Merrion House
Sustainability Appraisal Report and non-technical summary	Webpage (pdf) Paper copy on deposit in Merrion House
Sustainability Scoping Report	Webpage (pdf) Paper copy on deposit in Merrion House
Background papers	Webpage (pdf) Paper copy on deposit in Merrion House
Evidence base	Webpage (pdf)
Statement of Representation	Webpage (pdf) Paper copies on deposit in Merrion House and all libraries / community hubs in the Leeds District
Summary version of the Publication Draft Document (graphically designed with a 'plan-on-a-page' for each topic area)	Webpage (pdf) Paper copies on deposit in Merrion House and all libraries / community hubs in the Leeds District Paper copies made available at all in-person events
Introductory video, explaining what the consultation is about, what people can comment on and how to comment	Youtube (link on webpage and used for social media communications)

Publicity

- 5.5 The 'Your Neighbourhood, Your City, Your Planet' 'strapline' continued from the Regulation 18 consultation and helped to ensure the consultation felt familiar and consistent. The following methods were used:

Publicity/Communication method	Targeting / Reach
GovDelivery bulletin to everyone on the Planning consultation database, and those who had taken part in the Regulation 18 consultation. Email notifications to internal officers, Ward Members, external stakeholders, statutory consultees, neighbouring authorities	1276 consultees
Press releases	Yorkshire Evening Post Leeds Live
Posters were printed. E-posters were made available for groups/forums who were willing to print and display	Distributed to all libraries and Community Hubs around the Leeds district
Email bulletins via Youth Council, Youth Parliament, Voice & Influence Networks, Localities Networks.	Targeted publicity for young people
Use of Leeds City Council social media channels/networks for promotion (Facebook, Twitter, LinkedIn)	Included Equality Network, Community Committees, Children & Families, Age Friendly Network.
Paid for/organic social media posts via Facebook, Twitter, LinkedIn, Instagram and Spotify.	Targeting all adult population of Leeds Boosted Facebook posts were used to target specific Wards in advance of webinars and consultation events Boosted Facebook posts targeting 16-24 year olds
Promotion of consultation during any public meetings taking place during the consultation period	Neighbourhood forums / Parish & Town Councils Community committees etc.

Consultation Programme

- 5.6 A series of online and in-person events were run throughout the consultation period to raise awareness of the consultation, provide information and where possible give the opportunity for discussion and / or Q&A. The online Webinars were recorded and saved to the Youtube channel so they could be watched by anyone who couldn't attend live.

Event	Type of event	Targeting
The Regional Property Forum	Online	Business
Leeds Planning & Developers Forum	Online	Business
Leeds Property Forum	Online	Business
Beeston Neighbourhood Forum	In person	Local residents (Inner South)
Introductory webinar (daytime)	Online	All
Introductory webinar (evening)	Online	All
Drop-in event at Horsforth Library	In person	All / Local residents (Outer North West)
Drop in event at Burley Lodge Community Centre	In person	All / Local residents (Inner North West)

Event	Type of event	Targeting
Green Blue Infrastructure Webinar (daytime)	Online	All
Carbon Reduction Webinar (evening)	Online	All
Flood Risk Webinar (daytime)	Online	All
Drop-in Event at the White Rose Shopping Centre	Online	All / Local residents (South)
Placemaking Webinar (daytime)	Online	All
Inner West Community Committee meeting	In person	Ward Members / Local residents (Inner West)
Leeds Local Access Forum presentation	Online	Internal department / Interest groups links
Drop-in event at Crossgates Library	In person	All / Local residents (East)
Sustainable Infrastructure Webinar (daytime)	Online	All
Sustainable Infrastructure Webinar (evening)	Online	All
Carbon Reduction Webinar (daytime)	Online	All
Drop-in event at Little London Community Centre	In person	All / Local residents (Inner North)
Feed Leeds Presentation	Online	Interest Group – Food production and land access
Outer North East Community Committee meeting	In person	All / Local residents (Outer North East)
Influencing Travel Behaviour Team presentation	Online	Internal department links
Drop-In event at Leeds Central Library	In person	All / Local residents (Central)
Climate Action Leeds event	In person	Interest groups and Local Climate Hubs
Outer South Community Committee meeting	In person	Ward Members / Local residents (Outer South)
Inner North West Youth Service meeting	In person	Young people from Inner North West
Older Persons Forum presentation	Online	Older residents (all areas)

Consultation Responses

5.7 There were a number of ways for people to make comments on the Publication Draft material:

- A Smart Survey. This was available via the webpage. Paper copies were also taken to in-person events.
- Via the Local Plan Update email address.
- A postal address was provided.
- A dedicated Smart Survey for young people that was shorter, less technical and more engaging.
- Officers recorded informal comments at in-person events.

5.8 1474 representation were received as part of Publication Draft Consultation from 547 consultees.

5.9 In total 547 submissions were made during the consultation period which related to the Local Plan Update Publication draft stage. The method in which people chose to submit their comments is set out below.

Method of making comments	Submissions	%
Completed Smart Survey	422	77
Email representations	81	15
Completed Young Persons Survey	44	8
Total	547	100

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

5.11 A broad range of respondents submitted comments to the consultation. Of the 547 submissions received by the council a significant number were from residents.

Representor	Submissions	%
Comments from individuals	421	77
Community / Resident groups, Neighbourhood Planning forums, Town and Parish Councils	46	8
Statutory, Non- statutory and Private sector Organisations (Housebuilders, Consultants etc)	80	15
Total Submissions	547	100

5.12 A significant proportion of the submissions made comments on more than one proposed policy or element of the plan. All submissions were analysed by officers and an individual representation was logged for each specific comment raised (i.e. on a particular policy / element of the Plan). In total 1474 individual representations were received.

5.13 The makeup of comments and matters raised by representors are

Representor	Representations	100%
Comments from residents / individuals	684	46
Community / Resident groups, Neighbourhood Planning forums, Town and Parish Councils	178	12
Statutory, Non- statutory and Private sector Organisations (Housebuilders, Consultants etc)	612	42
Total Representations	1474	100

Main issues raised through the consultation with response and key actions

5.14 All comments received were entered into a database to enable analysis. A summary of the main issues raised along with the Council's response to these issues are provided in the following tables, which are ordered by topic for ease of readability. The tables have been divided into 4 sections to make it clear where comments have or haven't resulted in a change, and the justification for the Council's approach:

1. **PROPOSED CHANGES** – Those comments/changes that were requested through the consultation and have been agreed with and resulted in a direct change to the Plan.
2. **PARTIAL CHANGES** – Where comments submitted through the consultation were partially accepted and resulted in an element of change to the Plan.
3. **NO CHANGE PROPOSED** – Where comments or requested changes have not resulted in any change to the Plan, and the reason why.
4. **MATTERS OUTSIDE THE SCOPE OF THE CONSULTATION** – Those comments related to elements of the Local Plan that were not part of the consultation or outside the scope of the Local Plan Update.

CARBON REDUCTION REPRESENTATION SUMMARY TABLE

Policy	Summary of representation	Action / Response
Proposed changes:		
EN1 PART A: EMBODIED CARBON	The requirement to demolish a building could be motivated by factors other than carbon saving. The policy should be amended to account for these other factors.	Proposed policy EN1 Part A has been amended to allow developers to provide justification for why a building may need to be demolished. The amended supportive text provides examples of what would be considered acceptable justification.
EN1 PART A: EMBODIED CARBON	The building retention element of the policy will discourage investment in brownfield sites and encourage use of greenfield land.	Proposed policy EN1 Part A has been amended to allow developers to make their argument for why a building may need to be demolished. The amended supportive text provides examples of what would be considered as acceptable justification.
EN1 PART A: EMBODIED CARBON	It is suggested that applicants for demolition only projects are required to calculate the embodied carbon in the building to be demolished, which can then be used in future calculations	The proposed policy has been amended to state that where a building is proposed to be demolished, the development will reuse and recycle all material that it is possible to do so.
POLICY EN1B: OPERATIONAL ENERGY	The proposed carbon offset payments are far higher than precedent Councils in terms of cost per tonne and time frame. This goes far beyond the cost of all other precedents listed in the evidence base.	The financial offsetting methodology has been replaced with a system that focusses on renewable energy generation rather than carbon. The new figure is based on calculating the cost of generating the renewable energy required to make a development net zero offsite, using the Government's Photo Voltaics (PV) cost dataset. The Council believe this to be a more reasonable offset figure.
EN2: SUSTAINABLE CONSTRUCTION STANDARDS	BREEAM Outstanding is too onerous.	The policy has reverted to the current requirement of BREEAM Excellent to balance sustainability performance with a proportionate policy requirement.

Policy	Summary of representation	Action / Response
POLICY EN3: RENEWABLE ENERGY	<p>Wakefield Council suggest the wind section of the policy should be modified by adding the underlined text as set out below:</p> <p><i>Any impacts of the proposal on the local community (<u>including affected communities in adjacent districts</u>) have, through early consultation, been identified and mitigated;</i></p>	The policy has been amended to insert the suggested wording.
POLICY EN3: RENEWABLE ENERGY	<p>The loss of agricultural land is not assessed in the cumulative assessment of objective SA9: Efficient Use of Land (Appendix 7B) against policy EN3 against SA9 in Appendix 7A. Furthermore, there is no evidence in the appraisal of the consideration of valuable agricultural land and soils in relation to objective SA19: Land/Soil Quality</p>	The Sustainability Appraisal has been updated to reflect the impact of the potential loss of valuable agricultural land through policy EN3.
POLICY EN3: RENEWABLE ENERGY	<p>The Habitat Regulations Assessment Screening states the South Pennine Moors Phase 2 Special Protection Area is 12km from the general extent of its nearest opportunity area for wind turbines and 2.5km from the general extent of an opportunity area for solar power. However, this is not considered sufficient to rule out likely significant effects on the designated site. We therefore advise that any additional information/evidence used to inform the assessment should be presented in the HRA to justify the conclusions made (Natural England).</p>	<p>The policy has been amended to include criteria that would require wind and solar application to meet the requirement: <i>“Any potential impacts on nationally and internationally designated sites have been assessed and mitigation provided where appropriate.”</i></p> <p>Following further work on functionally linked land potentially affected by the solar opportunity area a 7.5km buffer to the SPA has been applied based on evidence collected on the habits of affected bird species. This is detailed in the Carbon Reduction background paper, and the updated buffer and policy has been reconsidered through the updated Habitat Regulations Assessment Screening, which concludes that there are no likely negative effects.</p>
POLICY EN3: RENEWABLE ENERGY	It does nothing to encourage community-led energy solutions, especially outside the opportunity areas	Policy has been amended to support community led schemes across the district and solar applications that fall partially within the opportunity area maps.

Policy	Summary of representation	Action / Response
POLICY EN3: RENEWABLE ENERGY	We suggest a tiered approach to the opportunity areas in which the criteria of suitability are significantly less restrictive for community-led energy schemes than for commercial developments	The policy wording has been amended to support community led energy schemes. “Applications for wind energy development involving one or more turbines will not be considered acceptable unless within an area identified as suitable for wind energy development or as part of a locally led community renewable scheme ”
Partial changes:		
POLICY EN1B: OPERATIONAL ENERGY	Concerned that the proposed policy states that gas boilers and direct electric resistive heating will not be supported within new development and that there is no transition period identified to phase out the use of gas boilers and direct electric resistive heating in new developments.	<p>The proposed policy now states that new development should ensure that new developments have fossil fuel free plants. This would still not allow gas boilers, but may allow direct electric heating, although this would make it difficult to meet the Energy Use Intensity requirements and would have to be robustly justified to allow installation.</p> <p>A transition period has been added to the policy in recognition of the time needed to step up to zero carbon</p>
POLICY EN1B: OPERATIONAL ENERGY	<p>This proposed policy sets two targets, which for housing is an Energy Use Intensity Target of 35 kWh/m2/year and a Space Heating Demand Target of 15 kWh/m2/year.</p> <p>As is the case elsewhere in the local plan, the policy is not clear as to what is being asked and therefore would be not effective. For example, do the targets refer to energy demand of homes or delivered energy to the home?</p>	The proposed policy refers to the energy demand of homes. The supportive text has been updated to provide clarity.
POLICY EN1B: OPERATIONAL ENERGY	15kWh/m2/year is equivalent to PassivHaus and is not necessarily required to achieve zero carbon. With this you get diminishing returns and the work we are involved in with the Future Homes Hub is highlighting that this cannot be rolled out <i>en masse</i> unless substantial changes and improvements occurred in trades and supply chain capability.	The Council believed that introducing the Space Heating Demand requirements is achievable beyond the transition period and is important to ensure new homes require less energy to heat and combat fuel poverty.

Policy	Summary of representation	Action / Response
		The policy has been amended to include a transitional period with less stringent Energy Use Intensity targets and space heating demand targets up to 2028.
POLICY EN1B: OPERATIONAL ENERGY	Zero Carbon (Regulated energy only) can be met with higher space heating demands – through fabric, efficient services with heat recovery and renewables. This then allows design flexibility. For this reason alone, we would suggest that the targets are reduced or the policy is deleted	By setting Energy Use Intensity targets and space heating demand standards the intention is also to trigger design innovations to meet the standards. A transition period has been introduced with higher standards from 2028 to aid adoption.
POLICY EN1B: OPERATIONAL ENERGY	To achieve certain levels, such as the PassivHaus standard, the whole development industry would have to change the way it designs / builds homes and lays out sites	The transition period will allow the industry to catch up and prepare for fully net zero homes from 2028.
POLICY EN1B: OPERATIONAL ENERGY	The line which states ‘gas boilers and direct electric resistive heating will not be supported,’ replicates other legislation, therefore this should be omitted, as this is dealt with via building regulation	The proposed policy has been amended to specifically not permit fossil fuel plants on new development. This may allow electric resistive heating where robustly justified through the application process. Given the climate emergency the Council needs to reduce the use of fossil fuel sooner than predicted changes to the Building Regulations.
POLICY EN1B: OPERATIONAL ENERGY	These targets go far beyond the current policy requirement, new building regulation Part L standards and the Future Homes Standard which will be in effect from 2025 and this may limit the market for developers and contractors as result of skill shortage and supply chains, negatively impacting the ability of LCC to meet its housing delivery commitments	The Council has introduced a transition period into the proposed policy which will allow the construction market to prepare for the delivery of net zero development from 2028.
POLICY EN1B: OPERATIONAL ENERGY	'Gas boilers and direct electric resistive heating will not be supported' however I think natural gas fired combined heat and power (CHP) systems should be added to this.	The proposed policy has been amended to state that new development will be ‘fossil fuel free’. This would include gas fired combined heat and power (CHP) systems.
POLICY EN3: RENEWABLE ENERGY	The policy should refer to wind and solar applications that may fall partially within the opportunity areas.	The wording for the solar element of the proposed policy has been amended to take account of applications that fall partially within the opportunity mapping areas. This has not been altered for wind generation, as the National Planning Policy Framework states that <i>“turbines should not be considered acceptable unless it is in an area</i>

Policy	Summary of representation	Action / Response
		<i>identified as suitable for wind energy development in the development plan</i> ". However wording has been added to allow for wind energy when it can be demonstrated to have community support, to reflect the changes to the NPPF in September 2023.
POLICY EN3: RENEWABLE ENERGY	The policy says nothing about solar PV on roofs and car parks.	It is an expectation that Policy EN1B will maximise PV panels on new development. However, the solar element of the policy has been amended to support roof mounted solar panels where it can be demonstrated that no harm is caused by the installation.
No change proposed:		
POLICY SP0: CLIMATE CHANGE MITIGATION AND ADAPTATION	The Council should not be accelerating national standards on climate change as this will complicate planning requirements, delay new development and impact on viability.	The proposed Plan and accompanying documentation set out the rationale for Leeds City Council setting targets in advance of national standards. The evidence is clear that for Leeds to remain within its legal carbon budget and for Leeds to achieve net zero by 2030, new developments should achieve net zero operational emissions before 2030. Nevertheless, appropriate changes which address some of the concerns raised are proposed through Policy EN1B, which are considered separately. Proposed policy is considered sound as drafted.
POLICY SP0: CLIMATE CHANGE MITIGATION AND ADAPTATION	The wording of the policy is overly prescriptive and should be amended to increase flexibility, to allow for viability, technical issues and site-specific considerations to be taken into account.	No change to proposed SP0 as it is considered that the change requested would already be considered as part of the planning balance. Nevertheless, appropriate changes which address some of the concerns raised are proposed through Policy EN1B, which are considered separately. Proposed policy is considered sound as drafted.
EN1 PART A: EMBODIED CARBON	Further clarity on what needs to be measured and the methodology required to use to calculate the whole life cycle carbon emissions of a development.	The Council will submit a Whole Life Cycle Carbon Assessment (WLCCA) guidance note with the pre-submission consultation,

Policy	Summary of representation	Action / Response
		<p>which will clarify what is expected to be submitted and the process involved.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>EN1 PART A: EMBODIED CARBON</p>	<p>Manufacturers are still lacking in creating and verifying their data or Environmental Product Declarations (EPDs)</p>	<p>Whole Life Cycle Carbon Assessments (WLCCA) have been successfully implemented within the Greater London Authority plan. Further guidance is found within the WLCCA guidance note, which will be published for the upcoming pre-submission consultation.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>EN1 PART A: EMBODIED CARBON</p>	<p>Clarification at what stage a full assessment would be required to be submitted, as schemes are amended throughout the planning application process</p>	<p>Further guidance is found within the Whole Life Cycle Carbon Assessment (WLCCA) guidance note on what is expected to be completed at each stage of the planning process.</p> <p>The guidance note will differentiate between type of applications and set different levels of aspirations based on them.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>EN1 PART A: EMBODIED CARBON</p>	<p>This policy does not serve a clear purpose and it is not evident how a decision maker should react to development proposals. Whilst it is requiring the calculation of the whole life cycle carbon emissions and actions to reduce life cycle carbon emissions it is not clear from the policy how it will be determined what is an appropriate level of emissions or what would be an appropriate level of reductions</p>	<p>The proposed policy refers to the need for applications to “demonstrate actions to reduce life-cycle carbon emissions of the development”. Further detail is given within the Whole Life Cycle Carbon Assessment (WLCCA) guidance note.</p> <p>Currently no targets are set as this is an evidence-gathering exercise to inform future policies. An appropriate level of emissions will be set in a subsequent local plan update, once sufficient data on feasibility can be gathered by the adoption of this policy.</p> <p>Proposed policy is considered sound as drafted.</p>

Policy	Summary of representation	Action / Response
EN1 PART A: EMBODIED CARBON	If the Council is to introduce a policy in relation to Whole Life Carbon it will have to closely consider how it will be monitored and what the implications are for the preparation of any assessment, particularly in relation to how easily accessible any data is, and that it will have to take into consideration that much of the responsibility for emissions will lie in areas outside of the control of the homebuilding industry, including material extraction and transportation, occupation and maintenance, demolition and disposal.	The Whole Life Cycle Carbon Assessment (WLCCA) guidance note will provide clarity on what is expected for developers to consider within their WLCCA's, and the process involved. The requirement to provide a WLCCA will drive suppliers of products for the industry and the transporters of those products to make data more readily available for homebuilders. Proposed policy is considered sound as drafted.
EN1 PART A: EMBODIED CARBON	The proposed policy should clarify and provide flexibility for how outline applications could satisfy the policy	The Whole Life Cycle Carbon Assessment (WLCCA) guidance note will provide clarity on what is expected for developers to consider at different stages of the planning process. Proposed policy is considered sound as drafted.
EN1 PART A: EMBODIED CARBON	Who has the ability to monitor life cycle carbon emissions in building development? (i.e. does the capacity exist?)	The Council has a specialised Energy Officer who will help determine compliance with the proposed policy within the Development Management process. Proposed policy is considered sound as drafted.
EN1 PART A: EMBODIED CARBON	Introduction of this requirement for all major development is significant and would put smaller major development schemes at a disadvantage. To reduce pressure on developments at this end of the scale Hydrock recommend a phased introduction approach to Whole Life Cycle Carbon Assessments, starting with a higher threshold of unit numbers or floor space.	The viability testing in the Climate Emergency Local Plan Update-Economic Viability Study (EVS) Aug 2022 has concluded that it is economically viable for small and medium housebuilders to submit Whole Life Cycle Carbon Assessments. Proposed policy is considered sound as drafted.
EN1 PART A: EMBODIED CARBON	Proposed policy EN1A does not provide specific guidance on Whole Life Cycle Carbon Assessment and how they should be implemented, stating that a "nationally recognised assessment methodology" should be used. Supplementary Planning Guidance (SPG) should be produced by the Council to provide further clarity on this and provide detailed guidance and reference material for applicants. This SPG should also include	The Whole Life Cycle Carbon Assessment (WLCCA) guidance note accompanying the Plan will provide clarity on what is expected to be submitted as part of the WLCCA. Proposed policy is considered sound as drafted.

Policy	Summary of representation	Action / Response
	guidance on which carbon data is considered appropriate, some data entries in OneClick LCA for example are unverified.	
EN1 PART A: EMBODIED CARBON	The Council should include a draft version of the Whole Life Cycle Carbon Assessment guidance note for comment as part of the consultation as this is a significant omission.	The Whole Life Cycle Carbon Assessment Guidance Note will be submitted for comment as part of the following pre-submission consultation.
EN1 PART A: EMBODIED CARBON	It is noted that there are no details within the policy in relation to heritage and conservation matters and suggest that these are given consideration. Proposals that include designated and non-designated heritage assets and buildings within conservation areas may not be able to calculate their whole life cycle carbon emissions at the application stage.	Adaptation to climate change and conservation of heritage are compatible aims. The London Plan requires Whole Life Cycle Carbon Assessments in its Policy SI 2 and there is no exemption for heritage assets. The Policy is only asking for an assessment as far as is possible. It does not require the development to be designed to meet an embodied carbon target. Proposed policy is considered sound as drafted.
EN1 PART A: EMBODIED CARBON	There are concerns with the cost implications associated with this policy requirement, which the Economic Viability Study accounts a total fixed cost of £50,000 for the Whole Life Cycle Carbon assessment (WLCCA). There does not appear to be justification for the request for a Whole Life Cycle carbon emissions calculation on all major development and it is considered this threshold is too low and could threaten the viability of small to medium sized major developments	Cost assumptions are based on average data, this is estimated to range between £5k and £15k. However the assessment also requires collaboration with the architect, engineers amongst others and to accommodate this an allowance has been set in the Climate Emergency Local Plan Update- Economic Viability Study (EVS) Aug 2022.
EN1 PART A: EMBODIED CARBON	The policy should go further and set kgCO2/m2 targets in line with Royal Institute of British Architects 2030 Climate Challenge (RIBA 2030)	The Council believe that the industry has a way to go in reporting and reducing embodied carbon, additionally offsetting emissions for construction is not viable at this moment. However, it is expected that the building industry's experience and knowledge of Whole Life Cycle Carbon Assessments will rapidly improve over the next 3-5 years, and therefore aligns with the policy approach of monitoring assessments up until a review of the policy. Proposed policy is considered sound as drafted.

Policy	Summary of representation	Action / Response
EN1 PART A: EMBODIED CARBON	The policy should allow some flexibility, particularly for reserved matters applications, which have not considered these requirements at outline stage.	<p>Outline applications approvals should have conditions attached that state the reserved matters should meet the policy requirements. Outline approvals after adoption of the Local Plan Update would be expected to have conditions attached that require compliance with Policy EN1A.</p> <p>Proposed policy is considered sound as drafted.</p>
POLICY EN1B: OPERATIONAL ENERGY	The policy should have more focus on restoration and insulation of existing stock	<p>Proposed policy EN1A supports the reuse of buildings and material. Financial offsetting beyond the transition period can be used for delivering renewable energy projects on existing housing stock.</p> <p>Proposed policy is considered sound as drafted.</p>
POLICY EN1B: OPERATIONAL ENERGY	The policy is seeking to set higher energy performance standards within the local plan for residential development, contrary to paragraph 012 of the National Planning Practice Guidance	<p>The Council believes there is legal justification to go beyond national standards. This justification can be found within the Carbon Reduction background paper. Other Local Authorities have adopted standards that go beyond building regulations.</p> <p>Proposed policy is considered sound as drafted.</p>
POLICY EN1B: OPERATIONAL ENERGY	The reservation that financial contributions to offset carbon (where it is argued that operational net zero cannot be achieved) might be allowed too easily. This should be a genuine last resort solution.	<p>Evidence suggests certain type of development cannot create a carbon net zero energy balance through onsite generation, and therefore will have to provide financial contributions to make up the shortfall in energy. Outside of those types of development, applications will have to robustly justify why they cannot maximise onsite renewable energy generation.</p> <p>Proposed policy is considered sound as drafted.</p>
POLICY EN1B: OPERATIONAL ENERGY	The existing list of exempt building types looks reasonable, with the possible exception of some “changes of use or conversions” as these may be on a large scale	<p>The policy allows for a developer to provide a justification statement to explain why they cannot meet the policy. It is expected that some changes of use and conversions would not be able to meet the policy requirements because of the limitations of existing buildings. The Council wants to promote the reuse of buildings and will consider applications for re-use of existing</p>

Policy	Summary of representation	Action / Response
		<p>buildings favourably where the applicant can demonstrate that it is too challenging to meet net zero operational energy. Change of use and conversions will generally have to conform to building regulations which will also improve the energy efficiency of the building.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>POLICY EN1B: OPERATIONAL ENERGY</p>	<p>It is important to note that operational energy is covered under Part L Conservation of Fuel and Power of the Building Regulations and that the new future homes standard being brought in, in 2025, is being consulted on next year.</p>	<p>The Council believes that Part L of the building regulations does not reflect the full extent of energy performance. Therefore to fully deliver net zero homes, performance against energy metrics (space heating demand) and Energy Use Intensity targets need to be measured and it is appropriate that the targets are included within the policy.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>POLICY EN1B: OPERATIONAL ENERGY</p>	<p>It is unclear how much modelling will be required to establish predicted carbon emissions in order to achieve net zero operational carbon emissions at planning stage, which has the potential to be onerous and costly. In addition, Given the importance of how a building is occupied and used following its construction, there is concern that net zero operational carbon emissions will be difficult to demonstrate at planning stage</p>	<p>Energy modelling is required to give a realistic prediction of a building's energy demands, reduce the performance gap and move towards the net zero operational carbon target. It is understood that there might be discrepancies between predicted and actual operational carbon emissions, which is the reason behind using a metric which can be easily monitored in operation.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>POLICY EN1B: OPERATIONAL ENERGY</p>	<p>The water flowing through our waterways contains enough thermal energy to produce approximately 640 MW of energy nationwide, and we believe can make a contribution towards the needs of Leeds. The Trust wish to highlight that water resources from our network are commonly used for active cooling and heating solutions in new developments, including the use of water source heat pumps, which can be more efficient than air source alternatives</p>	<p>Policy EN4 requires development to consider water source heat pumps as a heating technology.</p> <p>Proposed policy is considered sound as drafted.</p>

Policy	Summary of representation	Action / Response
POLICY EN1B: OPERATIONAL ENERGY	Further clarity on how net zero is actually measured.	<p>The Council sees a net zero building as one which is fully powered by renewable energy. In order to achieve this, development will have to minimise operational energy demand and maximise onsite renewable energy generation. Further clarity can be found within the background paper.</p> <p>Proposed policy is considered sound as drafted.</p>
POLICY EN1B: OPERATIONAL ENERGY	The Council should not limit requirements for energy saving approaches to only a small proportion of properties and assessments.	The policy requires <i>all</i> development, other than those on the list of exceptions, to meet the net zero operational requirement. This should cover a significant number of applications within Leeds.
POLICY EN1B: OPERATIONAL ENERGY	It is unclear if the additional pressure on the electricity grid in/around Leeds has been appropriately assessed in terms of energy infrastructure upgrades to cope with increasing demand – we note however that the Northern Powergrid supply map for Leeds indicates some areas already have low capacity for connection and that major network reinforcements could take a significant period to deliver. Further evidence is needed in support of the policy	The policy is designed to reduce energy demand and stress on the grid (through better energy efficiency measures and Photo Voltaics onsite)
POLICY EN1B: OPERATIONAL ENERGY	The Council’s definition of operational net zero includes both regulated and unregulated carbon emissions. At this stage no information has been provided on how to calculate unregulated carbon emissions, this should be included with a Supplementary Planning Document (SPD) to provide guidance to developers and planning officers on what level of detail is acceptable and excepted. There are two types of assessment available, CIBSE TM54 (detailed analysis of unregulated emissions) and the BRE Domestic Energy Model (BREDEM) calculation, this uses benchmark figures based on floor area. Hydrock would recommend a phased approach to the type of assessment required as follows:	<p>A suite of guidance documents will follow the policy which will consider the phased approach to calculating unregulated carbon emissions.</p> <p>Proposed policy is considered sound as drafted.</p>

Policy	Summary of representation	Action / Response
	<p>a) BREDEM calculation accepted for developments up to 150 units;</p> <p>b) CIBSE TM54 calculation to be provided on all developments above 150 units.</p> <p>This is a significant deviation from the current energy strategy calculation requirements which are purely based on SAP/SBEM calculations</p>	
<p>POLICY EN1B: OPERATIONAL ENERGY</p>	<p>This is a significant step from the current policy and the way in which the market has been used to assessing and reporting carbon emissions. The inclusion of unregulated carbon emissions within this policy also goes far beyond the precedent set by other councils who have introduced zero carbon targets.</p>	<p>Local Authorities such as Cornwall and Bath and North-East Somerset successfully adopted plans that require detailed modelling that calculates total energy demand, including unregulated carbon emissions. The Climate Emergency justifies a similar approach and the Council believes that this is the most appropriate way to help achieve net zero development.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>POLICY EN1B: OPERATIONAL ENERGY</p>	<p>It is unclear where the energy use intensity targets have been derived from - what the basis is for their inclusion within the policy</p>	<p>The background paper provides clarification on the evidence for the Energy Use Intensity targets, before and after the transition period.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>POLICY EN1B: OPERATIONAL ENERGY</p>	<p>The Council have not provided the justification for why there is a need for the home building industry to consider the unregulated emissions in addition to the regulated emissions, as it is generally acknowledged that developers have limited control over future unregulated emissions</p>	<p>The Council believes that the building regulations and Part L do not calculate building energy use performance accurately. Therefore to fully deliver net zero homes, performance against energy metrics (space heating demand and Energy Use Intensity Targets) needs to be measured and is included within the policy.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>POLICY EN1B: OPERATIONAL ENERGY</p>	<p>The Council have not justified the Energy Use Intensity Targets and Space Heating Demand Targets set out in the policy, it is not apparent why these levels have been chosen and how they relate to existing development in Leeds.</p>	<p>The Carbon Reduction background paper justifies the Energy Use Intensity targets set out within the policy. They are based on several evidence documents and what has been found sound within other Local Authorities such as Bath and North-East Somerset and Cornwall and which are applicable to the Leeds circumstance.</p>

Policy	Summary of representation	Action / Response
POLICY EN1B: OPERATIONAL ENERGY	It is expected that new legislation will mean that from 2025 all newly built homes will not be able to include a gas boiler therefore the policy has no requirement to also request this.	Proposed policy is considered sound as drafted. The Climate Emergency is of sufficient priority for the Council to warrant action prior to the 2025 gas boiler ban and would hope for the plan to be adopted before 2025. There is no guarantee at this stage that the Government ban will be enacted. Proposed policy is considered sound as drafted.
POLICY EN1B: OPERATIONAL ENERGY	This requirement should not apply to all developments and should recognise the scale of development in relation to the significant requirements of this policy.	The accompanying Viability Assessment states that there would be no viability concerns with all development being subject to the policy requirements. Proposed policy is considered sound as drafted.
POLICY EN1B: OPERATIONAL ENERGY	The Viability Study utilises costs from a report by Currie and Brown from December 2018 to estimate the cost of carbon reduction in new residential buildings. It suggests costs of achieving zero carbon ranging from £7,056 to £16,464. However, the assessment goes on to suggest that to prevent double counting the costs of achieving the interim uplifts to Part L and Future Home Standards need to be deducted from these costs and suggests an additional cost of £3,850 per house and £1,098 per apartment. The HBF is concerned that these costs are low and do not seem reflective of the requirements of the policy which are significantly over and above the current standards and above the emerging Future Homes Standards.	Table 4.10 of the Climate Emergency Local Plan Update - Economic Viability Study (EVS) Aug 2022 sets out the cost data (costs of achieving zero carbon) extracted from the Curry and Brown Report. Footnote 42 explains that the costs were adjusted for inflation using the BCIS All in Tender Price Index in addition Para's 4.59 to 4.60 (inclusive of Table 4.11) then explains how these costs have been interpreted and applied within the assessment.
POLICY EN1B: OPERATIONAL ENERGY	The policy should promote Photo Voltaics on roofs and car parks that may encourage developers to maximize Photo Voltaics on available space	The policy states that development should maximise renewable energy generation onsite, which therefore includes the whole site and not just the development's roof space. Proposed policy is considered sound as drafted.

Policy	Summary of representation	Action / Response
EN2: SUSTAINABLE CONSTRUCTION STANDARDS	The policy states that development should maximise renewable energy generation onsite, which includes the whole site and not just the development.	<p>The Council believes that HQM Level 4 is an achievable but ambitious target to ensure the quality of new housing development within Leeds. BREEAM Excellent is already being implemented in Leeds. BRE have confirmed that they support the policy and consider it to be deliverable. The next version of BREEAM is likely to include more focus on renewable energy, carbon reduction and embodied carbon.</p> <p>Proposed policy is considered sound as drafted.</p>
EN2: SUSTAINABLE CONSTRUCTION STANDARDS	There is limited take up of the Home Quality Mark across the country. There are alternative standards available.	<p>The Council believes that the Home Quality Mark guarantees the delivery of high-quality residential development which covers several factors of sustainable development. The supportive text of the policy allows consideration of alternative standards where they can demonstrate similar outputs to the Home Quality Mark, for flexibility. The Council has compared other construction standards and found Home Quality Mark to be the most closely aligned to our other policies.</p> <p>Proposed policy is considered sound as drafted.</p>
EN2: SUSTAINABLE CONSTRUCTION STANDARDS	There is a lack of Home Quality Mark assessors that can implement the policy.	<p>Whilst compared to BREEAM assessors there may be less available nationally, BRE have confirmed that they offer a simple add-on for a BRE assessor to become a Home Quality Mark assessor. Therefore it is relatively easy and quick to upskill BREEAM assessors to be Home Quality Mark assessors.</p> <p>Proposed policy is considered sound as drafted.</p>
EN2: SUSTAINABLE CONSTRUCTION STANDARDS	The policy should allow some flexibility, particularly for reserved matters applications, which have not considered these requirements at outline stage.	<p>Outline applications approvals should have conditions attached that state the reserved matters should meet the policy requirements. Outline approvals after adoption of the Local Plan Update would be expected to have conditions attached that require compliance with Policy EN2.</p>

Policy	Summary of representation	Action / Response
		Proposed policy is considered sound as drafted.
EN2: SUSTAINABLE CONSTRUCTION STANDARDS	General comment on new developments encouraged to follow Passivhaus standards - ventilation systems need to be more rigorous than the policies suggest.	Home Quality Mark and BREEAM have standards relevant to ventilation and overheating. Proposed policy is considered sound as drafted.
EN2: SUSTAINABLE CONSTRUCTION STANDARDS	The phrase 'there is a need for new buildings to stop adding to these emissions' is ambiguous, it could either mean these new buildings are need to stop it happening, or we must stop new buildings adding to this. It needs rewording.	The language is clear that there is a need for new buildings, when built, to reduce their operational carbon requirements.
EN2: SUSTAINABLE CONSTRUCTION STANDARDS	I would prefer a Passivhaus standard being set.	Whilst the Council understands that the Passivhaus standard would result in a highly efficient dwelling, we believe that asking new dwellings to meet the Home Quality Mark (HQM) standard, is more achievable and holistic standard to ensure quality development. The supportive text does allow other standards to be used if it can be demonstrated that compliance with another construction standard meets the outputs required by a BREEAM/HQM assessment. A development can be delivered to both a Passivhaus and HQM standard. Proposed policy is considered sound as drafted.
EN2: SUSTAINABLE CONSTRUCTION STANDARDS	A 4-star BRE Home Quality Mark only requires 240 out of 500 credits, why not raise the expectation to say 300 credits (4½ stars)?	This is a new construction standard being introduced in the policy and the Council has sought to find a balance between being ambitious and realistic. The standard will require time to embed with developers and could be subject to a future plan review if a higher qualification is deemed necessary. Proposed policy is considered sound as drafted.
POLICY EN3: RENEWABLE ENERGY	The 'Renewable Energy Study' states that the maps were produced at a high level by collating and filtering overlays of the identified constraints to "show the areas unlikely to be suitable". We are concerned that there is insufficient evidence	The National Planning Policy Framework requires the Council to identify opportunity areas for wind turbines but given the limitations on data availability, it can only be a strategic exercise at this time.

Policy	Summary of representation	Action / Response
	for proposals outside of the 'opportunity areas' to have policy weigh against them in principle when they may, at closer assessment, be found to be suitable	<p>With regards to the solar opportunity area map, the proposed policy has been amended to positively consider applications that may fall partially within the identified areas.</p> <p>Proposed policy is considered sound as drafted.</p>
POLICY EN3: RENEWABLE ENERGY	The Local Plan Update identifies 'Wind and Solar Opportunity Areas'. The title would suggest a positively prepared policy; however, the supporting text on page 20 of the proposed text changes states that 'Applications which fall outside of the opportunity areas are unlikely to be acceptable'. Similar text is carried through into Policy EN3. This is not a sufficiently evidenced (and therefore not justified) position for the Local Plan Update to take; it is more appropriately addressed in a planning application which would assess a solar or wind proposal on its own merits	<p>The National Planning Policy Framework requires the Council to identify opportunity areas for wind turbines but given the limitations on data availability, it can only be a strategic exercise at this time.</p> <p>With regards to the solar opportunity area map, the policy has been amended to positively consider applications that may fall partially within the identified areas.</p> <p>Proposed policy is considered sound as drafted.</p>
POLICY EN3: RENEWABLE ENERGY	Evidence grows of forced labour and slavery in production of solar panels, wind turbines	The Planning system cannot influence these factors.
POLICY EN3: RENEWABLE ENERGY	The Council should consider how the pollution caused during the manufacturing process of renewable energy appliances. The cost of maintenance and the broken the wind turbines or solar panels will be much more wasted than using traditional energy.	<p>The Council believed that benefits of renewable energy outweigh the embodied carbon costs of manufacturing the technology.</p> <p>Proposed policy is considered sound as drafted.</p>
POLICY EN3: RENEWABLE ENERGY	Rather than develop land-based wind-power, the effectiveness of investment in offshore projects should be assessed. These have economies of scale, and greater utilisation factors.	<p>The Council wants to maximise renewable energy generation within the Leeds district and the wind opportunity area map identifies land suitable for wind generation. Development of offshore wind farms is outside of the Council's control.</p> <p>Proposed policy is considered sound as drafted.</p>

Policy	Summary of representation	Action / Response
POLICY EN4: DISTRICT HEATING	The current wording of this policy is unclear. There should be a “e) Or any other low carbon heating technology” option	<p>The policy states that the list of heating technologies listed should be ‘considered’. If an application can demonstrate that the options on the list have been considered, however there is an alternative low carbon heating technology that can be delivered at low cost for the inhabitants, then that technology could be permitted.</p> <p>Proposed policy is considered sound as drafted.</p>
POLICY EN4: DISTRICT HEATING	The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies. This may mean that it is more sustainable and more appropriate for developments to utilise other forms of energy provision, and this may need to be considered	<p>The policy only requires applications to consider low carbon heating technologies. However, in order to meet the requirements found within Policy EN1B, applications will have to use some form of low carbon heating. The Council understand that there may be feasibility concerns, such as with supply chains, that may result in certain technologies not being available for mass installation upon adopting the Plan, however the transition period would allow for the industry to catch up with increasing demand.</p> <p>The policies have been checked for financial viability and it has been demonstrated within the Climate Emergency Local Plan Update-Economic Viability Study (EVS) Aug 2022 that it is economically viable to deliver low carbon heating technologies within new development.</p> <p>Proposed policy is considered sound as drafted.</p>

FLOOD RISK REPRESENTATION SUMMARY TABLE

Policy	Summary of representation	Action / Response
Proposed changes:		
<p>Water 1: Water Efficiency</p>	<p>Delete 'where feasible' in the second paragraph of the proposed policy (The Environment Agency).</p> <p>The proposed policy should apply to all residential development and not just major residential development (a local resident/consultant).</p>	<p>The wording of the proposed policy is amended so that the words 'where feasible' only apply to conversions. The Environment Agency have provided evidence to support the view that it is not onerous for all new build residential development to meet the standard. For conversions there may be building specific factors that limit the ability of developments to meet the 110 litre per person per day standard, and where this is the case, the Council would expect to see a proportionate justification.</p> <p>The wording of the proposed policy is amended so that the water consumption standard applies to all residential development.</p>
<p>Water 2: Protection of the Water Environment</p>	<p>Stronger reference to the Water Framework Directive and Humber River Basin Management Plan objectives requested (The Environment Agency).</p>	<p>The importance of the Directive and of the management plan is recognised and the proposed policy will be amended to include this, in order to strengthen the protection for water quality.</p>
<p>Water 3: Functional Floodplain Zone 3b</p>	<p>Support a functional floodplain policy, but concerns raised with the way Flood Zone 3b is mapped in the Strategic Flood Risk Assessment (SFRA). The importance of using the new definition of functional floodplain in the Planning Practice Guidance (PPG) highlighted (The Environment Agency).</p>	<p>Further work has been done to the Strategic Flood Risk Assessment so that Flood Zone 3b has been mapped according to the new definition of functional floodplain in the Planning Practice Guidance, using the 3.3% AEP (Annual Exceedance Probability), or a proxy where it is not available.</p>
<p>Water 3: Functional Floodplain Zone 3b</p>	<p>Functional floodplain is all one layer and policy should not subdivide between the urban and non-urban areas (The Environment Agency).</p>	<p>Water 3 has been revised so that functional floodplain is all one layer and not subdivided between the urban and non-urban areas, in order to provide improved clarity.</p>

Policy	Summary of representation	Action / Response
Water 3: Functional Floodplain Zone 3b	The proposed policy should refer to annual exceedance probabilities rather than return periods (Numerous housebuilders; consultant). Use the terminology in the National Planning Policy Framework (The Environment Agency).	An amendment has been made to the policy so that it uses the term 'annual probability of flooding' because this is the same terminology used in the National Planning Practice Guidance (NPPG). This terminology has been used for clarity and consistency with the NPPG.
Water 4: Land at Increased Risk of Flooding	Request that the proposed policy should refer to all sources of flooding given the National Planning Policy Framework change in 2021 (The Environment Agency; a number of housebuilders; a consultant).	All sources of flooding are now included, to reflect the National Planning Policy Framework and Planning Practice Guidance.
Water 4: Land at Increased Risk of Flooding	Make it clearer in the supporting text that highly vulnerable development is not considered appropriate in Flood Zone 3 (The Environment Agency).	An amendment to the wording of the supporting text has been made for clarity.
Water 5: Residual Risk	Show the areas that the policy applies to on a map (The Environment Agency).	The area will be viewable on the Policies Map.
Water 5: Residual Risk	Request that the Strategic Flood Risk Assessment (SFRA) includes more explanation of where / when the Level 2 SFRA is to be produced (The Environment Agency).	The Strategic Flood Risk Assessment has been updated as requested, for clarity.
Water 6a: Safe Access and Escape	It is unclear which Environment Agency guidance is being referred to (The Environment Agency).	The wording of the proposed policy has been amended to specify 'national' guidance rather than Environment Agency (EA), for accuracy.
Water 7: Sustainable Drainage	Suggest that the proposed policy should explicitly require the submission of maintenance and management requirements (The Environment Agency; a consultant).	The proposed policy has been amended with a bullet point added to require the submission of maintenance and management arrangements for Sustainable Drainage Systems (SuDS).
Water 7: Sustainable Drainage	The proposed policy should be clearer in that if all surface water cannot be disposed of by infiltration, then some (or all) of it will need to go to a watercourse or sewer; attenuating in ponds or	The wording of the proposed policy has been amended for clarity.

Policy	Summary of representation	Action / Response
	open water for gradual release still requires a receptor (a number of housebuilders).	
<p>Water 8: Porous Paving, Loss of Front gardens and Permitted Development Rights</p>	<p>The proposed policy does not reflect the potential for some hardstanding areas to require a more traditional approach, particularly for larger industrial buildings. These often have extensive yard areas, which need to achieve suitable loading capacities. There is also the potential for hydrocarbon leaks or spills in the yard areas, as well as a need to ensure that any product spills are not immediately mobilised to the ground water resources. In addition, there is a need to recognise the lower margins achieved for such development compared to other, higher value uses- or uses which have smaller hardstanding areas with no risk of pollutant spills. There may also be other more technical considerations for uses such as airport runways, or bases/substates for open waste management uses, etc. They are concerned this hasn't been costed in the viability study (a housebuilder).</p>	<p>The proposed policy requirement for hardstanding areas to be constructed from permeable materials has been amended with the addition of "unless there are clear reasons why this would not be appropriate." This will give flexibility if required for more sensitive / technical uses.</p>
<p>Partial changes:</p>		
<p>Water 2: Protection of the Water Environment</p>	<p>The reference to controlling quality of surface water runoff adjacent to sensitive water bodies is welcomed. However, a specific reference to nationally and internationally designated sites should also be included in the proposed policy (Natural England).</p>	<p>The proposed policy has been written so <i>all</i> water bodies need to be considered, not just ones in or close to nationally and internationally designated sites.</p>
<p>Water 2: Protection of the Water Environment</p>	<p>The proposed policy fails to define what is meant by 'adjacent' and 'sensitive water bodies'. Both should be defined to ensure that the policy is clear and unambiguous (a number of housebuilders).</p>	<p>Examples of sensitive water bodies are included in the proposed policy. However, definitions have been added to the glossary to help improve clarity.</p>
<p>Water 6: Flood Risk Assessments</p>	<p>Numerous housebuilders (through the consortium of housebuilders) raised detailed queries with the policy as follows:</p>	<p>Most of this proposed policy is existing adopted policy and not subject to change as it is still fit for purpose and reflects the Planning Policy Guidance (PPG) criteria for what should be included in a flood</p>

Policy	Summary of representation	Action / Response
	<p>Stem 1 – should this read “...there is the possibility of flood risk to the site from any source,”?</p> <p>Stem 2(b) – This stem is vague. Is it referring to flood risk from rivers only, or from all sources of flood risk? If the former, this should be made clear. On the presumption that this stem is referring to flood risk from rivers only, it introduces the notion of the 3.33% (i.e. functional floodplain) plus climate change event. This is a new requirement, albeit not unreasonable.</p> <p>Stem 2(c) – Again, is this stem referring to river flooding only? This stem suggests that development in flood zone 3 would be unlikely to be supported. This is contrary to national planning policy which regards all forms of development (except Highly Vulnerable uses) to be appropriate, subject to the relevant assessments and tests being undertaken/passed. I believe that this stem should be deleted.</p> <p>Stem 2(d) – Is this stem referring to river flooding only? The policy (or accompany notes) need to define clearly what the “flood design event” is. The “design flood” is defined in para. 002 of the NPPG as the fluvial 1 in 100 AEP event plus climate change, the sea 1 in 200 AEP event plus climate change, and the surface water 1 in 100 AEP event plus climate change event. Also the term “beyond” has no meaning in this context – I presume the text means “for flows exceeding the flood design event” The text “...after allowing for the effects of climate change” is superfluous if the design flood event has already been defined to include the effects of climate change.</p> <p>Stem 3 – It is not clear what drainage infrastructure this stem is referring to. If it is referring to public infrastructure</p>	<p>risk assessment. Only the wording in italics in the consultation document was the subject of the consultation and this wording had been added to reflect recent changes in the Planning Practice Guidance.</p> <p>However, the respondent raises a number of queries and these are addressed as follows:</p> <p>Stem 1 – it is not considered that whether the wording reads ‘any flood risk’ or ‘flood risk from any source’ makes a significant difference to either intent or clarity to warrant a change to adopted policy.</p> <p>Stem 2(b) – Flood Risk Areas (FRAs) must consider flood risk from all sources, not just river flooding. The proposed policy does not state that it applies to river flooding only because it applies to <i>all</i> sources of flood risk.</p> <p>Stem 2(c) – the proposed policy is not referring to river flooding only. National policy states that development should be avoided in flood risk areas (paragraph 162 of the National Planning Policy Framework) and it is correct for the policy to make developers aware of this.</p> <p>Stem 2(d) – the policy and national guidance on Flood Risk Areas (FRAs) in the Planning Practice Guidance (PPG) do not limit FRAs to only considering river flooding. For the avoidance of doubt the term ‘flood design event’ has been added to the glossary at the end of the Plan and the definition from the PPG has been used. The comment about some of the text being superfluous has been noted, but it is not considered sufficient to warrant a change to adopted policy.</p>

Policy	Summary of representation	Action / Response
	owned/operated/maintained by a sewerage undertaker, then it is the duty of the sewerage undertaker to ensure that its infrastructure can accommodate new development, is it not?	Stem 3 – the term ‘drainage infrastructure’ is referring to any infrastructure required to drain water from the site. For the avoidance of doubt the term has been added to the glossary.
Water 8: Porous Paving, Loss of Front gardens and Permitted Development Rights	The proposed policy may be too onerous. Suggest adding words to give more flexibility so that it reads ‘make adequate space for water where achievable and possible’ (a housebuilder).	<p>Increased urbanisation and intensification of development erodes the natural ability to manage flood risk. Water has to go somewhere and all developments need to make some space for water so as to share the burden and avoid the need for costly flood defences. This is an important ethos of national policy so that burden doesn’t fall on the public purse.</p> <p>Notwithstanding the above, changes have been made to the requirement for hardstanding areas to be constructed from permeable materials to say ‘unless there are clear reasons why this would not be appropriate’ which gives more flexibility to the proposed policy where needed.</p>
Water 8: Porous Paving, Loss of Front gardens and Permitted Development Rights	Concerns that the proposed policy is trying to do too much and should be split into two separate policies (housebuilder; consultant).	Whilst there may be 3 different suggested actions in the proposed policy, they all relate to the same objective, so the Council considers that it is sensible to keep it all in one policy. However, to improve clarity bullet points have been added to help differentiate between different actions in the proposed policy.
No change proposed:		
Water 1: Water Efficiency	Although this proposed policy is about water efficiency it also refers to ‘Sustainable drainage systems’ (SuDS) and ‘more absorbent surfaces for water drainage’ which are approaches to manage and reduce surface water runoff. Therefore, they should be deleted from this policy as they are not related to reducing	The proposed policy is about using water more wisely, and one of the goals of Sustainable Drainage Systems (SuDS) is water efficiency so the two elements are interlinked and therefore it is considered wholly appropriate for the policy to also refer to SuDS.

Policy	Summary of representation	Action / Response
	water consumption per se, and instead should be covered in policies specifically relating to surface water drainage (a number of housebuilders).	<p>The Canal and River Trust support the proposed policy and they have stated that it complies with para 174 (e) of the National Planning Policy Framework and will help reduce pollution from surface water runoff into canals and rivers.</p> <p>Proposed policy is considered sound as drafted.</p>
Water 1: Water Efficiency	The Written Ministerial Statement of March 2015 precludes Councils from adopting standards for housing which go beyond national policy and therefore the requirement for development to meet an optional standard would conflict with national policy (a housebuilder).	<p>The Government's Technical Standards for Housing provide for a local planning authority to adopt the tighter water standard of 110 litres where they can evidence that this is needed. This was the approach the Council took for the Core Strategy Selective Review (2019) and the policy was found sound on examination.</p> <p>Water shortages have become more frequent in Leeds since the policy was adopted in 2019, it is therefore considered that there is even more evidence now to support the policy requirements.</p> <p>Proposed policy is considered sound as drafted.</p>
Water 1: Water efficiency	The Inspector's Report on the Examination of the Worthing Local Plan (October 2022) concluded that the Written Ministerial Statement of March 2015 precludes Councils from adopting standards for housing which go beyond national policy (a housebuilder).	<p>The Government's Technical Standards for Housing provide for a local planning authority to adopt the tighter water standard of 110 litres where they can evidence that this is needed. This evidence was provided in the Core Strategy Selective Review (2019) and the policy was found sound at examination.</p> <p>Proposed policy is considered sound as drafted.</p>
Water 1: Water Efficiency	The Viability Study prepared by Avison Young suggests a cost uplift of £9 per property as a result of this policy requirement, although there is no evidence provided to support this is still an appropriate cost allowance in the current market or that viability would not be compromised if a more realistic allowance was made (a housebuilder).	<p>Evidence provided by the Environment Agency during preparation of the Core Strategy Selective Review showed that the cost is negligible for the developer, therefore it is considered that the figure of £9 is a generous over-estimate for the cost of meeting this standard.</p> <p>A further update to the evidence base is provided in the Flood Risk Background Paper, including evidence provided by the Environment Agency.</p>

Policy	Summary of representation	Action / Response
		<p>Housebuilders who meet the standard are able to get relief on the cost of the water supply connection from Yorkshire Water if they meet the water standard. This relief has not been taken into account in the Avison Young Viability Study so there is even less impact on viability resulting from this policy.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>Water 2: Protection of the Water Environment</p>	<p>Policies on water abstraction are absent (Natural England).</p>	<p>Water abstraction has to be permitted by the Environment Agency through an approval system separate from the planning application process. It is not something that requires planning permission and therefore the Council does not provide planning policy on that issue.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>Water 3: Functional Floodplain Zone 3b</p>	<p>The redevelopment of a site in Floodzone 3b should not necessarily be restricted to the existing footprint. It may be that a better protection, equal protection and / or enhanced storage could be generated through an alternate layout on the site. That should be considered on a site-by-site basis rather than removing the potential for improvement through policy.’ (a housebuilder).</p>	<p>The National Planning Policy Framework and Planning Practice Guidance make no provision for development of Functional Floodplain by compensating for the loss elsewhere.</p> <p>One of the principles behind a Functional Floodplain designation is to safeguard such land from inappropriate development that could increase flood risk now and in the future. In relation to Functional Floodplain Leeds City Council’s Strategic Flood Risk Assessment states ‘It is essential that these floodplain areas are protected from future development’, therefore it is not considered appropriate to amend this proposed policy.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>Water 4: Land at Increased Risk of Flooding</p>	<p>The Strategic Flood Risk Assessment does not map the impact of failure of the reservoirs down the Washburn Valley. (a consultant).</p>	<p>The Strategic Flood Risk Assessment can only collate data that is available; there are not sufficient resources to run new models for the district.</p>

Policy	Summary of representation	Action / Response
Water 4: Land at Increased Risk of Flooding	The proposed policy should be amended to allow the use of alternative modelling produced by developers, the Council or any other body to be used as an appropriate evidence base upon which to make decisions (a number of housebuilders).	Modelling has to be verified by the Environment Agency before the Council can accept it as sufficient evidence base, therefore it would be misleading for the proposed policy to suggest that the Council can accept modelling done by others where it may not be the case. Proposed policy is considered sound as drafted.
Water 5: Residual Risk	Breach analysis should be proportionate and consider how likely the breach is to occur and consider whether the site is protected for most events (a number of housebuilders).	Where there is a flood defence in place on a site there is always the potential for breach, and the Council must have assurance that any risk has been assessed and the development will be safe. It is better for developers to know about this requirement from the outset to allow them to plan with confidence. Proposed policy is considered sound as drafted.
Water 5: Residual Risk	Less vulnerable and water compatible uses in a defended area should not have to undertake the sequential and exception tests (a housebuilder).	This is existing national policy (Paragraph 161 National Planning Policy Framework - NPPF) and cannot be amended by the Council. Para 61 of the NPPF specifically states that it also applies to residual risk. Locating development in areas with a residual risk of flooding, associated with a potential breach of the flood alleviation scheme or other defence, should also be avoided. Proposed policy is considered sound as drafted.
Water 6a: Safe Access and Escape	A 'stay put' policy may be acceptable (a number of housebuilders).	Discussions the Council have had with the Environment Agency confirm that a 'stay put' approach is not recommended as it can lead to an extra burden on the emergency rescue services, and could conflict with national guidance: Planning Practice Guidance (PPG) paragraph 044 states: <i>'The emergency services are unlikely to regard developments that increase the scale of any rescue that might be required as being safe. Even with defences in place, if the probability of inundation is high, safe access and escape should be maintained for the lifetime of the development.'</i>

Policy	Summary of representation	Action / Response
		<p>PPG paragraph 045 states: Where there is the need for an emergency plan these <i>'should avoid additional burdens on emergency services.'</i></p> <p>PPG paragraph 047 states: <i>'Developers should seek to minimise reliance on emergency services to make development safe.'</i></p> <p>Proposed policy is considered sound as drafted.</p>
<p>Water 6a Safe Access and Escape</p>	<p>A number of housebuilders (through the consortium of housebuilders) raised detailed queries with the proposed policy as follows:</p> <p>Stem 1(iii) – This stem introduces the 0.1% (1 in 1000) AEP event plus climate change. This is inappropriate and not what the ADEPT guidance states. The definition should be modified to exclude climate change.</p> <p>Stem 3 – Again the text “including an allowance for climate change” is superfluous since it is implicit in the definition of a design flood.</p> <p>Stem 4 – This stem presumably refers to guidance prepared by the Environment Agency and the Association of Directors of Environment, Economy, Planning and Transport (ADEPT) as referred to in the accompanying notes. If so, it is worth noting that this document states “Local Planning Authorities should lead on producing local policies and guidance on flood risk emergency plans for new development. They should be produced and agreed with the Environment Agency, Lead Local Flood Authority, local authority emergency planning teams</p>	<p>Stem 1 (iii) – The proposed wording has been included in the policy so there is no doubt that a climate change allowance is required. This is based on the experience of Leeds City Council Flood Risk Management colleagues when applying the existing policy.</p> <p>Stem 3 – The wording may be largely superfluous but it has been included in the proposed policy so there is no doubt that a climate change allowance is required.</p> <p>Stem 4 – Leeds has not produced its own emergency planning guidance which is why it refers to the ADEPT guidance.</p> <p>Proposed policy is considered sound as drafted.</p>

Policy	Summary of representation	Action / Response
	and the Local Resilience Forum”. Has Leeds City Council prepared local guidance?	
Water 7: Sustainable Drainage	The proposed policy should not require the demonstration of biodiversity benefits (a number of housebuilders).	Biodiversity is one of the 4 pillars of Sustainable Drainage Systems and part of sensible design measures to provide surface water management and habitat features of value for biodiversity, so it is correct for the proposed policy to require it. Proposed policy is considered sound as drafted.
Water 7: Sustainable Drainage	The proposed policy is welcomed but suggest the wording could be strengthened in light of the National Planning Policy Framework paragraphs 167 & 169. Specifically, this places a presumption on the use of Sustainable Drainage Systems (SuDS) unless they are shown to be inappropriate. They believe this has a slightly different meaning compared to the existing policy wording which suggests SuDS should be incorporated where practical (The Environment Agency).	The proposed policy refers to both circumstances of ‘where practical’ and ‘where inappropriate’. The policy attempts to give more clarity to developers as to what is meant by ‘inappropriate’ by suggesting that it means where it is not technically practical rather than just more costly. Proposed policy is considered sound as drafted.
Water 7: Sustainable Drainage	Links and reference to the CIRIA manual should be included in the plan CIRIA guidance (susdrain.org) as supporting text (The Environment Agency).	The Council agrees that this is a useful document, but the CIRIA link is out of the Council’s control and if it changes in the future, it is not so easy for the Local Plan to be updated accordingly. Therefore the Council have tried to avoid referencing it in the Plan. Proposed policy is considered sound as drafted.
Matters outside the scope of the consultation:		
Water 4: Land at Increased Risk of Flooding	The Local Planning Authority should carefully examine any land set aside for housing, far more carefully than Leeds City Council have done in the past (a number of local residents).	All existing allocations were examined and found sound but flood risk changes and can get worse. The Strategic Flood Risk Assessment Update will allow us to consider future flood risk. Future allocations will be examined for flood risk through the sequential and exception test processes.

Policy	Summary of representation	Action / Response
<p>Policy EN5: Managing Flood Risk</p>	<p>Various comments have been made on Core Strategy Policy EN5 including:</p> <ul style="list-style-type: none"> • New culverts should be avoided because of the adverse environmental concerns associated with culverts. Existing culverts should seek opportunities to daylight (open up) culverts, unless there are flood risk or other environmental issues (the Environment Agency). • The policy does not include any reference to cumulative impacts of flood risk (the Environment Agency). • There is no reason for this policy to be retained as all elements are covered by the proposed new policies (A number of housebuilders through the Consortium of Housebuilders). 	<p>Core Strategy Policy EN5 was not included in the consultation as it is considered to be fit for purpose. It is a broad overarching policy for the detailed Water policies which are the subject of this Local Plan Update but none of the principles in Policy EN5 have changed.</p>

GREEN BLUE INFRASTRUCTURE REPRESENTATION SUMMARY TABLE

Policy	Summary of representation	Action / Response
Proposed changes:		
<p>Spatial policy 13: Protecting, maintaining, enhancing and extending green and blue infrastructure</p>	<p>The Policies Map should be up to date and an interactive version should be available.</p>	<p>This work is currently being undertaken and will be published on the Leeds City Council website (LINK) once complete.</p>
<p>Policy G1: Protecting, maintaining, enhancing and extending green and blue infrastructure within and outside areas of GBI</p>	<p>Section 2b of Proposed Policy Spatial Policy 13 and the requirements G1 were repetitious.</p> <p>A request to add a reference to Public Rights of Way (PROW) as an item that needs to be addressed.</p>	<p>Agreed and Spatial Policy 13 - Section 2b is now proposed for deletion.</p> <p>Agreed and proposed Policy G1 was amended to include reference to Public Rights of Way.</p>
<p>Policy G2A - Protection of trees,</p>	<p>Concern was raised that a tree survey and/or assessment of a tree's value cannot demonstrate whether the need for the development outweighs any harm and whether the development could be re-</p>	<p>This was agreed and changes have been made to the proposed policy to separate those issues to be addressed through a tree</p>

Policy	Summary of representation	Action / Response
<p>woodland and hedgerows</p>	<p>designed to retain the trees/hedgerows. These matters should be considered within a Planning Statement and Design and Access Statement. (A developer)</p> <p>When the proposed policy applies should be clearer and it should not curtail a landowner's right to manage trees/ vegetation on their own land. (Several developers, individual)</p> <p>Applying the policy to all trees is not justified. It should apply to higher value trees only (Category A and B). (Several developers)</p> <p>The removal of dead, dying or unsafe trees should be exempt. (Several developers)</p> <p>Trees are part of wider biodiversity therefore securing 10% net gain would ensure tree loss is accounted for. (A developer)</p> <p>Taking removed trees into account is ambiguous, introduces uncertainty and will be difficult to evidence and enforce. If this is to be included, there should be a time limit to how long is considered. (Several developers)</p>	<p>survey and tree assessment, and those to be addressed through other elements of a planning application, more clearly.</p> <p>This was agreed and changes have been made to the supporting text to insert additional wording to clarify when the proposed policy will apply. The policy will not impact on general tree/vegetation management, rather it will protect woodland, trees and hedgerows on development sites.</p> <p>Additional wording has been inserted within the supporting text and the policy draft to clarify that the proposed policy will apply to Category A, B and C trees and hedgerows. Category C trees are still important in terms of carbon sequestration, storage of pollutants, biodiversity and amenity value.</p> <p>This was agreed and changes have been made to the proposed policy and supporting text to insert additional wording to clarify any exemptions.</p> <p>Changes have been made to the supporting text to insert additional wording to emphasise the varied benefits of trees and justify the separate consideration of trees beyond biodiversity net gain.</p> <p>Changes have been made to the supporting text to insert additional text to clarify. Changes have been made to the proposed policy to clarify the time limit for the consideration of removed trees.</p>

Policy	Summary of representation	Action / Response
<p>Policy G2B - Ancient woodland, long established woodland, ancient trees, veteran trees</p>	<p>Concern over what justification there is to give Long Established Woodland (which is a local level designation) the same protection as Ancient Woodland, Ancient Trees and Veteran Trees which are nationally recognised and are ‘irreplaceable habitats’ (Several developers, individuals)</p> <p>Some support for buffers but others considered the buffers to be too onerous and not justified as they exceed the ancient woodland buffers of 12 – 15m recommended by the Government, Natural England and the Forestry Commission. The Government advises that the size and type of buffer to ancient woodland/veteran trees/ancient trees should depend on a) the scale and type of development and its effect on the woodland and trees; and b) character of surrounding area. (Several developers)</p> <p>Refer to ‘exceptional reasons’ rather than ‘exceptional benefits’ in line with government guidance. (A developer)</p>	<p>This was agreed and changes have been made to remove references to Long Established Woodland. A new proposed policy has been drafted for Long Established Woodland which is called Policy G2C. The earlier Policy G2C – Tree Replacement is now Policy G2D.</p> <p>The buffers have been retained and additional wording has been inserted in the supporting text to provide principles and details of the 50m buffer to Ancient Woodland which is reflected in additional wording in the proposed policy. Minor additional wording has been inserted in the policy in relation to buffers for Ancient Trees and Veteran Trees and the text has been relocated within the policy. Part c) has been deleted. Details on buffers for Long Established Woodland have been included in the new Long Established Woodland policy and the supporting text.</p> <p>This was agreed and changes have been made to the proposed policy to refer to ‘exceptional reasons’ rather than ‘exceptional benefits’.</p>
<p>Policy G2D – Tree replacement</p>	<p>Clarity on the inclusion (or not) of Category U trees is required (Several developers)</p> <p>Clarity on whether the policy applies to trees/hedges in residents’ gardens is required. (Several developers)</p> <p>Clarity on whether parity in carbon sequestration is at point of planting or over time would be useful. (A developer)</p>	<p>This was agreed and changes have been made to the supporting text to inserted additional wording for clarity.</p> <p>This was agreed and changes have been made to the supporting text to inserted additional wording for clarity.</p> <p>This was agreed and changes have been made to the supporting text to inserted additional wording for clarity.</p>

Policy	Summary of representation	Action / Response
	<p>Has the encouragement of fruit trees and trees attracting wildlife been factored into the methodology? (Several developers)</p> <p>There is no justification for retaining replacement trees in perpetuity rather than a fixed period which is onerous. (A developer)</p>	<p>No, therefore the references to these trees have been removed.</p> <p>This was agreed and changes have been made to section 4. in the proposed policy to amend the period for retention for on-site and off-site planting.</p>
<p>Policy G8A: Protection of important species and habitats</p>	<p>The policy needs more detail to give adequate protection and align more with the National Planning Policy Framework. (Natural England, several developers)</p>	<p>This was agreed and changes have been made to the proposed policy so it more closely reflects wording in the National Planning Policy Framework.</p>
<p>Policy G8B: Leeds habitat network</p>	<p>The extent of the Leeds Habitat Network is not published. It should be based on ecological information, reports and evidence. (A developer)</p>	<p>The boundary of the Leeds Habitat Network has been reviewed and updated by the West Yorkshire Ecology Service, in conjunction with the Council. This will be published and available to comment on during the formal pre-submission consultation.</p>
<p>Policy G9 – Biodiversity net gain</p>	<p>Clarity on how residual biodiversity units will be delivered via financial contributions if on and off-site delivery is not possible is required. (Several developers)</p> <p>Further clarity regarding how off-site Biodiversity Units will be legally secured should be provided e.g. by S106 agreements or conservation covenant. (Several developers, Natural England)</p>	<p>This was agreed and changes have been made to the proposed policy to give more detail of how financial contributions and biodiversity credits will be addressed, though some aspects are yet to be finalised.</p> <p>This was agreed and changes have been made to the proposed policy for clarity.</p>

Policy	Summary of representation	Action / Response
	<p>The policy could refer to Biodiversity Net Gain being legally secured for a minimum of 30 years.</p> <p>Precluding privately owned land from accommodating Biodiversity Net Gain habitats does not accord with national policy and guidance. Whilst private gardens cannot be legally secured for the 30-year period, the Biodiversity Metric does assign them a biodiversity value and they can provide locally important spaces for biodiversity. (Several developers, Natural England)</p> <p>The approach taken in terms of private and public land should follow Natural England’s published guidance on the Biodiversity Metric. (A developer)</p> <p>Support and objection to identifying preferred locations for Biodiversity Unit delivery. Internationally and nationally protected sites within or adjacent to Leeds which may benefit from targeted enhancement from biodiversity net gain adjacent to their boundaries should be included. (Several developers, The Environment Agency, Natural England)</p> <p>Should refer to all types of Biodiversity Net Gain units – habitat, hedgerows and watercourses. A 10% biodiversity net gain must be achieved in all types identified within the on-site baseline. The specific watercourse metric should be used for watercourses. (The Environment Agency, Natural England)</p>	<p>This was agreed and changes have been made to the policy to refer to a minimum of 30 years.</p> <p>This was agreed and changes have been made to the proposed policy, though any Biodiversity Net Gain delivered in private gardens must exceed the minimum of 10%.</p> <p>This was agreed and changes have been made to prioritise Biodiversity Net Gain delivery.</p> <p>Preferred locations have been retained but changes have been made to prioritise land within or immediately adjacent to any designated nature conservation site or Habitat of Principal Importance (as per Policy G8a).</p> <p>This was agreed and changes have been made to the proposed policy and supporting text for clarity.</p>

Policy	Summary of representation	Action / Response
	<p>Need to consider a catchment-based approach to delivery of Biodiversity Net Gain and potentially allow for delivery outside Leeds (The Environment Agency, Natural England)</p> <p>Reference should be made to how the strategic significance value in the Biodiversity Metric should be applied (The Environment Agency, Natural England)</p> <p>It should be made clear that impacts to ancient woodland and other irreplaceable habitats cannot be accounted for or offset through biodiversity net gain. These should be assessed using Policies G2B or G8A and any necessary mitigation and/or compensation requirements dealt with separately from BNG provision. (Natural England)</p> <p>The need for costed options to be considered when applying the mitigation hierarchy when justifying the removal of medium and high distinctiveness biodiversity units does not accord with national policy. (A developer)</p>	<p>This was agreed and changes have been made to the proposed policy to introduce a new priority location for the delivery of watercourse biodiversity units within a catchment area which could be outside Leeds.</p> <p>This was agreed and changes have been made to the proposed policy and supporting text to give greater detail on on-site and off-site strategic significance.</p> <p>This was agreed and changes have been made to the supporting text for clarity.</p> <p>This was agreed and changes have been made to the proposed policy to remove “costed”.</p>
<p>Policy F1: Food resilience</p>	<p>Change to supporting text of 4.10.17 to include ‘Allotments’ and ‘Community Orchards’.</p> <p>Change to supporting text of 4.10.17 to include changes that support the idea of ‘nature friendly’ practices.</p>	<p>This was agreed and proposed changes made.</p> <p>This was agreed and proposed changes made.</p>

Policy	Summary of representation	Action / Response
	Change to supporting text of 5.5.56 include changes that support the idea of 'Food [System] Resilience' as Well as 'Food Security'.	This was agreed and proposed changes made.
GBI Chapter	Consider a new policy to require swift bricks to be provided in developments (Individuals, an organisation)	This was agreed and a new policy (Policy G10) has been drafted with supporting text to seek a range of species features, including integral swift bricks and integral bat roosting features.
Partial changes:		
Policy G2A - Protection of tress, woodland and hedgerows	The proposed policy is too strict and inflexible. It should be applied flexibly and proportionately considering the benefits development could bring. It should include "should" rather than "will". (Several developers)	It is considered that the proposed policy has sufficient flexibility as it allows for the removal of woodland, trees and hedgerows subject to specified requirements. "Will" has been changed to "should".
Policy G4B: Quality of new green space	Concern was raised about the design and use of Water Attenuation Tanks and the sterilisation of land above.	Changes proposed in Supporting Text. 5.5.28 identifying this and referencing principal Policy on this matter, WATER 7 – <i>'Some forms of green space suffer in terms of usability due to poor drainage (for example sports pitches). Green Spaces need good drainage. For example, a poorly drained Sports Pitch will curtail its ability to be used multiple times a week. Underground water storage can sterilise the ability to produce high-quality, well-designed Green Space above the tanks (Note: Leeds will always prefer sustainable options rather than the use of tanks). In the implementation of Policy G4B Policy Water 7 will need to be addressed. This gives specific requirements as to what constitutes sustainable drainage. This includes 'benefits to water quality, Landscape Amenity and...biodiversity'.</i>

Policy	Summary of representation	Action / Response
Policy G4C – Maintenance of green space	Whether there is a clear understanding of what ‘good’ maintenance is. General support for the Policy.	Agreed to explore further what defines ‘good’ with regard to the proposed policy, for clarity.
Policy G8A: Protection of important species and habitats	Reference needs to be made to international sites and the Conservation of Habitats and Species Regulations 2017 (Natural England)	The proposed policy has been amended to specifically refer to international sites. The Conservation of Habitats and Species Regulations 2017 are already in force and developers must comply with them, so it is considered unnecessary to repeat them in the Local Plan.
GBI Chapter	<p>Increased use of the word ‘Blue’ to “make the document more effective in signposting applicants and decision makers to the role of waterways, which can often be less apparent where only ‘Green’ Infrastructure is referred to”</p> <p>Perception that Green Space on Housing schemes is subsequently sold off to create more housing.</p> <p>A general desire to see more emphasis on Local Food production at a commercial scale.</p> <p>Clear and explicit links to Leeds Food Strategy</p>	<p>This was partially agreed to. A check for consistency was undertaken across the proposals and changes made where appropriate for clarity.</p> <p>Future work includes improved monitoring which will assist in verifying this.</p> <p>Planning cannot be explicit about what type of development applicants should make. Given the proposed policies it is unlikely that any sustainable nature friendly food growing initiatives would ever be refused planning permission.</p> <p>Leeds Food Strategy is based on two Countrywide Food Strategies. The Government Food Strategy and Independent National Food Strategy. Policies in the National Planning Policy Framework are supported and the national two strategies will carry material weight. With this in mind explicit referencing to the Leeds Food Strategy is not considered necessary.</p>

Policy	Summary of representation	Action / Response
No change proposed:		
<p>Spatial policy 13: Protecting, maintaining, enhancing and extending green and blue infrastructure</p>	<p>That a principle is clearly stated that a loss of Green and Blue Infrastructure (GBI) can be accepted by a re-provision or enhancement of GBI elsewhere.</p>	<p>Spatial Policy 13 is a Strategic Policy. The loss and subsequent re-provision (including enhancement) of any form of Green and Blue Infrastructure will be a matter for more specific policies. These will be considered in the overall planning balance through the Development Management and other nature-based processes.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>Policy G1: Protecting, maintaining, enhancing and extending green and blue infrastructure within and outside areas of GBI</p>	<p>Questions raised as to the financial burden potentially imposed on the applicant by the proposed Policy G1.</p> <p>Proposal of a trigger for the Policy of 150 Residential Units.</p> <p>Proposed Policy is not flexible enough and needed to be applied more proportionately against the scale of development.</p>	<p>When considering the financial implications of the Climate Change Update, any viability issues will be addressed by the published EVS (Economic Viability Study). Taking the environment into account at an early stage of masterplanning (ideally before land purchase) will help avoid viability pressures.</p> <p>It was decided that a trigger level for G1 was not needed as:</p> <ul style="list-style-type: none"> a. Any trigger level (including 150 units) needs to be supported by evidence. b. The Policy was felt to be sufficiently flexible (see answer to 3.) that a trigger was not needed. <p>The Policy ensures that the applicant addresses all the relevant GBI issues appropriate to the development. If the development is minor and the impact minimal, then the assessment will be as such. It is not the expectation that a full expensive assessment of</p>

Policy	Summary of representation	Action / Response
	<p>A Supplementary Planning Document (SPD) underpinning the Policy should be produced for comment prior to the adoption of the Policy.</p>	<p>all the Policy requirements will be undertaken. Rather that everything in the list has been considered.</p> <p>Whilst there is no objection to the production of a Supplementary Planning Document (SPD), it is felt that one at this stage of the Plan Preparation process is not timely. An SPD adds further detail to extant adopted Sound Policy that is in the Development Plan so at this stage of the Plan Making process an SPD would not be appropriate.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>Policy G2A - Protection of tress, woodland and hedgerows</p>	<p>The requirement for an additional assessment of carbon sequestration, storage of pollutants, biodiversity and amenity value with all applications, regardless of the scale of development and/or tree loss, is unduly onerous and not justified and will increase costs and impact on viability. (Several developers)</p> <p>Trees are already adequately protected against removal by legislation. (A developer)</p>	<p>These assessments will only be required if trees are to be removed, and they will be proportional to the extent of that removal. Current tree reports and assessments already cover some of these elements.</p> <p>Trees are only protected if covered by a specific Tree Preservation Order or located within a designated Conservation Area. Many valuable trees do not have protection under existing legislation therefore it is important to extend protection in recognition of the key role of trees in addressing climate change through the storage of carbon and pollutants, in creating valuable habitats for biodiversity, in contributing to landscape and amenity and benefitting our physical and mental wellbeing.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>Policy G2B - Ancient woodland, ancient trees, veteran trees</p>	<p>The proposed policy should reflect the National Planning Policy Framework and guidance from Natural England and the Forestry Commission and allow compensation for loss. (Several developers)</p>	<p>The proposed policy does allow for compensation of loss under section b) 5. subject to demonstrable “wholly exceptional reasons”.</p>

Policy	Summary of representation	Action / Response
	<p>“Long Established woodland” and “veteran trees” need to be defined. (Several developers, an individual)</p> <p>“Harmful development” needs to be defined and clarity on how this will be measured. (Several developers)</p>	<p>Veteran trees are already defined in the Core Strategy Glossary under “Ancient or veteran trees”. A definition of Long Established Woodland was included in the Publication Draft version - “Woodland that has been continuously present since at least 1854, the date of the first series of detailed Ordnance Survey maps for West Yorkshire.”</p> <p>The reference to harmful development has been deleted. Harm is a common concept and consideration in the planning system although there is no definitive definition. Harm is considered on a site-by-site basis and is often a judgement and a matter of fact and degree, balanced against identified benefits of development.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>Policy G2D – Tree replacement</p>	<p>Policy is too onerous, inflexible, complicated, unclear, undeliverable and unjustified. (Several developers)</p> <p>How the retention of deadwood on site impacts the replacement rates should be considered. (A developer)</p> <p>Where planting requirements cannot be met on site, there needs to be provision for off-site planting and/or payment of a financial contribution where this can be justified. (Several developers)</p>	<p>The concept of retaining carbon sequestration parity if trees are removed is clear and an important element of the Council’s response to the climate emergency. There is flexibility in the proposed policy in terms of on and off-site delivery and the tree replacement calculator (spreadsheet) available will simplify the application of the methodology.</p> <p>The tree replacement methodology considers living specimens only which is regarded as a proportional and appropriate approach.</p> <p>Part 4 of the proposed policy allows for off-site planting or the payment of a financial contribution subject to full and detailed justification.</p>

Policy	Summary of representation	Action / Response
	<p>The proposed policy could have significant effects on deliverability, viability, efficient use of land, site capacity, infrastructure etc. (Several developers)</p> <p>Replacement trees need to be appropriate to their location. (A developer)</p> <p>There is only some evidence to support this policy so is this the best way to prevent loss of carbon sequestration capacity or are there more appropriate options? (A developer)</p> <p>Viability study's 1% increase is not evidenced and is too little. (Several developers)</p> <p>Clarity is needed on how a tree should be assessed for Biodiversity Net Gain (BNG). (A developer)</p>	<p>This proposed policy will help to ensure development is located and designed in a way that will fully consider and prioritise trees. It will retain as many existing trees as possible and increase planting where removal is justified which will maximise the role of trees in sequestering and storing carbon and addressing the climate emergency. Other factors and policies will be considered within the "planning balance".</p> <p>This wording is already covered in part 6 of the proposed policy.</p> <p>The report 'What is "like for like"?' (UBoC and University of Leeds, 2021) considers other existing tree replacement methods but these are not based on achieving carbon sequestration parity. The UBoC/University of Leeds method is based on data specifically from Leeds and therefore is highly relevant.</p> <p>Proposed policy G2C is in the main focussed on conserving trees and replacing those that are lost. The policy does require all developments to introduce new planting. Proposed policy G2D seeks additional tree and hedgerow planting within developments. Some of these costs are site specific costs, but case cost allowances accommodate this. The Economic Viability Study (2022) is recent and up to date.</p> <p>The most up to date Biodiversity Net Gain Metric should be used to assess trees for BNG. The tree replacement methodology is an assessment of carbon sequestration only. Trees are multi-functional which can contribute to biodiversity, carbon sequestration, amenity and landscape and townscape quality.</p>

Policy	Summary of representation	Action / Response
		Proposed policy is considered sound as drafted.
<p>Policy G4A: Green and blue space improvement and new green and blue space provision</p>	<p>Request to increase the level of Green Space as demanded by proposed policy G4A.</p> <p>A desired increase in the quality of new Green Space.</p> <p>Specifying specific typologies of green space in certain areas should be possible.</p> <p>Request to change the level of green space requested under policy G4A.</p>	<p>The levels of Green Space for proposed policy G4A (the old policy G4) were agreed at the Core Strategy Selective Review 2019 and it is not proposed to change them in this update. It should be noted that in numerical terms this is likely to raise the level of Green Space in the City Centre as the proposed policy G4A covers the City Centre and numerically will ask for more Green Space than policy G5.</p> <p>The quality of Green Space is specifically being addressed in proposed policies G4B and G4C.</p> <p>It is important (as stated in the Core Strategy) that Leeds “deliver the best type and the best quality of green space to where it is most needed in Leeds”. The proposed new ‘quality’ policy G4B, coupled with good collaboration between all parties during the Development Management process, should help deliver appropriate green space that serves of the needs of the local community. Currently the evidence we hold is not of a sufficient robustness to specify a specific typology on an application in an area. A new project to review and update green space evidence as part of Leeds Local Plan 2040 preparation is proposed.</p> <p>The levels of Green Space as stated in proposed policy G4A are not proposed for change as these levels were found sound in the Core Strategy Selective Review (2019).</p>

Policy	Summary of representation	Action / Response
	<p>Concern raised about the consequential loss of policy G5 as a result of the extension of policy G4 to the City Centre. A suggestion to retain G5 and to undertake some work to create an evidence base to justify changing the City centre boundary to take in areas outside the City centre.</p> <p>It is explicit in the policy that commuted sums are spent locally.</p> <p>A representor felt that commuted sums were used too liberally and should only be used in exceptional circumstances.</p> <p>Desire to place a requirement for community food growing areas as part of the development in Policy G4A (or G4B)</p>	<p>In the context of the City centre boundary, the provision of green space is currently disaggregated using policy G4 (outside the City centre boundary) and policy G5 (inside the City centre boundary). The deletion of policy G5 is a consequential change of proposed policy G4A covering the whole City. Green space provision is based on the principle of burden. People in the City centre will place a burden on other green space across the district. Also an increase in green space will mitigate the 'urban heat island' effect. With regards to the City centre boundary this is scheduled for review in Leeds Local Plan 2040.</p> <p>This is a general provision of national policy and applies to all obligations. However, it was felt that some allowance be given to create more strategic green space (larger areas used by people travelling further distances) to reflect the needs of the City. The supporting text therefore supports the need for the sums to be spent locally but also makes provision for strategic outcomes.</p> <p>Clear guidance has already been provided in 5.5.18.6 of the Core Strategy Selective Review 2019 (CSSR). Policy G4 of the CSSR requires on-site provision, unless it is unachievable or inappropriate, at which point equivalent off-site provision and/or or financial contribution is considered.</p> <p>This has been introduced in proposed policy F1 - 'Support residential development to reserve and create on-site opportunities for community food growing for residents and local community as part of their GBI assessment'.</p> <p>Proposed policy is considered sound as drafted.</p>

Policy	Summary of representation	Action / Response
<p>Policy G4B: Quality of new green space</p>	<p>The proposed policy is too prescriptive. The policy specifically states that ‘In order to be considered high quality new green space should meet the following objectives.’</p> <p>Questions raised about the achievability of the 14 points on smaller sites.</p> <p>Wished the policy to be specific about the number of Trees G4B (m)</p> <p>Include the word ‘Beauty’ in the title and in one of the bullet points. E.g. ‘Beautiful and Quality Green Spaces’</p>	<p>The proposed policy is about creating quality green space. If specific reasoning is given as to why a certain aspect of the quality criteria cannot be provided it will be taken into consideration through the design part of the Development Management process.</p> <p>Using the target levels for housing mix as per policy H4 of the Core Strategy Selective Review 2019, an area of green space 19.3m x 19.3m is considered the minimum site area able to be demanded under proposed policy G4A. Evidence is being prepared that shows that the criteria in proposed policy G4B can be achieved on a site of this area. It should also be recognised that any item that cannot be achieved due to design, viability or other considerations can be negotiated through the Development Management process.</p> <p>It is felt that this would be too prescriptive. Enough scope exists within the proposed policy for a high-quality scheme that includes trees. Other policies in Plan provide guidance and clarity on other tree planting opportunities.</p> <p>In design terms the concept of beauty is highly subjective. Some people will find a highly curated manicured park garden beautiful, whilst others will prefer a much more natural wild approach. Whilst planning can control quality materials and good design, the phrase ‘beautiful’ in itself is not able to be defined. With this in mind it was felt that this phrase would, rather than creating clarity as to what is needed, cause difficulties for both applicants and the Council when implementing the policy.</p>

Policy	Summary of representation	Action / Response
		Proposed policy is considered sound as drafted.
Policy G4C – Maintenance of green space	Whether 15 years maintenance for contributions in lieu of green space was correct. This has been raised for both those asking is it enough and those second asking is it too much.	<p>The Council feel that is an appropriate figure (used by other local authorities such as Birmingham) and evidence that this is an appropriate figure will be provided in the updated background paper.</p> <p>Proposed policy is considered sound as drafted.</p>
Policy G6: Protection of existing green space	<p>Recognition that the definition of green space that has protection has changed, and that the protection afforded by green space protection policies now goes beyond what is designated in the policies map.</p> <p>That proposed Policy G6 (4), which seeks to allow provision for the protection of green space that can be used for climate change mitigation, will place a further burden on land that in turn puts added pressure on green belt for residential development.</p> <p>Pedestrian corridors should be deleted from the list of items covered in proposed policy G6.</p> <p>That proposed policy G6 should only be applied to green spaces that are specifically protected by planning condition.</p>	<p>Green space that is protected is now clearly stated in proposed policy G6.</p> <p>It is not considered that the proposed policy will place an extra burden on green belt, as that would assume that all land given by the landowner for climate mitigation would otherwise be used for housing. Residential pressure is not a legitimate planning reason regarding the soundness of a policy as green belt will have its own policy and Development Management protection.</p> <p>Pedestrian corridors were agreed as sound in the examination of the Core Strategy Selective Review 2019. The purpose of the proposed changes in the climate change update is for further clarity on certain aspects green space protection.</p> <p>The Council felt that it was not appropriate to use conditions in the context of the Development Management system or the proposed policy as it would limit the green space protected by policy G6.</p>

Policy	Summary of representation	Action / Response
		Proposed policy is considered sound as drafted.
Policy G8A: Protection of important species and habitats	The proposed policy needs to be more flexible and have a more balanced approach. (Several developers)	The National Planning Policy Framework is clear on the importance of protecting and enhancing sites of biodiversity and geological value. The proposed policy is flexible in terms of allowing harm, but only if clear criteria are met. Proposed policy is considered sound as drafted.
Policy G8B: Leeds habitat network	Leeds Habitat Network is not mature enough to implement as a policy requirement. (A developer) Needs to be flexible to ensure it is cohesive with the whole plan approach. (Several developers) Refer to “resulting in net improvements” rather than “no significant adverse impacts”. (An organisation)	The Leeds Habitat Network (LHN) has existed since 2014 and is shown on the current policies map therefore it is a well-established concept. Current policy G9 (adopted 2014) protects the integrity and connectivity of the LHN from significant adverse impacts and seeks positive contributions to the habitat network. The LHN will form a key component of Local Nature Recovery Strategies in due course. All relevant policies and other material considerations will be considered in the assessment of the ‘planning balance’ during the Development Management process. The policy seeks expansion and enhancement of the network which will result in improvement. Proposed policy is considered sound as drafted.
Policy G9 – Biodiversity net gain	Questioned whether the policy is needed as it is seeking the minimum of 10% as set out in the Environment Act? (A developer)	The policy goes beyond simply requiring a minimum of 10% Biodiversity Net Gain as it provides more detail on on-site and off-site delivery therefore it is considered necessary to include the policy to provide clarity on the additional expectations / requirements.

Policy	Summary of representation	Action / Response
	<p>Suggest setting unit price across the District as significant demand on certain sites will increase the unit price and affect viability. (A developer)</p> <p>Concerns with the costings included in the Viability Study to account for the cost of this policy (Several developers)</p>	<p>Any unit price will be set outside the Local Plan process.</p> <p>For the purpose of the Economic Viability Study (EVS) it was assumed that developments will need to provide a minimum of 10% Biodiversity Net Gain (BNG) in line with the Environment Act 2021. The cost of meeting BNG obligations for developers is estimated at £19,698 per hectare to create and maintain sites over a 30-year lifespan. The costs were adjusted for inflation, which resulted in a total cost of £23,000 per hectare. As a national mandatory obligation, BNG should be accounted for in the price a developer pays for land and not part of local policy pressures.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>Policy F1: Food System Resilience</p>	<p>‘Support residential development to reserve and create on-site opportunities for community food growing for residents and the local community as part of their GBI assessment’ should be extended to commercial developments as well</p> <p>Against bullet point 7 of the proposed policy F1 due to:</p> <ul style="list-style-type: none"> a. Viability b. Residents not wanting trees in their gardens 	<p>The principle behind green space provision is that of a greater burden placed on existing green space by new residential development (more people = more burden). Thus, the link between employment or commercial uses and green space may be seen as tenuous. Whilst it is agreed that uses such as concentrated retail will benefit from good open space, it is questionable whether this should be for community food growing. The same could be said for other commercial uses, especially as they are often located outside of residential areas for amenity reasons.</p> <p>Response:</p> <ul style="list-style-type: none"> a. Viability will be addressed though the supporting Economic Viability Study.

Policy	Summary of representation	Action / Response
	<p>c. Precludes other formats of food growing</p> <p>Fruit trees in gardens do NOT contribute to biodiversity net gain units.</p> <p>Change text of 5.5.57 to include wording 'access to healthy, nutritious and culturally appropriate food that meets their needs. This adds in the wording 'culturally appropriate'.</p>	<p>b. Residents can choose whether to buy the house, or choose to remove the tree (if not subject to Tree Preservation Order or in a Conservation Order).</p> <p>c. A fruit tree in a garden does not preclude other types of food growing being accessed particularly in light of policy F1 supporting community food growing areas. A long list of positive benefits underpins why the provision of fruit trees was requested in the proposed policy. This is shown in the supporting text of the LPU1 update prior to the Policy.</p> <ul style="list-style-type: none"> • Providing free local food • Reconnecting the public (particular children) to food • Mental health benefits • Community benefits • Physical health benefits • Require little maintenance • Mitigation of Urban Heat Island (UHI) effects • Biodiversity net gain benefits <p>It is not the purpose of fruit trees in gardens to contribute towards biodiversity net gain units. This is not the purpose of the policy. The purpose is as explained above.</p> <p>Change is not considered justified because para 5.5.57 includes the wording 'meets their needs' which is considered to also reflect that culturally appropriate foods may be available.</p>

Policy	Summary of representation	Action / Response
	<p>The proposed policy for fruit trees is not an effective policy as it is not an effective solution for food resilience. Fruit trees need care and maintenance to be effective.</p>	<p>There are several reasons for promoting an increase in the number of trees:</p> <ul style="list-style-type: none"> a. These reasons (which are supported by the National Planning Policy Framework) are listed in the proposed changes in the Local Plan Update (section 5.5.59). b. It is not the case that fruit trees will solve all the food resilience issues. This was never the aim, but it will have positive effects, alongside other measures. c. With regard to care, maintenance and productivity Tree Officers and Landscape Officers have stated that once established the trees will 'look after themselves'. An example of an environment where extra care may be needed is if fruit are grown for commercial uses. <p>Proposed policy is considered sound as drafted.</p>

PLACE MAKING REPRESENTATION SUMMARY TABLE

Policy	Summary of representation	Action / Response
<p>Proposed changes:</p>		
<p>Policy SP1B: Achieving well-designed sustainable places</p>	<p>It is not considered clear whether this proposed policy requires an appraisal / site assessment to form part of application submission documents, i.e. is it a validation requirement?</p> <p>The draft policy appears to stop “mid flow”. It asks for a contextual analysis but doesn’t say what that will be used for. This is already a requirement of a Design and Access Statements and is repeated in Policy P10. Suggest SP1B is deleted. Not “justified” as it is duplication of policy content and a reasonable alternative is to rely solely on P10. (Developers)</p>	<p>Policy SP1B aims to provide strategic emphasis on the need to consider design before schemes are put forward. The contextual analysis requirement is already an expectation though Design & Access Statements, so no further/new documentation or validation criteria is being introduced.</p> <p>Policy SP1B aims to highlight the importance of contextual analysis and design. The provision of this within a strategic policy is in accordance with NPPF Para 17. which states that strategic policies can be included, that address Local Planning Authority Priorities. Policy SP1B sets out the overall strategy for ensuring that high quality design is provided. The detailed principles of how to do this is then set out in Policy P10. Policy SP1B to be retained, however the duplicated text between Policy SP1B and P10 will be removed and both Policy SP1B and Policy P10 reworded for clarity.</p>
<p>Policy P10: Development principles for high-quality design and healthy place making</p>	<p>The combination of 6 initial requirements followed by 10 Principles could be confusing. A single set of Principles would be clearer. Suggest that the first 5 requirements could be woven into the 10 Principles presentation.</p>	<p>Changes are proposed to make the policy more efficient and clearer:</p> <ul style="list-style-type: none"> • The first part of policy P10 (the 6 initial requirements) are to be removed and redrafted into Policy SP1B. • A consequential redraft to the policy introduction along with other minor amendments to wording of policy P10 and supporting text to pick up on points of clarity and terminology and signposting to other (relevant) Local Plan policies are to be made.

Policy	Summary of representation	Action / Response
<p>Spatial Policy 1: Location of development</p>	<p>Policy SP1 should form part of a wider local plan review including a new site allocations plan - new potential to recognise new sustainable settlements and urban extensions. If the effect of a combination of policy SP1A and Spatial Policy 1 is that development which is not in an area of at least 'good accessibility' on map LPU6 will not be supported, this effectively precludes development in some smaller settlements entirely, while reducing the developable extent of others. This change in policy wording would result in a significant change to the settlement hierarchy which is not justified by the evidence base nor considered within the Sustainability Appraisal.</p>	<p>It is agreed that there is cross over between the Local Plan Update and scoping of Leeds Local Plan 2040 in regard to Spatial Strategy (Policy SP1).</p> <p>The proposed change to policy SP1 is to be removed from the Local Plan Update to allow more detailed and wider review of Policy SP1 through Leeds Local Plan 2040.</p>
<p>Partial changes:</p>		
<p>Policy SP1A: Achieving complete, compact and connected places</p>	<p>This proposed policy appears to be justified on, and only refers to, housing?</p> <p>Policy SP1A effectively uses 20-minute neighbourhoods as a retro-fitted development management policy (as evident by the policy wording). Indeed, many of the SP1A criteria are design and placemaking matters which do not require a specific 20-minute neighbourhood policy.</p> <p>Would be useful to better understand the analysis of the scoring of amenities by hex/area – clarification requested. The current wording of the policy does not explain how the weightings assigned to the importance of local amenities will be considered.</p>	<p>Proposed policy SP1A is written as a replacement to Core Strategy Policy H2: New Housing Development on Non-Allocated Sites, therefore the emphasis is on housing rather than employment. As a replacement to policy H2, this does not impact on other policies.</p> <p>Repeating some of the principles of existing Development Management aspects that are necessary to creating complete, compact and connected places is considered appropriate as it reiterates the inter-relationship between a range of policy considerations that respond to detailed principles of place-making. Proposed policy SP1A is a strategic policy which sets out the strategy for achieving “complete, compact and connected places”. The provision of this is in accordance with National Planning Policy Framework paragraph 17, which states that strategic policies can be included, that address Local Planning Authority Priorities. Policy SP1A sets out the overall strategy for complete, compact and connected places and an assessment tool for using walkable modelling work to assess windfall (housing) development.</p>

Policy	Summary of representation	Action / Response
		<p>However, points of clarity of how the proposed policy applies to housing and the relationship and overlaps with Policy SP0 and other policy links are to be made clearer in the supporting text.</p> <p>Further guidance on the modelling will be provided as part of monitoring and review and to assist implementation of the policy.</p>
<p>Policy SP1A: Achieving complete, compact and connected places</p>	<p>Existing accessibility standards means sites will have to be assessed against the accessibility standards in Core Strategy Policy T2 as well as meeting the ‘good accessibility’ criteria to support the 20-minute neighbourhood policy. The requirement for sites to meet two separate accessibility policies is not justified and is unnecessary.</p> <p>We note that there is no reference to what constitutes ‘quality public transport’</p>	<p>Current accessibility doesn’t consider the walkability of places, or the efficiency of land uses through densities, so it’s considered appropriate to have the two policies. Potential to rename the proposed policy title to align better with walkable accessibility so it’s clear that this sits alongside policy T2 accessibility criteria and is around creating safe, attractive and “walkable places”. Clarity to be added to the justification text that this policy reads alongside others in the plan to assist in the balance of considerations of high-quality development.</p> <p>Policy T2 defines accessibility criteria to Public Transport, which is services that offer a 15min service frequency (30mins for rail) relating to weekly daytime services). Other quality aspects in terms of design of shelters/stops and the buses/trains etc themselves are matters beyond planning. Therefore the word “quality” will be removed for clarity.</p>
<p>Policy P10: Development principles for high-quality design and healthy place making</p>	<p>Clarification on terminology “inclusive and accessible to all users” - what does this include/exclude. Should be cognisant of balancing any harm to listed buildings. Not clear on how policy P10 and policy H10 work together.</p> <p>Suggested alternative: 5. All development shall be inclusive and accessible to all users, other than in exceptional circumstances which shall be agreed with the Council.</p>	<p>This policy is a direct reflection of National Planning Policy Framework paragraph 130(f): “<i>create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience</i>”.</p>

Policy	Summary of representation	Action / Response
	<i>(Developers)</i>	<p>Policy H10 is in specific response to residential dwellings and the proportion of units required to meet requirements of M4(2) and M4(3) (wheelchair adaptable dwellings). It should be read alongside P10 for residential schemes.</p> <p>Propose no change other than to add cross reference to “protected characteristics” as defined by the Equality Act 2010 for clarity on inclusion.</p>
<p>Policy 10: Development principles for high-quality design and healthy place making</p>	<p>Terminology “monolithic”/“slab-like” sought to be deleted as considered too subjective. (Developer)</p>	<p>The definition was introduced as a Publication Draft change to the Core Strategy Glossary (Reg 18 proposed consultation document): <i>“Monolithic/slab like: Tall high block buildings that appear as “slabs” in the townscape and have high visual impact”</i>. The word “composition” to be added to the definition for added clarity but propose no further change.</p>
<p>Policy P10: Development principles for high-quality design and healthy place making</p>	<p>“High Quality” considered an intangible test. (Developer)</p>	<p>“High Quality” is a direct reflection of National Planning Policy Framework (NPPF) paragraph 126: <i>“The creation of <u>high quality</u>, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”</i></p> <p>The Supplementary Planning Documents (SPDs) in Leeds and emerging work on refreshing and introducing Design Codes (NPPF</p>

Policy	Summary of representation	Action / Response
	<p>“Exceptional quality for tall buildings” should be deleted with a requirement that the design is not harmful to the area. (Developer)</p>	<p>Paragraph 128) will provide the clarity on the Council’s expectations.</p> <p>There is no reference to “exceptional” in the NPPF. Will remove “exceptional” and replace with “require special consideration” which is consistent with the language used in National Design Code.</p>
<p>Policy P10: Development principles for high-quality design and healthy place making</p>	<p>Point 4) considered not consistent with National Planning Policy Framework. Interventions in existing built environment is necessary to provide safe infrastructure, seating/shade, and address bottlenecks. Green and Blue Infrastructure policies are seeking to create more shade in urban areas. Seating is referred to in greenspace design policy. The mechanisms to adapt the existing built environment could be made more explicit. The Healthy Streets Index may be useful here. (Yorks & Humber Climate Commission)</p>	<p>Added cross reference and language consistent with the “Healthy Streets Index” for clarity and coherence.</p>
<p>No change proposed:</p>		
<p>Policy SP1A: Achieving complete, compact and connected places</p>	<p>Not clear how proposed policy SP1a would be used to assess options for future site allocations. It would be expected that the Council would need to produce and provide a Supplementary Planning Document (SPD) or similar to guide developers as to the level of information and detail expected. (Developers)</p> <p>The policy will prejudice the ability of small windfall sites to come forward as it is questioned how small-scale development can viably address deficiencies in accessibility. (Developers, Residents)</p>	<p>Clarification on the link to the scoping of Leeds Local Plan 2040 spatial strategy will be made clearer within the background paper so does not require change to proposed policy SP1A.</p> <p>See also deletion change to policy SP1 above - It is noted that there is cross over between the Local Plan Update and scoping of Leeds Local Plan 2040 in regard to Spatial Strategy (policy SP1). The proposed change to policy SP1 is to be removed from the Local Plan Update to allow more detailed and wider review of policy SP1 through Leeds Local Plan 2040.</p>

Policy	Summary of representation	Action / Response
<p>Policy SP1A: Achieving complete, compact and connected places</p>	<p>Concern over maximising densities – from perspective of adverse implication on wildlife/biodiversity, but counter development industry achieving this in out of centre locations. Suggestion that the policy is linked to Design Codes to further refine mapping assessment. (Resident)</p>	<p>A section on higher density is considered in the Placemaking background paper. Higher densities can be achieved without building too high and equally making better use of sites to allow for natural/biodiversity and other site requirements. Ultimately density follows appropriate character and site context analysis. Existing Core Strategy Policy H3: Density of residential development remains and sets minimums. Proposed policy SP1a is setting out the recognition that better efficiencies of land and facilities/services can be made (as appropriate) with higher density.</p> <p>The Supplementary Planning Documents (SPDs) in Leeds and emerging work on refreshing and introducing Design Codes (National Planning Policy Framework paragraph 128) will provide added clarity.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>Policy SP1A: Achieving complete, compact and connected places</p>	<p>The proposed approach presents a risk of undermining rural communities and rural growth and acts as a barrier to rural development. Lack of clear expectations/enforcement criteria – policy should state it is to help ‘facilitate’ the principles of 20-minute neighbourhood. Not always possible for a development to meet all seven points outlined for valid development reasons. The draft policy wording should therefore be amended. Greater flexibility sought. (Developer and resident)</p>	<p>The aim of this proposed policy is the promotion of sustainable development and guiding where and how windfall development comes forward so that development is not perpetuating the delivery of car reliant schemes. The threshold for the Policy is set at 5 dwellings and is only one policy within the plan that will be considered in the balance of determination.</p> <p>Windfall development is that which has not been planned for. It can come forward in areas that meet the principles of policy SP1A. It is not a requirement of all sites to address deficiencies but in some cases, subject to scale, development may be able to do so. Other factors such as the Governments consultation on Community Infrastructure Levy (CIL) will need to be considered alongside this.</p> <p>Proposed policy is considered sound as drafted.</p>

Policy	Summary of representation	Action / Response
<p>Policy SP1A: Achieving complete, compact and connected places</p>	<p>Policy SP1A part iii) c) where it makes reference to exceeding health infrastructure by number of dwellings - how will this be assessed and by who, given that this would include a wide range of services under different ownership and operations? Suggest health is removed. (Developer)</p>	<p>Health infrastructure is an integral part of services and facilities expected to meet daily needs. This wording was included in the existing Core Strategy policy H2 and has therefore been brought through to proposed policy SP1A which aims to replace policy H2. It is appropriate that the inclusion of 'health' is retained to reflect the Council's Health and Well-being Strategy aims.</p> <p>Proposed policy P10A: The health impacts of developments, further deals with how health will be considered. The development of both proposed policies SP1A and P10A has been carried out in collaboration with Public Health colleagues.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>Policy SP1A: Achieving complete, compact and connected places</p>	<p>The Policy appears to exclude nature conservation. (Natural England)</p>	<p>Nature conservation is included in SP1A 3f(ii).</p> <p>Proposed policy is considered sound as drafted.</p>
<p>Policy SP1A: Achieving complete, compact and connected places</p>	<p>Limitations in the accuracy of the modelling data highlighted. Needs to be regularly updated if it is to be used as assessment tool. (Resident, Developers)</p>	<p>The potential limitations are acknowledged and referenced within the Publication Draft Background Paper on Place Making. Ongoing and annual updates to the modelling data and mapping will be part of the implementation and monitoring of the proposed policy.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>Policy EN9: New drive thru' development</p>	<p>Whilst there is a merit in seeking to reduce the reliance on the private car such a blanket approach to the consideration of drive thru developments fails to recognise the important contribution such uses have and importantly that they can be</p>	<p>Comments explore both removing and strengthening (widening out the no-car approach) of this policy, so drafting a policy that satisfies all concerns is not considered possible.</p>

Policy	Summary of representation	Action / Response
	<p>used as part of a linked trip with other uses. Has the equality of this policy been established to understand impact? (developer)</p> <p>Policy P8 of the Leeds Core Strategy outlines that for all out of centre Class A, leisure or office uses a sequential assessment is required. However, the draft policy is silent on out of centre sites and its compliance with Policy P8 of the Core Strategy. National policy is clear that out of centre retail proposals are acceptable subject to compliance with the retail tests. Part A of Policy EN9 does not allow such sites to be justified and therefore it is not consistent with national or adopted policy which Policy EN9 will sit alongside. (Developer)</p> <p>Objection to the policy in support that drive thru's assist the economy. (Developer)</p> <p>Seems pretty weak and unimaginative (especially alongside much more progressive policy proposals such as the energy intensity standards). Surely we can do better? (Housing Developer)</p> <p>EN9 is potentially counter-productive and needs re-thinking to be more definitively restrictive - An unequivocal presumption against new drive-thru developments would be significantly more consistent with the rest of the plan and with the combined objectives for climate and public health. (Yorkshire & Humber Climate Commission)</p>	<p>The tests against National Policy will be tested through the independent examination.</p> <p>Proposed policy is considered sound as drafted.</p>

Policy	Summary of representation	Action / Response
Policy P10: Development principles for high-quality design and healthy place making	Amendment sought to allow flexibility (in compliance with National Planning Policy Framework) on the preservation and enhancement of the districts historic and natural assets. (Developer)	It is considered that the application of ‘planning balance’ during the Development Management’ process will provide this flexibility. Proposed policy is considered sound as drafted.
Policy P10: Development principles for high-quality design and healthy place making	“Safe and accessible routes that are easy to move through and create permeability and accessibility” – amendment sought as the requirement for all sites to be permeable is unsound. (Developer)	The word “appropriately” is used in the policy to provide flexibility. This approach reflects National Planning Policy Framework paragraphs 92(b) and 110(b) 130 (f) Proposed policy is considered sound as drafted.
Policy P10: Development principles for high-quality design and healthy place making	Should consider landscape impacts on the Nidderdale Area of Outstanding Natural Beauty (AONB). (Natural England)	This requirement is covered elsewhere and not a design consideration for the majority of Leeds. Proposed policy is considered sound as drafted.
Policy P10A: The Health Impacts of developments	Justification for 100 or more residential units trigger.	A threshold of 100 units is considered proportionate and not inconsistent with the approach adopted by other authorities. Further explanation to the method of arriving at this threshold is set out in the Placemaking background paper Proposed policy is considered sound as drafted.
Policy P10A: The Health Impacts of developments	Future and existing allocated sites above 100 dwellings will not necessarily have significant health impacts, therefore only if a significant adverse impact on health and wellbeing is identified should a Health Impact Assessment be required.	Planning policy guidance (<i>Healthy and Safe Communities</i> , August 2022) recognises that Health Impact Assessment (HIA) is a useful tool. Establishing whether the impacts are significant may not be

Policy	Summary of representation	Action / Response
		<p>possible without undertaking a HIA. The threshold is also consistent with the approach taken by other authorities.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>Policy P10A: The Health Impacts of developments</p>	<p>Justification for 10,000sqm or more non-residential uses trigger</p>	<p>The threshold has been reviewed and it is considered that the threshold is reasonable and proportionate. Further explanation to the method of arriving at this threshold is set out in the background paper</p> <p>Proposed policy is considered sound as drafted.</p>
<p>Policy P10A: The Health Impacts of developments</p>	<p>Not clear what would be considered to be an ‘unacceptable impact on health and wellbeing’ would be or how this is defined and against what criteria.</p>	<p>There may be circumstances where for certain types of development or certain locations it is considered that a Health Impact Assessment (HIA) would be required given potential concerns about impact on the health of the existing or new population arising from the development. This would be determined through a screening process either at the pre-application stage or following submission of a planning application. This will be a decision for Public Health in consultation with the planning officer.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>Policy P10A: The Health Impacts of developments</p>	<p>Health impact is already covered in other policy requirements</p>	<p>Whilst many planning policies can be linked to health outcomes, existing policies do not provide a direct link to health or require consideration of health. The Council’s Health & Wellbeing Strategy priority recognises the important links between housing and the environment and people’s health. Health Impact Assessment (HIA) is a well-established process recognised by the national planning guidance, the Office for Health Improvement and Disparities (OHID) and numerous other organisations. Many local authorities already have local plan policies requiring the consideration of health impact including HIA.</p>

Policy	Summary of representation	Action / Response
<p>Policy P10A: The Health Impacts of developments</p>	<p>The proposed policy presumes that impact can always be mitigated (part 4 of Policy P10A)</p>	<p>Proposed policy is considered sound as drafted.</p> <p>Part 2 of proposed policy P10A says that developments with an unacceptable impact on health and wellbeing will not be permitted unless appropriate mitigation can be provided. So if the impact cannot be mitigated, P10A includes the provision that the development would not be supported.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>Policy P10A: The Health Impacts of developments</p>	<p>The Local Plan policies should collectively consider health impacts of development. If development is in line with policies in the Local Plan a Health Impact Assessment should not be necessary</p>	<p>The national planning policy guidance recognises that Health Impact Assessment (HIA) is a useful tool. Establishing whether the impacts of a specific development are significant may not be possible without undertaking a HIA.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>Policy P10A: The Health Impacts of developments</p>	<p>The requirement to discuss the impact on health service providers is onerous and it is questioned who would provide this information from the health service providers</p>	<p>When finalised, the guidance document accompanying proposed policy P10A will provide more detail including a protocol setting out the responsibilities of health partners. Planning applications for new residential use already potentially give rise to increased pressure on infrastructure provision, so the consideration of impact on health infrastructure should already be considered and is supported by adopted Core Strategy policy SP1(vi) and policy ID2. The Health Impact Assessment provides a more structured approach to engaging with NHS partners.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>Policy P10A: The Health Impacts of developments</p>	<p>The draft policy expects development to “contribute to reducing the causes of ill health” and to “reduce health inequalities”. It should recognise development cannot resolve it and only has a modest effect</p>	<p>Development is one of a number of contributing factors which affect the health of the population (see Leeds Health & Wellbeing Strategy). The policy only seeks development to 'contribute to reducing', not solve, existing health problems.</p> <p>Proposed policy is considered sound as drafted.</p>

Policy	Summary of representation	Action / Response
<p>Policy P10A: The Health Impacts of developments</p>	<p>The requirement for the type of Health Impact Assessment should be proportionate</p>	<p>The requirements for undertaking a Health Impacts Assessment will be set out in the guidance document accompanying proposed policy P10A. The requirements for individual planning applications will be screened and advised as part of the pre-application process to establish the level of detail and assessment proportionate to the development and population potentially affected by the development.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>Policy P10A: The Health Impacts of developments</p>	<p>An estimated cost of £50,000 is made for undertaking a Health Impact Assessment [in the Viability assessment]. This cost is unnecessary and unjustified and an onerous policy burden.</p>	<p>The national planning policy guidance recognises that Health Impact Assessment (HIA) is a useful tool in order to establish whether the impacts of a specific development are significant or not. Some of the aspects of the HIA should already be addressed in other supporting documents which could be used to cross-reference to the HIA for ease. Many local planning authorities have required HIA for some time.</p> <p>Proposed policy is considered sound as drafted.</p>

SUSTAINABLE INFRASTRUCTURE REPRESENTATION SUMMARY TABLE

Policy	Summary of representation	Action / Response
Proposed changes:		
SP11a Mass Transit and Rail Infrastructure	Noted that the policy omits reference to the 'Wakefield and Five Towns' route which will also travel through Leeds (Wakefield District Council).	This omission was an error. Proposed policy SP11a(1) amended so that it also includes 'Wakefield and Five Towns'.
SP11a Mass Transit and Rail Infrastructure	Suggested that wording is needed regarding minimising impacts of parking where stations are attractive for park and ride (National Highways).	Additional text added to proposed policy SP11A(3) to state " <i>The provision of park and ride facilities linked to the Mass Transit network will be supported in appropriate locations</i> " and associated supporting text added to recognise that " <i>There will likely be particular opportunities for park and ride facilities to be developed alongside some of the new mass transit stops, and multi-modal access strategies will be used to plan for the interchange between different modes of transport</i> ".
SP11a Mass Transit and Rail Infrastructure	Requested that the proposed policy or supporting text make reference to the need to consider the impact of new bridges on the spaces below them (Canal and River Trust).	Additional text added to SP11A4 (bullet 3) to state " <i>New bridge crossings must consider the impact on travel through the spaces below the structure</i> "
SP11a Mass Transit and Rail Infrastructure	Clarification sought on what the term 'identified' means in the context of the proposed policy (a developer).	Supporting text amended for clarity to say: " <i>...Until this time, proposals in the locations <u>that have been identified by the West Yorkshire Combined Authority as forming part of the proposed Mass Transit network</u> where mass transit is being planned will need to be considered on a case-by-case basis against the latest plans for mass transit, in order to ensure that they will not prejudice its implementation</i> ".

Policy	Summary of representation	Action / Response
Policy DC1 Digital Connectivity	There is general support for the policy. In addition, a number of respondents from the development industry raised the issue that the proposed policy is unnecessary, either as a result of existing development practice or as a result of new changes to the building regulations.	<p>Since the end of the consultation period changes have been made to the Building Regulations (2010) which require digital connectivity to be provided for all developments being equipped with gigabit-ready physical infrastructure. The updated Building Regulations are fairly comprehensive setting out a requirement for new dwellings and new buildings or when existing buildings are subject to major renovation works.</p> <p>Given the new Building Regulations came into immediate effect from 26th December 2022 the proposed policy is no longer needed and is withdrawn from the Local Plan Update.</p>
No change proposed:		
SP11a Mass Transit and Rail Infrastructure	Majority of representations supported the policy.	Support recorded; no change required.
SP11a Mass Transit and Rail Infrastructure	Considered that the need to reduce the capacity of the highway network in the vicinity of mass transit should be stipulated in planning policy (a resident).	<p>How the highway is used / capacity is managed falls beyond the control of the (spatial) planning system, and so it would not be appropriate to stipulate this through the Local Plan.</p> <p>Proposed policy is considered sound as drafted.</p>
SP11b Leeds Station	Majority of representations supported the proposed policy.	Support recorded; no change required.
SP11b Leeds Station	Suggested that the proposed policy needs a clearer statement about specifically integrating with public transport links to major settlements (rather than just public transport links more generally) (a community group).	<p>The policy already seeks improved interchange with a range of other transport modes, and it is not considered that distinction should be made between routes to particular places.</p> <p>Proposed policy is considered sound as drafted.</p>

Policy	Summary of representation	Action / Response
SP11b Leeds Station	Proposed that the policy / text should also make reference to proposed enhancements to the southern canal towpath and a new crossing over the canal (a developer).	<p>These schemes are not directly related to the station and so are not included in this proposed policy.</p> <p>Proposed policy is considered sound as drafted.</p>
SP11b Leeds Station	Concern raised regarding the long timescales associated with improvements to the station and focus of policy on Leeds Station only. (numerous residents).	<p>The option of the proposed policy considering other stations was considered through the Sustainability Appraisal but discounted on the basis that they are sufficiently covered by existing policies.</p> <p>Proposed policy is considered sound as drafted.</p>
SP11b Leeds Station	Considered that the policy should not support improvements to station parking (as it is contrary to efforts to support non-car use) (a resident).	<p>The supporting text to the policy notes that pick up/drop off arrangements are causing wider congestion issues which creates a poor passenger and pedestrian experience, and this needs to be addressed in order to support the transformation of Princes Square. It is this that the policy aims to address through improvements to parking rather than encouraging additional parking.</p> <p>Proposed policy is considered sound as drafted.</p>
Leeds Bradford Airport	The Local Plan Update should include a policy that restricts the future growth of the airport in order to limit further carbon emissions (numerous residents).	<p>The Council recognises the strength of feeling regarding the role of Leeds Bradford Airport both as an economic contributor but also as a polluter. It was considered that at the time of the Local Plan Update's drafting that there was insufficient clarity on national policy regarding airport growth to ensure that a robust policy proposal could be arrived at. However, it is considered that the airport should be within the scope of the Leeds Local Plan 2040. As such, it is expected that the issue of the future growth of the airport can be better explored through that Plan, which will follow shortly after the Local Plan Update. As such, no changes are proposed to the Local Plan Update.</p>

Matters outside the scope of the consultation:

<p>SP11a Mass Transit and Rail Infrastructure</p>	<p>Some concerns raised re. the rationale for mass transit, or the proposed routes, and whether alternative proposals may be more effective (numerous residents).</p>	<p>Proposals for the West Yorkshire Mass Transit Network are being developed by the West Yorkshire Combined Authority (WYCA). WYCA are responsible for considering suggestions regarding the network, its technologies and its relative benefits compared to other potential options, and this lies outside the influence of the Local Plan Update.</p>
<p>SP11a Mass Transit and Rail Infrastructure</p>	<p>Some general transport issues and concerns were raised that lie outside the scope of the planning system – i.e. repairs, general issues with public transport, seeking improvements to bus connections and networks, the introduction of a Workplace Parking Levy (numerous residents).</p>	<p>These concerns outside the scope of what spatial planning (and so the Local Plan Update) is able to influence. The Connecting Leeds Transport Strategy sets a framework for broader transport improvements.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>SP11a Mass Transit and Rail Infrastructure</p>	<p>Some concerns were raised regarding schemes that are currently underway (e.g. City Square redevelopment) (numerous residents).</p>	<p>The Local Plan Update is not able to influence schemes that are already underway.</p> <p>Proposed policy is considered sound as drafted.</p>
<p>SP11b Leeds Station</p>	<p>Noted that new parking at Leeds Station will need to be fully assessed and mitigated accordingly (National Highways).</p>	<p>Proposals will be assessed in accordance with existing policies and the Transport Supplementary Planning Document.</p>
<p>SP11b Leeds Station</p>	<p>Suggested that measures such as integrated ticketing would deliver substantial gains sooner (residents).</p>	<p>Integrated ticketing is outside the scope of what the Local Plan Update is able to influence (though is supported by the Connecting Leeds Strategy).</p>
<p>SP11b Leeds Station</p>	<p>Some concerns were raised regarding schemes that are currently underway (e.g. City Square redevelopment) (numerous residents).</p>	<p>The Local Plan Update is not able to influence schemes that are already underway.</p>

Next steps

- 5.15 Following consideration and analysis of all consultation responses, it is considered that some of the issues raised relate directly to the soundness of the Plan and therefore some amendments to the detailed policies are required. Government guidance makes clear that Local Planning Authorities should only submit plans for examination that they consider to be sound. Whilst it is possible that changes to the Plan can be made as part of the examination process, the Council has been advised by the Planning Inspectorate that if the Council is aware that changes to the Plan are required, these should be the subject to an additional round of consultation before the Plan is submitted for examination. A pre-submission consultation is expected to take place in late 2023. This represents good practice, supports transparency and, in addition, these further revisions to policies enables the Council to ensure that they will be as effective as possible in meeting desired outcomes, in the interests of adopting a robust Plan that will stand the test of time.

6 Appendices

Appendix 1 – Local Plan Review Report, July 2020

Appendix 2 – Issues & Options – Statement of Representation

Appendix 3 – Issues & Options – Consultation Notification Letter, July 2021

Appendix 4 – Issues & Options – Consultation Libraries Letter, July 2021

Appendix 5 – Issues & Options – Smart Survey questionnaires:

Local Plan Update - Carbon Reduction

Local Plan Update - Flood Risk

Local Plan Update - Green Infrastructure

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Local Plan Update Summary - Carbon Reduction

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Appendix 6 – Issues & Options – Poster Advertising the consultation

Appendix 7 – Issues & Options – Reg 18 Scoping Report of Consultation, Sept 2022

Appendix 8 – Publication Draft – Statement of Representation

Appendix 9 – Publication Draft – Consultation notification Letter, Oct 2022

Appendix 10 – Publication Draft – Smart Survey & Young Persons Survey



Local Plan Review

Leeds Local Plan

July 2020

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Annex 1 - Policy Review Table

Summary

Local Authorities are required by the Town and Country Planning Act (England) Regulations 2012 to review the policies that make up the Local Plan, every five years. This exercise has been undertaken and is shown in Appendix 1.

The current Leeds Local Plan is a set of five Development Plan Documents (DPDs) mainly covering the period between 2012 and 2028, but with some policies covering up to 2033. The Core Strategy sets the overall strategic framework for development in Leeds and is underpinned by other DPDs covering Natural Resources and Waste and site allocations. A number of years have passed since the Core Strategy (CS) was adopted in 2014. Whilst it was subject to an update in 2019 this was selective and focussed largely on housing, leaving much of the remainder untouched. Similarly the Natural Resources and Waste Plan was adopted in 2013 and since then, despite it ensuring good progress regarding the management of the natural environment, the declaration of a Climate Emergency in Leeds is a driver to update it.

Within the context of national planning guidance, evidence and local priorities, it is crucial therefore that the local plan is kept up to date and subject to regular review, to ensure it remains fit for purpose in providing certainty for communities and investors.

Since January 2020, a review of extant Local Plan policies has been undertaken. This helps show how existing policies are performing, their conformity with national guidance and whether an update needs to be considered. There are over 250 policies in the Local Plan and it is not proposed that they all need to be updated. Some, such as those updated by Core Strategy Selective Review, Site Allocations Plan and AVLAAP, are very recently adopted and remain up to date.

Main issues

1. The Local Planning Authority has a legal obligation to undertake a review of its Local Plan every five years in accordance with Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012) and further set out in paragraph 33 of the National Planning Policy Framework, (NPPF, 2019). This is the first review that Leeds has undertaken under the new legislation. The use of the word “review” by Government in this context is to consider policies every 5 years and see whether they need to be updated; not the process of such an update.
2. The Leeds Local Plan is a part of the overall Development Plan for Leeds and is comprised of a number of adopted documents: the saved policies in the Unitary Development Plan (2006); Core Strategy (2014 and amended 2019); the Natural Resources and Waste Development Plan Document (2013 and revised 2015); the Aire Valley Leeds Area Action Plan (2017); the Site Allocations Plan (2019). Each of the documents cover slightly different plan periods.
3. The focus of the review of Local Plan policies is not on those policies that have been recently adopted as they are not yet 5 years old. Instead the focus is on the saved policies of the UDP (2006), policies in the Core Strategy (2014) which were not part of the Selective Review in 2019 and the Natural Resources and Waste DPD (2013 and revised 2015).
4. The aim of this report is to demonstrate that the review of the Leeds Local Plan has been undertaken in a robust and objective way. The approach taken is to follow the guidance in the MHCLG Guidance on “plan-making” (2019). This provides details on what reviews should address; namely changes in National Policy or local circumstances. Where a Local Planning Authority needs to amend one or more policies, it should update its Local Development Scheme to set out the timetable for when these amendments will be consulted upon and examined. The LDS was last updated in January 2020.
5. In undertaking a review of the Local Plan it allows us to understand which policies remain up to date for the purposes of decision making or where circumstances may have changed and whether or not the policy / policies in the Plans continue to be effective in addressing the specific local issues that are identified in them. This in turn helps to focus on whether and to what extent, an update of the policies is required.
6. Emphasis has been placed on the documents of the Local Plan where the plan period has expired and where the 5 year review period (post adoption), as required by the NPPF, has been reached. This focuses attention on the Saved Policies of the UDP (2006-2016) (policies saved by the Secretary of State in 2007 and 2009), the Natural Resources and Waste DPD (2013 2028) and the Core Strategy (2014-2028). There are a total of 185 policies across these three documents and an assessment of each one has been undertaken. Whilst this excludes the Core Strategy Selective Review (CSSR), Site Allocations Plan (SAP) and the Aire Valley Leeds Area Action Plan (AVLAAP) from the review because they are all less than 5 years old, the guidance is clear that should

significant changes occur, a need for a review may be triggered before 5 years has elapsed.

7. In that context the LDS notes that there is provision under Policy HGR1 of the recently adopted SAP, to undertake a SAP update for housing and safeguarded land, which will be subject of its own plan-making process. Similarly, the LDS notes that there is a need to undertake an update of the adopted AVLAAP in relation to the High Speed 2 rail line and the city station interchange.
8. The assessment of the policies in the Leeds Local Plan has been captured in a database. The outcomes have been translated into the table in Annex 1 of this report. This provides a summary of whether the policy is considered to be up-to-date; in line with the NPPF (2019); still relevant and effective and whether there is any change to the evidence. A short commentary is included within the table which in turn has fed into the conclusion on whether the policy needs to be updated/amended or not.
9. The MHCLG Guidance states that if a local planning authority decides, as a result of the review, that they do not need to update their policies, they must also publish the reasons for this decision within 5 years of the adoption date of the plan. The table in Annex 1 identifies those policies within the scope of the current review that in the Council's opinion do not need updating as well as identifying those that require update / amendment.
10. This process and its conclusions are important in considering the weight to be given to policies in the Local Plan in decision making. It is important to note that not all policies become out of date or ineffective by the passage of time as this will depend on local circumstances and a plan does not become out-of-date automatically after 5 years. The review process is a method of ensuring that a plan and the policies within it remain effective. Applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. Due weight should be given to relevant policies in existing plans according to their consistency with the National Planning Policy Framework. It remains the case (in line with the National Planning Practice Guidance) that it is up to the Local Planning Authority to decide the weight to give to planning policies.
11. Neighbourhood Plans form a part of the overall statutory development plan for Leeds but not the Local Plan. They are subject to their own review and update process, which will be driven by local Neighbourhood Planning groups and supported by the Council.

Review Outcomes

12. The assessment of 185 policies has identified a number of policies that require update / amendment of varying scale and degree. The level of update /amendment required can be grouped into three broad categories, as a result of the following:
 - changes in evidence base: which requires refreshed evidence that may
 - lead to a potential need for a policy update; changes in national policy and local circumstances: particularly to align with updates to the NPPF, 2019. These may lead to a potential need for a policy update;
 - changes in local circumstances: particularly to align with priorities in relation to the Climate Emergency Declaration, Inclusive Growth Strategy, health and well-being and infrastructure. These may lead to a potential need for a policy update.
13. The table in Annex 1 is relatively self-explanatory but the paragraphs below aim to set out the general scale of policies that the review concludes need amending. As stated earlier in this report this is a technical exercise and no decision is being made as to when or how policies are to be updated following their consideration through this review.
14. There are 70 of the 185 policies that do not need to be updated (either by amendment or superseding). These will be reviewed again in five years. In line with the NPPF, if there are changes in national policy and local circumstances before the next review then an earlier review will be under taken.
15. There are 115 policies that need to be considered for update. It should be noted that the majority of these are non-strategic policies and any policy updates would be to provide minor or contextual updates to be consistent with the wording in the NPPF, but the general policy intent remains in general conformity with the NPPF and can continue to be applied in the determination of planning applications, albeit, as necessary with NPPF as context.
16. The summary responses set out in Annex 1 illustrate the policy by policy nuances in this regard. In addition there are a number of strategic policies, including some of the Spatial Policies of the Core Strategy where the evidence base has changed or needs refreshing (i.e. the employment land assessment; strategic flood risk assessment, retail needs study) or where changes in local circumstances related to the Council Priorities around the Climate Emergency, Leeds Inclusive Growth Strategy, Health and Well-being and infrastructure (e.g. HS2) need to be reflected.

ANNEX 1 - Summary table of Leeds Local Plan Review, July 2020

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
CS 2014	GENERAL POLICY		Achieving sustainable development	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF.	Consider as part of the Local Plan Update.
CS 2014	SPATIAL POLICY 1	LOCATION OF DEVELOPMENT	Achieving sustainable development	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF.	Consider as part of the Local Plan Update.
CS 2014	SPATIAL POLICY 2	HIERARCHY OF CENTRES AND SPATIAL APPROACH TO RETAILING, OFFICES, INTENSIVE LEISURE AND CULTURE	Ensuring the vitality of town centres	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF.	
CS 2014	SPATIAL POLICY 3	ROLE OF LEEDS CITY CENTRE	Ensuring the vitality of town centres	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF.	
CS 2014	SPATIAL POLICY 4	REGENERATION PRIORITY PROGRAMME AREAS	Achieving sustainable development	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed (including current Indices of Multiple Deprivation and priority neighbourhoods), despite being considered up-to-date and in conformity with NPPF.	
CS 2014	SPATIAL POLICY 5	AIRE VALLEY LEEDS URBAN ECO-SETTLEMENT	Plan-making	Yes (potentially as part of consideration of SP4) Policy SP5 acts as strategic acknowledgement of the importance of the Aire Valley as a major area of development in Leeds but is implemented by the AVLAAP.	

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
CS 2014	SPATIAL POLICY 8	ECONOMIC DEVELOPMENT PRIORITIES	Building a strong, competitive economy	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF.	Consider as part of the Local Plan Update.
CS 2014	SPATIAL POLICY 9	PROVISION FOR OFFICES, INDUSTRY AND WAREHOUSE EMPLOYMENT LAND AND PREMISES	Building a strong, competitive economy	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF.	
CS 2014	SPATIAL POLICY 10	GREEN BELT	Protecting Green Belt land	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
CS 2014	SPATIAL POLICY 11	TRANSPORT INFRASTRUCTURE INVESTMENT PRIORITIES	Promoting sustainable transport	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF.	Consider as part of the Local Plan Update.
CS 2014	SPATIAL POLICY 12	MANAGING THE GROWTH OF LEEDS BRADFORD INTERNATIONAL AIRPORT	Promoting sustainable transport	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF.	
CS 2014	SPATIAL POLICY 13	STRATEGIC GREEN INFRASTRUCTURE	Conserving and enhancing the natural environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF.	
CS 2014	POLICY CC1	CITY CENTRE DEVELOPMENT	Ensuring the vitality of town centres	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF.	Consider as part of the Local Plan Update.
CS 2014	POLICY CC2	CITY CENTRE SOUTH	Ensuring the vitality of town centres	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF.	

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
CS 2014	POLICY CC3	IMPROVING CONNECTIVITY BETWEEN THE CITY CENTRE AND NEIGHBOURING COMMUNITIES	Ensuring the vitality of town centres	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF	
CS 2014	POLICY H1	MANAGED RELEASE OF SITES	Delivering a sufficient supply of homes	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
CS 2014	POLICY H2	NEW HOUSING DEVELOPMENT ON NON ALLOCATED SITES	Delivering a sufficient supply of homes	No. Considered up-to-date and in conformity with NPPF.	
CS 2014	POLICY H3	DENSITY OF RESIDENTIAL DEVELOPMENT	Making effective use of land	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
CS 2014	POLICY H4	HOUSING MIX	Delivering a sufficient supply of homes	No. Considered up-to-date and in conformity with NPPF.	
CS 2014	POLICY H6	HOUSES IN MULTIPLE OCCUPATION (HMOS), STUDENT ACCOMMODATION AND FLAT CONVERSIONS	Delivering a sufficient supply of homes	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF.	Consider as part of the Local Plan Update
CS 2014	POLICY H7	ACCOMMODATION FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOW PEOPLE	Gypsies and travellers	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
CS 2014	POLICY H8	HOUSING FOR INDEPENDENT LIVING	Delivering a sufficient supply of homes	No. Considered up-to-date and in conformity with NPPF.	
CS 2014	POLICY EC1	GENERAL EMPLOYMENT LAND	Building a strong, competitive economy	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF.	Consider as part of the Local Plan Update.

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
CS 2014	POLICY EC2	OFFICE DEVELOPMENT	Building a strong, competitive economy	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF See SP9	
CS 2014	POLICY EC3	SAFEGUARDING EXISTING EMPLOYMENT LAND AND INDUSTRIAL AREAS	Building a strong, competitive economy	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF	
CS 2014	POLICY P1	TOWN AND LOCAL CENTRE DESIGNATIONS	Ensuring the vitality of town centres	No. There is a minor reference update required (minor modification)	Minor Mod/ Review again in 5 years
CS 2014	POLICY P2	ACCEPTABLE USES IN AND ON THE EDGE OF TOWN CENTRES	Ensuring the vitality of town centres	Yes. Consider superseding, as it is simply a list of town centre uses, despite being considered up-to-date and in conformity with NPPF	Consider as part of the Local Plan Update.
CS 2014	POLICY P3	ACCEPTABLE USES IN AND ON THE EDGE OF LOCAL CENTRES	Ensuring the vitality of town centres	Yes. As Policy P2, consider superseding first part of policy. Need to consider updating second part of policy to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF	Consider as part of the Local Plan Update.
CS 2014	POLICY P4	SHOPPING PARADES AND SMALL SCALE STAND ALONE FOOD STORES SERVING LOCAL NEIGHBOURHOODS AND COMMUNITIES	Ensuring the vitality of town centres	Yes. Consider superseding, despite being considered up-to-date and in conformity with NPPF, as it doesn't go beyond what other policies say.	
CS 2014	POLICY P5	APPROACH TO ACCOMMODATING NEW FOOD STORES ACROSS LEEDS	Ensuring the vitality of town centres	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF	
CS 2014	POLICY P6	APPROACH TO ACCOMMODATING NEW COMPARISON SHOPPING	Ensuring the vitality of town centres	Yes. Consider superseding, despite being considered up-to-date and in conformity with NPPF, as it doesn't go beyond what other policies say.	

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
		IN TOWN AND LOCAL CENTRES			
CS 2014	POLICY P7	THE CREATION OF NEW CENTRES	Ensuring the vitality of town centres	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
CS 2014	POLICY P8	SEQUENTIAL AND IMPACT ASSESSMENTS FOR MAIN TOWN CENTRE USES*	Ensuring the vitality of town centres	No. There is a minor reference update required (part D) (minor modification)	Minor Mod/ Review again in 5 years
CS 2014	POLICY P9	COMMUNITY FACILITIES AND OTHER SERVICES	Promoting healthy and safe communities	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF.	Consider as part of the Local Plan Update.
CS 2014	POLICY P10	DESIGN	Achieving well-designed places	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF.	
CS 2014	POLICY P11	CONSERVATION	Conserving and enhancing the historic environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF. Minor modification for wording update. Opportunity to rationalise relevant UDP policies.	Consider as part of the Local Plan Update.
CS 2014	POLICY P12	LANDSCAPE	Achieving well-designed places	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
CS 2014	POLICY T1	TRANSPORT MANAGEMENT	Promoting sustainable transport	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF.	Consider as part of the Local Plan Update.
CS 2014	POLICY T2	ACCESSIBILITY REQUIREMENTS AND NEW DEVELOPMENT	Achieving well-designed places	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF.	

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
CS 2014	POLICY G1	ENHANCING AND EXTENDING GREEN INFRASTRUCTURE	Conserving and enhancing the natural environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF.	
CS 2014	POLICY G2	CREATION OF NEW TREE COVER	Conserving and enhancing the natural environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence is refreshed, despite being considered up-to-date and in conformity with NPPF.	
CS 2014	POLICY G3	STANDARDS FOR OPEN SPACE, SPORT AND RECREATION	Promoting healthy and safe communities	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
CS 2014	POLICY G7	CEMETERIES AND BURIAL SPACE	Conserving and enhancing the natural environment	No. Considered up-to-date and in conformity with NPPF.	
CS 2014	POLICY G8	PROTECTION OF IMPORTANT SPECIES AND HABITATS	Conserving and enhancing the natural environment	No. Minor modification required in terminology	Minor Mod/ Review again in 5 years
CS 2014	POLICY G9	BIODIVERSITY IMPROVEMENTS	Conserving and enhancing the natural environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF.	Consider as part of the Local Plan Update.
CS 2014	POLICY EN1	CLIMATE CHANGE – CARBON DIOXIDE REDUCTION	Meeting the challenge of climate change & flooding	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF.	
CS 2014	POLICY EN3	LOW CARBON ENERGY	Meeting the challenge of climate change & flooding	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF.	Consider as part of the Local Plan Update.

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
CS 2014	POLICY EN5	MANAGING FLOOD RISK	Meeting the challenge of climate change & flooding	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible despite being considered up-to-date and in conformity with NPPF. A new SFRA needs to be undertaken.	Consider as part of the Local Plan Update.
CS 2014	POLICY EN6	STRATEGIC WASTE MANAGEMENT	NPPW	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
CS 2014	POLICY EN7	MINERALS	Facilitating the sustainable use of minerals	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF.	Consider as part of the Local Plan Update.
CS 2014	POLICY ID1	IMPLEMENTATION AND DELIVERY MECHANISMS	Plan-making	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF	Consider as part of the Local Plan Update.
CS 2014	POLICY ID2	PLANNING OBLIGATIONS AND DEVELOPER CONTRIBUTIONS	decision-making	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
NRWDPD Jan 2013 Rev 2015	GENERAL POLICY 1		Achieving sustainable development	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
NRWDPD Jan 2013 Rev 2015	MINERALS 1	PROVISION OF AGGREGATES	Facilitating the sustainable use of minerals	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF	Consider as part of the Local Plan Update.
NRWDPD Jan 2013 Rev 2015	MINERALS 2	MINERAL SAFEGUARDING AREAS - SAND AND GRAVEL	Facilitating the sustainable use of minerals	See Minerals 1. Any change in targets may require reassessment of safeguarded sites.	Consider as part of the Local Plan Update.
NRWDPD Jan 2013 Rev 2015	MINERALS 3	MINERAL SAFEGUARDING AREAS - SURFACE COAL	Facilitating the sustainable use of minerals	See Minerals 1. Any change in targets may require reassessment of safeguarded sites.	
NRWDPD Jan 2013 Rev 2015	MINERALS 4	SAFEGUARDED EXISTING MINERAL EXTRACTION SITES	Facilitating the sustainable use of minerals	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF	

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
NRWDPD Jan 2013 Rev 2015	MINERALS 5	MINERAL EXTRACTION - SAND AND GRAVEL - AREA OF SEARCH	Facilitating the sustainable use of minerals	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF	
NRWDPD Jan 2013 Rev 2015	MINERALS 6	LIMITING SAND AND GRAVEL EXTRACTION IN THE WHARFE VALLEY	Facilitating the sustainable use of minerals	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF	
NRWDPD Jan 2013 Rev 2015	MINERALS 7	PREFERRED AREAS - STONE AND CLAY EXTRACTION	Facilitating the sustainable use of minerals	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF	
NRWDPD Jan 2013 Rev 2015	MINERALS 8	PROVISION OF STONE FOR REPAIRS AND REFURBISHMENT OF EXISTING BUILDINGS	Facilitating the sustainable use of minerals	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
NRWDPD Jan 2013 Rev 2015	MINERALS 9	APPLICATIONS FOR MINERAL DEVELOPMENT	Facilitating the sustainable use of minerals	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF	Consider as part of the Local Plan Review
NRWDPD Jan 2013 Rev 2015	MINERALS 10	RESTORATION OF MINERAL SITES	Facilitating the sustainable use of minerals	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
NRWDPD Jan 2013 Rev 2015	MINERALS 11	AFTERCARE OF RESTORED PROPOSALS	Facilitating the sustainable use of minerals	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
NRWDPD Jan 2013 Rev 2015	MINERALS 12	SAFEGUARDED MINERAL PROCESSING SITES	Facilitating the sustainable use of minerals	No. Considered up-to-date and in conformity with NPPF.	
NRWDPD Jan 2013 Rev 2015	MINERALS 13	TRANSPORT MODES	Facilitating the sustainable use of minerals	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
NRWDPD Jan 2013 Rev 2015	MINERALS 14	CRITERIA FOR ASSESSING ALTERNATIVE DEVELOPMENT ON	Facilitating the sustainable use of minerals	No. Considered up-to-date and in conformity with NPPF.	

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
		PROTECTED WHARVES AND RAIL SIDINGS			
NRWDPD Jan 2013 Rev 2015	WASTE 1	SELF SUFFICIENCY FOR FUTURE WASTE MANAGEMENT IN LEEDS	NPPW	No. Considered up-to-date and in conformity with NPPF.	
NRWDPD Jan 2013 Rev 2015	WASTE 2	SAFEGUARDING EXISTING WASTE MANAGEMENT CAPACITY	NPPW	No. Considered up-to-date and in conformity with NPPF.	
NRWDPD Jan 2013 Rev 2015	WASTE 3	A CITY WIDE NETWORK OF WASTE MANAGEMENT SITES AND FACILITIES	NPPW	No. Considered up-to-date and in conformity with NPPF.	
NRWDPD Jan 2013 Rev 2015	WASTE 4	WASTE MANAGEMENT FACILITIES - PERMANENT USES	NPPW	No. Considered up-to-date and in conformity with NPPF.	
NRWDPD Jan 2013 Rev 2015	WASTE 5	WASTE USES WITHIN EXISTING INDUSTRIAL AREAS	NPPW	No. Considered up-to-date and in conformity with NPPF.	
NRWDPD Jan 2013 Rev 2015	WASTE 6	STRATEGIC WASTE MANAGEMENT SITES	NPPW	No. Considered up-to-date and in conformity with NPPF.	
NRWDPD Jan 2013 Rev 2015	WASTE 7	WASTE ALLOCATION	NPPW	No. Considered up-to-date and in conformity with NPPF.	
NRWDPD Jan 2013 Rev 2015	WASTE 8	WASTE PROPOSALS AT OTHER LOCATIONS	NPPW	No. Considered up-to-date and in conformity with NPPF.	
NRWDPD Jan 2013 Rev 2015	WASTE 9	WASTE MANAGEMENT FACILITIES - POTENTIAL ISSUES AND IMPACTS	NPPW	No. Considered up-to-date and in conformity with NPPF.	
NRWDPD Jan 2013 Rev 2015	WASTE 10	LANDFILL	NPPW	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
NRWDPD Jan 2013 Rev 2015	WASTE 11	WASTE DISPOSAL: LANDFILL AND LANDRAISING SITES	NPPW	No. Considered up-to-date and in conformity with NPPF.	

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
NRWDPD Jan 2013 Rev 2015	ENERGY 1	LARGE SCALE WIND ENERGY GENERATION	Meeting the challenge of climate change & flooding	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
NRWDPD Jan 2013 Rev 2015	ENERGY 2	MICRO-GENERATION DEVELOPMENT	Meeting the challenge of climate change & flooding	No. Considered up-to-date and in conformity with NPPF.	
NRWDPD Jan 2013 Rev 2015	ENERGY 3	HEAT AND POWER ENERGY RECOVERY	Meeting the challenge of climate change & flooding	No. Considered up-to-date and in conformity with NPPF.	
NRWDPD Jan 2013 Rev 2015	ENERGY 4	HEAT DISTRIBUTION INFRASTRUCTURE	Meeting the challenge of climate change & flooding	No. Considered up-to-date and in conformity with NPPF.	
NRWDPD Jan 2013 Rev 2015	AIR 1	THE MANAGEMENT OF AIR QUALITY THROUGH DEVELOPMENT	Promoting healthy and safe communities	No. Considered up-to-date and in conformity with NPPF.	
NRWDPD Jan 2013 Rev 2015	WATER 1	WATER EFFICIENCY	Meeting the challenge of climate change & flooding	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF	Consider as part of the Local Plan Update.
NRWDPD Jan 2013 Rev 2015	WATER 2	PROTECTION OF WATER QUALITY	Conserving and enhancing the natural environment	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
NRWDPD Jan 2013 Rev 2015	WATER 3	FUNCTIONAL FLOOD PLAIN	Meeting the challenge of climate change, flooding	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF	Consider as part of the Local Plan Update.
NRWDPD Jan 2013 Rev 2015	WATER 4	DEVELOPMENT IN FLOOD RISK AREAS	Meeting the challenge of climate change, flooding	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
NRWDPD Jan 2013 Rev 2015	WATER 5	ZONES OF RAPID INUNDATION	Meeting the challenge of climate change, flooding	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
NRWDPD Jan 2013 Rev 2015	WATER 6	FLOOD RISK ASSESSMENTS	Meeting the challenge of climate change, flooding	No. Considered up-to-date and in conformity with NPPF.	
NRWDPD Jan 2013 Rev 2015	WATER 7	SURFACE WATER RUN-OFF	Meeting the challenge of climate change, flooding	No. Considered up-to-date and in conformity with NPPF.	
NRWDPD Jan 2013 Rev 2015	LAND 1	CONTAMINATED LAND	Making effective use of land	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF	Consider as part of the Local Plan Update.
NRWDPD Jan 2013 Rev 2015	LAND 2	DEVELOPMENT AND TREES	Conserving and enhancing the natural environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshed, despite being considered up-to-date and in conformity with NPPF	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	GP1	LAND USE AND THE PROPOSALS MAP	decision-making	No. Minor modification required in terminology	Minor Mod/ Review again in 5 years
UDP 2006 (SAVED)	GP5	REQUIREMENT OF DEVELOPMENT PROPOSALS	decision-making	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF	Consider as part of the Local Plan Update.

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
UDP 2006 (SAVED)	GP6	UNIMPLEMENTED LOCAL PLAN PROPOSALS	Plan-making	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF A range of site commitments and other improvements carried forward into the UDP from previous local plans. Those that have completed and or have become inappropriate are redundant. Others remain extant and relevant. Separate assessments have been made of all the individual commitments .Sites and designations that are relevant have already been carried forward into the Site Allocations Plan 2019. Other sites and designations that are no longer appropriate can be superseded.	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	N8	URBAN GREEN CORRIDORS	Conserving and enhancing the natural environment	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
UDP 2006 (SAVED)	N9	URBAN GREEN CORRIDORS AND DEVELOPMENT	Promoting healthy and safe communities	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Considered ineffective as policy intent covered by CS G1. Potential to supersede.	Consider as part of the Local Plan Update
UDP 2006 (SAVED)	N11	OPEN LAND IN BUILT UP AREAS	Conserving and enhancing the natural environment	Yes. Need to consider evidence base refresh.	
UDP 2006 (SAVED)	N14	LISTED BUILDING AND PRESERVATION	Conserving and enhancing the natural environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. See also CS P11	

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
UDP 2006 (SAVED)	N15	LISTED BUILDINGS AND CHANGE OF USE	Conserving and enhancing the natural environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. See also CS P11	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	N16	LISTED BUILDINGS AND EXTENSIONS	Conserving and enhancing the natural environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. See also CS P11	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	N17	LISTED BUILDINGS CHARACTER AND APPEARANCE	Conserving and enhancing the natural environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. See also CS P11	
UDP 2006 (SAVED)	N18A	CONSERVATION AREAS AND DEMOLITION	Conserving and enhancing the natural environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. See also CS P11	
UDP 2006 (SAVED)	N18B	CONSERVATION AREAS AND DEMOLITION	Conserving and enhancing the natural environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. See also CS P11	
UDP 2006 (SAVED)	N19	CONSERVATION AREAS NEW BUILDINGS	Conserving and enhancing the natural environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. See also CS P11	

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
UDP 2006 (SAVED)	N20	CONSERVATION AREAS AND RETENTION OF FEATURES	Conserving and enhancing the natural environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. See also CS P11	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	N23	DEVELOPMENT AND INCIDENTAL OPEN SPACE	Achieving well-designed places	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. See also CS P10.	
UDP 2006 (SAVED)	N24	DEVELOPMENT PROPOSALS NEXT TO GREEN BELT / CORRIDORS	Achieving well-designed places	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
UDP 2006 (SAVED)	N25	DEVELOPMENT AND SITE BOUNDARIES	Achieving well-designed places	No. Considered up-to-date and in conformity with NPPF.	
UDP 2006 (SAVED)	N27	VACANT SITES AND LANDSCAPING SCHEMES	Achieving well-designed places	No. Considered up-to-date and in conformity with NPPF.	
UDP 2006 (SAVED)	N28	HISTORIC PARKS AND GARDENS	conserving and enhancing the natural environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	N29	SITES OF ARCHAEOLOGICAL IMPORTANCE	conserving and enhancing the natural environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.	
UDP 2006 (SAVED)	N32	GREEN BELT AND THE PROPOSALS MAP	Protecting Green Belt land	Plan period has passed but policy considered to be upto date, in conformity with NPPF and relevant to decision making. Consider Minor Modification to terminology.	

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
UDP 2006 (SAVED)	N33	DEVELOPMENT IN THE GREEN BELT	Protecting Green Belt land	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	N35	DEVELOPMENT AND AGRICULTURAL LAND	conserving and enhancing the natural environment	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
UDP 2006 (SAVED)	N36	CHANGE OF USE OF RURAL BUILDINGS	conserving and enhancing the natural environment	No. Considered up-to-date and in conformity with NPPF.	
UDP 2006 (SAVED)	N37	SPECIAL LANDSCAPE AREAS	conserving and enhancing the natural environment	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
UDP 2006 (SAVED)	N37A	DEVELOPMENT IN THE COUNTRYSIDE	conserving and enhancing the natural environment	No. Considered up-to-date and in conformity with NPPF.	
UDP 2006 (SAVED)	N39B	WATERCOURSES AND NEW DEVELOPMENT	Meeting the challenge of climate change, flooding	No. Considered up-to-date and in conformity with NPPF.	
UDP 2006 (SAVED)	N43	INFORMAL OUTDOOR RECREATION	Promoting healthy and safe communities	Yes. Consider superseding as other CS G and UDP N33 policies cover policy intent.	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	T10A	SAFEGUARD FORMER RAIL LINES	Promoting sustainable transport	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
UDP 2006 (SAVED)	T16	PARK AND RIDE FACILITIES	Promoting sustainable transport	No. Considered up-to-date and in conformity with NPPF.	
UDP 2006 (SAVED)	T17	PARK AND RIDE SITES	Promoting sustainable transport	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshing, despite being considered up-to-date and in conformity with NPPF.	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	T20	MAJOR HIGHWAY SCHEMES	Promoting sustainable transport	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence base refreshing, despite being considered up-to-date and in conformity with NPPF. Those schemes that have completed are redundant.	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	T29	LORRY PARKING AND COACH LAYOVER	Promoting sustainable transport	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
UDP 2006 (SAVED)	H14	AFFORDABLE HOUSING IN RURAL AREAS	Delivering a sufficient supply of homes	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
UDP 2006 (SAVED)	E3A	RENEWAL OF PLANNING PERMISSIONS	Building a strong, competitive economy	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence refreshed, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	E3B	UNIMPLEMENTED EMPLOYMENT ALLOCATIONS	Building a strong, competitive economy		
UDP 2006 (SAVED)	E3C	COMMITTED EMPLOYMENT SITES	Building a strong, competitive economy		

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
UDP 2006 (SAVED)	E4	EMPLOYMENT ALLOCATIONS	Building a strong, competitive economy		Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	LT3	ATTRACTIONS AND FACILITIES IN THE CITY CENTRE	Building a strong, competitive economy	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. The policy is promotional in nature and adds little to the general statement referring to promoting the tourism industry set out in CS policy SP8. Consider superseding.	
UDP 2006 (SAVED)	LT4	CULTURAL AND SPORTING FACILITIES LOCATIONS	Building a strong, competitive economy	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF.	
UDP 2006 (SAVED)	LT5	PURPOSE BUILT EXHIBITIONS. CONCERTS AND CONFERENCE FACILITIES	Building a strong, competitive economy	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF.	
UDP 2006 (SAVED)	LT5A	ELLAND ROAD FOOTBALL STADIUMS	Building a strong, competitive economy	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Parts of the area have been delivered which makes the policy redundant, however some areas of development potential remain.	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	LT5B	LEISURE AND TOURISM FACILITIES SITES	Building a strong, competitive economy	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Schemes that have completed and or have become inappropriate are redundant.	
UDP 2006 (SAVED)	LT6	WATERWAYS CORRIDORS AND TOURISM	Building a strong, competitive economy	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Promotional policy, consider potential to supersede.	

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
UDP 2006 (SAVED)	LT6A	WATERWAYS AND LEISURE DEVELOPMENTS	Building a strong, competitive economy	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF.	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	LT6B	WATERWAYS AND PUBLIC RIGHTS OF WAY	Building a strong, competitive economy	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
UDP 2006 (SAVED)	R2	PROPOSED AREA BASED INITIATIVES	Achieving sustainable development	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Some of the area priorities are covered by CS Policy SP4.	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	R3	COMPULSORY PURCHASE ORDERS	Achieving sustainable development	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
UDP 2006 (SAVED)	CC2	CITY CENTRE BOUNDARY AND POLICY AREA	Ensuring the vitality of town centres	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence refreshed, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. See CS CC1 and CC2.	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	CC24	BAD NEIGHBOUR AND LARGE SCALE INDUSTRIAL USES	Building a strong, competitive economy	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider superseding as policies such as GP5 can appropriately address amenity issues if a proposal were to come forward.	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	T30:14.2.7	AIRPORT OPERATIONAL LAND BOUNDARY	Promoting sustainable transport	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
UDP 2006 (SAVED)	T30A	LEEDS / BRADFORD AIRPORT AND RELATED USES	Promoting sustainable transport	No. Considered up-to-date and in conformity with NPPF.	

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
UDP 2006 (SAVED)	T30B	AIRPORT PUBLIC SAFETY ZONES	Promoting sustainable transport	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
UDP 2006 (SAVED)	T30C	AERODROME SAFEGUARDING AREA	Promoting sustainable transport	No. Considered up-to-date and in conformity with NPPF.	
UDP 2006 (SAVED)	RL1	RURAL LAND NORTH OF THE RIVER WHARFE	Conserving and enhancing the natural environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	BD2	DESIGN AND SITING OF NEW BUILDINGS	Achieving well-designed places	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
UDP 2006 (SAVED)	BD3	DISABLED ACCESS NEW BUILDINGS	Achieving well-designed places		
UDP 2006 (SAVED)	BD4	PLANT EQUIPMENT AND SERVICE AREAS	Achieving well-designed places		
UDP 2006 (SAVED)	BD5	AMENITY AND NEW BUILDINGS	Achieving well-designed places		
UDP 2006 (SAVED)	BD6	ALTERATIONS AND EXTENSIONS	Achieving well-designed places		
UDP 2006 (SAVED)	BD7	SHOP FRONTS AND SECURITY MEASURES	Achieving well-designed places	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
UDP 2006 (SAVED)	BD8	DESIGN AND LOCATION OF SIGNS	Achieving well-designed places		
UDP 2006 (SAVED)	BD9	PROJECTING AND ILLUMINATED SIGNS	Achieving well-designed places		

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
UDP 2006 (SAVED)	BD10	BANNERS AND TEMPORARY ADVERTISING	Achieving well-designed places	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
UDP 2006 (SAVED)	BD11	BLINDS FORMS AND DESIGN	Achieving well-designed places		
UDP 2006 (SAVED)	BD12	ADVERTISEMENT HOARDINGS	Achieving well-designed places		
UDP 2006 (SAVED)	BD14	FLOODLIGHTING	Achieving well-designed places		
UDP 2006 (SAVED)	BD15	PUBLIC ART	Achieving well-designed places		
UDP 2006 (SAVED)	BC7	DEVELOPMENT IN CONSERVATION AREAS	conserving and enhancing the historic environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. See also CS P11.	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	BC8	DEMOLITION OF BUILDINGS IN CONSERVATION AREAS	conserving and enhancing the historic environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology. See also CS P11.	
UDP 2006 (SAVED)	LD1	LANDSCAPING SCHEMES	Achieving well-designed places	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF.	
UDP 2006 (SAVED)	LD2	NEW AND ALTERED ROADS	Achieving well-designed places	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF.	Consider as part of the Local Plan Update.

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
UDP 2006 (SAVED)	ARC1	SCHEDULED ANCIENT MONUMENTS	conserving and enhancing the historic environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	ARC4	PRESERVATION OF CLASS I and II AREAS	conserving and enhancing the historic environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence refreshing, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.	
UDP 2006 (SAVED)	ARC5	PLANNING DECISIONS AND CLASS I, II and III AREAS	conserving and enhancing the historic environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence refreshing, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.	
UDP 2006 (SAVED)	ARC6	PRESERVATION BY RECORD	conserving and enhancing the historic environment	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible and evidence refreshing, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.	
UDP 2006 (SAVED)	ARC7	HISTORIC LANDSCAPES	conserving and enhancing the historic environment	Yes. Consider superseding as policy aim not covered by NPPF.	
UDP 2006 (SAVED)	ARC8	MANAGEMENT AGREEMENTS	conserving and enhancing the historic environment	Yes. Consider superseding as policy aim not covered by NPPF.	
UDP 2006 (SAVED)	GB2	INFILLING THE GREENBELT	Protecting Green Belt land	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.	
UDP 2006 (SAVED)	GB3	CHANGE OF USE FOR A BUILDING OF HISTORIC OR ARCHITECTURAL INTEREST	Protecting Green Belt land	Yes. Consider superseding as UDP GB4 and GB9 cover intent of policy.	Consider as part of the Local Plan Update.

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
UDP 2006 (SAVED)	GB4	CHANGE OF USE OF BUILDINGS	Protecting Green Belt land	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF.	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	GB7	MAJOR DEVELOPED SITES IN THE GREEN BELT	Protecting Green Belt land	Yes. Consider superseding as policy aim not covered by NPPF.	
UDP 2006 (SAVED)	GB9	REDEVELOPMENT OF BUILDINGS	Protecting Green Belt land	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.	
UDP 2006 (SAVED)	GB12	RETAIL DEVELOPMENT IN THE GREEN BELT	Protecting Green Belt land	Yes. Consider superseding as policy intent covered by other parts of NPPF and CS retail policies.	
UDP 2006 (SAVED)	GB13	STABLES AND EQUESTRIAN DEVELOPMENT	Protecting Green Belt land	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.	
UDP 2006 (SAVED)	GB17	CRITERIA FOR AFFORDABLE HOUSING IN THE GREEN BELT	Protecting Green Belt land	Yes. Consider superseding as policy intent covered by UDP policy H14.	
UDP 2006 (SAVED)	GB19	OUTDOOR SPORT AND RECREATION	Protecting Green Belt land	Yes. Consider superseding as policy intent covered by other CS G policies.	
UDP 2006 (SAVED)	GB20	BUILDINGS FOR SPORT AND RECREATION	Protecting Green Belt land	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF. Consider minor modifications to terminology.	

LEEDS LOCAL PLAN DOCUMENT	POLICY REF.	POLICY TITLE	NPPF TOPIC	Consider updating	Recommendation
UDP 2006 (SAVED)	GB21	HOLIDAY ACCOMMODATION	Protecting Green Belt land	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years
UDP 2006 (SAVED)	GB22	HOLIDAY ACCOMMODATION AND MINOR WORKS	Protecting Green Belt land	No. Considered up-to-date and in conformity with NPPF.	
UDP 2006 (SAVED)	GB23	STORAGE OF CARAVANS IN THE GREEN BELT	Protecting Green Belt land	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF.	Consider as part of the Local Plan Update.
UDP 2006 (SAVED)	GB24	ALLOTMENT GARDENS IN THE GREEN BELT	Protecting Green Belt land	Yes. Need to consider updating to ensure local priorities are as fully reflected as possible, despite being considered up-to-date and in conformity with NPPF.	
UDP 2006 (SAVED)	GB25	GARDEN EXTENSIONS INTO THE GREEN BELT	Protecting Green Belt land	No. Considered up-to-date and in conformity with NPPF.	Review again in 5 years

**Local Plan
Planning and Compulsory Purchase Act 2004
Town and Country Planning (Local Planning) (England) Regulations 2012 - Regulation 18
LEEDS LOCAL PLAN UPDATE: SCOPING DOCUMENT FOR PUBLIC CONSULTATION**

The City Council has published, for comment, an early scoping¹ document for the Leeds Local Plan Update (LPU). The Leeds Local Plan sets out the authority's approach to planning policy and new development across the district over the next decade and beyond. **This will be an 8 week public consultation period starting on Monday 19 July and finishing on Monday 13th September 2021.**

The draft Local Plan Update is titled 'Your Neighbourhood, Your City, Your Planet'. It is not intended to deal with all planning issues, and will focus on ways we can shape planning policy to reduce our city's impact on the environment and help achieve net zero carbon emissions by 2030.

The draft plan is based around five topic areas:

- **Carbon reduction** - changing the way buildings are built, and how we generate renewable energy.
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- **Place-making** – guiding new development to places that offer the best opportunities for active travel and public transport, health & well-being and making the best use of communities' assets to create '20-minute neighbourhoods' where people want to live, work and play.
- **Sustainable infrastructure** – integrating low emissions transport and improved digital connectivity, helping reduce journeys by car.

The dedicated and accessible website www.leeds.gov.uk/lpu will be home to all the information contained within the draft Local Plan. This includes separate sections for the different topic areas, which are available in long read and "5 min read" formats. A PDF version of the document will also be available on the website.

The consultation will be carried out in accordance with the [Interim Statement of Community Involvement](#). The Council's consultation activity will be online with all consultation material being made available at www.leeds.gov.uk/lpu

This means people can read the whole draft plan or just the areas that are of interest, and can contribute their views using our online surveys whether they have read the documents in detail or having read a shorter, more summarised version. You will also be able to access consultation material at Libraries and Community Hubs as well as the Council's Main Office at Merrion House.

Over the coming weeks, members of the Council's Planning team will also be hosting a series of webinars so people can find out more about the draft Local Plan and its individual topics. The details are available online at www.leeds.gov.uk/lpu

This is an important piece of work, and it is crucial that we hear from everybody that wants to comment on our plan, making sure we gather the views of as many people, businesses and stakeholders as possible so the comments gathered represent varied views from all people across the city.

¹ this falls under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

People can also have their say on the Local Plan update by using the online response form through the website www.leeds.gov.uk/lpu, alternatively emailing lpu@leeds.gov.uk, or by writing to:

Leeds Local Plan Update Consultation, Policy & Plan Group, Merrion House, 9th Floor East, 110 Merrion Way, Leeds, LS2 8BB.

This initial scoping consultation on the draft Local Plan update will run until Monday 13 September, and is the first stage in the process. We will continue to seek people's views as we progress, so that we can develop an updated Local Plan which represents the ambitions of our city as a whole.

The next stage known as "Publication" will set out proposed draft policies which will be subject to public consultation in Spring 2022. Taking account of all comments received the Plan will then be subject to examination in public by an independent Inspector before it can be adopted by the Council.

Unless you specify otherwise, if you make a representation, we will notify you of future stages (including further public consultation).

Please let us know if you have any requirements in terms of alternative formats or languages and we will make arrangements to make sure your views are registered².

If you are unable to access the consultation material online please contact us on 0113 37 87993 or write to us a: lpu@leeds.gov.uk

² Please note that the consultation material is available as html format on our dedicated web-site to enable wider accessibility

City Development
Policy and Plans Group
Merrion House, 9th Floor East,
110 Merrion Centre,
Leeds,
LS2 8BB

Contact: Local Plans Team
Tel: 0113 37 87993
Email: lpu@leeds.gov.uk

Date: 19th July 2021

Dear Sir/Madam,

Leeds Local Plan Update: Scoping Document Consultation (Regulation 18) - Your Neighbourhood, Your City, Your Planet'

You are receiving this letter because you have expressed an interest to be kept informed about the Leeds Local Plan, which sets out the authority's approach to planning policy and new development across the district over the next decade and beyond.

The City Council has published, for comment, an early scoping¹ document for the Leeds Local Plan Update (LPU). This will be an 8 week public consultation period starting on **Monday 19 July and finishing on Monday 13th September 2021**.

The draft Local Plan Update is titled 'Your Neighbourhood, Your City, Your Planet'. It is not intended to deal with all planning issues, and will focus on ways we can shape planning policy to reduce our city's impact on the environment and help achieve net zero carbon emissions by 2030.

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- **Sustainable infrastructure** – integrating low emissions transport and improved digital connectivity, helping reduce journeys by car.

How to view the Scoping Document

The dedicated and accessible website www.leeds.gov.uk/lpu will be home to all the information contained within the draft Local Plan. This includes separate sections for the different topic areas,

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Have Your Say

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Next Steps

This initial scoping consultation on the draft Local Plan update will run until Monday 13 September 2021, and is the first stage in the process. We will continue to seek people’s views as we progress, so that we can develop an updated Local Plan which represents the ambitions of our city as a whole.

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Yours faithfully



Martin Elliot
Head of Strategic Planning

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**All Libraries and
Community Hubs**

City Development
Policy and Plans Group
Merrion House, 9th Floor East,
110 Merrion Centre,
Leeds,
LS2 8BB

Contact: Local Plans Team
Tel: 0113 37 87993
Email: lpu@leeds.gov.uk

Date: 19th July 2021

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Yours faithfully



Martin Elliot
Head of Strategic Planning

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Local Plan Update: Carbon Reduction

1. Introduction

This consultation is from the Policy and Plans Group at Leeds City Council.

We would like to hear your views on the scope of the Local Plan Update.

Consultation commenced on Monday 19th July 2021 for a period of eight weeks. The period to submit comments on the Local Plan Update will close on Monday 13th September 2021.

The City Council has published, for comment, an early scoping [1] document for the Leeds Local Plan Update (LPU). It is not intended to deal with all planning issues, and will focus on ways we can shape planning policy to reduce our city's impact on the environment and help achieve net zero carbon emissions by 2030.

[1] this falls under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

There are 5 topic areas each with full set of consultation questions:

Topic 1 Carbon Reduction

Topic 2 Flood Risk

Topic 3 Green Infrastructure

Topic 4 Placemaking

Topic 5 Sustainable Infrastructure

You should read the Carbon Reduction topic paper before filling in this form. Which can be viewed at our dedicated and accessible website: www.leeds.gov.uk/lpu (<http://www.leeds.gov.uk/lpu>)

Instructions

It should take you about 15-30 minutes to answer the questions (subject to the level detail you are submitting). Your response will only be registered if you complete all of the questions and click 'finish' on the last page.

Each comment box capacity is approx 2,000 words, 4 pages of A4.

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2. Privacy notice (data protection)

Privacy notice (data protection)

Leeds City Council will hold your representation to which it concerns for their consideration. The Council is the Data Controller of the information you provide and has a statutory duty under planning law to collect and process this information as part of its public task obligations as a Local Planning Authority. In addition, the council is required to provide all information submitted to us, including all personal information, to the Planning Inspectorate and their designated Programme Officer as part of the public examination of the Local Plan Update. The Planning Inspectorate may use your personal information to contact you during the public examination process. Our software supplier, SmartSurvey Ltd, will also process your data on our behalf but will never use these for its own purposes.

To comply with its statutory obligations, the Council must make your representation available for public inspection and regulations allow this information to be made available on the internet. This includes your name, address, and the contents of your comment. To protect personal data from unnecessary disclosure, the Council will, however, remove any personal information provided in your representation which we are not required, by law, to make available (for example, telephone numbers and signatures).

The personal information you provide will be held until the adoption of the Development Plan Document, after which it will be securely destroyed. Please note that we cannot provide anonymity or accept comments marked 'private' or 'confidential'. Comments that include offensive, racist, discriminatory, threatening and other non-relevant statements will be destroyed.

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We use cookies (<http://www.leeds.gov.uk/privacy-statement>) to improve your experience of using our website. If you continue without changing your cookie settings, we assume that you are happy with this usage.

1. Please confirm... *

I give my consent for my personal information to be used as described in the privacy notice.

3. Questions

Do you agree that to meet the objective of the Local Plan Update the scope should focus on the Climate Emergency, including topics

1. Carbon Reduction
2. Flood Risk
3. Green Infrastructure
4. Place-Making
5. Sustainable Infrastructure

Please explain your reasons in the comments box below.

Strongly agree

Agree

- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons in the comments box below.

4. Questions relating to Topic Paper 1: Carbon Reduction

Leeds Local Plan Update – Scoping Consultation
Topic 1: Carbon Reduction

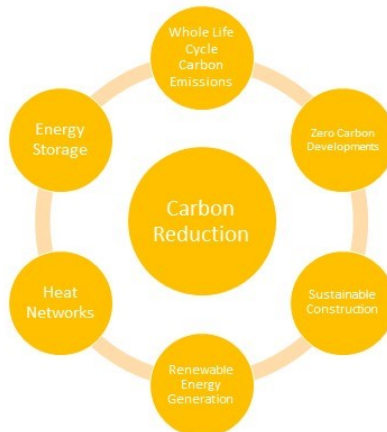
Plan on a page

Vision for Carbon Reduction: To minimise energy demand and meet all heat and power requirements without increasing carbon emissions to allow Leeds to meet its climate emergency commitment of zero carbon by 2030

What is this topic about?

As part of our aspiration to make Leeds zero carbon by 2030 we need to make changes to the way buildings are built in Leeds and to how we generate renewable energy.

The proposed policy areas



Where do we want to get to?

- We want new developments to measure carbon emissions across the whole life-cycle of a building.
- We want new buildings to be sustainable constructed and be zero carbon
- We want to ensure we've delivered enough renewable and low carbon energy to meet zero carbon aspirations.

Where are we now?

Our current Local Plan has many effective policies on carbon reduction and renewable energy generation and they have seen real improvements in the way development is built in Leeds. However, they don't go far enough to make us zero carbon by 2030, so we think we need to go further.

Have your say

We need your views on whether you think our aspirations for the Local plan Update are correct. If you agree with our vision, how do you think we can get there? If you disagree, what do you think we should be doing instead?

5. Whole life Cycle Carbon Emissions

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

Yes

No

Please explain your reasons in the comments box below.

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

6. Operational Energy Carbon Reduction

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

Yes

No

Please explain your reasons in the comments box below.

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

Yes

No

Please explain your reasons in the comments box below.

7. Sustainable Construction

6. Do you think that Leeds should set a standard for sustainable construction of new residential development?

Yes

No

7. If so, do you think we should use one of the established sustainable construction rating systems such as BREEAM Residential or create our own set of standards?

8. Resilience To Heat

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

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your reasons in the comments box below.

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

9. Renewable Energy Generation

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

Yes

No

Please explain your reasons in the comments box below.

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

10. Heat Networks

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

Yes

No

Please explain your reasons in the comments box below.

11. Energy Storage And Distribution

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

Yes

No

Please explain your reasons in the comments box below.

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

Yes

No

Please explain your reasons in the comments box below.

12. Document Upload

15. Here you can upload documents alongside comments you may have made above.

Choose File

Choose file No file chosen

13. About You

We would like to know a little more about you. This is so we can be sure we are hearing from a wide range of people from different backgrounds and better understand what you tell us.

Answering these questions will also help us consider how our policies affect people from different backgrounds; we have a legal duty to do this under the Equality Act 2010.

By answering, you are giving your consent for us to use this information as explained above.

16. Are you submitting comments as an individual or on behalf of a group, or an agent representing a client? *

Individual / group

Agent

14. Contact details - Individual / group

17. Your details: *

Title

First Name

*

Last Name

*

Organisation

*

18. Email address: *

19. Address:

House number or name

Street

Area

City or district

Postcode

15. Contact details - Agent

20. Your details: *

Title

First Name

*

Last Name

*

Organisation

*

21. Please provide: *

Name of Client:

22. Agent Email address: *

23. Address:

House number or name

Street

Area

City or district

Postcode

16. Final Step

Thank you - That is all the questions we have for you.

Please now click the Finish button below to save and send your responses to us.

Local Plan Update: Flood Risk

1. Introduction

This consultation is from the Policy and Plans Group at Leeds City Council.

We would like to hear your views on the Local Plan Update Publication Draft.

Consultation commenced on xxx xxth xxx 2022 for a period of eight weeks. The period to submit comments on the Local Plan Update will close on xxxxx xxth xxxr 2022.

The City Council has published, for comment, an early scoping [1] document for the Leeds Local Plan Update (LPU). It is not intended to deal with all planning issues, and will focus on ways we can shape planning policy to reduce our city's impact on the environment and help achieve net zero carbon emissions by 2030.

[1] this falls under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

There are 5 topic areas each with full set of consultation questions:

Topic 1 Carbon Reduction

Topic 2 Flood Risk

Topic 3 Green Infrastructure

Topic 4 Placemaking

Topic 5 Sustainable Infrastructure

You should read the Flood Risk topic paper before filling in this form. Which can be viewed at our dedicated and accessible website: www.leeds.gov.uk/lpu (<http://www.leeds.gov.uk/lpu>)

Instructions

It should take you about 15-30 minutes to answer the questions (subject to the level detail you are submitting). Your response will only be registered if you complete all of the questions and click 'finish' on the last page.

Each comment box capacity is approx 2,000 words, 4 pages of A4.

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To comply with its statutory obligations, the Council must make your representation available for public inspection and regulations allow this information to be made available on the internet. This includes your name, address, and the contents of your comment. To protect personal data from unnecessary disclosure, the Council will, however, remove any personal information provided in your representation which we are not required, by law, to make available (for example, telephone numbers and signatures).

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1. Please confirm... *

I give my consent for my personal information to be used as described in the privacy notice.

3. Questions

Do you agree that to meet the objective of the Local Plan Update the scope should focus on the Climate Emergency, including topics

1. Carbon Reduction
2. Flood Risk
3. Green Infrastructure
4. Place-Making
5. Sustainable Infrastructure

Please explain your reasons in the comments box below.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons in the comments box below.

4. Questions relating to Topic Paper 2: Flood Risk

Vision for Flood Risk: Leeds will ensure that new developments are located and designed to avoid, reduce and mitigate flood risk, increase biodiversity and reduce the carbon footprint of risk reduction schemes through natural flood solutions.

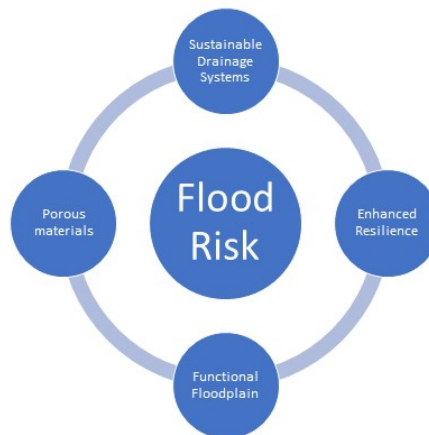
What is this topic about?

As part of our aspiration to make Leeds zero carbon by 2030 we want to ensure that our communities are resilient to the impact of climate change. Flood risk is one of the most direct impacts of climate change that Leeds faces. It's important that up to date evidence, best practice and guidance are used to avoid, reduce and mitigate that risk.

Where are we now?

Our current Local Plan has many effective policies for Flood Risk and through Flood Alleviation Schemes the Council is working with partners and investing in infrastructure help protect communities. But with the impacts of climate change worsening, it's important that we consider options for improving policies on flood risk.

The proposed policy areas



Where do we want to get to

•We want to ensure that all new developments are located and designed to avoid, reduce and mitigate flood risk

•We want to reduce the speed of surface water run-off through increased use of sustainable and natural drainage systems

•We want to ensure our policies reflect up to date evidence, guidance and best practice to help manage flood risk

Have your say

We need your views on whether you think our aspirations for the Local Plan Update are correct. Do you agree that the topic of Flood Risk should be considered. If so, what would you like to see new policies contain?

5. Avoiding development in flood risk areas

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

Yes

No

Please explain your reasons in the comments box below.

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

Yes

No

Please explain your reasons in the comments box below.

6. Functional floodplain

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

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons in the comments box below.

7. Surface water flooding and sustainable drainage

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

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree

Strongly disagree

Please explain your reasons in the comments box below.

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

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons in the comments box below.

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

Yes

No

Please explain your reasons in the comments box below.

8. Resilience

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

Yes

No

Please explain your reasons in the comments box below.

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

Yes

No

Please explain your reasons in the comments box below.

9. Permitted development rights and porous paving

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

Yes

No

Please explain your reasons in the comments box below.

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

Yes

No

Please explain your reasons in the comments box below.

10. Comments

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

11. Document Upload

13. Here you can upload documents alongside comments you may have made above.

Choose File

No file chosen

12. About You

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Individual / group

Agent

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First Name

*

Last Name

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Organisation

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16. Email address: *

17. Address:

House number or name

Street

Area

City or district

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18. Your details: *

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First Name

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Last Name

*

Organisation

*

19. Please provide: *

Name of Client:

20. Agent Email address: *

21. Address:

House number or name

Street

Area

City or district

Postcode

15. Final Step

Thank you - That is all the questions we have for you.

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Local Plan Update: Green Infrastructure

1. Introduction

This consultation is from the Policy and Plans Group at Leeds City Council.

We would like to hear your views on the scope of the Local Plan Update.

Consultation commenced on Monday 19th July 2021 for a period of eight weeks. The period to submit comments on the Local Plan Update will close on Monday 13th September 2021.

The City Council has published, for comment, an early scoping [1] document for the Leeds Local Plan Update (LPU). It is not intended to deal with all planning issues, and will focus on ways we can shape planning policy to reduce our city's impact on the environment and help achieve net zero carbon emissions by 2030.

[1] this falls under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

There are 5 topic areas each with full set of consultation questions:

Topic 1 Carbon Reduction

Topic 2 Flood Risk

Topic 3 Green Infrastructure

Topic 4 Placemaking

Topic 5 Sustainable Infrastructure

You should read the Green Infrastructure paper before filling in this form. Which can be viewed at our dedicated and accessible website: www.leeds.gov.uk/lpu (<http://www.leeds.gov.uk/lpu>)

Instructions

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Privacy notice (data protection)

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To comply with its statutory obligations, the Council must make your representation available for public inspection and regulations allow this information to be made available on the internet. This includes your name, address, and the contents of your comment. To protect personal data from unnecessary disclosure, the Council will, however, remove any personal information provided in your representation which we are not required, by law, to make available (for example, telephone numbers and signatures).

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3. Questions

Do you agree that to meet the objective of the Local Plan Update the scope should focus on the Climate Emergency, including topics

1. Carbon Reduction
2. Flood Risk
3. Green Infrastructure
4. Place-Making
5. Sustainable Infrastructure

Please explain your reasons in the comments box below.

Strongly agree

Agree

- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons in the comments box below.

4. Questions relating to Topic Paper 3: Green Infrastructure

Leeds Local Plan Update – Scoping Consultation
Topic 3: Green Infrastructure

Plan on a page

Vision for Green Infrastructure: Leeds will create new Green Infrastructure (GI) through the planning process, and identify, improve, protect and extend existing GI to address the challenges of climate change and create a healthy city for all.



5. Identification, protection, enhancement and extension of green infrastructure

2. Do you agree that enhanced policy for the protection, improvement and enhancement of GI should be included in the Local Plan Update? What would you like to see included in such a policy?

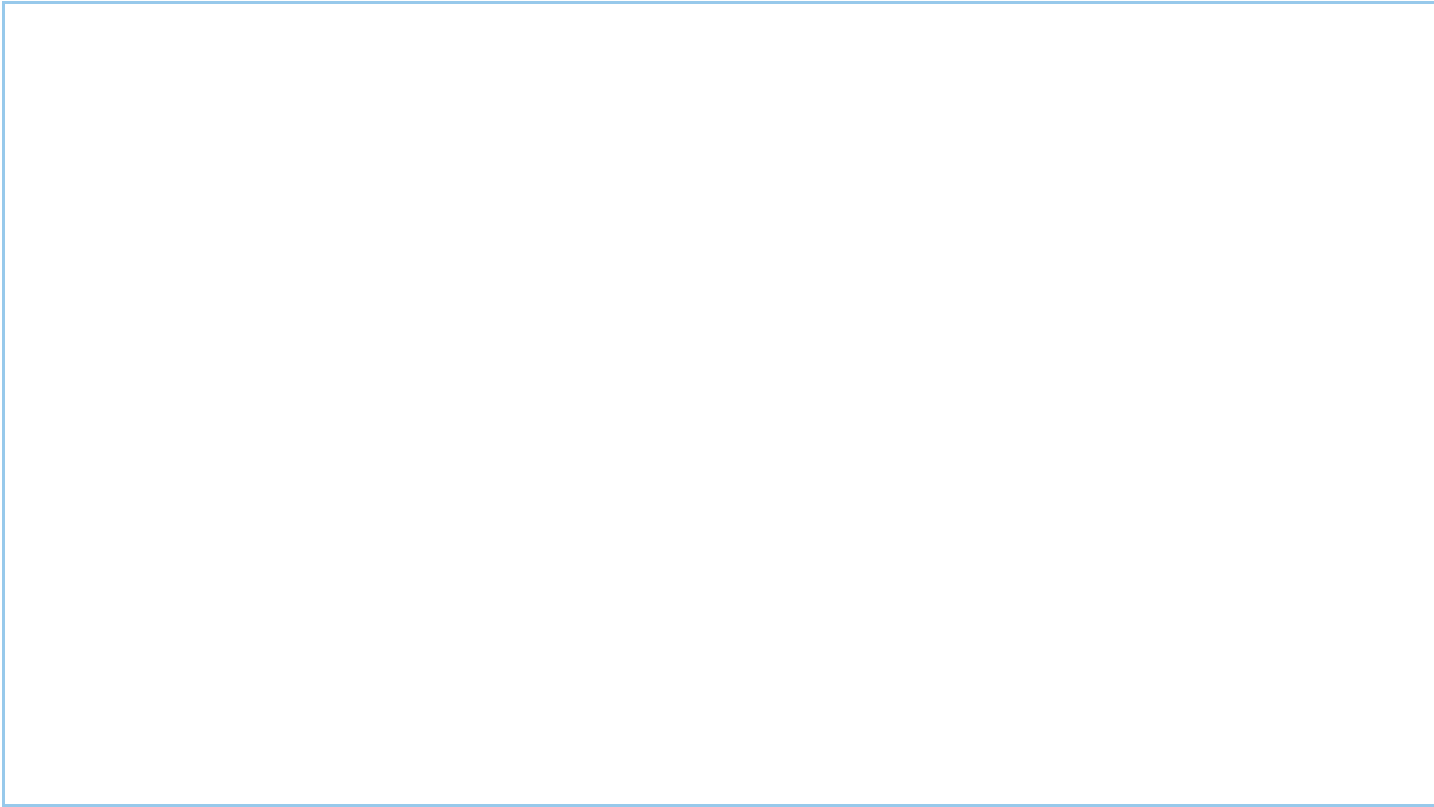
- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons in the comments box below.

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

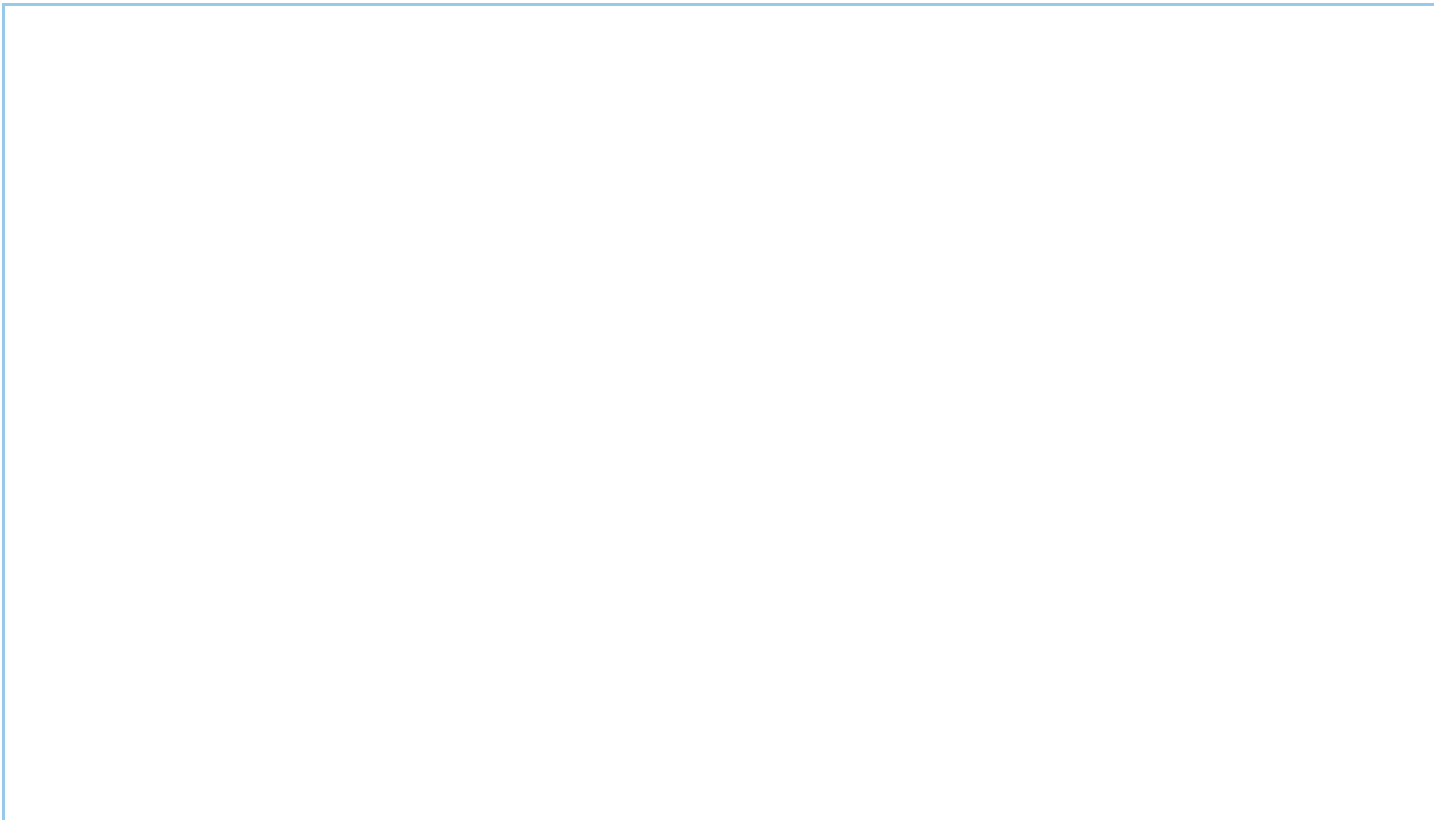
- Yes
- No

Please explain your reasons in the comments box below.



6. Trees

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



7. Green Space

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

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons in the comments box below.

8. Nature Conservation

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

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree

Strongly disagree

Please explain your reasons in the comments box below.

9. Biodiversity

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

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons in the comments box below.

10. Local food production

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

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons in the comments box below.

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

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

11. Comments

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

12. Document Upload

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Choose File

Choose file No file chosen

13. About You

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Name of Client:

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Street

Area

City or district

Postcode

16. Final Step

Thank you - That is all the questions we have for you.

Please now click the Finish button below to save and send your responses to us.

Local Plan Update: Place Making

1. Introduction

This consultation is from the Policy and Plans Group at Leeds City Council.

We would like to hear your views on the scope of the Local Plan Update.

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The City Council has published, for comment, an early scoping [1] document for the Leeds Local Plan Update (LPU). It is not intended to deal with all planning issues, and will focus on ways we can shape planning policy to reduce our city's impact on the environment and help achieve net zero carbon emissions by 2030.

[1] this falls under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

There are 5 topic areas each with full set of consultation questions:

Topic 1 Carbon Reduction

Topic 2 Flood Risk

Topic 3 Green Infrastructure

Topic 4 Placemaking

Topic 5 Sustainable Infrastructure

You should read the Place Making topic paper before filling in this form. Which can be viewed at our dedicated and accessible website: www.leeds.gov.uk/lpu (<http://www.leeds.gov.uk/lpu>)

Instructions

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3. Questions

Do you agree that to meet the objective of the Local Plan Update the scope should focus on the Climate Emergency, including topics

1. Carbon Reduction
2. Flood Risk
3. Green Infrastructure
4. Place-Making
5. Sustainable Infrastructure

Please explain your reasons in the comments box below.

Strongly agree

Agree

- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons in the comments box below.

4. Questions relating to Topic Paper 1: Carbon Reduction

Leeds Local Plan Update – Scoping Consultation

Topic 4: Place-making

Plan on a page

Vision for Place-making: To minimise carbon emissions by guiding new development to locations that offer the best opportunity for active travel, for use of public transport and for minimal use of private motor vehicles. To capitalise upon a local community's assets, inspiration and potential and create high quality, sustainable and resilient places that people want to live, work and play in and promote people's health, happiness and well-being.

What is this topic about?

As part of our aspiration to make Leeds zero carbon by 2030 we want to ensure that we guide development to the most sustainable places and to ensure that all new development is designed to high standards.

The proposed policy areas



Where do we want to get to

- We want to embed the 20-minute neighbourhood concept into planning policy

- We want to ensure that new development is sustainably located.

- We want to ensure that planning policy ensures the highest design standards are being achieved in Leeds

Where are we now?

Our existing Local Plan has strong policies to encourage development in sustainable locations and to support high standards of design. However, these policies pre-date the climate emergency declaration and the well-being impacts of Covid-19. We feel that now is the right time to consider refreshing our Plan to ensure it is suitably ambitious.

Have your say

We need your views on whether you think our aspirations for the Local Plan Update are correct. Do you agree that the topic of Place-making should be considered? If so, what would you like to see new policies contain?

5. Strategic place making

2. Does Leeds need a local policy definition of sustainability?

Yes

No

Please explain your reasons in the comments box below.

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

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

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons in the comments box below.

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

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

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

Yes

No

Please explain your reasons in the comments box below.

6. High quality, resilient and healthy places

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

Yes

No

Please explain your reasons in the comments box below.

7. Comments

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

8. Document Upload

10. Here you can upload documents alongside comments you may have made above.

Choose File

No file chosen

9. About You

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Street

Area

City or district

Postcode

12. Final Step

Thank you - That is all the questions we have for you.

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Local Plan Update: Sustainable Infrastructure

1. Introduction

This consultation is from the Policy and Plans Group at Leeds City Council.

We would like to hear your views on the scope of the Local Plan Update.

Consultation commenced on Monday 19th July 2021 for a period of eight weeks. The period to submit comments on the Local Plan Update will close on Monday 13th September 2021.

The City Council has published, for comment, an early scoping [1] document for the Leeds Local Plan Update (LPU). It is not intended to deal with all planning issues, and will focus on ways we can shape planning policy to reduce our city's impact on the environment and help achieve net zero carbon emissions by 2030.

[1] this falls under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

There are 5 topic areas each with full set of consultation questions:

Topic 1 Carbon Reduction

Topic 2 Flood Risk

Topic 3 Green Infrastructure

Topic 4 Placemaking

Topic 5 Sustainable Infrastructure

You should read the Sustainable Infrastructure topic paper before filling in this form. Which can be viewed at our dedicated and accessible website: www.leeds.gov.uk/lpu (<http://www.leeds.gov.uk/lpu>)

Instructions

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3. Questions

Do you agree that to meet the objective of the Local Plan Update the scope should focus on the Climate Emergency, including topics

1. Carbon Reduction
2. Flood Risk
3. Green Infrastructure
4. Place-Making
5. Sustainable Infrastructure

Please explain your reasons in the comments box below.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons in the comments box below.

4. Questions relating to Topic Paper 5: Sustainable Infrastructure

Vision for Sustainable Infrastructure: Leeds will ensure the delivery of an accessible and integrated transport and communications system which focuses on public transport and active travel

What is this topic about?

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

Where are we now?

Our current Local Plan already has policies for the growth of the airport and provides general support for digital connectivity. However there are no detailed policies for HS2, Leeds Station or Mass Transit. Nor are there detailed consideration of digital infrastructure. We feel that now is the time to consider these policy areas.

The proposed policy areas



Where do we want to get to

- We want to consider new policies for HS2, Leeds Station and Mass Transit to maximise the benefits of these schemes.

- We want to improve digital infrastructure provided through new developments to ensure that digital connectivity is given priority.

- We want to review existing policy at the airport to ensure it is effective for managing growth

Have your say

We need your views on whether you think our aspirations for the Local Plan Update are correct. Do you agree that the topic of Sustainable Infrastructure should be considered. If so, what would you like to see new policies contain?

5. Leeds Station and HS2

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

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons in the comments box below.

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

6. Mass Transit

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

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons in the comments box below.

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

7. Leeds Bradford Airport

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

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons in the comments box below.

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

Yes

No

Please explain your reasons in the comments box below.

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

8. Digital connectivity

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

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons in the comments box below.

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

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your reasons in the comments box below.

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

- Residential development only
- Commercial development only
- Both residential and commercial development

Please explain your reasons in the comments box below.

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

Yes

No

Please explain your reasons in the comments box below.

9. Comments

13. Do you have any further comments, ideas or have we missed anything?

10. Document Upload

14. Here you can upload documents alongside comments you may have made above.

Choose File

No file chosen

11. About You

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14. Final Step

Thank you - That is all the questions we have for you.

Please now click the Finish button below to save and send your responses to us.

Local Plan Update Summary: Carbon Reduction

1. Introduction

This consultation is from the Policy and Plans Group at Leeds City Council.

Carbon reduction

What do we mean by carbon reduction?

Carbon reduction is about making sure that new developments minimise their energy demands and carbon emissions during construction and when the building is being used.

In Leeds, we have declared a 'climate emergency' and we are seeking to be a carbon neutral city by 2030. This is a declaration that urgent action is required to reduce or halt climate change and avoid potentially irreversible environmental damage resulting from it, by reducing the city's man-made greenhouse gas emissions to zero. Climate change will directly impact West Yorkshire by increasing the risk of flooding, heatwaves and wildfires; by threatening much of our local wildlife; and by making food in many places harder to grow and more expensive. Climate change is already shaping the world around us, but by taking action now to prevent and protect the city from the worst impacts of climate change, we can make Leeds a fairer, healthier, green and ultimately better place to live.

How can reducing carbon consumption help climate change?

Carbon emissions from burning fossil fuel (coal, crude oil, natural gas) accumulate in the atmosphere and our planet does not have enough capacity to neutralise this and prevent environmental damage. The more carbon we use the greater the impact on the temperature of the planet and the acceleration of climate change

Reducing carbon can have other benefits too, including reduced heating costs for thousands of Leeds residents and businesses and improving health through the reduction of air pollution.

We want to hear from every neighbourhood in Leeds

Leeds is a proudly diverse city. Every neighbourhood is different. We want to hear from people living in every community across the district. We want to know how you think about opportunities in your area to reduce carbon reduction or any other issues relating to this topic. Your comments will help us to ensure that we are able to deal with the effects of climate change in the future.

We already think we have some of the answers, but we don't have them all. What do you think?

Based on what people have said in the past and on the challenges that we know that we face in Leeds, we have some ideas on how to become a carbon neutral city by 2030 and we would like your early thoughts on these before any decisions are made.

We are asking you if you think what we are proposing is a good idea or not, but we would also welcome any comments on the ideas as well as your views on anything that you think we have missed.

We would like to hear your views on the scope of the Local Plan Update.

Consultation commenced on 19th July 2021 for a period of eight weeks. The period to submit comments on the Local Plan Update will close on Monday 13th September 2021.

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Individual / group

Agent

4. Contact details - Individual / group

3. Your details: *

Title

First Name

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Last Name

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Organisation

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4. Email address: *

5. Address:

House number or name	<input type="text"/>
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City or district	<input type="text"/>
Postcode	<input type="text"/>

5. Contact details - Agent

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7. Please provide: *

Name of Client:

8. Agent Email address: *

9. Address:

House number or name	<input type="text"/>
Street	<input type="text"/>

Area	<input type="text"/>
City or district	<input type="text"/>
Postcode	<input type="text"/>

6. Reduced whole life-cycle emissions

Do you agree or disagree with the following Policy Idea:

Reduced whole life-cycle emissions – We could seek to reduce carbon emissions for the whole life of a development, from construction and use to demolition.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

7. Zero carbon developments

Do you agree or disagree with the following Policy Idea:

Zero carbon developments – There is an opportunity to ensure there are improvements to the energy efficiency of new developments so their operational energy use is carbon neutral.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

8. Sustainable construction

Do you agree or disagree with the following Policy Idea:

Sustainable construction - We could set higher standards for new developments to be environmentally

responsible and energy efficient, including standards for energy use/production, materials, water, waste, pollution and ecology considerations.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

9. Renewable energy generation

Do you agree or disagree with the following Policy Idea:

Renewable energy generation – There are opportunities across Leeds to explore a range of renewable or low carbon energy sources for developments, either on-site (such as air and ground source heat pumps) or off-site (such as from a solar or wind farm).

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

10. Heat networks

Do you agree or disagree with the following Policy Idea:

Heat networks – We already have a heat network in Leeds which recovers energy from non-recyclable household waste to supply low carbon heat and hot water in the urban area to local homes and businesses. We could seek to extend this.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

11. Energy storage

Do you agree or disagree with the following Policy Idea:

Energy storage - The ability to store renewable energy for use later is changing all the time and we could look to increase this significantly to use in Leeds when it's needed.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

12. Comments

Please let us know if you have any other comments, ideas or if you think we missed something.

13. Document Upload

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Choose File

No file chosen

14. Final Step

Thank you - That is all the questions we have for you.

Please now click the Finish button below to save and send your responses to us.

Local Plan Update Summary: Flood Risk

1. Introduction

This consultation is from the Policy and Plans Group at Leeds City Council.

Minimising Flood Risk

What do we mean by minimising flood risk?

Minimising flood risk is about taking steps to reduce and avoid flooding across Leeds, protecting homes, businesses and other buildings from flooding and the damage that it can bring to people's livelihoods and well-being.

Why does climate change make flood risk worse?

Flooding is a big problem in Leeds after heavy rainfall and scientists say that the risk of Leeds flooding will get worse as the climate changes. An increase in temperature means that the air holds more moisture leading to heavier rainfall. The loss of natural areas to buildings and hard surfaces means that the land has less capacity to absorb rainfall and it runs off quicker leading to flash flooding. If homes are built in areas prone to flooding this increases the risk for the people who live and work in that area. This means that when planning decisions are made we need to think about the vulnerability of the proposed use, we need to try to avoid making flood risk harder to manage and we need to make sure developments are constructed so they are resilient to flooding and the correct defences are in places.

We want to hear from every neighbourhood in Leeds

Some parts of Leeds have already experienced significant flooding and this could be set to continue, worsen and spread if we do not take action. Whether your neighbourhood has been affected or not we want to hear from you as flooding has the potential to affect everyone.

What is your local priority?

Areas like Garforth and Kirkstall have already experienced significant problems due to flooding, other areas less so and some areas have had no issues at all. We want to hear from neighbourhood about personal experiences, local issues and ideas about flooding and how we should deal with it.

We already think we have some of the answers, but we don't have them all. What do you think?

Based on what people have said in the past and on the challenges that we know that we face in Leeds, we have some ideas on how to minimise flood risk in Leeds and we would like your early thoughts on these before any decisions are made.

We are asking you if you think what we are proposing is a good idea or not, but we would also welcome any comments on the ideas as well as your views on anything that you think we have missed.

We would like to hear your views on the scope of the Local Plan Update.

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3. Sustainable drainage systems

Do you agree or disagree with the following Policy Idea:

Sustainable drainage systems – These are natural solutions designed to drain or soak up rainfall in a more sustainable way than the conventional practice of draining water run-off through a pipe into a sewer e.g. permeable soakaways and ponds.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

4. Location of development

Do you agree or disagree with the following Policy Idea:

Location of development – This would involve keeping development out of medium and high flood risk areas, particularly for new homes.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

5. Functional floodplain

Do you agree or disagree with the following Policy Idea:

Functional floodplain – These are areas where the floodplain must be kept open and undeveloped to store

flood water in large flooding events until it can drain away naturally.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

6. Enhanced resilience

Do you agree or disagree with the following Policy Idea:

Enhanced resilience – Making sure development is safe for its lifetime, increasing flood proofing and ensuring safe access and escape routes are included where appropriate.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

7. Porous materials

Do you agree or disagree with the following Policy Idea:

Porous materials – Using materials that have good drainage and soft landscaping to help reduce the speed of rain water run off.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

8. Comments

Please let us know if you have any other comments, ideas or if you think we missed something.

9. Document Upload

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Choose File

No file chosen

10. About You

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*Organisation
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12. Contact details - Agent

7. Your details: *

Local Plan Update Summary: Green Infrastructure

1. Introduction

This consultation is from the Policy and Plans Group at Leeds City Council.

Green Infrastructure

What is green infrastructure?

In a nutshell, green infrastructure refers to green spaces and the natural environment in and around Leeds and how its protection, improvement and expansion can help us to fight climate change and improve health and well-being.

How can green infrastructure help to tackle climate change?

Green infrastructure can help replenish groundwater stores, relieving stress on our local water supplies, as well as help potential flood water drain away naturally. It can also help to reduce the urban heat island effect through the planting of trees and building green roofs, lowering energy demands for our buildings. Nature conservation and increased tree planting also help to take harmful carbon emissions out of the atmosphere.

We want to hear from every neighbourhood in Leeds

Every neighbourhood in Leeds has varying types and quality of green infrastructure, including grass verges, gardens, parks, allotments and woodland. There are some neighbourhoods with a great deal of high quality green infrastructure and others that have much less or of a poorer quality. We want to ensure that all neighbourhoods in Leeds, irrespective of the level and quality of their green infrastructure, can make the best use of what they have to help fight climate change and improve quality of life.

We already think we have some of the answers, but we don't have them all. What do you think?

Based on what people have said in the past and on the challenges that we know that we face in Leeds, we have some ideas on how to improve and make the best use of our green infrastructure and we would like your early thoughts on these before any decisions are made.

We are asking you if you think what we are proposing is a good idea or not, but we would also welcome any comments on the ideas as well as your views on anything that you think we have missed.

We would like to hear your views on the scope of the Local Plan Update.

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3. Enhanced Policy Framework

Do you agree or disagree with the following Policy Idea:

Enhanced policy framework – We could update our high level strategic policy with more detailed policies underneath setting out clearly what is expected in terms of protecting, improving and increasing green infrastructure. This could include measures such as resisting development on green space, retaining and planting trees, and improving biodiversity through wild belts, green roofs/walls and habitat creation.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

4. Plant more trees

Do you agree or disagree with the following Policy Idea:

Plant more trees – There is an opportunity to better protect the trees we have and plant more new trees to help capture dangerous carbon emissions, manage flood risk and create happier healthier places.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

5. Enhanced Greenspace

Do you agree or disagree with the following Policy Idea:

Enhanced greenspace – We could go further to improve existing green space and protect it from development, and ensure that new and accessible, high quality green space is created in those areas that need it.

- Strongly agree
- Agree

- Neither agree nor disagree
- Disagree
- Strongly disagree

6. Increased bio-diversity and nature conservation

Do you agree or disagree with the following Policy Idea:

Increased bio-diversity and nature conservation – We could better protect and manage wildlife sites and habitats to help restore biodiversity and increase carbon storage naturally.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

7. Comments

2. Please let us know if you have any further comments, ideas or if you think we have missed something.

8. Document Upload

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House number or name

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Name of Client:

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House number or name

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City or district

Postcode

12. Final Step

Thank you - That is all the questions we have for you.

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Local Plan Update Summary: Place Making

1. Introduction

This consultation is from the Policy and Plans Group at Leeds City Council.

Place Making

What is Place Making?

Place making is the term used to describe a joined-up approach to the planning, design and management of places in order to optimise the location of new development, efficient uses of land and the creation of close-knit neighbourhoods. Think about it as helping to make your area an attractive, healthy and successful place for you, your family and friends, and for business.

How can place making help tackle climate change?

In the context of climate change and the Council's ambition to be carbon neutral by 2030, we want to ensure that we guide development to the most sustainable places. Place making in this context is focussed on optimising carbon reduction by improving, protecting and making the best use of land and guiding new development to locations that offer the best opportunity for active travel, use of public transport and for minimal use of private motor vehicles. Place making is also about how buildings and spaces are designed and work together, encouraging resilient places that promote people's health, happiness and wellbeing. Our focus for climate change is on high quality design that ensures that development helps to reduce waste and pollution and has a positive impact on the local environment rather than a negative one, through mitigation (reducing greenhouse gas emissions and minimising embodied energy) and adaptation (to rising temperatures and increased risk of flooding).

We want to hear from every neighbourhood in Leeds

Here in Leeds, as part of this Local Plan Update, we are looking at how we can work together to make attractive, healthy and successful neighbourhoods. Looking not just at what development is needed and where it should go, but what the buildings and the spaces around them should look like and how they should be used on a day to day basis. Leeds is a diverse city and every neighbourhood is different so we want to hear from people living in every neighbourhood across the district on how you think your area can be a better, healthier and happier place. Your comments will help us to ensure that we are able to deal with the effects of climate change in the future.

What is your local priority?

If you live in the inner-city, pollution and access to green spaces may be the most important place making issue for you. Or, if you live in one of the towns surrounding Leeds you may think that design quality or easy access to shops and services is more important. For those who live in one of the many villages around Leeds, your priority may be health and well-being. Wherever you live and whatever you think, we want to hear from you.

We already think we have some of the answers, but we don't have them all. What do you think?

Based on what people have said in the past and on the challenges that we know that we face in Leeds, we have some ideas on how to improve place making and we would like your early thoughts on these before any decisions are made.

We are asking you if you think what we are proposing is a good idea or not, but we would also welcome any comments on the ideas as well as your views on anything that you think we have missed.

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3. 20-minute neighbourhood

Do you agree or disagree with the following Policy Idea:

20-minute neighbourhood – This is the concept of a walkable neighbourhood, where there is access to all the facilities needed within a short walk of 15-20 minutes. This will be easier to achieve for some neighbourhoods and more difficult or impractical for others but we think it should be seen as a general aspiration for most.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

4. Locations for growth

Do you agree or disagree with the following Policy Idea:

Locations for growth - Concentrating growth around city, town and local centres would mean easier and safer walking and cycling to shops, healthcare and the services that we need. This should also improve health and well-being while reducing carbon emissions.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

5. Detailed design matters

Do you agree or disagree with the following Policy Idea:

Detailed design matters – We could seek to raise design standards in Leeds to make our buildings and spaces more attractive, healthier and successful places to be. Examples could be requiring landscape plans to increase shade and biodiversity, specifying the use of sustainable building materials, using design requirements to help improve places that we live and work and to reduce the requirements on resources (land, energy & water).

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

6. Comments

Please let us know if you have any other comments, ideas or if you think we missed something.

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Postcode

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Thank you - That is all the questions we have for you.

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Local Plan Update Summary: Sustainable Infrastructure

1. Introduction

This consultation is from the Policy and Plans Group at Leeds City Council.

Sustainable Infrastructure

What is sustainable infrastructure?

For the Local Plan Update, sustainable infrastructure refers to certain aspects of travel and communications that help us to move around the city, communicate with each other and do business in a way that enhances our daily lives and helps protect our natural resources. You may be aware that the Council has already consulted on the Connecting Leeds Transport Strategy earlier this year and it is not the intention of this Local Plan Update consultation to cover all aspects of transport in Leeds. Instead the Plan seeks to focus on four aspects:

High Speed 2 and Leeds City Station;

Mass Transit;

Leeds Bradford Airport, and;

Digital Connectivity.

We are exploring whether new planning policies are required to help improve how schemes such as HS2 and Mass Transit are integrated with their surroundings, how we might manage growth of the airport in the long term, and how we can improve the rollout of fast broadband in new buildings.

It is important to note that policies in the Local Plan Update cannot determine whether schemes such as HS2 and Mass Transit go ahead. But the Local Plan can play a key role in setting out how the benefits of such projects could be maximised.

Why is sustainable infrastructure important for tackling climate change?

By becoming a more physically and digitally connected city, and giving people a variety of travel choices other than by private car, we will be much more likely to achieve our aim of becoming a carbon neutral city by 2030. This topic also links closely to those on carbon reduction and place making.

What is your local priority?

We know that HS2, Leeds Station and the Airport may not impact directly on your day to day lives, however you may have opinions on the opportunities and challenges these bring to Leeds. We want to hear about what you think are the main issues with regard to the aspects of sustainable infrastructure that are being proposed as part of the Local Plan Update. This will help us to find the right solutions for your area and for the city as a whole.

If your comments relate to accessible transport (walking, cycling and public transport) you may wish to

view the place making topic which introduces the concept of the twenty minute neighbourhood.

We already think we have some of the answers, but we don't have them all. What do you think?

Based on what people have said in the past and on the challenges that we already know that we face in Leeds, we have some ideas on how to improve sustainable infrastructure in order to become a carbon neutral city by 2030.

We are asking you if you think what we are proposing is a good idea or not, but we would also welcome any comments on the ideas as well as your views on anything that you think we have missed.

We would like to hear your views on the scope of the Local Plan Update.

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To comply with its statutory obligations, the Council must make your representation available for public inspection and regulations allow this information to be made available on the internet. This includes your name, address, and the contents of your comment. To protect personal data from unnecessary disclosure, the Council will, however, remove any personal information provided in your representation which we are not required, by law, to make available (for example, telephone numbers and signatures).

The personal information you provide will be held until the adoption of the Development Plan Document, after which it will be securely destroyed. Please note that we cannot provide anonymity or accept comments marked 'private' or 'confidential'. Comments that include offensive, racist, discriminatory,

threatening and other non-relevant statements will be destroyed.

The Council's corporate privacy notice, which includes details of the authority's Data Protection Officer and your Information Rights is available at: www.leeds.gov.uk/privacy-statement/privacy-notice (<https://www.leeds.gov.uk/privacy-statement/privacy-notice>)

We use cookies (<http://www.leeds.gov.uk/privacy-statement>) to improve your experience of using our website. If you continue without changing your cookie settings, we assume that you are happy with this usage.

1. Please confirm... *

I give my consent for my personal information to be used as described in the privacy notice.

3. HS2

Do you agree or disagree with the following Policy Idea:

HS2 – By planning for the integration of the HS2 line into our city, planning for new development under and around the new line, and seeking opportunities for new green and public spaces to be created alongside HS2 we could ensure wider benefits for the city as a whole.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

4. Mass Transit

Do you agree or disagree with the following Policy Idea:

Mass Transit – We could better prepare for any mass transit system that is provided in Leeds so that it can improve access around the city and deliver wider benefits to those areas struggling with congestion.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

5. Leeds Station

Do you agree or disagree with the following Policy Idea:

Leeds Station – By making sure all proposals for the development of Leeds Station work together to achieve the same vision we could maximise benefits to residents, commuters, businesses and visitors to the City.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

6. Leeds Bradford Airport

Do you agree or disagree with the following Policy Idea:

Leeds Bradford Airport – There is an opportunity to manage the development of Leeds Bradford Airport and access to it in a sustainable manner.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

7. Digital Connectivity

Do you agree or disagree with the following Policy Idea:

Digital Connectivity – By supporting reliable, high-speed data at work, home and whilst on the move, we can ensure that Leeds is a modern, resilient and efficient economy which can support increased remote working.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

8. Comments

Please let us know if you have any other comments, ideas or if you think we missed something.

9. Document Upload

2 Here you can upload documents alongside comments you may have made above.

Choose File

No file chosen

10. About You

We would like to know a little more about you. This is so we can be sure we are hearing from a wide range of people from different backgrounds and better understand what you tell us.

Answering these questions will also help us consider how our policies affect people from different backgrounds; we have a legal duty to do this under the Equality Act 2010.

By answering, you are giving your consent for us to use this information as explained above.

3. Are you submitting comments as an individual or on behalf of a group, or an agent representing a client? *

Individual / group

Agent

11. Contact details - Individual / group

4. Your details: *

Title

First Name
*

Last Name
*

Organisation
*

5. Email address: *

6. Address:

House number or name

Street

Area

City or district

Thank you - That is all the questions we have for you.

Please now click the Finish button below to save and send your responses to us.

THE LEEDS LOCAL PLAN UPDATE SCOPING CONSULTATION 2021

YOUR NEIGHBOURHOOD • YOUR CITY • YOUR PLANET

Have your say on future planning policies to help
reduce our city's impact on climate change



To have your say...

Visit www.leeds.gov.uk/lpu

Email: lpu@leeds.gov.uk

Call on: 0113 3787993

Or write to:

Leeds Local Plan Update Consultation

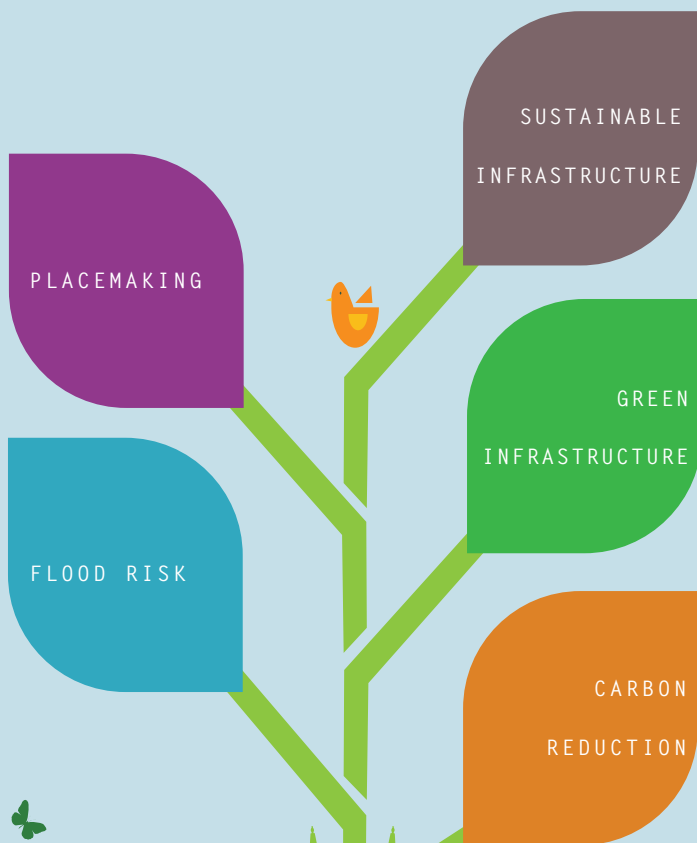
Policy & Plans Group

Merrion House

9th Floor East

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Leeds, LS2 8BB



 **Leeds**
CITY COUNCIL



SCAN ME



Local Plan Update

Leeds Local Plan

Report of Consultation

Development Plan Document

September 2022

Report of Consultation – Regulation 18

Introduction

The Local Plan Update consultation, ‘Your Neighbourhood, Your City, Your Planet’ commenced on 19th July 2021 for 8 weeks and officially ended 13th September 2021.

The consultation was a ‘scoping’ consultation and was in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This requires that the Local Planning Authority must notify residents, businesses and consultation bodies on the “*subject of the local plan which the local planning authority propose to prepare and invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain*”. This represents the first key stage in the process of preparing a Development Plan Document.

As a scoping consultation, there is a balance to be struck between seeking views on the general issues of interest and concern to local people (and other stakeholders) and the clear direction provided by the Council given the critical and urgent nature of the climate emergency, declared in 2019. As such the consultation material made clear that “*The priority for the Local Plan Update is to update and improve existing policies and make new ones to address climate change, and the climate emergency declaration to achieve net zero emissions by 2030*”. This was further expressed within the consultation material through five central themes that were highlighted as key areas of focus to consider following initial research and evidence-gathering. These five themes are:

- Carbon Reduction
- Flood Risk
- Green Infrastructure
- Placemaking
- Sustainable Infrastructure

Within these topics specific ideas regarding potential policy areas were provided, in order to give some focus for discussions and comments. However, it was made clear that these were initial ideas and the consultation provided the opportunity for respondents to agree/disagree any part of the material and include their own ideas, suggestions and evidence.

Principles/aims

The consultation was guided by the principles set out in the Interim Statement of Community Involvement (ISCI), which allowed us to undertake consultations online whilst the Covid-19 rates remained high and social distancing restrictions were in place. We also embedded the use of plain English, accessibility and inclusion within the consultation in line with guidance contained in the Interim SCI. It is important to stress that whilst the Interim SCI curtailed face to face meetings that would normally be held, these were replaced by a number of other communication methods, such as

digital advertising and social media, and there is nothing to suggest that the Interim SCI resulted in less awareness raising of the Local Plan Update. Well in advance of the start of the consultation an Engagement Strategy was prepared where we considered how we could ensure that the methods proposed for promotion, information and consultation were in line with the Interim SCI and were as effective, far-reaching and inclusive as possible.

Our vision for the consultation was:

‘We want everyone to take part in the consultation, whether they live in the inner-city, a village or a town and whether they feel confident and knowledgeable about the issues that we are consulting on or not. As a result of taking part in the consultation we want participants to feel listened to, valued and to have learnt about how climate change can be tackled city-wide and locally.’

When preparing the Engagement Strategy we looked at the feedback and lessons learned from previous planning consultations and we made sure we acted upon the main points during the Local Plan Update consultation. Some of the lessons included:

- Lack of awareness of consultations amongst the public.
- Number of questions on consultation surveys can be off-putting to some.
- The consultation should be accessible.
- There should be early engagement, and relevant information that is shared in a timely manner.
- A range of methods should be used.
- More engagement with young people, inner city communities and any other groups who are often disconnected from planning consultations.
- Sufficient time should be allowed to comment.
- Make it clear where comments have been taken into account.

Campaign Page

The dedicated web campaign page www.leeds.gov.uk/lpu was produced. This included all sections of the draft Local Plan Update document in an accessible web format with links to Smart Surveys to collect responses, webinar information and YouTube links, and provided a home for the PDF version of the material. The same logo, colours and some of the photos used in the pdf material were inserted into the webpage for consistency and a coherent user experience. ‘Topic pods’ were available which made accessing information and surveys on each topic clear. Following issues reported by some consultees regarding confusion over where to comment the Web Team altered the layout slightly to make the user journey more straightforward and ensure that people could submit comments easily.

There were 10,345 unique views over the campaign duration, with 14,000+ views in total. It was also the 27th most popular LCC webpage during campaign. 69% of people accessing the content did so via mobile or tablet, compared to 45% for other Planning content on the LCC website.

Consultation Material

The consultation material comprised a series of 'Topic Papers' which went into detail about the range of issues we thought should be considered through the Local Plan Update. The detailed topic papers were also condensed down to form a 'Summary' version, with the main information picked out, and there was a 'Plan on a Page' graphic for each topic which provided a general overview. This ensured that people had choice over how much information they wished to read and how much time they needed to commit to learning about the local plan update. Splitting the document into separate topic areas also meant that respondents were able to provide feedback on the sections that were of interest / relevance to them. The material was available via the campaign page in two formats:

- HTML format - an accessible web-based format which can be used on e-readers and translated into different languages using relevant software. The html format is also mobile phone/tablet-friendly, which means the text fits the size of the screen and can be easily scrolled.
- Pdf format - a graphically designed version of the full material was produced. LCC Creative Services created a logo to tie all the aspects of the consultation together, and designed the material to be more engaging and visually appealing with the use of colour, photographs and other graphics.

Copies of the pdf version were also printed and sent to all the libraries and community hubs in the district so people unable to access the digital version could still inform themselves. Spare paper copies were also available upon request.

The identity developed for the material and overall campaign was impactful and well-received by stakeholders and colleagues. There were 583 downloads of the PDF Local Plan document.

Communications

A variety of different promotional methods were used during the campaign:

- Three Local Plan Update specific Govdelivery bulletins were delivered to 2,054 contacts on the Planning consultation database. There were also links provided on some more general resident bulletins on COVID / essential information updates. There was an average open rate of the bulletins of 35% (more than 600 people), and a total of 121 unique clicks through to the website.
- We emailed information to 'trusted messengers', such as Ward Members, Neighbourhood Forums, Parish/Town Councils, Localities Team network, Equality Hub network, local interest groups, Leeds Youth Council, the Universities etc., so information could be cascaded to reach different audiences and neighbourhoods. Reminders were also sent nearer the close of the consultation. Information was shared with WYCA, the LEP and all statutory bodies via email, and with businesses via Inward Investment team.
- Posters were created by Creative Services and approximately 80 posters were displayed in LCC libraries, hubs and leisure centres, around the city centre and in Morley with the support of a local resident.

- Four media releases were issued at different stages of campaign, signposting to website, Coverage secured in a number of local media websites and newspapers, including Wharfedale Observer, Leeds Star, Caring Together, Leeds Climate, Doing Good Leeds, South Leeds Live, The Telegraph & Argus and Yorkshire Evening Post.
- Paid-for Facebook advertising was undertaken throughout the duration of the campaign targeting over 18s living in Leeds, segmented into the 10 community committee areas. In total, 166,693 people were reached through these adverts with 448,851 impressions and 3,032 clicks to the website. Facebook, Twitter and Instagram ads were also posted via LCC accounts, encouraging participation and tailored towards the individual topics. These had a total reach of 1,026,139 across Facebook, Twitter and LinkedIn, with 57,378 total impressions. LinkedIn accounted for more than 318 clicks to the website, 100 clicks to the webpage via Facebook and 117 for Twitter.
- There was also paid digital advertising targeting web users aged 18 and above across the Leeds district, from 1/8/21 to 31/8/21. In total, 66,645 unique devices were reached with 500,289 impressions and 1,468 clicks to the website.

Overall, communications have been effective in reaching a broad range of people and communities, establishing a baseline for us to work from along with stimulating conversations around 'best practice' in how we communicate planning consultations in future. Efforts to move to a more digital and accessible way of communicating have broadly been well-received but as we move out of the pandemic we need to consider how a 'digital-first' approach should be supplemented by face-to-face / traditional communications that may be more effective in other communities, for future rounds of LPU consultation.

Engagement

Several engagement methods were used during the consultation, including some that had never been tried by the service before:

- A series of online webinars were held to help people gain greater depth of understanding of the topics and policies and ask specific questions. 10 webinars were held, two per topic, with five taking place during working hours, and five in the evening. The webinars were better attended during the day which suggests more attendance from the professional community, but more residents attended during the evening sessions which led to more Q&A style engagement. One attendee with hearing loss was unable to participate effectively, so was sent transcripts and slides prior to each event which was well received. The webinars were recorded and saved on the LCC Youtube channel so anyone who missed live events could watch them at their leisure.
- Five short videos giving a more 'bitesize' explanation of the topic areas were created and posted on the LCC Youtube Channel, providing a short and more visual explanation of the material and encouraging people to view the website. The videos were posted in mid-August and had 351 views.

- Targeted workshops were held with groups including Leeds Youth Council, Developers Forum and Age Friendly Leeds. These were successful and indicated that working with established groups/teams who have an existing relationship with communities was an effective way of encouraging participation.
- A series of workshops were organised with Planning Aid England. The aim of the workshops was to engage harder-to-reach groups in the consultation process. Outreach took place through a variety of networks, including the Universities, Localities Team, Equality hub and Neighbourhood Forums, but uptake was low, with only one workshop proceeded. Feedback was positive however, and the comments made by participants during the workshop were used as a formal consultation response.
- It was initially thought that no face-to-face engagement could take place due to Covid-19 restrictions. However, towards the end of the consultation period officers attended the Age Friendly Leeds Festival, taking along copies of the material.

Submissions

There were a variety of ways for people to submit comments on this consultation:

- 5 detailed Smart Surveys, accessible through the ‘topic pods’ on the campaign page.
- 5 summary Smart Surveys with a higher-level overview of the consultation material and a smaller number of questions, asking for more general endorsement or opposition with text boxes for further comments, ideas or suggestions.
- Local Plan Update email inbox (lpu@leeds.gov.uk) for anyone to email responses.
- The postal address was provided for written responses.
- The Policy & Plans team telephone number was published for any queries.

Overall, 760 consultation submissions were made. Of these, 655 submissions were made via Smart Survey links from content on the website. 65 responses were received via email, with the remaining 40 captured on-street by ‘Our Future Leeds’ as part of their drive to get people in Leeds engaged in the Local Plan Update. Below is an example of the postcards designed by Our Future Leeds to collect quick responses from interested parties.








Of the 655 Smart Survey submissions, 417 submissions (64%) related to the summaries of each topic. This shows that more people were inclined to interact with shorter versions of the materials.

The official end of the consultation was 13th September, however we received emails from some stakeholders to say that due to the consultation largely taking place over the summer holidays they were struggling to get their comments completed by this deadline. We advised anyone struggling for time to submit a 'holding comment' with a broad outline of their submission by 13th September, with full comments accepted until 30th September. The campaign page wasn't taken offline until 30th September to allow anyone who had requested the informal extension of time to access the full material.

An Analysis of the Comments Received

Overall Scope

Do you agree that to meet the objective of the Local Plan Update the scope should focus on the Climate Emergency, including topics 1. Carbon Reduction 2. Flood Risk 3. Green Infrastructure 4. Place-Making 5. Sustainable Infrastructure?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		80.3%	183
2	Agree		7.9%	18
3	Neither agree nor disagree		5.7%	13
4	Disagree		2.2%	5
5	Strongly disagree		3.9%	9
			answered	228

The chart above shows that of those who responded to the full online response form there was strong support for the proposed scope of the Plan. The vast majority of consultee representations have made it clear that they support the Plan focussing on the climate emergency, with respondents being encouraged by the proposed direction the Plan will take. Respondents have also clearly stated their feelings, that addressing the climate emergency is the most pressing issue faced by the Council and society at large.

However, a number of respondents suggested that alternative matters should also be addressed in the scope of the Plan. In particular a number of consultees suggested that housing policies and allocations should be included within the scope of this Plan, including reassessing the housing requirement to include the Government’s standard method and 35% urban uplift; reviewing the spatial distribution of housing; reassessing needs for affordable housing and its delivery in order to fully address the UN Sustainability Goals; or looking to curtail housing growth in order to reduce further carbon emissions.

In addition, the following amendments to the scope were suggested:

- The “Ecological Emergency” should be added to the scope,

- “Blue Infrastructure” should be explicitly added to the scope to maximise the benefits of our waterways,
- Employment land requirements and provision,
- Consideration of the important contributions Leeds’ mill buildings make to the its urban and historic environment,
- Review and update policy on specialist housing for older people,
- The Plan should have a clear 15-year Plan Period lasting until 2038,
- The plan Period should be extended to 30 years,
- Health equity and addressing other inequalities should be an explicit goal,
- A strategic plan for how funding from developments is used,
- The Plan should consider the role of communities within the process,
- New policy to increase provision of EV charging points in areas without off-street parking,
- New developments should be encouraged to have car clubs,
- A clearer commitment to the ‘Circular Economy’, by decoupling economic activity from the consumption of finite resources by keeping materials in use for longer, e.g. more use of recycled and recyclable materials.
- Inclusion of Public Rights of Way
- Inclusion of Protection of soil
- Inclusion of Air quality and pollution
- Promotion of community projects
- The Local Plan Update should be a wholesale review of the entire Local Plan,
- Inclusion of jobs, skills and the supply chain
- Consideration of whether utilities, such as water, should be included within the Sustainable Infrastructure topic,
- More consideration of how Covid will impact society. managing the future risks of pandemics should be an objective of the Plan.

In most cases where respondents are seeking to broaden the subject of the Plan and its scope, they are still overtly supportive of the inclusion of the climate emergency as the key driver for the LPU. Such consultees are seeking additions, rather than deletions to the proposed scope. These suggestions will be considered in relation to the specific subject and proposed objectives of the LPU and also within the wider Local Plan process. It is noted that in defining the objectives of the LPU the Council carried out a Review of Local Plan policies in 2020, to see if they needed to be updated, in line with Government guidance.

Whilst not directly related to the scope of the Plan, concern was raised by a number of parties about the inconsistent national, regional and sub-regional targets to achieve net zero and the impacts this may have on planning within the development industry. In addition comments were raised about the structure of the Plan review, with concerns raised that an already confusing and piecemeal Local Plan, could be made even more complicated by the LPU process.

Finally, it is noted that a very small number of respondents objected to the proposed scope of the Plan on the basis of rejecting the Council’s objectives of addressing the

climate emergency, citing the potential for negative impacts on private car use and the knock-on effects this could have on the economy.

Carbon Reduction

In quantitative terms, there was strong support for new or refreshed policies on all the policy areas raised within the Carbon reduction topic.

The detailed comments covered issues including:

Whole Life Carbon Emissions – general support was expressed for a policy requiring assessments to be made in whole life carbon emissions, with many consultees expressing that these kinds of assessments should be introduced as soon as possible. Detailed comments included:

- Concerns over how policy will interrelate with other policies and how it could affect the viability for small house builders, who argue that it should only apply to large schemes,
- Concerns over who will monitor/assess the information, otherwise applicants will be ‘marking their own homework’,
- Views expressed that Building Regulations may be a better place to introduce this kind of assessment. However, others considered that current Building Regulations do not go far enough,
- Clarity needed for the assessment framework/agreed standard. Also, requests were made for a transitional period to allow the housing industry to understand how to undertake an assessment,
- Better use of modular buildings that can be easily deconstructed and re-assembled to give building materials new purpose,
- The Council may need to widen the types of technology used, which may mean relaxing planning guidance on the appearance of buildings,
- The Council should be promoting the re-use of existing buildings first and foremost,
- Views expressed that developers and builders will not do this voluntarily, so policies must be robust.

Operational Energy – strong support was expressed for a zero-carbon emissions energy standard to be introduced into planning policy as shown in the tables below.

Do you think we should require new development to achieve a zero-carbon energy performance standard for the operational use of the buildings?				
Answer Choices			Response Percent	Response Total
1	Yes		88.52%	54
2	No		11.48%	7





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

Please note this is a collation of online responses to the above question in the FULL documentation and does not take account of responses via email or Smartsurvey to the SUMMARY consultation.

answered

61

Do you agree or disagree with the following Policy Idea: Zero carbon developments – There is an opportunity to ensure there are improvements to the energy efficiency of new developments so their operational energy use is carbon neutral.

Answer Choices			Response Percent	Response Total
1	Strongly agree		87.13%	88
2	Agree		9.90%	10
3	Neither agree nor disagree		1.98%	2
4	Disagree		0.00%	0
5	Strongly disagree		0.99%	1
Please note this is a collation of responses to the above question in the SUMMARY documentation and does not take account of responses via email or Smartsurvey to the FULL consultation.			answered	101

The following detailed points were also raised as part of the consultation:

- Carbon off-setting should be the last resort,
- All new buildings should be required to provide solar panels,
- The technology exists to introduce carbon neutral development now, and therefore this should be a requirement of development,
- Retrofitting poorly insulated older properties is a bigger priority,
- The policy will need to define what zero energy performance means and how to measure it,
- It is unreasonable for all developments to be zero carbon within such a short time frame,
- New standards can cause confusion and undermine economies of scale for product manufacturers,
- Rather than introducing new bespoke targets, the new national Future Homes Standards should be used for operational carbon performance standards. The Council needs to take Government policy into account and any future changes to the Building Regulations,
- Certain development, such as healthcare buildings, have different energy demands and have difficulty meeting high energy standards,
- General support for new development requiring on site renewable energy, however any policy would need to understand that site constraints may not allow it,
- On site renewables may not always be the most efficient way to meet standards.

Sustainable Construction – There is strong support for Leeds setting a sustainable construction standard, with many consultees expressing the view that this should be a national or international standard rather than Leeds developing their own bespoke standard. The contrary view is that existing standards do not go far enough, and that Leeds could develop its own world leading standard for sustainable construction. Concerns were expressed from some representatives of the development industry that any future standards should not be overly prescriptive, as such an approach could limit innovation and new working practices. Comments also suggested that Leeds should work with other Local Planning Authorities to avoid a fragmented approach.

Resilience to Heat – General support was expressed for a policy on this topic. Objectors raised the issue that matters related to overheating were already covered in existing guidance and regulations. However, other consultees expressed the view that these did not go far enough to meet the challenges we are likely to face. Detailed responses provided information on ventilation systems (natural and mechanical), the importance of improved fabric efficiency and passive design to minimise unwanted heat gain, the benefits of access to outdoor space and mitigating impacts of landscaping features such as trees, as well as the dangers of solar gain via windows. Concerns were also raised on the conversion of office space to residential and the subsequent heating problems this could produce. The UK Green Buildings Future Homes Playbook was also highlighted as a key piece of evidence for developing policies on this subject.

Renewable Energy – strong support was expressed for the provision of renewable energy, with many respondents feeling that 100% of the energy needs of a development should be derived from on-site renewable sources. Below are some of the detailed comments raised:

- The requirement of on-site provision will help encourage the growth of the industry,
- Appropriate energy storage solutions also need to be factored in, as small-scale generation is not readily accommodated by the National Grid,
- Ground source heat pumps are more efficient than air source heat pumps and are ideal for larger sites,
- New builds can be designed to ensure roof mounted PV cells are perfectly aligned to the sun, to maximise efficiency,
- Rainwater harvesting should be incorporated into new developments,
- The Council should be encouraging the use of new technologies such as solar glass (a clear photovoltaic cell that can be used in windows whilst also generating electricity),
- The Canal and Rivers Trust have raised ideas on water source heat pumps, and the opportunities provided by the canal network to generate renewable energy.

There was also general support for the strategic provision of renewable energy, with many consultees supporting setting local targets. Evidence has been provided from Munich and Vancouver which have committed to generating 100% of their energy from renewable sources by 2025 and 2050 respectively. However, others felt that there were limited benefits for Leeds taking such an approach when the national policy approaches to energy would dwarf any contribution Leeds could make, particularly with the economies of scale of off-shore wind being far more efficient than local solutions.

Energy Storage – strong support was expressed for new policy on energy storage. However, some objections were raised that such a policy would be unnecessary as Government do not require local authorities to set such targets. Below are some of the detailed comments raised:

- A 'flexible network' needs to be developed to allow home generated energy to be stored and released into the grid when needed,
- Setting ambitious but realistic targets for energy storage is likely to help increase total energy storage solutions,
- Robust policy on energy storage will help address public nervousness about hydrogen,
- The Council must lead the way on this new area,
- Without a target it is unlikely that significant storage will be provided,
- a clear and fair policy on the siting of energy infrastructure will make it easier for local residents to accept new installations.
- It is important to consider the location of any new energy storage proposal to ensure that it is adequately resilient and sustainable to future climate risks,
- Targets need to be realistic.

Flood Risk

There is broad support for the Flood Risk topic in general and the detailed policy areas in particular to be included within the scope of the Plan. A range of stakeholders have provided comments including detailed comments from statutory consultees such as the Environment Agency, as well as developers and members of the public.

The comments covered issues including:

Development in flood risk areas – the results show strong support for this policy area being within the scope of the LPU. However, a range of opinions have been expressed relating to whether the Council has currently got the balance right between locating homes close to the services and facilities that people need whilst avoiding high flood risk areas. Many respondents felt that we need to give priority to avoiding flood risk, with suggestions that these areas would be better used for 'rewilding' than for development. However, others have expressed the view that provided buildings can be made resilient to flooding then development can take place in otherwise sustainable locations that are subject to flood risk. The Civic Trust (amongst others) raised the view that new developments may no longer need to be located close to services due to increased digital connectivity limiting the role of physical proximity.

Functional floodplain – strong support was expressed for limiting urban expansion in unprotected high flood risk areas, with some consultees noting that an adequate land supply was protected by the Flood Alleviation Scheme (FAS). The Environment Agency (EA) have requested that the Council write policy to limit development in flood risk areas and *future* high flood risk areas under climate change scenarios.

Related to this issue the EA also advise through their representation that the LPU should include a policy which sets out which uses would be appropriate in which flood risk zones, in order to ensure that no inappropriate development is developed in areas of high flood risk.




Sustainable Drainage Systems (SuDS) – Similarly there is general support for the LPU to consider policies relating to SuDS and the Council’s suggested approaches within the consultation material to increase their usage in developments, with the notable exception of objections from some housebuilders and other developers who have expressed the view that matters relating to SuDS should be left to the NPPF with local interventions being focussed on guidance rather than policy.

Respondents suggested the inclusion of the full spectrum of blue green infrastructure techniques should be used including rain gardens, swales, permeable paving, rainwater collection, green space, tree cover and wildlife ponds to slow run-off, as well as minimising the areas of impermeable surfaces. Others advocated that LPAs should have the power to make SuDS mandatory. In addition, it was advocated that Natural flood risk management should be used both on site and at source locations, which can be informed by further mapping work.



The importance of strong linkages between these policy areas and those of green infrastructure and placemaking was also highlighted, with consultees urging that effective connections be made across the topics.

Resilience – There is strong support for enhancing the Local Plan Policy position with regard to flood resilient housing. However, a number of representatives of the housebuilding industry have argued that Leeds should not be setting new standards for flood resilient housing on the grounds of cost and viability. It is also argued that local standards may reduce the opportunities for developers to use modern methods of construction. Other representations have raised the following issues:

- Clarity needed on the role of blue infrastructure in place-making as well as green infrastructure,
- Policy needs to get the balance right between encouraging innovation and meeting standards,
- Strong emphasis from others that resilience is an essential regardless of the cost,
- If we want to build in flood risk areas it must be demonstrated that the developments are resilient to flooding,
- The EA are keen for us to set our own policies for safe access and egress.

Do you agree or disagree with the following Policy Idea: Enhanced resilience – Making sure development is safe for its lifetime, increasing flood proofing and ensuring safe access and escape routes are included where appropriate.				
Answer Choices			Response Percent	Response Total
1	Strongly agree		86.67%	65
2	Agree		10.67%	8
3	Neither agree nor disagree		2.67%	2
4	Disagree		0.00%	0
5	Strongly disagree		0.00%	0
Please note this is a collation of responses to the above question in the SUMMARY documentation and does not take account of responses via email or Smartsurvey to the FULL consultation.			answered	75

Vulnerable People – broad support was expressed for the view that accommodation for more vulnerable people should not be in areas of high flood risk.

9. Should the Local Plan consider where accommodation for more vulnerable people is located?				
Answer Choices			Response Percent	Response Total
1	Yes		91.89%	34
2	No		8.11%	3
Please note this is a collation of online responses to the above question in the FULL documentation and does not take account of responses via email or Smartsurvey to the SUMMARY consultation.			answered	37

Permitted development rights and porous paving – Strong support was expressed for the LPU considering this vital issue, whilst noting frustrations at the lack of powers that local authorities have in this regard, as a result of permitted development rights. Ideas were raised in line with a policy approach adopted in Harringay which requires a % of the site area to be kept green or natural, limiting further extensions to existing properties within flood risk areas. However, of course it must be noted that any formal policy can only be applied where planning permission is required.





Green infrastructure

Overall, there is strong support for the inclusion of Green Infrastructure policies within the LPU. As a general matter, a number of consultees expressed a desire to see more overt references being made to blue infrastructure as part of a combined 'Green and Blue Infrastructure' topic. As part of this, both the EA and Natural England have asked for the LPU to include policies on water quality and water resources.

Biodiversity – There is significant debate within the representations as to whether the Council should stick with the 10% biodiversity net gain baseline as established through the Environment Bill, or whether it should pursue a more ambitious local target. Generally, those within the development industry supported not exceeding the 10% figure, citing the viability of future developments as a key concern. Others felt that the real issue was not one of percentages but about the long-term management and maintenance of any gains for nature, thus ensuring that ecologically beneficial improvements were made.

In addition, the view has been expressed that the LPU needs to make clear mention of the 'ecological emergency' as well as the 'climate emergency', given the impact human activity is having on bird and insect populations.

Trees –

Do you agree or disagree with the following Policy Idea: Plant more trees – There is an opportunity to better protect the trees we have and plant more new trees to help capture dangerous carbon emissions, manage flood risk and create happier healthier places.				
Answer Choices			Response Percent	Response Total
1	Strongly agree		86.32%	82
2	Agree		9.47%	9
3	Neither agree nor disagree		3.16%	3
4	Disagree		1.05%	1
5	Strongly disagree		0.00%	0
Please note this is a collation of responses to the above question in the SUMMARY documentation and does not take account of responses via email or Smartsurvey to the FULL consultation.			answered	95

Strong support was shown for the protection of existing trees and for increased new planting. The consultation has highlighted the tension between clarity and flexibility, which emerges when making decisions on setting clear targets for tree replacement

based on a numeric approach (e.g. 3 for 1), or those based on replacing on-site levels of carbon sequestration, which would be more bespoke to each site. Generally, there is support for going further than the existing policy requirement of a 3:1 replacement, with the importance of tree diversity also being highlighted. This helps to increase resilience, by avoiding similar species in the same locality, and their potential to be collectively impacted by disease. Other ideas/matters raised included:

- Presumption in favour of native and local species,
- Promote the planning of hedgerows as wildlife corridors and ensure their management and maintenance encourages increased biodiversity,
- Policies should allow for off-site provision where sites are particularly constrained e.g. city centre,
- Trees are important in protecting the ecology of rivers,
- Use Leeds Habitat Network and Local Nature Recovery Strategies to identify suitable locations for additional woodland,
- All mature trees should be treated as if having Tree Preservation Order status, due to their carbon sequestration and biodiversity value.

Nature conservation – strong support was shown for enhancing planning policy related to nature conservation, with comments including:

- Homeowners should be encouraged to rewild their gardens and plant productive plants which enhance natural drainage, promote biodiversity, increase carbon storage and also deliver crops,
- Provision must be made for monitoring and reviewing the Leeds Habitat Network to ensure that it is a high quality and effective ecological network across Leeds District and beyond,
- Must require development to maintain and create connectivity between habitats to prevent fragmentation of nature and maintain healthy populations of animals and plants that are then more resilient to climate change,
- Bird and bat boxes should be provided on all new homes.

However, other respondents suggested that new policies were not required and instead reliance should be placed on national policy and regulations.

Food production – Strong support was expressed for the LPU including new policies for local food production, with many consultees noting the negative impacts food miles has on the environment and the lack of connection modern communities have to the food they eat. Many representations have included detailed responses and these comments have helped expand our understanding of the issues presented by this topic. Organisations such as Feed Leeds are keen for us to work closely with them in the future as we develop new policy. Comments raised included:

- Consideration should be given to requiring “growing space” to be part of new developments, through larger gardens, allotments and other community food growing spaces,
- Land should be set aside for local food growing and use of Shared Spaces and roof gardens,
- Support for new techniques such as hydroponics, aeroponics and mushroom farming, with places such as roofs and abandoned buildings being better utilised. As well as under-utilised land such as car parks which sit largely empty,
- Targets could be set for local food production and this could be supported by smaller allotment plots and use of Council parks to include community food growing projects
- More allotments need to be provided,
- The policy should also focus on commercial food production by better protecting good quality agricultural land,
- The ‘Space Left Over After Planning’ - SLOAP - runs to many thousands of square metres within the city, and policy to ensure that this land is either planted with low maintenance edible forest garden style plantings, or made available for local community growing, could open up many new opportunities for local residents.

However, some representatives of the development industry feel that food production areas should not be provided as part of new housing development, as this would reduce the quantity of housing that could be delivered. Instead, local food production should be considered more strategically and considers whether local parks could incorporate such provision.

Green space – Responses suggest that stakeholders are supportive of increased greenspace provision within the City Centre and beyond. However, fears have been raised that better greenspace (and other GI more generally) as part of new developments could result in higher maintenance costs, which could get passed on to consumers. Separately, strong support has been expressed for green roofs, green walls and roof gardens, to be part of the green space and wider GI solution. Further comments included:

- The Council needs to better understand the types of greenspace it would like to see on sites. More clarity and evidence needs to be provided,
- Trees are multifunctional, so are a really positive tool for meeting multiple needs,
- Green verges need protection,
- GI should be better and more clearly defined to ensure we can better protect it.

Placemaking

20-Minute Neighbourhoods – Responses indicate that consultees are very supportive of the 20-minute neighbourhood concept, particularly as a means of tackling climate change and also the effects of current and future pandemics.

Detailed questions and comments have related to:

- How the concept can be applied across the city,
- How can we be proactive with other Council directorates to make sure the delivery of services are co-ordinated,
- Some representatives of the development industry have also expressed support but state that the concept needs to align with housing delivery, with calls for a review of the SAP given their opinion that housing is not being distributed correctly.

Presumption against cars – General support was expressed for the Council's aspirations to be a City where you don't need to own a car and how planning policies could be used to prevent further car-borne developments, with much of the emphasis being placed on increasing the ease of active travel and public transport. Views were also expressed that new developments should be as car-free as possible. However, strong views were also expressed by those who for a range of reasons (mobility, employment access etc) felt they had to own a car and feared being unfairly penalised.

Sustainable Development Checklist – There was general support for ensuring that health and wellbeing and climate change issues were fully addressed in all development proposals. Supporters felt that such an approach would encourage greater provision of local amenities and active travel opportunities. It was also felt that it could be used to support developers taking appropriate action, provided they could be enforced. However, it should be noted that other consultees feared that such checklists would result in increased bureaucracy and red-tape for development, with little benefit.

Sustainable Infrastructure

HS2 and Leeds Station – Broad support has been expressed for a policy on this topic, however a number of concerns were raised relating to the focus on HS2. Some of the issues raised included:

- Greater emphasis should be placed on Northern Powerhouse Rail and Transpennine upgrades, with many feeling this is more crucial than HS2,
- The Council should not focus on just the station element of HS2; the wider scheme itself is also key and how it integrates with the wider city,
- Improving integrated transport is the key, justifying strong links to the transport strategy,
- The policy should focus on ensuring permeable and active spaces underneath the viaduct,
- There is an opportunity to enhance the river environment, given the proximity to water courses,
- Given the uncertainty surrounding HS2 there should be a focus on making Leeds Station a hub for active travel and its crucial connections with other public transport modes.
- Policy should be flexible and relevant to any and all new strategic railway lines, not just HS2,
- There is too much focus on the city centre and more needs to be done (with regard to rail connections) for other areas.
- Climate change considerations are vital, when understanding carbon emissions from railway construction and encouraging onward journeys by sustainable modes.
- More green spaces need to be associated with the station,
- A strategy is required for creating active permeable spaces under the viaduct.
- Should consider opportunities to enhance local waterways as part of station redevelopment.

In addition to the issues raised above, on the topic of meanwhile uses, which is raised through the consultation materials, responses were received stating that such uses should not include car parks.

Mass Transit – general support was expressed for a policy considering Mass Transit. However, many respondents raised the argument that the Council should still be focussing on improving existing bus and rail networks, noting the risks of relying too heavily on the transformational benefits of Mass Transit, should the project not come to fruition. Comments also raised the following issues:

- Safeguarding of the route would be premature at this stage as there is a lack of clarity on that route,
- Mass transit should link to the overall spatial strategy of development, so greater densities can be delivered at key transport nodes,
- Reducing the need to travel should be the priority, particularly as Covid has changed commuting patterns. The risk is that Mass Transit is designed to fit in with pre-Covid commuting patterns,
- Mass Transit's role as a stimulus for new investment means that the route can have a positive impact on communities,
- Important to consider natural surveillance at stops, as well as how walking routes can be made attractive for pedestrians.
- Walking and cycling routes should be well-linked to Mass transit network,
- There should be disincentives for parking in the city centre,
- There needs to be a vision for how Mass Transit is integrated into the City, so that it sits well within the street scene and doesn't present any barriers. As such there are important links with place-making principles around the route and at stops.

Leeds Bradford Airport – strong support was expressed for a new policy concerning Leeds Bradford Airport. However, some doubts were expressed as to whether the sustainability of the airport could be enhanced. Leeds Bradford Airport have responded to express their in-principle support for the LPU whilst also highlighting the important role the airport has for the local economy, as well as the importance of the LPU following national policy. Other consultees (including WYCA) have set out that a future policy should explicitly set out how the airport could be supported through the development of public transport, such as rail and bus, and establish who is responsible for delivering and funding these interventions and by when.

Digital Connectivity – There is strong general support for the Council providing new policies on digital connectivity, largely in response to the important role digital connectivity has in modern life, and the damage it can do for those who do not have a good level of connectivity. However, some representatives of the development industry felt (whilst clearly noting the importance of digital connectivity) that the Council should not be establishing standards that go beyond the provisions of existing national policy and building regulations, particularly in light of the Government's commitment to address this through new legislation.

Sustainability Appraisal

The Local Plan Update will need to be accompanied by a Sustainability Appraisal (SA) prepared in accordance with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. The first stage of the Sustainability Appraisal process is to prepare a Scoping Report to consult with the three environmental consultee bodies (the Environment Agency, Natural England and Historic England) which:

- identifies other policies, plans and programmes relevant to the LPU,
- provides baseline information, either already collected or still needed,
- identifies social, environmental and economic issues identified as a result of the work undertaken,
- presents the SA framework, including objectives and indicators, and,
- sets out the proposed structure and content of the SA Report.

An SA Scoping Report has been prepared and consultation undertaken with the Environmental Bodies during the LPU Scoping consultation period. The proposed scope was based on the SA Framework used to assess the Core Strategy Selective Review adopted in 2019 with an update to baseline economic, social and environmental data and policies, plans and programme reflecting the scope of the LPU themes.

Responses were received from the Environment Agency (EA) and Natural England who both expressed general support for the proposed approach of the Sustainability Appraisal. The EA have suggested an additional sustainability objective around the water environment and water resources and the need to include reference to groundwater and preventing pollution. Both bodies have provided further information in relation to policies, plans and programme and baseline data that should be considered within the appraisal process.

Conclusion

As shown above, there is strong support for the scope of the Plan as proposed, with a range of contributions from consultees to help the Council refine these policy areas and progress towards draft policies within a Publication draft.

The largely digital Local Plan Update consultation had considerable benefits and enhanced our ability to connect with consultees that may not have attended face to face meetings. The use of social media and digital advertising improved our reach and provided useful analytics that can be used as baseline data for monitoring the success of future consultations. A range of new methods of engaging were utilised which provide a strong basis for future engagement. It is hoped and expected that we will be able to engage both physically and digitally on the Publication draft plan consultation as restrictions and Covid-19 rates ease.

**Leeds Local Plan
Planning and Compulsory Purchase Act 2004
Town and Country Planning (Local Planning) (England) Regulations 2012 - Regulation 19**

STATEMENT OF REPRESENTATION PROCEDURE

LEEDS LOCAL PLAN UPDATE: PUBLICATION DRAFT POLICIES

The City Council has published the Publication Draft Policies for the Leeds Local Plan Update (LPU) and subject to comments received will propose to submit the plan to the Secretary of State for Independent Examination.

The Leeds Local Plan sets out the authority's approach to planning policy and new development across the Leeds district over the next decade and beyond. Having regard to the objective of the Local Plan Update to update and improve existing policies and make new ones to address climate change, and the climate emergency declaration to achieve net zero emissions by 2030, the scope of the Plan will update and create new policies; making consequential changes, within the Adopted Leeds Core Strategy (amended 2019), the Natural Resources and Waste Local Plan (2013) and Unitary Development Plan (2006) which focus on: carbon reduction, flood risk, green and blue infrastructure including biodiversity and nature conservation), place-making and sustainable infrastructure in order to adapt to and mitigate the impacts of climate change and ensure the delivery of sustainable development within the Leeds Metropolitan District for a period of at least 15 years from Adoption.

The draft plan is based around five topic areas:

- **Carbon reduction** - changing the way buildings are built, and how we generate renewable energy.
- **Flood risk** - making our communities resilient to the impact of flooding, one of the most direct impacts of climate change that Leeds faces.
- **Green & Blue infrastructure** - making the most of our green spaces and natural environment, to help improve the health and well-being of our citizens.
- **Place-making** – guiding new development to places that offer the best opportunities for active travel and public transport, health & well-being and making the best use of communities' assets to create '20-minute neighbourhoods' where people want to live, work and play.
- **Sustainable infrastructure** – integrating low emissions transport and improved digital connectivity, helping reduce journeys by car.

Period for submission of Comments

Local Plan update has been consulted on previously (July - September 2021, Reg 18 stage). This is your opportunity to make representations about the draft policies prior to it being submitted for Independent Examination to government Inspector.

The Publication Draft consultation will run for a period of 8 weeks starting on Monday 24th October and finishing on Monday 19th December 2022.

How to view the documents

The dedicated and accessible website www.leeds.gov.uk/lpu will be home to all the information contained within the draft Local Plan. This includes separate sections for the different topic areas, which are available in a short summary format. A PDF version of the document will also be available on the website.

You will also be able to access consultation material at [Libraries](#) and [Community Hubs](#) as well as the Council's Main Office at Merrion House, 110 Merrion Way, Leeds, LS2 8BB.

Over the coming weeks, members of the Council's Planning team will also be hosting a series of webinars and drop-in sessions so people can find out more about the draft Local Plan policies. The details are available online at www.leeds.gov.uk/lpu

Key points to consider when making a representation

It is crucial that we hear from everybody that wants to comment on our plan, making sure we gather the views of as many people, businesses and stakeholders as possible, so the comments gathered represent varied views from all people across the city.

We are asking for people to consider two specific questions when making representations on the Local plan:

- 1) Is the plan legally compliant? Does the plan comply with the relevant legislation and regulations in the way it has been prepared, and in its content?
- 2) Is the plan 'sound'? Has the plan been 'positively prepared'? Is it robustly justified and evidence-led? Will it be effective in what it sets out to achieve? And is it consistent with national planning policy?

Submitting your comments

People can have their say on the Local Plan publication draft policies by using the online response form through the website www.leeds.gov.uk/lpu; alternatively emailing lpu@leeds.gov.uk, or

by writing to: Leeds Local Plan Update Consultation, Policy & Plan Group, Merrion House, 9th Floor East, 110 Merrion Way, Leeds, LS2 8BB.

All comments should be received by Monday 19th December 2022.

All representations received within the time period outlined above, will be submitted to the Secretary of State, and considered as part of a Public Examination by an Independent Planning Inspector.

Notification Request

Respondents can indicate on the comments from whether they would like to be notified of future stages in the progression of the Council's Local Plan

Please let us know if you have any requirements in terms of alternative formats or languages and we will make arrangements to make sure your views are registered¹.

If you are unable to access the consultation material online please contact us on 0113 37 87993 or write to us at: lpu@leeds.gov.uk

¹ Please note that the consultation material is available as html format on our dedicated web-site to enable wider accessibility

City Development
Policy and Plans Group
Merrion House, 9th Floor East,
110 Merrion Centre,
Leeds,
LS2 8BB

Contact: Local Plans Team
Tel: 0113 37 87993
Email: lpu@leeds.gov.uk or
innovationarc@leeds.gov.uk
Date: 24th October 2022

Dear Sir/Madam,

Consultation on:

- (1) Leeds Local Plan Update: Publication Draft Policies (Regulation 19) - Your Neighbourhood, Your City, Your Planet'; and**
(2) Leeds Innovation Arc Supplementary Planning Document Consultation

You are receiving this letter because you have expressed an interest to be kept informed about the Leeds Local Plan, or you wrote to us about proposed policies at a previous consultation stage (July 2021). You do not need to do anything if you do not wish to get involved with the Local Plan.

The Leeds Local Plan comprises a number of documents containing long-term strategic planning policies, that guide the amount and location of development in the Leeds district. It also includes more detailed topic-specific policies that guide different types of development, and makes sure that priorities such as design, green space, heritage, infrastructure, flood risk management etc. are considered during decision making.

As part of the Local Plan, Leeds City Council is commencing formal public consultation on two planning policy documents. These are

- [Leeds Local Plan Update 'Your Neighbourhood, Your City, Your Planet' Publication Draft Policies and](#)
- [Leeds Innovation Arc Supplementary Planning Document.](#)

You are invited to make comments about both or either of these documents and more detail is set out below.

(1) Leeds Local Plan Update: Publication Draft Policies

This will be an 8 week public consultation period starting on **Monday 24 October and finishing on Monday 19th December 2022.**

The objective of the current Local Plan consultation is to update and improve existing policies and make new ones to address climate change, and the climate emergency declaration to achieve net zero emissions by 2030. The City Council has published the Publication Draft Policies for the



Leeds Local Plan Update (LPU) and will consider responses before proposing to submit the plan to the Secretary of State for Independent Examination.

Please visit the Local Plan Update webpage www.leeds.gov.uk/lpu where you will be able to:

- view the consultation material
- book a place at our webinars
- find out more at our drop-in events

It is important that we hear from everybody that wants to comment, making sure we gather the views of as many people, businesses, and stakeholders as possible, so the comments gathered represent varied views from people all across the city.

Please don't hesitate to get in touch if you do not understand the material or the process. We will be happy to talk you through it.

People can have their say on the proposed policies by using the online response form through the website www.leeds.gov.uk/lpu or:

- emailing lpu@leeds.gov.uk
- writing to: Policy & Plans Group, Merrion House, 9th Floor East, 110 Merrion Way, Leeds, LS2 8BB.

We would prefer you to use the on-line form if possible as it makes it easier to manage your responses and speeds up the time taken to assess comments.

(2) Leeds Innovation Arc Supplementary Planning Document

This will be an 7 week public consultation period starting on **Monday the 24th of October and finishing on Monday the 12th of December 2022.**

This supplementary planning document (SPD) details guidance for future development and transformation of the 'Innovation Arc' – an area to west of the city centre which is home to many of the city's educational, healthcare and cultural institutions The SPD covers movement and connectivity, public spaces, land use and opportunities, heritage and culture and sustainability.

Please visit the SPD webpage www.inclusivegrowthleeds.com where you will be able to:

- view the consultation material
- book a place at our webinars
- find out more at our drop-in events

It is important that we hear from everybody that wants to comment, making sure we gather the views of as many people, businesses, and stakeholders as possible, so the comments gathered represent varied views from people all across the city.

Please don't hesitate to get in touch if you do not understand the material or the process. We will be happy to talk you through it.

People can have their say on the proposed SPD by using the online response form through the website www.inclusivegrowthleeds.com or:

- emailing innovationarc@leeds.gov.uk
- writing to: Policy & Plan Group, Merrion House, 9th Floor East, 110 Merrion Way, Leeds, LS2 8BB.

We would prefer you to use the on-line form if possible as it makes it easier to manage your responses and speeds up the time taken to assess comments.

More information

The enclosed Statement of Representation Procedure explains further details of the documents, how to submit comments and availability of documents.

The consultation will be carried out in accordance with the [Statement of Community Involvement](#).

If you wish to be removed from our mailing list then please e-mail us at: lpu@leeds.gov.uk

Next Steps

All duly made representations received during the consultation period will be considered by the Council. Comments relating to the Local Plan will in due course be forwarded to the Planning Inspector for consideration as part of their independent examination of the document.

Unless you specify otherwise, if you make a representation, we will notify you of future stages (including further public consultation).

Please let us know if you have any requirements in terms of alternative formats or languages and we will make arrangements to make sure your views are registered¹.

If you are unable to access the consultation material online please contact us on 0113 37 87993 or write to us at: lpu@leeds.gov.uk or innovationarc@leeds.gov.uk.

Yours faithfully



Martin Elliot
Head of Strategic Planning

¹ Please note that the consultation material is available as html format on our dedicated website to enable wider accessibility

Local Plan Policy Consultation young person's survey

1.



**It's time
to Have
Your Say!**

**'Your
Neighbourhood,
Your City,
Your Planet'**



We want you to help us make Leeds better for you and for the planet



We want to hear what young people think about how we are planning to make all new buildings in Leeds greener, cleaner and better for the planet.

This consultation is focussed on how the Council should decide how Leeds should grow over the next 10+ years and how we can help to reduce harmful carbon emissions across the city.



The last day that you can complete this survey is **Monday 19th December 2022**.

If you need to speak to someone about this consultation, then please email: lpu@leeds.gov.uk or telephone: 0113 37 87993.

Please let us know if you have any requirements in terms of alternative formats or languages and we will make arrangements to ensure that your views are registered.

Thank you for taking the time to participate in this consultation.

Privacy notice (data protection)

Leeds City Council will hold your representation to which it concerns for their consideration. The Council is the Data Controller of the information you provide and has a statutory duty under planning law to collect and process this information as part of its public task obligations as a Local Planning Authority. In addition, the council is required to provide all information submitted to us, including all personal information, to the Planning Inspectorate and their designated Programme Officer as part of the public examination of the Local Plan Update Publication Draft Policies. The Planning Inspectorate may use your personal information to contact you during the public examination process. Our software supplier, SmartSurvey Ltd, will also process your data on our behalf but will never use these for its own purposes.

To comply with its statutory obligations, the Council must make your representation available for public inspection and regulations allow this information to be made available on the internet. This includes your name, address, and the contents of your comment. To protect personal data from unnecessary disclosure, the Council will, however, remove any personal information provided in your representation which we are not required, by law, to make available (for example, telephone numbers and signatures).

The personal information you provide will be held until the adoption of the Development Plan Document, after which it will be securely destroyed. Please note that we cannot provide anonymity or accept comments marked 'private' or 'confidential'. Comments that include offensive, racist, discriminatory, threatening and other non-relevant statements will be destroyed.

The Council's corporate privacy notice, which includes details of the authority's Data Protection Officer and your Information Rights is available at: www.leeds.gov.uk/privacy-statement/privacy-notice

We use cookies to improve your experience of using our website. If you continue without changing your cookie settings, we assume that you are happy with this usage.

1. Please confirm.... *

I give my consent for my personal information to be used as described in the privacy notice.

2. Climate Change

Climate change describes a change in the typical weather for an area, such as how hot or cold it gets or how much rain falls, over a long period of time. Scientists have observed that, overall, the Earth is warming. This is mainly due to human activities, such as the burning of fossil fuels like coal, oil and gas.

How concerned are you by climate change?

- Not concerned at all
- Not very concerned
- A little concerned
- Very concerned
- Extremely concerned

3. If you are concerned about climate change, how does it affect you (select all that apply)?

Worry/anxiety

Trouble sleeping Nightmares Arguments with family/friends I have not been affected emotionally Other (please specify):

4. Has local climate change impacted you in any of the following ways?

 Your home, school or places you visit have flooded? You have experienced health problems, perhaps due to excessive heat or air pollution? You couldn't do normal activities during the heatwave or drought (like cancelled sports events, shorter school day or unable to fill paddling pool or water garden etc.)? Other (please specify):

3. Our planning policies

We have written some new planning policies (a list of rules) that we think will ensure that the best new buildings are built to help us achieve our goals.



5. How important is this to you?

 Extremely important Very important Somewhat important Not so important Not at all important

Flood Risk – Reducing the risk of new development flooding, making sure people can escape safely during floods. Providing drainage ponds and other natural ways to allow rain to soak away.



6. How important is this to you?

- Extremely important
- Very important
- Somewhat important
- Not so important
- Not at all important



Green & Blue Infrastructure – Protecting and increasing the number of trees, parks, woods and river corridors in Leeds for the benefit of people, the climate and wildlife.

7. How important is this to you?

- Extremely important
- Very important
- Somewhat important
- Not so important
- Not at all important

Placemaking –
Designing our
neighbourhoods to make
it easier to walk or cycle
to local shops, schools,
parks and other
important facilities.



8. How important is this to you?

- Extremely important
- Very important
- Somewhat important
- Not so important
- Not at all important



Sustainable
Infrastructure –
Supporting low
carbon transport
(such as buses and
trains), and improved
internet connections,
to help reduce car
journeys.

9. How important is this to you?

- Extremely important
- Very important
- Somewhat important
- Not so important
- Not at all important

4. Comments

10. Are there any other comments you would like to make?

5. A chance to win!

We have five £10 vouchers to give away to young people helping us by completing this survey. If you would like to be entered into the prize draw please leave contact details (either for yourself or a parent/guardian) so we can get in touch if you win. Please ask your parent/guardian's permission first.

We will only use personal data for this purpose, and all personal data will be destroyed after the prize draw has taken place.

11. Name

12. Email address:

13. Home address:

House number or name	<input type="text"/>
Street	<input type="text"/>
Area	<input type="text"/>
City or district	<input type="text"/>
Postcode	<input type="text"/>

Local Plan Update - Publication Draft Consultation

1. Introduction

This consultation is from the Policy and Plans Group at Leeds City Council.

Welcome to Leeds City Council's public consultation on Local Plan Update 'Your Neighbourhood, Your City, Your Planet'.

The Council have created the Publication Draft Policies using comments and suggestions from our previous consultations as well as further research and evidence. This is your opportunity to let us know if you agree with the policies we are proposing to submit to the Secretary of State for Independent Examination. To view the draft policies please click the image below:



(<http://www.leeds.gov.uk/lpu>)

This formal eight-week consultation will start on Monday 24th October 2022 and will run until Monday 19th December 2022. During this time residents, community groups, interested parties and stakeholders may make comments, also known as 'representations' on the draft plan.

Following the end of this consultation period all responses received will be forwarded onto the Planning Inspectorate to be taken into account, together with the Local Plan itself and the supporting evidence base documents. All relevant documents can be found on the Council's website at: www.leeds.gov.uk/lpu

We would like to hear your views on the Local Plan Update Publication Draft Policies. We would recommend you read the documents before filling in this form which can be found by clicking the image above. A summary of each topic covered in the Local Plan Update is included below:

Carbon Reduction

To minimise energy demand and meet all heat and power requirements without increasing carbon emissions to allow Leeds to meet its climate emergency commitment.

Flood Risk

Leeds will ensure that new developments are located and designed to avoid, reduce and mitigate flood risk, increase biodiversity and reduce the carbon footprint of risk reduction schemes through natural flood solutions.

Green Infrastructure

Leeds will create new Green Infrastructure (GI) through the planning process, and identify, improve, protect and extend existing GI to address the challenges of climate change and create a healthy city for all.

Place-Making

To guide development to locations that offer the best opportunity for active travel, public transport and minimise private motor vehicle use. To capitalise on local community's assets and to deliver high quality, sustainable and resilient places.

Sustainable Infrastructure

Leeds will ensure the delivery of an accessible and integrated transport system alongside digital and communications infrastructure to support sustainable and resilient places.

PLEASE NOTE THAT REPRESENTATIONS SHOULD ONLY RELATE TO THE LOCAL PLAN UPDATE PUBLICATION DRAFT POLICIES, THE SUSTAINABILITY APPRAISAL & HABITAT REGULATIONS ASSESSMENT AND / OR BACKGROUND MATERIAL.

Instructions:

It should take you about 10 - 15 minutes to answer the questions in this consultation (subject to the level of detail you are submitting). Your response will only be registered if you complete the required questions, and you click 'finish' on the last page. The last day that you can respond is Monday 19th December 2022.

If you need to speak to someone about this consultation, then please email: lpu@leeds.gov.uk or telephone: 0113 37 87993.

Please let us know if you have any requirements in terms of alternative formats or languages and we will make arrangements to ensure that your views are registered.

Thank you for taking the time to participate in this consultation.

2. Privacy notice (data protection)

Privacy notice (data protection)

Leeds City Council will hold your representation to which it concerns for their consideration. The Council is the Data Controller of the information you provide and has a statutory duty under planning law to collect and process this information as part of its public task obligations as a Local Planning Authority. In addition, the council is required to provide all information submitted to us, including all personal information, to the Planning Inspectorate and their designated Programme Officer as part of the public examination of the Local Plan Update Publication Draft Policies. The Planning Inspectorate may use your personal information to contact you during the public examination process. Our software supplier, SmartSurvey Ltd, will also process your data on our behalf but will never use these for its own purposes.

To comply with its statutory obligations, the Council must make your representation available for public inspection and regulations allow this information to be made available on the internet. This includes your name, address, and the contents of your comment. To protect personal data from unnecessary disclosure, the Council will, however, remove any personal information provided in your representation which we are not required, by law, to make available (for example, telephone numbers and signatures).

The personal information you provide will be held until the adoption of the Development Plan Document, after which it will be securely destroyed. Please note that we cannot provide anonymity or accept comments marked 'private' or 'confidential'. Comments that include offensive, racist, discriminatory, threatening and other non-relevant statements will be destroyed.

The Council's corporate privacy notice, which includes details of the authority's Data Protection Officer and your Information Rights is available at: www.leeds.gov.uk/privacy-statement/privacy-notice (<https://www.leeds.gov.uk/privacy-statement/privacy-notice>)

We use cookies (<http://www.leeds.gov.uk/privacy-statement>) to improve your experience of using our website. If you continue without changing your cookie settings, we assume that you are happy with this usage.

Please confirm... *

I give my consent for my personal information to be used as described in the privacy notice.

3. Comments in relation Local Plan Update Publication Draft

"The Council believes that the policies in the publication draft LPU update meet the overall objective to use planning policy tools to help address the climate emergency, with a focus on carbon reduction, flood risk, green and blue infrastructure, place-making and sustainable infrastructure."

To what extent do you agree with this statement?

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

4. Comments Relating to Specific Policies

Do you have any specific comments, either in support of the plan or policies, or in objection to the plan or policies, to make?

(If you wish to comment on all the policies then please selected "All the Policies", if you wish to comment on one or multiple policies then please tick the relevant boxes)

	Support	Do Not Support	No Comment
All the Policies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Support	Do Not Support	No Comment
Strategic Policy SP0: Climate Change Mitigation and Adaption	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EN1 Part A: Embodied Carbon	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EN1 Part B: Operational Energy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EN2: Sustainable Construction Standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EN4: District Heating	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EN3: Renewable Energy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Support	Do Not Support	No Comment
Water 1: Water Efficiency	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water 2: Protection of Water Quality	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water 3: Functional Floodplain	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water 4: Land at Increased Risk of Flooding	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water 6: Flood Risk Assessments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water 6a: Safe Access and Escape	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water 5: Residual Risk	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water 7: Sustainable Drainage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water 8: Porous Paving, Loss of Front Gardens and Permitted Development Rights	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Support	Do Not Support	No Comment
Spatial Policy 13: Protecting, Maintaining, Enhancing and Extending Green and Blue Infrastructure	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy G1: Protecting, Maintaining, Enhancing and Extending Green and Blue Infrastructure Within and Outside Areas of GBI	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Support	Do Not Support	No Comment
Policy G2a: Protection of Trees, Woodland and Hedgerows	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy G2b: Ancient Woodland, Long Established Woodland, Ancient Trees, Veteran Trees	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy G2c: Tree Replacement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy G4a: Green Space Improvement and New Green Space Provision	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy G4b: Quality of New Green Space	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy G4c: Maintenance of Green Space	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy G6: Protection of Existing Green Space	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy G8a: Protection of Important Species and Habitats	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy G8b: Leeds Habitat Network	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy G9: Biodiversity Net Gain	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy F1: Food Resilience	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Support	Do Not Support	No Comment
Policy SP1b: Achieving Well-Designed Sustainable Places	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy P10: Development Principles for High-Quality Design & Healthy Place Making	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy SP1a: Achieving 20 Minute Neighbourhoods in Leeds	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Spatial Policy 1: Location of Development	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy EN9: New Drive Thru' Development	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy P10a: The Health Impacts of Development	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Support	Do Not Support	No Comment
Policy SP11a: Mass Transit and Rail Infrastructure	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy SP11b: Leeds Station	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy DC1: Digital Connectivity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any further details if relevant:

Paragraph

Page

Do you wish to comment on any other document as part of the consultation material, such as the Sustainability Appraisal , Habitats Regulations Assessment etc.?

Title of document

Paragraph Number

Page Number

5. Legal Compliance and Soundness of the Local Plan

Explained - Tests of Soundness

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the legal and procedural requirements, and whether it is 'sound'. A local planning authority should submit a plan for examination which it considers 'sound, this is explained in paragraph 35 of the National Planning Policy Framework (<https://www.gov.uk/guidance/national-planning-policy-framework/3-plan-making>).

Local Plans are considered 'sound' if they are:

Positively Prepared:

The plan should be prepared to meet our social, economic and environmental requirements.

Justified:

The plan is based on reasonable and proportionate evidence

Effective:

The plan should be deliverable over the plan period, up to 2040

Consistent with National Policy:

The plan seeks to deliver sustainable development and is consistent with national policy

(<https://www.leeds.gov.uk/Local%20Plans/Soundness.png>)

At this stage, before the Local Plan is sent to the Secretary of State for Public Examination, we are asking for your views about the 'soundness' of the Plan. An independent Inspector will examine the Plan against the 'tests of soundness' (These terms are explained in the guidance note).

Legal Compliance

Based on the policies selected previously do you consider the Local Plan legally compliant? *

- Yes
- No
- Don't Know

Which part of legal compliance is your comment about?

- Local Development Scheme
- Planning and Compulsory Purchase Act 2004
- Statement of Community Involvement
- Sustainability Appraisal Report
- Consultation of appropriate Statutory Bodies
- Town & Country Planning (Local Planning) Regulations
- Duty to Cooperate

Please give details of

i) why you think the Local Plan is or is not legally compliant and;

ii) set out what change(s) you consider necessary to ensure that the Policies are legally compliant and why (if necessary).

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Each box capacity is approx 2,000 words, 4 pages of A4.

There is an opportunity to upload documents before the Form is submitted.

Soundness

Based on the policies selected previously do you consider the Local Plan sound? *

- Yes
- No
- Don't Know

Which test of soundness are your comments about?

- Positively Prepared
- Effective
- Justified
- Consistency with National Policy

Please give details of

i) why you think the Local Plan is or is not sound and;

ii) set out what change(s) you consider necessary to ensure that the Policies are Sound and why (if necessary).

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Each box capacity is approx 2,000 words, 4 pages of A4.

There is an opportunity to upload documents before the Form is submitted.

6. Other Comments

If you wish to provide any further comments then please use the text box below.

Each box capacity is approx 2,000 words, 4 pages of A4.

There is an opportunity to upload documents before the Form is submitted.

7. Document Upload

Here you can upload documents alongside comments you may have made previously.

Choose File

No file chosen

8. Take part in the public examination

Your comments will be taken into account by the Planning Inspector. Would you like to take part in the forthcoming Public Examination?

Yes

No

If you have selected No, your representation(s) will still be considered by the Independent Planning Inspector by way of written representations.

9. Future Updates

Would you like to be notified of any of the following? (please tick as appropriate)

The submission of the Local Plan for public examination

The publication of the Inspector's report

The Adoption of the Local Plan

10. About you

We would like to know a little more about you. This is so we can make sure we are hearing from a wide range of people from different backgrounds and better understand what you tell us.

Answering these questions will also help us consider how our policies affect people from different backgrounds; we have a legal duty to do this under the Equality Act 2010.

By answering, you are giving your consent for us to use this information as explained above.

Are you submitting comments as an individual or on behalf of a group, or an agent representing a client? *

- Individual / group
- Agent

11. Contact details - Individual / group

Your details: *

Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Organisation	<input type="text"/>

Email address: *

Address:

House number or name	<input type="text"/>
Street	<input type="text"/>
Area	<input type="text"/>
City or district	<input type="text"/>
Postcode	<input type="text"/>

12. Contact details - Agent

Your details: *

Title	<input type="text"/>
-------	----------------------

First Name

*

Last Name

*

Organisation

*

Please provide: *

Name of Client:

Agent Email address: *

Address:

House number or name

Street

Area

City or district

Postcode

13. Equality and Diversity

Please indicate which best describes your ethnic origin:

White

English / Welsh / Scottish / Northern Irish / British

Irish

Any other White background

Mixed / Multiple ethnic groups

White and Black Caribbean

- White and Black African
- White and Asian
- Any other Mixed / Multiple ethnic background

Asian / Asian British

- Indian
- Pakistani
- Bangladeshi
- Kashmiri
- Chinese
- Any other Asian background

Black / Black British

- African
- Caribbean
- Any other Black background

Other ethnic group

- Arab
- Gypsy or Traveller
- Any other background

Prefer not to say

- Prefer not to say

If you selected an 'Any other' option please describe your ethnic group:

14. Age

What year were you born?

15. Where you live

Please could you provide the first part of your postcode (e.g. LS1, LS25), or the name of your neighbourhood, to help the Council measure that comments are received from all communities in Leeds.

16. Consultation Material

Have you found the material in this survey engaging?

Yes

No

17. Final step

Thank you - That is all the questions we have for you.

Please now click the Finish button below to save and send your responses to us.