



Appendix 2: Schedule of Changes

Publication Draft Pre-Submission Changes to the Leeds Local Plan Update

September 2023

Please note this table details the Publication Draft Pre-Submission Changes (under Regulation 19) to the Leeds Local Plan Update and identifies the changes following the initial Publication draft document which was subject to consultation from 24th October to 19th December 2022.

The changes to the policy wording and supporting text are itemised below:-

New text is shown as **bold underlined**

Deleted text is shown as ~~**bold strike through**~~

To assist readers, the full text of the Local Plan Update showing the Pre-Submission Changes as tracked changes is available [here](#)

Consultation comments should relate to the Publication Draft Pre-Submission Changes only and not revisit the remaining original policy wording and supporting text, which was subject to consultation in 2022.

Pre-Submission Change Number	Topic Heading	Para. Number /Policy Ref in LPU Document	Details of Pre-Submission Change	Reason for Change
1	EXPLANATORY NOTE	1 st para.	Revise second sentence to read: "As these policies will have the effect of amending and updating the existing Core Strategy (2019 as amended) <u>and the Natural Resources and Waste Local Plan 2013 (Minerals Transport polices 2015)</u> , the document specifies which parts of the adopted Core Strategy <u>and Natural Resources and Waste Local Plan</u> are proposed to be amended."	For clarity
2	OVERALL APPROACH	4.0.9	Insert new text after end of second bullet point: " <u>and encouraging the re-use of buildings rather than demolition</u> "	To reflect circular economy principles which are an

				important part of carbon reduction
3	OVERALL APPROACH	POLICY SP0	<p>Amend POLICY SP0 to read:</p> <p>STRATEGIC POLICY SP0: CLIMATE CHANGE MITIGATION AND ADAPTATION</p> <p>Development must contribute to the reduction of carbon emissions in Leeds.</p> <p>New developments will achieve 100% net zero operational carbon reductions (on 2000 levels) to help make significant progress to the District being net zero by 2030.</p> <p>New developments will support the District's wider science-based Scope 1 and 2 carbon reduction targets (on 2000 levels) as follows:</p> <ul style="list-style-type: none"> i. 85% by 2030 ii. 95% by 2035 iii. 97% by 2040 iv. 99% by 2045 v. 100% by 2050 <p>This will be achieved by:</p> <ul style="list-style-type: none"> 1. Minimising carbon emissions, including by: <ul style="list-style-type: none"> a. Developing in sustainable locations in accordance with Policy SP1 and SP1A b. Supporting the city centre, town and local centres as sustainable hubs in accordance with Policies SP2, P2, P3 and P8 c. Supporting the delivery of 20-minute neighbourhoods which are walkable and cyclable complete, compact and connected places in accordance with Policy SP1A 	Reference to 20 minute neighbourhoods replaced to reflect

			<p>d. Building zero carbon operational buildings in accordance with Policies EN1</p> <p>e. Improving the sustainability of buildings in accordance with Policy EN2</p> <p>f. Taking opportunities to incorporate Whole Life Cycle carbon emissions into buildings in accordance with Policy EN1</p> <p>g. Taking opportunities to incorporate and connect to renewable and low carbon sources of heat and power in accordance with Policies EN1, EN2 and EN4</p> <p>h. Promoting the generation of renewable energy within the District in accordance with Policy EN3</p> <p>i. Reducing the need to travel by car and encouraging sustainable travel in accordance with Policy SP1, SP11, EN9, T1, T2 and MINERALS 13</p> <p>j. Delivering densities that make the most of accessible sites in accordance with Policy H3</p> <p>k. Incorporating electric vehicles charging points in accordance with Policy EN8</p> <p>l. Encouraging more food growing in the District so as to reduce food miles in accordance with Policy F1.</p> <p>m. <u>Promoting the circular economy by prioritising the retention of existing structures rather than demolition</u>.</p> <p>2. Adapting to the impacts of climate change, including by:</p> <p>a. Restricting inappropriate development in high flood risk areas and managing flood risk in association with Policies EN5 and WATER 3, 4, 5, 6 and 7</p> <p>b. Delivering net gains for biodiversity that help support plants and animals adjust to changing climates in accordance with Policy G9</p> <p>c. Incorporating water and energy efficiency measures into the active and passive design of new buildings in accordance with EN2 and WATER 1</p>	<p>wording change to SP1A</p> <p>Reference to circular economy principles added as they are an important part of carbon reduction. Therefore, included for completeness. The Government states that <i>“the UK is committed to moving towards a more circular economy which will see us keeping resources in use as long as possible, extracting maximum value from them, minimizing waste and promoting</i></p>
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			<p>d. Providing Green and Blue Infrastructure and Green Spaces which provide shade, reduce overheating and mitigate air pollution in urban areas in accordance with Policies G1 and G4B</p> <p>3. Ensuring resilient and healthy places, including by:</p> <p>a. Promoting the creation and growth of 20-minute neighbourhoods complete, compact and connected places where the reliance on the private car is reduced and social interaction and health and well-being are maximised, in accordance with Policy SP1A</p> <p>b. Making best use of land, including in the inner city which is more vulnerable to a changing climate, to ensure that it can perform carbon adaptation roles such as laying out of Green Space and protecting trees in accordance with Policy G2A</p> <p>c. Improving the design of places, in accordance with Policy P10</p> <p>d. Improving the health and well-being of residents of Leeds, in accordance with Policy P10A.</p> <p>4. Maximising carbon storage and sequestration, including by:</p> <p>a. Protecting, enhancing and extending Green and Blue Infrastructure that helps sequester carbon in accordance with Policies SP13 and G1</p> <p>b. Protecting habitats that fulfil carbon storage functions in accordance with Policy G8</p> <p>c. Protecting and planting trees and recognising their essential role for carbon sequestration as well as amenity and ecology, in accordance with Policies G2A and G2C.</p> <p>5. Supporting the robustness of the District's biodiversity, including by:</p> <p>a. Protecting, enhancing and extending Green and Blue Infrastructure that helps create places, corridors and</p>	<p><i>resource efficiency</i>". (Source: Circular Economy Package policy statement DEFRA 30 July 2020)</p> <p>A more detailed policy on the circular economy will be included in LLP Reference to 20 minute neighbourhoods replaced to reflect wording change to SP1A</p>
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			<p>stepping stones for nature in accordance with Policies SP13 and G1</p> <p>b. Identifying opportunities to create more biodiverse developments in accordance with Policy G9 and SP1B</p> <p>c. Protecting important habitats from development and harm in accordance with Policy G8</p> <p>d. Seeking biodiversity net gain from all relevant development in accordance with Policy G9</p> <p>e. Protecting and planting trees, in accordance with Policies G2GD.</p>	Revision to update policy reference
4	CARBON REDUCTION		Insert paragraph numbering for section	For clarity and consistency
5	CARBON REDUCTION Whole Life Cycle Carbon Assessments	After 8 th para.	<p>After 8th paragraph insert:</p> <p><u>“Whole life cycle carbon assessments will be monitored and this policy will be subject to a future plan review to set a benchmark figure for future development to achieve.”</u></p>	Text moved from policy EN1A as does not refer to a specific date for review
6	CARBON REDUCTION Whole Life Cycle Carbon Assessments	9 th para. under	<p>Delete 9th paragraph and replace with:</p> <p><u>“Where an application is seeking to demolish an existing building, then the applicant will have to demonstrate that the new development would have a lowr carbon cost over its lifetime through the calculation of its embodied carbon and projected operational carbon emissions when measured against reusing the existing building(s). If the building is currently not in use, or in a state of disrepair, an estimation of its energy demand for the proposed use should be provided by the applicant.Existing buildings contain significant amounts of embodied carbon that can be wasted through demolition. In order for applications to consider whether demolition is necessary, and if it is, how those existing</u></p>	Changes to supportive text relates to policy wording amendments.

			<p><u>materials can be reused or recycled through a new development, Policy EN1A Part B requires applicants to demonstrate how existing buildings may not be suitable for the proposed development and how materials should be recycled and reused if demolition is necessary. Where materials cannot be reused or recycled, justification for this should be submitted through the application. Justification for why demolition of buildings may be required include:</u></p> <ul style="list-style-type: none"> • <u>The buildings are unsafe, or contain hazardous materials</u> • <u>The buildings do not support the proposed use, in terms of layout or size.</u> • <u>The proposed development will improve energy efficiency, resulting in long term carbon savings and lower costs of operation for the occupiers. “</u> 	
7	CARBON REDUCTION Whole Life Cycle Carbon Assessments	POLICY EN1 PART A	<p>Amend policy to read:</p> <p><u>EN1 PART A: EMBODIED CARBON</u></p> <ol style="list-style-type: none"> 1. All major development should calculate the whole life cycle carbon emissions using a nationally recognised assessment methodology and demonstrate actions to reduce life-cycle carbon emissions of the development. 2. All applications to demolish a building will need to demonstrate how the replacement development will be more energy efficient and use less carbon over its lifetime than reusing the existing building. Buildings should be reused. Where an application is seeking to demolish a building, the applicant must demonstrate how the proposed use is not suitable for the existing buildings on site. Once it has been established that the proposed use is not suitable for the proposed use, applications will need to demonstrate how they will reuse and recycle materials created through 	<p>Policy intention is to retain embodied carbon in existing buildings. Previous methodology was not implementable and therefore not effective.</p>

			<p><u>the demolition. Evidence will be required where applicants believe that materials cannot be reused or recycled.</u></p> <p>3. Minor and household applications should consider the whole life cycle emissions of the development and make reasonable efforts to reduce those emissions using natural and recycled materials in the construction process. This should be demonstrated by assessing the scheme against the Council’s whole life cycle carbon assessment checklist for minor and household applications.</p> <p>Whole life cycle carbon assessments will be monitored and this policy will be subject to a future plan review to set a benchmark figure for future development to achieve.</p> <p>“Where an application is seeking to demolish a building, the applicant must demonstrate how the proposed use is not suitable for the existing buildings on site. Once it has been demonstrated that the proposed use is not suitable for the existing building, applications will need to demonstrate how they will reuse and recycle materials created through the demolition. Justification will be required where applicants believe that materials cannot be reused or recycled.”</p>	
8	CARBON REDUCTION Operational Energy	2 nd para. under Operational Energy	<p>Revise 3rd sentence in the to read:</p> <p><u>“However Part L does not calculate unregulated energy and is not an appropriate method to calculate predicted building energy use performance accurately. Therefore Policy EN1B will focus on energy based metrics and require applications to calculate their predictive energy demands using modelling tools applicants to calculate the predicted energy demands (space heating demand and Energy Use Intensity targets) of the development using modelling tools.”</u></p>	To reflect why we are moving away from Part L as a method to deliver net zero operational energy buildings.

9	CARBON REDUCTION Operational Energy	3 rd para. under Operational Energy	Revise 1 st sentence to remove “ Part ” in reference to Policy EN1 and add “ by 2030 ” at end of sentence.	For clarity and to reflect the timescale set by policy EN1
10	CARBON REDUCTION Operational Energy	3 rd para. under Operational Energy	Revise 4 th sentence to read: “...be that through onsite and or offsite generation <u>with financial contributions as a last resort.</u> ”	To acknowledge that offsetting is required for certain building types to be ‘net’ zero
11	CARBON REDUCTION Operational Energy	4 th para. under Operational Energy	Revise 3 rd sentence remove “ Energy Use Intensity ” and add “ <u>demand</u> ” after operational energy	For clarity
12	CARBON REDUCTION Operational Energy	6 th para. under Operational Energy	Insert the following sentence at start of paragraph to read: <u>“New development will be expected to be ‘fossil fuel free’”</u>	The policy previously restricted development from using gas boilers and electric resistive heating. We feel that this wording would ensure no fossil fuel-based energy would be used onsite (gas boilers and any others) whilst potentially allowing electric resistive heating in certain scenarios
13	CARBON REDUCTION Operational Energy	6 th para. under Operational Energy	Insert the following sentence at start of paragraph to read: <u>“Fossil fuel plants onsite may be seen as acceptable where:</u> <ul style="list-style-type: none"> • <u>There are emergency and life safety issues, such as providing back up power in the healthcare sector or other emergency uses.</u> • <u>There is a requirement for energy back up to essential functions in buildings and sites defined of critical importance.”</u> 	To reflect comments made during consultation by NHS Trust about how certain uses have more specialised energy needs.

14		7 th para. under Operational Energy	<p>Revise paragraph to read:</p> <p>In order <u>to comply with implement</u> Policy EN1B planning applications will be supported by energy statements (pre and post construction) that demonstrate how the development meets <u>a</u> net zero operational <u>carbon energy balance</u>. This will include calculations for annual & cumulative carbon emissions for 30 years. This can be done using an approved building modelling software such as IES VE, SBEM and PHPP depending on the type of development, the outputs of which must be included in the planning application. To reflect the changing grid carbon intensity, developers should employ the official UK government's expected electricity grid carbon intensity figures rather than the static carbon factors inherent in 2021 Building Regulations / SAP methodology.</p>	<p>For clarity</p> <p>This is relevant to Part L building regulation calculations, which we have now moved away from using.</p>
15	CARBON REDUCTION Operational Energy	After 7 th para. under Operational Energy	<p>Insert new paragraph:</p> <p><u>"Up until the end of the transition period in 2027, applications will have to demonstrate how they have maximised fabric efficiency and onsite renewable energy generation with an aim to meet the transitional EUI and Space Heating Demand targets found within the policy. The Council understands that the heating technologies, supply chains and skill base may not currently be at the required national level to deliver all buildings in all locations to the standards detailed in the policy. However, this is a fast moving area and the development industry has told the council that it is committed to net zero so there is a need for a transition approach. In, in the interim, justification should be provided for why the requirements cannot be met. Once the transition period is complete by the end of 2027, applications will be expected to achieve a net zero operational energy balance by meeting the EUI's and Space Heating Demand within the policy and could be refused planning permission if not met."</u></p>	<p>To reflect the new policy wording and intent and justify why a transition period is required.</p>

16	CARBON REDUCTION Operational Energy	8 th para. under Operational Energy	<p>Revise paragraph to read:</p> <p>Where applications submitted after the 1st January 2028 a development that cannot technically or feasibly be delivered to net zero operational <u>energy balance standard</u>, then a carbon offsetting financial contribution would be sought Examples where a scheme may not be technically feasible may be where:</p> <ul style="list-style-type: none"> • Site constraints resulting in a lack of potential for on-site renewable energy generation equal to the buildings operational energy. <u>This is most likely in high density schemes where the available roof space to deliver Photo Volataic (PV) panels would not generate enough energy for the gross internal floorspace delivered.</u> • Historic buildings where energy carbon saving measures may create unacceptable damage or loss to the building’s historic character. <p>In such circumstances robust justification for not achieving <u>an</u> operational net zero carbon <u>energy balance</u> will be required which balances the need for the development against its additional carbon emissions that will conflict with Policy SP0.</p>	To reflect changes in policy wording and provide clarification where offsetting may be required.
17	CARBON REDUCTION Operational Energy	9 th para. under Operational Energy	<p>Delete the following paragraph:</p> <p>“The £/tonne of carbon commuted sum in which the Council will levy to developers is based on the best available science on the true cost of carbon, and on established practice. The UK Government provides an official £/tonne of carbon emissions which should be taken into account and as of 2022, the cost of carbon is set at £248/tonne, and this will increase to £280/tonne by 2030. The contributions in lieu will be used to deliver Council run projects that help reduce carbon across the district.”</p>	Policy EN1B has been amended to require buildings to deliver an operational energy balance of zero after a transition period. Buildings are expected to achieve this through the delivery of renewable energy onsite, and where not possible,

				<p>offsite through financial contributions. Therefore the financial offsetting mechanism has changed from a carbon based figure to a sum calculated from the installation of meeting the residual renewable energy cost.</p>
18	CARBON REDUCTION Operational Energy	After 9 th para. under Operational Energy	<p>Insert the following two paragraphs:</p> <p><u>“Following the end of the transition period in 2027, applications that can not generate the renewable energy demand of the development onsite will be expected to financially offset the residual energy requirement. The offset value will be calculated using the following methodology:</u></p> <p><u>Shortfall between annual energy and renewable energy generation onsite (kWh/m2) X cost of PV installation offset figure</u></p> <p><u>The financial offset multiplier is linked to the Government’s solar photovoltaic cost dataset and the cost per kW for 10-50 kW installations. The Council will provide an annual update of the offsetting value to reflect any amendments to the Government’s cost dataset with. As of September 2023, the offset price would be £1.35/kWh/yr, although this figure will have been updated upon adoption of offsetting in 2028.”</u></p>	<p>Previous methodology was carbon based, however we have moved towards an offset value based on the cost of delivering the renewable energy that is not possible onsite, offsite. As our Policy uses EUIs, it makes more sense to calculate this way as evidenced by Cornwall and Bath and North East Somerset’s adopted plans.</p>
19	CARBON REDUCTION Operational Energy	9 th para. under Operational Energy	<p>Before text “These will include” insert new sentence to read:</p> <p><u>“Financial contributions collected through offsetting will go towards renewable energy generation installations and projects to improve energy efficiency”</u></p>	<p>For clarity on use of offsetting contributions.</p>

20	CARBON REDUCTION Operational Energy	10 th para. under Operational Energy	<p>Revise paragraph to read:</p> <p>“The above projects are not exhaustive, and liable to change as the Council continues to support and introduce new carbon reducing projects. The annual sum of offset contributions received commuted sums collected will be monitored...”</p>	For clarity
21	CARBON REDUCTION Operational Energy	Policy EN1 Part B	<p>Revise Policy EN1 Part B to read:</p> <p>EN1 <u>PART</u> B: OPERATIONAL ENERGY</p> <p>All new development must demonstrate that the buildings will achieve net zero operational carbon emissions in line with the following hierarchy:</p> <p>Minimise carbon emissions through passive design principles including fabric efficiency measures. Following carbon minimisation in Step 1, include renewable energy onsite to deliver an annual net zero carbon balance (including regulated and unregulated emissions) Exceptionally and subject to a demonstration of technical or feasibility constraints, all remaining operational carbon for a 30-year timeframe should be offset through a £248/tonne financial contribution to the Council to deliver carbon savings locally. This will increase to £280/tonne by 2030.</p> <p>Gas boilers and direct electric resistive heating will not be supported.</p> <p>Planning applications need to be supported by energy statements (pre and post construction) that demonstrate how the development meets net zero operational carbon</p> <p>An energy statement at the planning application stage will be required to demonstrate how energy efficient design and</p>	The policy has been amended to reflect comments received through the consultation. A transition period has been introduced to allow the building industry time to prepare of fully operationally energy net zero development by 2030. The policy also now provides clarification on when and why financial offsetting would be expected.

demand reduction measures meet the following Energy Use Intensity targets:

Development Type	Energy Use Intensity Target	Space Heating Demand
Housing	35 kWh/m ² /year	15kWh/m ² /year
Commercial Offices	55 kWh/m ² /year	15kWh/m ² /year
Schools	65 kWh/m ² /year	15kWh/m ² /year
Offices	55 kWh/m ² /year	15kWh/m ² /year
Multi-residential (student accommodation etc)	35 kWh/m ² /year	15 kWh/m ² /year
Retail	55 kWh/m ² /year	15kWh/m ² /year
Leisure	100 kWh/m ² /year	15kWh/m ² /year
Research Facility	150 kWh/m ² /year	15kWh/m ² /year
Higher education teaching facilities	55 kWh/m ² /year	15kWh/m ² /year
Light industrial uses	110 kWh/m ² /year	15 kWh/m ² /year
GP Surgery	55 kWh/m ² /year	15 kWh/m ² /year
Hotel	55 kWh/m ² /year	15 kWh/m ² /year

A post construction energy statement will be required before occupation.

Up to the 31st of December 2027, all new development must:

- Minimise energy demand through passive design principles including fabric efficiency measures,
- Maximise renewable energy onsite to attempt to deliver an annual net zero energy balance (including regulated and unregulated emissions) and
- Ensure on-site plant (e.g. heating, cooking, generator) are fossil fuel free, with the exceptions of emergency uses and uses where backup energy generation is deemed essential .

In order to achieve the above, applications will be expected to meet the following Transitional Energy Use Intensity (EUI) and Space Heating Demand targets:

<u>Development Type</u>	<u>Energy Use Intensity Target (kWh/m²/year)</u>	<u>Space (kWh/m²/year)</u>
<u>Housing (including student accommodation)</u>	<u>40</u>	<u>30</u>
<u>Commercial (Offices, retail, hotels, education)</u>	<u>75</u>	<u>30</u>
<u>Leisure</u>	<u>100</u>	<u>30</u>
<u>Industrial</u>	<u>110</u>	<u>30</u>
<u>Research Facility</u>	<u>150</u>	<u>30</u>

Where the above standards are not met, applicants will be expected to demonstrate the technical or policy factors that cause non-compliance, including evidence as to how they have maximised attempts to meet the target EUI and space heating demand figures.

Planning applications need to be supported by energy statements (pre and post construction) that will also demonstrate how the development seeks to maximise renewable energy opportunities onsite.

From January 2028, all new development must demonstrate how it will achieve a net zero operational energy balance. In order to achieve this, developments will use the following hierarchy:

- **Minimise energy demand through passive design principles including fabric efficiency measure,**
- **Maximise renewable energy onsite to and attempt to deliver an annual net zero energy balance (including regulated and unregulated emissions),**
- **Ensure on-site plant (e.g. heating, cooking, generator) are fossil fuel free, with the exceptions of emergency uses and uses where backup energy generation is deemed essential.**
- **Subject to a demonstration of technical or policy constraints, provide offsite financial contribution to deliver the remaining energy imbalance off site.**

In order to achieve the above, applications will have to meet the following Net Zero Operational EUI and Space Heating Demand targets:

<u>Development Type</u>	<u>Energy Use Intensity Target</u>	<u>Space</u>
	<u>(kWh/m²/year)</u>	<u>(kWh/n</u>
<u>Housing (including student accommodation)</u>	<u>35</u>	<u>15</u>

			<table border="1"> <tr> <td><u>Commercial (Offices, retail, hotels, education)</u></td> <td><u>55</u></td> <td><u>15</u></td> </tr> <tr> <td><u>Leisure</u></td> <td><u>100</u></td> <td><u>15</u></td> </tr> <tr> <td><u>Industrial</u></td> <td><u>110</u></td> <td><u>15</u></td> </tr> <tr> <td><u>Research Facility</u></td> <td><u>150</u></td> <td><u>15</u></td> </tr> </table> <p><u>Planning applications need to be supported by energy statements (pre and post construction) that demonstrate how the development delivers a net zero operational energy balance.</u></p> <p><u>Developments that will be exempt from this policy are:</u></p> <p><u>The above requirements will not apply to:</u></p> <ol style="list-style-type: none"> 1. Buildings exempt from building regulations 2. Alterations and extensions to buildings of up to 1,000 square metres 3. Change of use or conversion of buildings 4. 3. Ancillary buildings that stand alone and cover an area less than 50 square metres 5.4 Buildings which have an intended life of less than two years 6.5 Gypsy and Traveller and Showpeople <u>pitches and plots caravans</u> <p>For all such exceptions development must show how efforts to reduce carbon emissions have been considered, in accordance with current good practice.</p>	<u>Commercial (Offices, retail, hotels, education)</u>	<u>55</u>	<u>15</u>	<u>Leisure</u>	<u>100</u>	<u>15</u>	<u>Industrial</u>	<u>110</u>	<u>15</u>	<u>Research Facility</u>	<u>150</u>	<u>15</u>	
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22	CARBON REDUCTION Sustainable Construction Standards	2 nd para.under Sustainable Construction Standards	<p>Revise 1st sentence to read:</p> <p>“Non-domestic buildings are expected to deliver at least an ‘Outstanding’ Excellent rating”</p>	To be consistent with policy wording changes												

23	CARBON REDUCTION Sustainable Construction Standards	7 th para. under Sustainable Construction Standards	In 1st sentence replace Outstanding with ' Excellent '	Evidence suggests that 'outstanding' may be too onerous in some areas
24	CARBON REDUCTION Sustainable Construction Standards	POLICY EN2	<p>Amend POLICY EN2 to read:</p> <p><u>EN2: SUSTAINABLE CONSTRUCTION STANDARDS</u></p> <p><u>PART A: STANDARDS</u></p> <p>To ensure the delivery of high-quality new development, and assist in a holistic approach to sustainable construction as set out in EN1, SP1B, and P10, major applications should demonstrate how they meet one of the following construction standards:</p> <ol style="list-style-type: none"> 1. Non-residential development will conform to a <u>minimum</u> rating of BREEAM Outstanding <u>Excellent</u>. 2. New-build residential developments must achieve a <u>minimum</u> four-star rating (as a minimum) under the BRE Home Quality Mark scheme. <p>To evidence the above, applications will include independently certified evidence of their sustainability credentials at the design stage and post construction.</p>	<p>For consistency and clarity</p> <p>Evidence suggests that 'outstanding' may be too onerous in some areas</p>
25	CARBON REDUCTION Heat District Network	POLICY EN4	<p>Amend POLICY EN4 to read:</p> <p><u>EN4: DISTRICT HEATING</u></p> <p>Up until any revised district heat network national policy is introduced, where technically viable, appropriate for the development, and in areas with sufficient existing or potential heat</p>	To reflect the suggestion made by Natural England

			<p>density, developments of 1,000 sqm or more or 10 dwellings or more (including conversions where feasible) should propose heating systems according to the following hierarchy:</p> <ul style="list-style-type: none"> a) Connection to existing District heating networks, b) Construction of a site wide District heating network served by a new low carbon heat source, c) Collaboration with neighbouring development sites or existing heat loads/sources to develop a viable shared District heating network, d) In areas where District heating is currently not viable, but there is potential for future District heating networks, all development proposals will need to demonstrate how sites have been designed to allow for connection to a future District heating network. <p>Carbon savings and renewable energy generation achieved under this policy will contribute to EN1(A) and EN1(B).</p> <p>For development situated outside heating network zones, or where it has been evidenced that it is not technically feasible to connect to a heat network, then the following heating technologies should be considered instead:</p> <ul style="list-style-type: none"> a) Air source heat pumps b) Ground source heat pumps c) Shared ground heat exchanges d) Water source heat pumps <p>Preference should be given to the heat technology that finds a balance between delivering the lowest cost for future inhabitants and lowest carbon emissions over its lifetime.</p> <p><u>All heat network applications will need to demonstrate that potential impacts on nationally and internationally designated sites have been assessed and mitigation provided where appropriate.</u></p>	
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26	CARBON REDUCTION Renewable Energy	After 1 st para.	<p>Insert new paragraph to read:</p> <p><u>“The Council has identified the potential to generate a total of 2,290 MW of renewable energy through solar and wind power across the district:</u></p> <ul style="list-style-type: none"> • <u>90 MW of wind</u> • <u>2,200 MW of solar</u> <p><u>These are high estimations, that consider a cumulative delivery of all land identified suitable for wind and solar energy, subject to further planning considerations. It is acknowledged that not all potential land identified to deliver renewable energy generation will do so.”</u></p>	Text moved from policy wording, to provide clarity on what the potential energy generation numbers represent.
27	CARBON REDUCTION Renewable Energy	2 nd para.	<p>Add new sentence at the end of paragraph to read:</p> <p><u>“This mapping is relevant to the development of multiple turbines and solar farms rather than stand alone turbines and solar panels arrays on rooftops, which would be acceptable throughout the District in line with National Guidance. Indeed the Council supports small-scale, community-based wind turbine applications which are local led across all parts of Leeds.”</u></p>	To reflect changes in the NPPF with regards to community backed renewable energy generation schemes.
28	CARBON REDUCTION Renewable Energy	1 st para. under Wind and Solar Opportunity Areas	<p>After 10th bullet point add new bullet point <u>“The South Pennine Moors Special Protection Area and the functionally linked land that supports it”</u></p>	Reflect comments from Natural England
29	CARBON REDUCTION Renewable Energy	1 st para. under Wind and Solar Opportunity Areas	<p>Amend 16th bullet point by adding <u>“and Aerodrome Safeguarding Areas”</u></p>	For clarity

30	CARBON REDUCTION Renewable Energy	Solar Opportunities Map	Insert replacement Solar Opportunity Areas map	Map revised to reduce the extent of the solar opportunity area in the north west area to reflect further assessment of 'functionally linked land', as requested by Natural England.
31	CARBON REDUCTION Renewable Energy	1 st para. under Energy Storage	Insert new sentence at start of paragraph to read: Leeds has identified the potential need for 2,500MWh of energy storage in Leeds	For clarification text moved from Policy EN3
32	CARBON REDUCTION Renewable Energy	3 rd para.	Delete " Figure 'LPU 2' Renewable Energy Potential in Leeds "	Typographic correction
33	CARBON REDUCTION Renewable Energy	POLICY EN3	Amend POLICY EN3 to read: <u>EN3: RENEWABLE ENERGY</u> The Council has identified the potential to generate a total of 2,290 MW of renewable energy through solar and wind power across the district: a. 90 MW of wind b. 2,200 MW of solar <u>This policy identifies areas potentially suitable for wind and solar renewable energy, and these are identified on the Wind and Solar Energy Opportunities Maps policies map.</u> Within these areas, renewable energy and its associated infrastructure will be supported subject to the <u>following policy criteria:</u> <u>relevant policy criteria and all other relevant national and local policy being met.</u> WIND	To provide clarity, reflect wording in the NPPF and to reflect suggestion made by Natural England.

			<p>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 <u>as identified by this policy and shown</u> on the wind opportunities map <u>or as part of a locally led community renewable scheme.</u></p> <p><u>Applications in those areas must satisfy the following requirements: Applications should demonstrate that:</u></p> <ol style="list-style-type: none">1. 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;2. The proposal, both individually and cumulatively with other renewable energy developments, does not cause significant harm to the quality and enjoyment of the existing landscape;3. The proposal would not result in unacceptable harm on amenity, taking into account noise, shadow flicker, vibration, topple distance, air traffic safety and radar;4. The proposal has no unacceptable impact on high voltage overhead pylons;5. The proposal has no impact on the migration routes of important bird species;6. Provision has been made for the satisfactory decommissioning of the turbines and associated infrastructure once the operations have ceased and the site can be restored to a quality of at least its original condition and7. Very Special Circumstances <u>will need to be demonstrated for Green Belt release</u> if <u>applications they</u> are in areas of the District covered by Green Belt8. <u>Any potential impacts on nationally and internationally designated sites have been assessed and mitigation provided where appropriate.</u>	
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Applications that are seeking to repower or extend the life of existing turbines, including those that fall outside of an opportunity area, will be supported where any potential impacts can be made acceptable.

SOLAR

Applications for ground mounted solar energy and any associated infrastructure ~~will not be considered acceptable unless~~ within an area identified as suitable for solar energy development ~~as identified by this policy and shown on the solar opportunities map~~ **will be supported subject to meeting the following requirements: Applications will need to demonstrate that potential impacts on nationally and internationally designated sites have been assessed and mitigation provided where appropriate. Applications should consider the impact on the following criteria:**

- ~~Landscape~~
- ~~Agricultural Land~~
- ~~Visual Amenity~~
- ~~Noise~~
- ~~Safety and security~~
- ~~Ecology~~
- ~~Conservation and built environment and the energy generating potential~~
- **If the proposal involves greenfield land, then it should allow for continued agricultural use and encourage biodiversity improvements around arrays**
- **The proposal should ensure that there is no negative impact caused by glint and glare on the landscape, neighbouring uses and aircraft safety.**
- **Ensure that there are no negative impacts if solar arrays follow the daily movement of the sun**

			<ul style="list-style-type: none"> • <u>Well designed security measures such as lights and fencing</u> • <u>If within the setting of heritage assets, great care should be taken to ensure that they are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting.</u> • <u>The potential to mitigate landscape and visual impacts through, for example, screening with native hedges</u> • <u>Applications will need to demonstrate that potential impacts on nationally and internationally designated sites have been assessed and mitigation provided where appropriate</u> <p><u>Proposals that fall partially within the opportunity area and meet the above criteria, may also be supported if it can be demonstrated that no harm is caused by the development.</u></p> <p><u>Applications for roof mounted solar panels will be supported across the district, where it can be demonstrated that no harm is caused by the installation.</u></p> <p>OTHER AND MICRO GENERATION Applications for other renewable energy development including hydro-electric, anaerobic digestion/energy from waste and its associated infrastructure <u>including small scale wind and solar</u> will have to demonstrate that its impacts on the following are (or can be made) acceptable:</p> <ul style="list-style-type: none"> • Landscape • Visual and audio/acoustic amenity • Safety • Ecology; and • Conservation and built environment 	
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			<p>ENERGY STORAGE Leeds has identified the potential need for 2,500MWh of energy storage in Leeds. Energy storage developments will be supported in principle where:</p> <ul style="list-style-type: none"> • it is related to an existing or proposed renewable energy development, <p>or:</p> <ul style="list-style-type: none"> • It can demonstrate how the development alleviates grid constraints. <p>Applications must meet the following criteria:</p> <p>a) Any proposed development which will contain large quantities of batteries should include adequate mitigation measures such that Provide adequate mitigation for explosion and fire risks are acceptable;</p> <p>b) Proposed development should have a noise impact assessment carried out and;</p> <p>c) Proposed battery parks should:</p> <p>a.b) Seek to Mitigate any adverse seek to mitigate their visual impacts with the use of hard and soft landscaping and use of appropriate external materials;</p> <p>b.c) be supported by a noise assessment will be required and. If there are relevant noise receptors the development should incorporate suitable noise attenuation measures such that noise impacts to nearby sensitive receptors are suitably mitigated.</p> <p>a.d) Should not be located in flood zone 3 unless the Sequential and Exceptions tests can be passed and should be designed and constructed to remain operational and safe in times of flood and do will not increase the risk of flooding or other associated risks to other developments, infrastructure, natural habitats or farmland.</p> <p>b.e) Demonstrate that potential impacts on nationally and internationally designated sites</p>	
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			<u>have been assessed and mitigation provided where appropriate.</u>	
34	FLOOD RISK Water Efficiency	1 st para. under Water Efficiency	Amend 4 th sentence to read “.. Quality Home Quality Mark Standard”	For clarity
35	FLOOD RISK Water Efficiency	POLICY WATER 1	Amend POLICY WATER 1 to read: <u>WATER 1: WATER EFFICIENCY</u> All new developments should include measures to improve their overall water efficiency where appropriate. This will be achieved through a mixture of measures to use less treated water and reduce wastewater such as: <ol style="list-style-type: none"> 1. Sustainable urban drainage systems, 2. Rainwater collection and storage, 3. Grey water recycling and storage systems, and 4. More absorbent surfaces for water drainage. <u>All R</u> esidential developments <u>of 10 or more dwellings</u> (including conversion) where feasible are required to meet a water standard of 110 litres per person per day.	Change made in response to suggestion made at consultation. Evidence suggests that this is easily achieved for all residential development and should not be restricted to just large schemes.
36	FLOOD RISK Protection of Water Quality	1 st para. under PROTECTION OF WATER QUALITY	At end of first sentence insert “ <u>and as a legal duty to comply with the Humber River Basin Management Plan</u> ”	In response to comments made by the Environment Agency
37	FLOOD RISK Protection of Water Quality	1 st para. under PROTECTION OF WATER QUALITY	Insert new sentence after third sentence “ <u>A list of types of development which trigger the need for a Water Framework Assessment can be found in https://www.gov.uk/government/publications/water-framework-directive-how-to-assess-the-risk-of-your-activity</u> ”	For clarity and information
38	FLOOD RISK Protection of Water Quality	POLICY WATER 2	Amend POLICY WATER 2 to read:	Title changed at the request of the Environment Agency

			<p><u>WATER 2: PROTECTION OF THE WATER ENVIRONMENT</u> <u>WATER QUALITY</u></p> <p>Development within areas adjacent to sensitive water bodies, such as rivers, streams, canal, lakes and ponds, must demonstrate control of quality of surface water runoff for the lifetime of the development and during construction..</p> <p><u>Applications for development that include a waterbody within or adjacent to the red line boundary, or that fall within 10m of a waterbody should consider Water Framework Directive impacts through the submission of a Water Framework Assessment where relevant.</u></p> <p>For major developments the water management infrastructure should be considered as an integral part of the urban and landscape design.</p>	Reference to the water framework assessment added to strengthen the protection for water quality
39	FLOOD RISK Functional Floodplain	2 nd para. under Functional Floodplain	Amend third sentence to delete “ fluvial ”	To take account of changes to the NPPF which means that the sequential test must take account of all sources of flooding
40	FLOOD RISK Functional Floodplain	2 nd para. under Functional Floodplain	Amend fourth sentence to delete “ alternative ” after no reasonably and reinsert “ alternative ” after sites in Flood Zones and after Flood Zone 3 insert “ <u>or other areas of flood risk</u> ”	To take account of changes to the NPPF which means that the sequential test must take account of all sources of flooding
41	FLOOD RISK Functional Floodplain	3 rd para. under Functional Flood Plain	Amend first sentence to delete “ fluvial ”	To take account of changes to the NPPF which means that the sequential test must

				take account of all sources of flooding
42	FLOOD RISK Functional Floodplain	4 th para. under Functional Floodplain	<p>Amend paragraph to read:</p> <p>The functional floodplain, <u>or flood zone 3b</u>, includes land where water has to flow or be stored in times of <u>river flooding</u> with a 1 in 30 year estimated return period (3.3% AEP – Annual Exceedance Probability) of flooding <u>3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or</u></p> <ul style="list-style-type: none"> <u>land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding). These areas are identified as flood zone 3b. It will also include land designed to flood in an extreme event with a 1 in 1000 year estimated return period (0.1% AEP) of flooding</u> such as washlands or a flood storage area designed as part of a flood alleviation scheme. The extent of the functional floodplain is defined by the Strategic Flood Risk Assessment prepared in 2007 and updated in 2022. Most functional floodplain is open land and undeveloped. In <u>areas of functional floodplain these areas</u> only water compatible uses and essential infrastructure is permitted. <u>The Government guidance on how to prepare an SFRA states we may not need to designate the functional floodplain in locations where evidence shows flooding would be prevented by existing flood defences, flood risk management features or structures or solid buildings.</u> <p>Significant reaches of the River Aire in the urban conurbations of Leeds have benefitted from the construction of the Leeds Flood Alleviation Scheme. Substantial urban areas that would have otherwise flooded with a 1 in 30 year estimated return period (3.3% <u>or greater annual probability (AEP)</u> of flooding are now at a reduced risk of fluvial flooding. There are also other flood</p>	To reflect the change to the definition of functional floodplain in the PPG

			alleviation schemes in the district such as at Otley on the River Wharfe.	
43	FLOOD RISK Functional Floodplain	5 th Para. under Functional Floodplain	Amend 1 st sentence to replace AEP flood with “ <u>annual probability of flooding</u> ”	To reflect terminology used in the NPPF and PPG
44	FLOOD RISK Functional Floodplain	5 th Para. under Functional Floodplain	Amend 2 nd sentence to delete “ In accordance with the Planning Practice Guidance (PPG) ”	For clarity
45	FLOOD RISK Functional Floodplain	5 th Para. under Functional Floodplain	Amend 4 th sentence to replace 1 in 100 year annual probability AEP flood event with “ <u>1% annual probability of flooding</u> ”	For clarity
46	FLOOD RISK Functional Floodplain	POLICY WATER 3	Amend POLICY WATER 5 to read: <u>WATER 3: FUNCTIONAL FLOODPLAIN ZONE 3b</u> <u>The zone 3b functional floodplain is shown on the policies map. This is an area which</u> <u>(i) In undeveloped areas which would naturally flood with a 1 in 30 year estimated return period (3.3% annual probability of flooding exceedance probability) of flooding</u> where water has to flow or be stored in times of flood, only water compatible uses and essential infrastructure, which have passed the exception test, should be permitted. <u>Where existing infrastructure is present in those areas or there are solid buildings acting as either formal or informal defence structures,</u> <u>(ii) In developed areas which would naturally flood with a 1 in 30 year estimated return period (3.3% annual exceedance probability) of flooding, but are prevented from doing so by existing infrastructure or solid buildings acting as either formal or informal defence structures,</u> only the re-development of the existing built footprint for an existing or less vulnerable use or within an existing development plan allocation should be permitted <u>(providing all other policy requirements are met).</u>	To reflect the new definition of functional floodplain in the PPG, to use the same terminology as the PPG and in response to comments made by the Environment Agency where they have asked us to show the functional floodplain all as one layer

47	FLOOD RISK Land at Increased Risk of Flooding	3 rd para under Land at Increased Risk of Flooding	In the 1 st sentence insert “for Planning” after Flood Map	To provide the correct title
48	FLOOD RISK Land at Increased Risk of Flooding	3 rd para. under Land at Increased Risk of Flooding	In the 2 nd sentence revise sentence to read replace “ Development ” with “ Sites ” and insert “ development.. ” before permitted	For clarity, because the sequential test applies to both sites being allocated and planning applications
49	FLOOD RISK Land at Increased Risk of Flooding	4 th para. under Land at Increased Risk of Flooding	Amend 5 th sentence of 4 th paragraph to replace “ are not normally considered acceptable ” with “ will not be permitted ”	For clarity
50	FLOOD RISK Land at Increased Risk of Flooding	4 th para. under Land at Increased Risk of Flooding	Amend 6 th sentence of 4 th paragraph to add after where it is necessary for “ ‘less’ or ‘more’ “	For clarity
	FLOOD RISK Land at Increased Risk of Flooding	POLICY WATER 4	Amend POLICY WATER 4 to read: <u>WATER 4: LAND AT INCREASED RISK OF FLOODING</u> All allocations and developments are required to consider the effect of the proposed development on flood risk, both on-site and off-site the detail of which should be commensurate with the scale and impact of the development. Within flood zones 2 and 3 as shown on the flood map for planning and in areas of flood risk from all sources including surface water flooding, proposals must: (i) Pass the Sequential Test and if necessary the Exceptions Test as required by the NPPF. (ii) In applying i) take account of the future flood zone as mapped through the SFRA climate change scenarios. <u>(iii) Avoid locating development in areas of flood risk by taking a sequential approach to the layout of the site</u> (iii) (iv) Make space within the site for storage of flood water, the extent of which to be determined by the Flood Risk Assessment. (iv) (v) Must not create an increase in flood risk elsewhere.	To respond to comment by the Environment Agency and to reflect the NPPF and PPG

51	FLOOD RISK Flood Resilience	2 nd para. under FLOOD RESILIENCE	After 2 nd paragraph add new sentence “ <u>Climate change allowances are mapped in the SFRA to help applicants design for the relevant climate change scenarios as follows:</u> ”	For clarity
52	FLOOD RISK Flood Resilience	POLICY WATER 6	<p>Amend POLICY WATER 6 to read:</p> <p><u>WATER 6: FLOOD RISK ASSESSMENTS</u></p> <p>1. All applications for new development will be required to consider flood risk, commensurate with the scale and impact of the development. Where, in the opinion of the Local Planning Authority (LPA), there is the possibility of any flood risk to the site, or the potential for flood risk impact on other sites, a Flood Risk Assessment is required.</p> <p>2. The LPA is unlikely to support the development unless the Flood Risk Assessment demonstrates the following:</p> <p>a. No increase in flooding on-site and elsewhere will result from the new development. The implications of climate change must be taken into account using the latest government climate change allowances.</p> <p>b. There is less than a 3.33% <u>annual probability</u> of <u>site fluvial</u> flooding in any one year, after allowing for the effects of climate change,</p> <p>c. There is less than a 1% <u>annual probability of fluvial flooding chance</u> of any premises on the site flooding in any one year, after allowing for the effects of climate change, and</p> <p>d. For flows beyond the 1% flood design event it is demonstrated that there are no unreasonable adverse impacts off site, after allowing for the effects of climate change.</p> <p>e. Safe access and egress (<u>see policy Water 6A for more detail</u>).</p> <p>3. Developer contributions may be required for <u>flood risk infrastructure</u> improvement works (<u>maintenance, improvement or new fluvial flood alleviation scheme or surface water drainage infrastructure</u>) to ensure that the drainage</p>	To reflect comments made the Environment Agency

			infrastructure can cope with the capacity required to support the new development.	
53	FLOOD RISK Safe Access and Egress	3 rd para. under Safe Access and Egress	In the 3 rd paragraph delete “ The Environment Agency and ”	The Environment Agency requested the reference be removed
54	FLOOD RISK Safe Access and Egress	POLICY WATER 6A	Amend POLICY WATER 6A to read: <u>WATER 6A: SAFE ACCESS AND ESCAPE</u> 1. Developments located in areas at risk of flooding, which have satisfied flood risk sequential and exception tests where relevant, must ensure residual risks are appropriately managed for the lifetime of the development and that safe access and escape is provided by the submission of an appropriate emergency plan. The emergency plan must demonstrate: I. Safe access and escape routes are included II. Voluntary and free movement for people will be available during a design flood taking into account climate change III. There is potential for evacuation before a more extreme flood (0.1% <u>annual probability of floodingAEP</u>) taking into account climate change IV. Appropriate evacuation procedures and flood response infrastructure will be in place 2. If safe access and escape routes for people are not possible, development is unlikely to be supported other than in exceptional circumstances, depending on the vulnerability of the land use. 3. In all cases, where achievable, development should aim to provide a ‘dry’ access and escape route located above the design flood level, including an allowance for climate change. 4. The Flood Evacuation Plan shall be based on the latest available <u>national Environment Agency</u> guidance.	To use the same terminology used in the PPG The reference to national guidance at criteria 4 revised in response to the Environment Agency
55	FLOOD RISK	1 st para. under Flood Alleviation	Add new sentence at end of 1 st paragraph “ <u>These areas are shown on the Policies Map and in the Leeds Strategic Flood Risk Assessment (SFRA).</u> ”	To ensure that the geographical extent of the policy is clear

	Flood Alleviation Schemes and Residual Risk	Schemes and Residual Risk		
56	FLOOD RISK Flood Alleviation Schemes and Residual Risk	POLICY WATER 5	Amend POLICY WATER 5 to read: <u>POLICY WATER 5: RESIDUAL RISK</u> 1. In an area which is protected by a flood alleviation scheme or other defence, development will only be permitted where it can be demonstrated that the residual risk of flooding is reduced to an acceptable level. 2. A detailed breach analysis is required as part of the flood risk assessment for applications in these areas <u>and should consider the risk from all sources of flooding.</u> 3. The NPPF sequential and exception tests must also be satisfied where relevant.	To reflect the recent changes to the PPG
57	FLOOD RISK Sustainable Drainage Systems	7 th para. under Sustainable Drainage Systems	Add new sentence at end of 7 th paragraph " <u>The SFRA contains BGS mapping which gives an indication of areas which are the most likely to be suitable for infiltration.</u> "	To help developers make best use of the information available in the SFRA
58	FLOOD RISK Sustainable Drainage Systems	POLICY WATER 7	Amend POLICY WATER 7: <u>WATER 7: SUSTAINABLE DRAINAGE</u> <ul style="list-style-type: none"> • All developments are required to ensure no increase in the rate of surface water run-off to the existing formal drainage system. Development will be expected to incorporate sustainable drainage techniques according to the following surface water drainage discharge hierarchy, where practical: <ul style="list-style-type: none"> o Store rainwater close to the point of collection for later use o Use infiltration techniques, such as porous surfaces and soakaways o <u>Discharge Attenuate</u> rainwater in ponds or open water features for gradual release 	All changes to this policy are to improve clarity and in response to comments made by respondents including the Environment Agency

			<ul style="list-style-type: none"> o <u>Discharge rainwater to sealed water infrastructure, with attenuation as necessary by storing in tanks/pipes for gradual release</u> • <u>Where rainwater storage solutions and/or infiltration techniques are unviable or where a hybrid surface water drainage discharge solution is required, either with or without attenuation, development is expected to follow the hierarchy of discharge receptors:</u> • Only if it can be demonstrated that none of the above are possible then the following may be considered in order of hierarchy: <ul style="list-style-type: none"> o Discharge rainwater direct to a watercourse o Discharge rainwater to a surface water sewer/drain, <u>highway drain, or another drainage system</u> o Discharge rainwater to the combined sewer. • Applications for development should demonstrate that the drainage design and use of materials will provide adequate water quality for the off-site surface water flows in accordance with the simplified index approach as set out within the <u>CIRIA SuDS ciria suds</u> manual and can be achieved during all phases of the development. • Where <u>SuDS suds</u> are only proposed in part or not at all, then a full justification statement shall be provided to demonstrate why it is not appropriate. • No drainage system must pose a risk to groundwater quality or be constructed in ground affected by contamination . <u>unless appropriately remediated.</u> • <u>The system used must have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development</u> • Sustainable drainage schemes must demonstrate benefits to: 	
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			<ul style="list-style-type: none"> o Flood risk management, and o Water quality, and o Landscape/amenity, and o Biodiversity. 	
59	FLOOD RISK Porous Paving, Loss of Front Gardens and Permitted Development Rights	3 rd para. under Porous Paving, Loss of Front Gardens and Permitted Development Rights	Amend 1 st sentence of 3 rd paragraph to add “ <u>through reducing the speed of surface water run off</u> ”	For clarity
60	FLOOD RISK Porous Paving, Loss of Front Gardens and Permitted Development Rights	POLICY WATER 8	<p>Amend POLICY WATER 8 to read:</p> <p><u>WATER 8: POROUS PAVING, LOSS OF FRONT GARDENS AND PERMITTED DEVELOPMENT RIGHTS</u></p> <p>All proposals are expected to make adequate space for water. <u>The following measures will be used to help make space for water in new and/or existing development:</u></p> <ul style="list-style-type: none"> • Areas of hard standing should be constructed from permeable materials <u>unless there are clear reasons why this would not be appropriate.</u> • The loss of porous landscaping provided as part of new development will be resisted. • Where planning permission is required, the Council will only permit parking on front gardens where a minimum of 50% of existing soft landscape area is being retained. 	For clarity and to ensure the focus of the policy is on the intended outcome of making space for water in developments
61	GREEN AND BLUE INFRASTRUCTUR E	4.10.3	Amend 1 st sentence to add “ <u>which sits under the overarching umbrella of the Government’s national environmental strategy ‘A Green Future: Our 25 Year Plan to Improve the</u>	To clarify the national context

			<u>Environment’ (2018) and the first revision ‘Environmental Improvement Plan 2023’</u>	
62	GREEN AND BLUE INFRASTRUCTURE Green and Blue Infrastructure	New paragraph before para.4.10.4	Insert new paragraph above 4.10.4 <u>“Green and Blue Infrastructure is a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity³”</u>	For clarity, to explain the difference between Green & Blue Infrastructure (GBI), and Strategic Green and Blue Infrastructure (Strategic GBI)
63	GREEN AND BLUE INFRASTRUCTURE Green and Blue Infrastructure	New paragraph before para.4.10.4	Add footnote <u>“³NPPF – Glossary – National Planning Policy Framework (publishing.service.gov.uk)”</u>	For clarity
64	GREEN AND BLUE INFRASTRUCTURE Green and Blue Infrastructure	4.10.4	Amend existing paragraph 4.10.4 to add <u>“Strategic”</u> at start of 1 st sentence, add <u>“(which sits under the wider GBI)”</u> and add new sentence at end of paragraph <u>“Strategic GBI has strategic importance across the District due to its size, significance and corridor roles and is designated by Policy SP13 and identified on the policies map. A key feature of Leeds’ GBI is the role it plays in bringing nature into the main urban area and its communities through GBI corridors”</u> Amend third sentence of paragraph 4.10.4 to start a new paragraph and remove <u>‘strategic’</u> in reference to GBI	For clarity, to explain the difference between GBI and Strategic GBI
65	GREEN AND BLUE INFRASTRUCTURE Green and Blue Infrastructure	4.10.5	Amend 2 nd sentence to remove reference to <u>“is network of”</u> and start sentence with <u>“These”</u>	For clarity
66	GREEN AND BLUE INFRASTRUCTURE	4.10.6	Delete last sentence of paragraph <u>“Strategic GBI has strategic importance across the District due to its size, significance and corridor roles and is designated by Policy SP13 and</u>	Text moved to paragraph 4.10.4

	Green and Blue Infrastructure		identified on the policies map. A key feature of Leeds' GBI is the role it plays in bringing nature into the main urban area and its communities through GBI corridors"	
67	GREEN AND BLUE INFRASTRUCTURE Green and Blue Infrastructure	4.10.7	Amend the 5 th sentence to start as a new paragraph Add " <u>the strategic</u> " after its impact on and add " <u>strategic</u> " before GBI in 2 nd and 3 rd bullet point	For clarity
68	GREEN AND BLUE INFRASTRUCTURE Green and Blue Infrastructure	4.10.8	Amend 1 st sentence to add " <u>These also have</u> " and delete " <u>and</u> "	For clarity
69	GREEN AND BLUE INFRASTRUCTURE Green and Blue Infrastructure	4.10.8	Amend 2 nd sentence to add " <u>overall</u> "	For clarity
70	GREEN AND BLUE INFRASTRUCTURE Green and Blue Infrastructure	4.10.9	Amend 3 rd sentence to delete " (Policy G4) "	For consistency
71	GREEN AND BLUE INFRASTRUCTURE Trees	4.10.11	Amend 2 nd sentence to add " <u>which is significantly higher than current planting rates</u> ".	For clarity
72	GREEN AND BLUE INFRASTRUCTURE Trees	4.10.12	Amend 2 nd sentence to insert " <u>GBI Trees</u> " after The	For clarity
73	GREEN AND BLUE INFRASTRUCTURE Trees	4.10.12	Add new sentence at end of the paragraph: " <u>There is also an increasing need to create and manage woodlands that are more resilient to plant pests and</u>	To provide additional detail on the importance of creating and managing

			<u>diseases. This can be achieved through planting a wider range of tree species, using seed from a wider range of origins and provenances, encouraging natural regeneration and evolutionary adaptation and protecting from damaging animals and herbivores.</u>	resilient woodlands as part of the Council's response to climate change.
74	GREEN AND BLUE INFRASTRUCTURE Green Spaces	4.10.16	Amend 2 nd sentence to add " <u>in the production of local food</u> "	For clarity
75	GREEN AND BLUE INFRASTRUCTURE Local Food Production	4.10.16	Amend 5 th sentence "...Leeds is has develop ed ing its own Food Strategy."	Reflecting the completion of the Leeds Food Strategy
76	GREEN AND BLUE INFRASTRUCTURE Local Food Production	4.10.17	Amend 2 nd sentence to add reference to " <u>Community Orchards and allotments</u> " and " <u>nature friendly forms</u> "	To identify different types of food growing and highlighting nature friendly agriculture (recognising that not all agriculture is sustainable and low carbon)
77	GREEN AND BLUE INFRASTRUCTURE Biodiversity	4.10.21	Amend 2 nd sentence to read "It is therefore important that the variety of life is protected and the trend of losing biodiversity is reversed through improved protection, enhancement and expansion of <u>designated nature conservation sites (such as LLocal wWildlife sSites) and ancient and long-established woodland, whilst seeking and opportunities through Biodiversity Net Gain (BNG) to achieve this.</u>	To identify some key habitats and BNG as a way of reversing biodiversity loss.
78	GREEN AND BLUE INFRASTRUCTURE Biodiversity	4.10.23	Amend 1 st sentence to read: "The Council's Best City Ambition <u>is to tackle poverty and reduce</u> -inequality and improve <u>the quality of life for everyone</u>	To reflect the wording in the Best City Ambition

			who calls Leeds home, health and wellbeing of the people who live and work in Leeds.	
79	GREEN AND BLUE INFRASTRUCTURE E Biodiversity	4.10.23	Amend 3 rd sentence to replace “ Biodiversity Net Gain ” with “ <u>BNG</u> ”	For consistency
80	GREEN AND BLUE INFRASTRUCTURE E Design	SPATIAL POLICY 13	<p>Amend SPATIAL POLICY 13 to read:</p> <p><u>SPATIAL POLICY 13: PROTECTING, MAINTAINING, ENHANCING AND EXTENDING STRATEGIC GREEN AND BLUE INFRASTRUCTURE</u></p> <p>1. Leeds contains a significant network of strategic Green and Blue Infrastructure (GBI) comprising designated land for Green Space (Site Allocations Policy GS1 and AVLAAP Policy AVL14), Nature Conservation Sites (Policy G8a) and the Leeds Habitat Network (Policy G8b) together with additional assets including river corridors, lakes, ponds, woodland, Historic Parks and Gardens, functional flood plain and PROW. This is shown on the Policies Map and Map X. In total these contribute to and enhance the local and natural environment by providing multi-functional natural capital benefits and ecosystem services. These are designated as a strategic network of Green and Blue Infrastructure and indicated on the Key Diagram and identified on the policies map.</p> <p>2a. In order to help <u>protect</u>, maintain, <u>enhance and extend</u> the character of Leeds and enhance its environment all development and proposed allocations within the strategic network of GBI must follow the strategic principles of,</p> <p>i. conserve and enhance existing GBI functions</p> <p>ii. avoid severance of the strategic network</p> <p>iii. take opportunities to enhance existing GBI functions</p> <p>iv. extend GBI where appropriate and related to the development</p>	Ensure text follows Policy Title in terms of consistency, to remove repetition of text including text already covered by Policy G1 and for clarity

			2b. To help protect and enhance local GBI all development and proposed allocations outside of the strategic network of GBI must, in line with Policy G1, submit a GBI assessment.	
81	GREEN AND BLUE INFRASTRUCTURE	Following Spatial Policy 13	<p>Insert following text:</p> <p><u>“To be inserted in Section 5.5 of the Adopted Core Strategy</u></p> <p><u>Amend title Section 5.5 as follows:</u></p> <p><u>“Managing Environmental Resources, Green and Blue Infrastructure”</u></p> <p><u>Delete “a) Green Infrastructure and Green Space”</u></p> <p><u>Replace paragraphs 5.5.1 to 5.5.6 as follows:”</u></p>	For clarity
82	GREEN AND BLUE INFRASTRUCTURE Green Roofs and Walls	5.5.1-5.5.6	<p>Delete paragraphs 5.5.1 to 5.5.6 and replace as follows:</p> <p>“5.5.1 In order to help maintain the character of Leeds and enhance its environment Policy SP13 sets out that all development and proposed allocations within the strategic network of GBI should protect and maintain existing GBI functions, avoid severance of the strategic network, enhance existing GBI areas and extend GBI where appropriate and related to the development. Policy SP13 also sets out that outside of the strategic network of GBI local assets all development should assess and justify asset loss, avoid severance, seek opportunities for extension of local GBI assets, and seek opportunities to support and extend the Strategic GBI network.</p> <p>5.5.2 There are important opportunities to enhance Green and Blue Infrastructure in Leeds so as to secure benefits</p>	<p>Following further consideration the paragraphs are proposed to be deleted as they are considered to be repetitious and do not relate to Policy G1.</p> <p>To provide cross reference to Policy P10 and to provide further details on the nature of green walls</p>

		<p>from natural capital and ecosystem services. Policy G1 provides guidance for advancing this approach to conserving and enhancing the strategic network of GBI.</p> <p>5.5.3 Green Roofs can be seen to support good GI principles and can have multiple benefits.</p> <p>5.5.4 Green Wwalls can also support good GI; some are natural such as Ivy whilst others need to have their irrigation supported by mechanical intervention. Green walls also can support different types of plants which bring different and additional benefits.</p> <p>5.5.5 Whilst Leeds supports the principle of gGreen walls and Green roofs, there needs to be confidence that the benefits outweigh any disbenefits with regard to energy usage and subsequent maintenance. Green Wwalls and Green roofs will be supported where there is evidence of good design, and it can be shown that they are net carbon zero over their lifetime and subsequent lifetime management plans.</p> <p>5.5.6 Good Green and Blue Infrastructure cannot be in delivered in isolation. Policy G1 must be read and implemented along other policies that complement it in order to provide sustainable placemaking. With this in mind the aim of the Policy is to ensure that all GBI matters are assessed appropriately on all development and designed appropriately (See Strategic Policy - SP1B). The first priority will always be to protect the function of the Green and Blue Infrastructure."</p> <p><u>Green Roofs and Walls</u></p> <p><u>5.5.3 Green Roofs can be seen to support good GI principles and can have multiple benefits (Policy P10: Principles of High Quality Design &health Place-making). In</u></p>	
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			<p><u>the interests of climate change these will be expected to be delivered in conjunction with the requirements of Policy EN1B with the resultant preference being that which provides the best Climate Change benefit.</u></p> <p><u>5.5.4 Likewise Ggreen walls can also support good GI. Green walls also can support different types of plants which bring different and additional benefits. In the main there are two types;</u></p> <ul style="list-style-type: none"> • <u>natural such as Ivy whilst</u> • <u>others which need to have their irrigation supported by mechanical intervention.</u> 	
83	GREEN AND BLUE INFRASTRUCTURE Assessing Green and Blue Infrastructure	5.5.6	<p>Insert new subheading before paragraph 5.5.6</p> <p><u>“Assessing Green and Blue Infrastructure”</u></p>	For clarity
84	GREEN AND BLUE INFRASTRUCTURE Assessing Green and Blue Infrastructure	POLICY G1	<p>Amend POLICY G1 to read:</p> <p>POLICY G1: PROTECTING, MAINTAINING, ENHANCING AND EXTENDING GREEN AND BLUE INFRASTRUCTURE WITHIN AND OUTSIDE AREAS OF GBI</p> <ul style="list-style-type: none"> a. All applications must be supported by a GBI assessment. i. GBI assessments should appraise proposed development sites for GBI functions related to: <ul style="list-style-type: none"> (i) Habitat Enhancement (ii) Access (iii) Green and Open Space (iv) Water Management including flood risk, waste water and sustainable drainage (v) Amenity 	For clarity, to explain the difference between GBI and Strategic GBI and that Public Rights of Way are an important part of GBI and therefore should be included in policy

			<p>(vi) Carbon Reduction and (vii) Avoidance of Severance</p> <p>b. The GBI assessment <u>will need to address include consideration of:</u></p> <ol style="list-style-type: none"> 1) the type of development and its compatibility with GBI 2) maintaining and improving access to the <u>strategic</u> GBI network 3) creating opportunities that connect the site with the wider GBI network 4) managing and maintaining GBI assets throughout the life of the development. 5) how the laying out of new <u>gGreen sSpaces</u> provided within the development can protect, maintain, enhance and extend GBI 6) any need for specific GBI functions that do not fulfil Green Space functions and details of how these functions feed into the design of the development. 7) designing Green Spaces to a high standard so that they serve multifunctional purposes for human health, recreation, ecology, carbon capture and adaptation to the impacts of climate change 8) delivering Biodiversity Net Gain 9) the Leeds Habitat Network 10)existing trees 11)planting of new/replacement trees 12)managing water on site 13)flood risk management policies 14)community food growing for residents and the local community <u>15)Public Rights of Way (PROW)</u> 	
85	GREEN AND BLUE INFRASTRUCTURE	Following Policy G1	<p>Insert new text to read:</p> <p>“Delete “Map 16 Strategic Green Infrastructure”</p>	Consequential updating to reflect new definition of GBI as set out in the

			Delete “Map 17 Leeds Woodland Sites above 2 hectares”	updated policies, reflected in new mapping
			Replace paragraphs 5.5.7 to 5.5.XX as follows: “	
86	GREEN AND BLUE INFRASTRUCTURE Trees	5.5.8	Amend 3 rd sentence to replace “ North-East ” with “ <u>Whinmoor</u> ”	To give a more accurate location of Skelton Wood
87	GREEN AND BLUE INFRASTRUCTURE Protection of Trees, Woodland and Hedgerows	5.5.9	Insert new sentence at start of paragraph: “ <u>Section 4.0: Planning for Climate Change outlines Leeds’ ambitions for addressing climate change and aiming for net zero by 2030 and Policy SP0 recognises the importance of trees in climate change mitigation and adaptation.</u> ”	To more closely relate this section to the overall Leeds context
88	GREEN AND BLUE INFRASTRUCTURE Protection of Trees, Woodland and Hedgerows	5.5.9	Amend 4 th sentence to read: “It is important in terms of climate change and <u>the health of the environmental health</u> that we protect”	To avoid confusion with Environmental Health which is part of public health
89	GREEN AND BLUE INFRASTRUCTURE Protection of Trees, Woodland and Hedgerows	5.5.9	Amend 5 th sentence to read: “Indeed, a large, mature tree could store <u>well in excess of 1 tonne 3.5 tons</u> of carbon <u>over its lifetime</u> . Areas of woodland provide the highest concentrations of trees and carbon storage <u>however the study ‘Informing a carbon-based tree planting strategy for the White Rose Forest’ (UBoC, White Rose Forest, University of Leeds, 2021)⁴ a study undertaken by the University of Leeds</u> concludes that 1% of regions Leeds CO2 emissions <u>in 2018 were</u> is taken up by trees outside woodlands, such as those in urban areas.” Insert new footnote: <u>“⁴UBoC_WRF_MainReport_Nov2021.pdf</u>	To clarify the time period for carbon storage To give additional detail of the report and insert a link to the document.

90	GREEN AND BLUE INFRASTRUCTURE Protection of Trees, Woodland and Hedgerows	5.5.10	<p>Insert new text at end of paragraph:</p> <p><u>“in recognition of their critical roles beyond biodiversity, in storing carbon and pollutants and their amenity and landscape value. Indeed, trees and woodland, in particular, capture more carbon, more quickly than any other natural habitat. Natural England’s Carbon Storage and Sequestration by Habitat: a review of the evidence (2nd Edition)⁵ states that ‘The largest carbon sequestration rates amongst semi-natural habitats are in woodlands. Native broadleaved woodlands are reliable carbon sinks that continue to take up carbon over centuries with benefits for biodiversity and other ecosystem services. Native woodland managed with a minimum intervention approach can be an effective climate change mitigation measure’”</u></p> <p>Insert new footnote:</p> <p><u>⁵Carbon Storage and Sequestration by Habitat 2021 - NERR094 (naturalengland.org.uk)”</u></p>	<p>To give greater justification for the need for separate tree policies over and above trees considered through BNG.</p> <p>To insert a link to the document</p>
91	GREEN AND BLUE INFRASTRUCTURE Protection of Trees, Woodland and Hedgerows	New para. after 5.5.10	<p>Insert new paragraph after 5.5.10 to read:</p> <p><u>“Policy G2A applies to all developments requiring planning permission. It applies to all Category A, B and C trees and hedgerows as defined under BS 5837. Category U trees and Category U hedgerows are exempt unless they are deemed to be a veteran tree or a candidate veteran tree.”</u></p>	To clarify when the policy applies and what is exempt in response to comments made
92	GREEN AND BLUE INFRASTRUCTURE Protection of Trees, Woodland and Hedgerows	New para. after 5.5.10	<p>Insert new paragraph after 5.5.10 to read:</p> <p><u>“When determining the extent of any order to terms of of tree or hedgerow removal prior to the submission of a planning application, the Council will use the most up to date data available, including the Bluesky National Tree Map which provides data from 2018.”</u></p>	To give more detail on the evidence that will be used to determine any tree and hedgerow removal prior to application submission

93	GREEN AND BLUE INFRASTRUCTURE Protection of Trees, Woodland and Hedgerows	New para. after 5.5.10	Insert new paragraph after 5.5.10 to read: <u>“Felling should be clearly defined in any planning applications. Any trees subject to felling not identified could be subject to the need for a felling licence from the Forestry Commission.”</u>	Additional text clarifying felling
94	GREEN AND BLUE INFRASTRUCTURE Protection of Trees, Woodland and Hedgerows	Before Policy G2A	Insert new text: <u>“[Replace Core Strategy 2019 Policy G2 with the following new Policies G2A, G2B, G2C, G2D]”</u>	For clarity
95	GREEN AND BLUE INFRASTRUCTURE Protection of Trees, Woodland and Hedgerows	Policy G2A	Amend Policy G2A to read: POLICY G2A - PROTECTION OF TREES, WOODLAND AND HEDGEROWS a) All woodlands, <u>Category A, B and C</u> trees and <u>Category A, B and C</u> hedgerows will should be retained and undamaged unless <u>there is an overriding justification for</u> their removal <u>which</u> is justified and agreed by the Local Planning Authority through the submission of an up to date and appropriate tree <u>and/or hedgerow</u> survey and assessment of carbon sequestration, storage of pollutants, biodiversity and amenity value. which clearly demonstrates that: <u>b) In addition, it must be demonstrated through the planning application process that:</u> 1. Development cannot be redesigned to retain trees and hedgerows; and 2. The need for development clearly outweighs any harm to the ecological and amenity value of the <u>woodland, Category A, B and C</u> trees and <u>Category A, B and C hedgerows</u> to be removed, their carbon sequestration value and the landscape quality of the area; and	To clarify which trees and hedgerows are subject to this policy in response to comments made. To reflect wording used in British Standard 5837 To clearly separate what is addressed specifically through the tree survey and arboricultural assessment and issues addressed through other elements of a

			<p>3. Any trees removed will be replaced in compliance with the tree replacement methodology in Policy G2e<u>D</u></p> <p>c) When assessing existing woodland, trees and hedgerows, regard will be had to the removal of trees and hedgerows, to facilitate and increase the amount of developable land on a site, prior to the submission of a planning application.</p> <p>Evidence of woodland, tree and hedgerow existence since 2018 prior to submission will be sought if there are signs of unjustified removal prior to submission and criteria 1 above this policy will apply to those species removed as if their removal had not taken place.</p> <p>If unjustified removal has taken place, the Council will apply this policy against the latest evidence available of trees, woodlands and hedgerows on the site using mapping data and local knowledge.</p> <p>d) Any removal of hedgerows must comply with the Hedgerow Regulations 1997.</p>	<p>planning application in response to comments made</p> <p>To reflect change to policy numbering</p> <p>to remove information that is covered elsewhere.</p>
96	GREEN AND BLUE INFRASTRUCTURE	Following Policy G2A	<p>Insert new text to read:</p> <p><u>Replace paragraphs 5.5.XX to 5.5.XX as follows:</u></p>	For clarity
97	GREEN AND BLUE INFRASTRUCTURE Ancient Woodland, Ancient Trees and Veteran Trees	5.5.11	<p>Amend 2nd sentence to read "...and Plantations on Ancient Woodland Sites (PAWS)"</p>	For clarity

98	GREEN AND BLUE INFRASTRUCTURE Ancient Woodland, Ancient Trees and Veteran Trees	5.5.12	Amend 1 st sentence to insert “ areas of ” and amend “haves”	For clarity
99	GREEN AND BLUE INFRASTRUCTURE Ancient Woodland, Ancient Trees and Veteran Trees	5.5.13	Amend paragraph to read: “...National policy recognises this by stating that any application that would result in the loss or deterioration of damage an irreplaceable habitat will should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. If there is an overriding justification for damage and loss is justified in line with this approach to occur, the mitigation hierarchy approach will be taken.	To more closely reflect NPPF wording.
100	GREEN AND BLUE INFRASTRUCTURE Ancient Woodland, Ancient Trees and Veteran Trees	5.5.14	Amend paragraph 5.5.14 to insert new text after the first sentence to read: <u>“A buffer of 50 metres to Ancient Woodland will protect the existing Ancient Woodland and expand woodland cover in Leeds. The 50 metre width is based on the following principles and a Scheme for Ancient Woodland Protection and Expansion as required through policy G2Ba should include the following elements which are included in Diagram XX:</u> <u>1. Width required for establishment of one open-grown Large tree (such as an English Oak) based on RPA radius of 15.6 metres (total width = 31.2 m) and with native woodland shrubs and ground flora allowed to establish beneath it</u> <u>2. 10 metres of associated more-open habitat to provide eco-tones and mimic a woodland glade/ride through scrub and tall ruderal habitats</u>	To provide additional details on the buffer sought, including what is expected to be delivered.

			<p>3. <u>The combined width of the two principles above (approximately 40 m) will need to be designed to deter public access and therefore will largely accommodate any naturally falling adjacent mature trees (or limbs from such trees) from the existing Ancient Woodland or the new open grown large tree referred to above. Conflicts with public safety will be minimised and the important biodiversity role of retaining standing and fallen deadwood as part of the Ancient Woodland ecological community can therefore be facilitated</u></p> <p>4. <u>Beyond the 40 metre width required as outlined above, there should be up to 10 metres for a meadow strip to provide another ecotone to the edge of the woodland. This can also provide public access through low-impact infrastructure such as surfaced paths and in such cases should include appropriate fencing to protect new woodland expansion and/or an appropriate boundary feature to the adjacent woodland</u></p> <p>5. <u>Where only part of the buffer falls within the development site, bespoke protection and woodland expansion measures should be agreed”</u></p>	
101	GREEN AND BLUE INFRASTRUCTURE Ancient Woodland, Ancient Trees and Veteran Trees	5.5.14	Insert new <u>“Diagram XX Illustrative Ancient Woodland Buffer”</u>	To accompany PSC100
102	GREEN AND BLUE INFRASTRUCTURE Ancient Woodland, Ancient Trees and Veteran Trees	5.5.14	Insert new text: <u>“A buffer to Ancient and Veteran trees will help protect these trees and allow them to decline over as long a period of time as possible whilst retaining standing deadwood, whilst periodic, specialist, positive management might be required</u>	To provide additional details on the buffer sought, including what is expected to be delivered.

			<p><u>to ensure long-term structural integrity. The buffer width is based on the following principles and a Scheme for Ancient and Veteran Tree Protection, Management and Interpretation as required through G2B should include the following elements:</u></p> <p><u>1. Where the tree and buffer is within the development site and forms part of the on-site greenspace there will need to be appropriately designed protective fencing to deter safety conflicts between people and features of standing deadwood. Positive management of the tree to extend its life and also provision of an interpretation panel to explain the biodiversity features of such trees and their need for specialist management</u></p> <p><u>2. Where only part of the buffer is within the development site bespoke protection measures should be agreed”</u></p>	
103	GREEN AND BLUE INFRASTRUCTURE Ancient Woodland, Ancient Trees and Veteran Trees	5.5.14	Amend 3 rd sentence to delete two references to “ <u>long established woodland and</u> ”	Text deleted to separate long established woodland from ancient woodland/ancient trees/veteran trees as it is a local rather than national classification.
104	GREEN AND BLUE INFRASTRUCTURE Ancient Woodland, Ancient Trees and Veteran Trees	5.5.15	Amend 1 st sentence to read “ <u>The Natural England’s</u> Ancient Woodland Inventory <u>and</u> maps identify sites greater than 2ha....”	For clarity
105	GREEN AND BLUE INFRASTRUCTURE	5.5.15	Add “ <u>(as defined in the NPPF)</u> ” at end of 3 rd sentence	To cross refer to the NPPF definition

	Ancient Woodland, Ancient Trees and Veteran Trees			
106	GREEN AND BLUE INFRASTRUCTURE Ancient Woodland, Ancient Trees and Veteran Trees	5.5.16	Delete the 3 rd sentence “ Policy G2b: Ancient Woodland, Long Established Woodland, Ancient Trees, Veteran Trees ”	To remove repeated text
107	GREEN AND BLUE INFRASTRUCTURE Ancient Woodland, Ancient Trees and Veteran Trees	POLICY GB2B	Amend POLICYG2B to read: POLICY G2Ba - ANCIENT WOODLAND, LONG ESTABLISHED WOODLAND , AND ANCIENT TREES, VETERAN TREES a) Development resulting in the loss or deterioration of irreplaceable habitats, including Ancient Woodland (aAncient sSemi-nNatural wWoodland, pPlantations on aAncient wWoodland sSites and aAncient wWood pPasture and hHistoric pParklands), Long Established Woodland , Ancient Trees or Veteran Trees will <u>should</u> be refused, unless there are wholly exceptional reasons and full compensation measures can be demonstrably delivered . b) Through the submission <u>In addition to demonstrating exceptional reasons</u> , it must be shown that <u>in accordance with the following hierarchy</u> : 1. No appropriate alternative development site exists; and 2. Development cannot be redesigned to prevent the loss of, or <u>deterioration of detrimental impact on</u> , aAncient wWoodland, aAncient Ttrees or vVeteran Ttrees : and 3. There is an overriding need for the proposed development which, in conjunction with exceptional benefits delivered, justify the loss or damage of irreplaceable habitats. Unequivocal evidence will be required over and above any compensatory measures	to separate long established woodland from ancient woodland/ancient trees/veteran trees as it is a local rather than national classification Reference to compensation measures are referred to elsewhere To give more detail on what is expected To more closely reflect the wording of the NPPF Renumbering reference to Policy G2D To give more detail on what is expected and

			<p>to show the need and benefits of the development clearly outweigh any harm to the ecological and amenity value of the trees to be removed, their carbon storage abilities and the landscape quality of the area; and</p> <p>4. Any trees removed will be replaced in compliance with the tree replacement methodology in Policy G2<u>CD and</u></p> <p><u>5. A suitable compensatory strategy is prepared alongside the planning application, which is demonstrably deliverable</u></p> <p>c) Impacts on irreplaceable habitats will always result in loss and cannot be offset elsewhere. In order to prevent loss or deterioration and the damaging effects this can have on biodiversity, air quality, soils, habitat connectivity and woodland ecosystems</p> <p>1. Harmful development will not be acceptable within 50m of Ancient Woodland or 30m of Long Established Woodland and where these buffers form part of a development site a scheme for woodland expansion and avoiding any light spill will be required.</p> <p>2. Harmful development will not be acceptable within a distance 15 times larger than the diameter of an Ancient or Veteran Tree or 5m beyond the edge of the tree canopy (whichever is the larger) and where these buffers form part of a development site a scheme for protection and interpretation will be required. Such trees should not form part of any private garden space.</p> <p><u>Buffers</u></p> <p><u>Buffers will be used to prevent loss or deterioration and the damaging effects this can have on biodiversity, air quality, soils, habitat connectivity and woodland ecosystems and to increase woodland planting and cover.</u></p>	<p>more closely reflect the NPPF</p>
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Ancient Woodland Buffer Distance

a) Development which would cause harm, either directly or indirectly will not be permitted within 50 metres of Ancient Woodland, unless it is clearly evidenced that such harm cannot be avoided by locating on an alternative site with less harmful impacts, can be adequately mitigated, or, as a last resort, compensated for.

b) In order to reduce harm and provide expansion of woodland cover in Leeds:

i) Where the 50 metre buffer forms part of a development site a scheme for woodland expansion and avoiding any light spill will be required

ii) No closer than 40 metres to the ancient woodland the buffer may include low-impact infrastructure for public access such as surfaced paths and in such cases should include appropriate fencing to protect new woodland expansion and/or an appropriate boundary feature to the adjacent woodland

Ancient and Veteran Trees

a) Development which would cause harm, either directly or indirectly will not be permitted within a distance of 15 times larger than the diameter of an Ancient or Veteran Tree or 5m beyond the edge of the tree canopy (whichever is larger) unless it is clearly evidenced that such harm cannot be avoided by locating on an alternative site with less harmful impacts, can be adequately mitigated, or, as a last resort, compensated for.

b) In order to avoid deterioration, where the buffer forms part of a development site a Scheme for Ancient and Veteran Tree Protection, Management and Interpretation will be

			<p><u>required. Such trees should not form part of any private garden space.</u></p> <p>d) As Ancient Woodland, Ancient and Veteran Trees are irreplaceable, possible compensation will not form part of the assessment to determine whether the <u>wholly</u> exceptional benefits of reasons for the development proposal outweigh the loss.</p> <p>e) This policy will apply to all a<u>Ancient w</u>Woodlands, a<u>Ancient</u> and v<u>Veteran t</u>Trees, whether they are included on the Ancient Woodland Inventory, <u>the Ancient Tree Inventory, recognised Veteran Tree lists or maps</u> and or the Policies Map or <u>not meet the definitions of these terms.</u></p>	
108	GREEN AND BLUE INFRASTRUCTURE	Following Policy G2B	<p>Insert new sentence:</p> <p><u>“Replace paragraphs 5.5.XX to 5.5.XX as follows:”</u></p>	For clarity
109	GREEN AND BLUE INFRASTRUCTURE Long Established Woodland	New paragraphs following 5.5.16	<p>Insert the following new subsection and paragraphs to follow paragraph 5.5.16:</p> <p><u>“Long Established Woodland</u></p> <p><u>Ancient Woodland is considered the most important woodland resource for biodiversity and historic value in England because it has been around for the longest time (over 400 years). But we also need to recognise the value that other more recent but well-established woodland plays and protect these so that they become the Ancient Woodlands of the future. The UK Government’s “England Trees Action Plan 2021 -2024” (May 2021) introduces a new category of Long Established Woodland recognising their high ecological and societal role alongside Ancient Woodland.</u></p>	To insert new supporting text and policy on Long Established Woodland following its removal from the supporting text and policy on Ancient Woodland, Ancient Trees and Veteran Trees.

			<p><u>Long Established Woodland in Leeds consists of woodland that has been continuously present since at least 1854, the date of the first series of detailed Ordnance Survey maps for West Yorkshire (forming part of the Epoch 1 series of national maps). This network of Long Established Woodland, which is at least 170 years old, has been identified by West Yorkshire Ecology and will need to be kept under review to keep it up to date.</u></p> <p><u>A buffer of 30 metres to Long Established Woodland has been selected to both protect the existing woodland and expand woodland cover in Leeds. The 30 metre width is based on the following principles and a scheme for woodland expansion as required through policy G2Bb should include the following elements:</u></p> <ul style="list-style-type: none"> • <u>Width required for establishment of one open-grown Large tree (such as an English Oak) based on RPA radius of 15.6 m (total width = 31.2 m) and with native woodland shrubs and ground flora allowed to establish beneath it</u> • <u>Or width required for establishment of one open grown Medium tree (such as a Silver Birch or Mountain Ash) based on RPA radius of 10.8 m (total width = 21.6 m) with native woodland shrubs and ground flora allowed to establish beneath it. Together with up to 10 m of associated habitat to provide eco-tones and mimic a woodland glade/ride through scrub, tall ruderal and meadow strip</u> 	
110	GREEN AND BLUE INFRASTRUCTURE Long Established Woodland		<p><u>Insert new table:</u></p> <p><u>Table 8-1 Individual Urban and Rural Trees by size class from The Biodiversity Metric 4.0 User Guide (First published March 2023)</u></p>	To provide clarity on the characteristics of small, medium and large trees.

			<p>Table 8-1 Tree size classes and area equivalents</p> <table border="1"> <thead> <tr> <th>Size class</th> <th>Diameter at breast height (cm)</th> <th>Metric RPA radius (m)</th> <th>Metric area equivalent (ha)</th> </tr> </thead> <tbody> <tr> <td>Small</td> <td>greater than 7cm and less than or equal to 30cm</td> <td>3.6</td> <td>0.0041</td> </tr> <tr> <td>Medium</td> <td>greater than 30cm and less than or equal to 90cm</td> <td>10.8</td> <td>0.0366</td> </tr> <tr> <td>Large</td> <td>greater than 90cm</td> <td>15.6</td> <td>0.0764</td> </tr> </tbody> </table>	Size class	Diameter at breast height (cm)	Metric RPA radius (m)	Metric area equivalent (ha)	Small	greater than 7cm and less than or equal to 30cm	3.6	0.0041	Medium	greater than 30cm and less than or equal to 90cm	10.8	0.0366	Large	greater than 90cm	15.6	0.0764	
Size class	Diameter at breast height (cm)	Metric RPA radius (m)	Metric area equivalent (ha)																	
Small	greater than 7cm and less than or equal to 30cm	3.6	0.0041																	
Medium	greater than 30cm and less than or equal to 90cm	10.8	0.0366																	
Large	greater than 90cm	15.6	0.0764																	
111	GREEN AND BLUE INFRASTRUCTURE Long Established Woodland	Following Policy long established woodland	Insert new Diagram XX Illustrative Long Established Woodland Buffer 1 and Diagram XX Illustrative Long Established Woodland Buffer 2	To accompany PSC109																
112	GREEN AND BLUE INFRASTRUCTURE Long Established Woodland		<p><u>Insert new policy G2C to read:</u></p> <p><u>Policy G2C - Long Established Woodland</u></p> <p>a) <u>Long Established Woodland will be retained and undamaged unless removal is justified and agreed by the Local Planning Authority through the submission of an up to date and appropriate tree survey and assessment of carbon sequestration, storage of pollutants, biodiversity, amenity value and historical and social significance, and compensation measures can be demonstrably delivered .</u></p> <p>b) <u>Evidence should be submitted to show that/it must be demonstrated through the planning application process that:</u></p>	To recognise and protect Long Established Woodland following its deletion from Policy G2B Ancient Woodland, Ancient Trees and Veteran trees.																

			<ol style="list-style-type: none"><u>1. Development cannot be redesigned to prevent the loss of, or detrimental impact on,(or retain) Long Established Woodland: and</u><u>2. The need for development clearly outweighs any harm to the ecological, amenity and historical value of the Long Established Woodland to be removed, their carbon sequestration value and the landscape quality of the area: and</u><u>3. Any trees removed will be replaced in compliance with the tree replacement methodology in Policy G2D</u> <p><u>Long Established Woodland Buffer Distances</u></p> <ol style="list-style-type: none">a) <u>Development which would cause significant harm, either directly or indirectly will not be permitted within 30 metres of Long Established Woodland, unless it is clearly evidenced that such harm cannot be avoided by locating on an alternative site with less harmful impacts, can be adequately mitigated, or, as a last resort, compensated for.</u>b) <u>In order to reduce harm and provide expansion of woodland cover in Leeds:</u><ol style="list-style-type: none">i) <u>Where the 30 metre buffer forms part of a development site a scheme for Long Established Woodland Protection and Expansion and avoiding any light spill will be required</u>ii) <u>The buffer may include low-impact infrastructure for public access such as surfaced paths and in such cases should include appropriate fencing to protect new woodland expansion and/or an appropriate boundary feature to the adjacent woodland</u>	
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113	GREEN AND BLUE INFRASTRUCTURE Long Established Woodland	Following Policy G2C	Insert new text: <u>“Replace paragraphs 5.5.XX to 5.5.XX as follows:”</u>	For clarity
114	GREEN AND BLUE INFRASTRUCTURE Long Established Woodland	5.5.17	Amend the 2 nd sentence <u>“have devised”</u>	For clarity
115	GREEN AND BLUE INFRASTRUCTURE Tree Replacement	5.5.17	Insert new sentence following the 2 nd sentence to read: <u>“The aim is to achieve parity at time of replacement planting.”</u>	To clarify when parity is to be achieved
116	GREEN AND BLUE INFRASTRUCTURE Tree Replacement	5.5.17	Amend the 4 th sentence “replacement <u>tree</u> numbers (of <u>Extra Heavy Standards</u>)”	To clarify
117	GREEN AND BLUE INFRASTRUCTURE Tree Replacement	New para. following 5.5.19	Insert new paragraph following paragraph 5.5.19 to read: <u>“Policy G2C applies to all developments requiring planning permission . It applies to all Category A, B and C trees as defined under BS 5837. Category U trees are exempt.”</u>	To clarify when and to which category of tree the policy applies.
118	GREEN AND BLUE INFRASTRUCTURE Tree Replacement	POLICY G2C	Amend POLICY G2C to read: <u>POLICY G2CD – TREE REPLACEMENT</u> 1. All development should conserve trees and introduce new tree planting where appropriate opportunities exist within the boundary of the development as part of creating high quality living and working environments and enhancing the public realm. 2. Where removal of existing <u>Category A, B and C</u> trees outside woodland is unavoidable, justified and agreed with the Local Planning Authority, those trees removed will be	Incremental change to policy reference number to further clarify when off-site planting may be acceptable. to further clarify when a financial contribution may be acceptable to clarify what type of plan

			<p>replaced with an appropriate number, size and type of extra heavy standard tree calculated using the Council's tree replacement methodology based on preventing loss of carbon sequestration capacity.</p> <p>3. Replacement planting will be provided on site outside private gardens as part of an overall landscape scheme to be agreed by the Local Planning Authority.</p> <p>34. Where on-site replacement is not possible and sSubject to full and detailed justification, a proportion of the replacement planting may be located off-site or where this is not possible the payment of a financial contribution will be required to fund off-site planting in locations that will extend and enhance the network of blue and green infrastructure.</p> <p>45. Detailed ongoing maintenance and management arrangements should be set out in a landscaping plan, approved by the Local Planning Authority and implemented to retain replacement planting for the lifetime of the development in perpetuity for on-site planting and 30 years for off-site planting.</p> <p>56. The use of native and local species, the planting of fruit trees and those that attract wildlife will be encouraged. Trees planted should be appropriate for their location.</p>	<p>to set a more reasonable time limit for maintenance and management.</p> <p>These have not been explicitly considered in the tree replacement methodology</p>
119	GREEN AND BLUE INFRASTRUCTURE Green and Blue Space	5.5.20 – 5.5.38	All references to green space amended to green " and blue " space	For consistency so all green spaces amended to green and blue spaces
120	GREEN AND BLUE INFRASTRUCTURE	5.5.23	Amend paragraph to read: <u>"It should be noted Policy G4 clearly states that it should be provided On-Site and provides a The calculation of area of</u>	For clarity

	Green and Blue Space		green and blue space provision in Policy G4 which is based upon..”													
121	GREEN AND BLUE INFRASTRUCTURE Green and Blue Space	POLICY G4A	<p>Amend POLICY G4A to read:</p> <p><u>POLICY G4A: GREEN AND BLUE SPACE IMPROVEMENT AND NEW GREEN AND BLUE SPACE PROVISION</u></p> <p>a) Residential developments of 10 dwellings or more will be required to provide the following quantities of on-site green and blue space per residential unit or where this quantity of green and blue space is unachievable or inappropriate on-site, equivalent off-site provision, financial contribution in lieu of provision or combinations thereof should be sought:</p> <table> <tr> <td>1 bedroom dwelling</td> <td>23sqm</td> </tr> <tr> <td>2 bedroom dwelling</td> <td>33sqm</td> </tr> <tr> <td>3 bedroom dwelling</td> <td>44sqm</td> </tr> <tr> <td>4 bedroom dwelling</td> <td>54sqm</td> </tr> <tr> <td>5 or more bedroom dwelling</td> <td>66sqm</td> </tr> <tr> <td>Student bedspaces</td> <td>18sqm</td> </tr> </table> <p><i>In determining whether this quantity of provision should be delivered on-site, off-site or as a commuted sum, consideration of the following are relevant:</i></p> <ol style="list-style-type: none"> <i>local deficits in quantity & quality green and blue space</i> <i>quantum and quality of green space feasibly achievable on site</i> <i>potential for other development sites to deliver green and blue space</i> <i>the development generating a need for play facilities that do not currently exist in the locality, and</i> <i>potential to combine green space provision with wider multi-functional requirements e.g. Sustainable Urban Drainage Systems.</i> 	1 bedroom dwelling	23sqm	2 bedroom dwelling	33sqm	3 bedroom dwelling	44sqm	4 bedroom dwelling	54sqm	5 or more bedroom dwelling	66sqm	Student bedspaces	18sqm	For consistency so all green spaces amended to green and blue spaces
1 bedroom dwelling	23sqm															
2 bedroom dwelling	33sqm															
3 bedroom dwelling	44sqm															
4 bedroom dwelling	54sqm															
5 or more bedroom dwelling	66sqm															
Student bedspaces	18sqm															

122	GREEN AND BLUE INFRASTRUCTURE Green and Blue Space	5.5.28	Replace 2 nd sentence with “ Any new green space should have acceptable and appropriate levels of sustainable drainage. 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’ ”	For clarity
123	GREEN AND BLUE INFRASTRUCTURE Green and Blue Space	POLICY G4B	Amend POLICY G4B to read: POLICY G4B: HIGH QUALITY OF NEW GREEN <u>AND BLUE</u> SPACE a) New G green and s <u>blue</u> S Space should be of a high quality reflecting the principles set out below. Poor quality G green <u>and blue</u> space will not be supported. b) In order to be considered high quality new green <u>and blue</u> space should seek to meet the following objectives: a. provided on-site for the benefit of all residents in the local community b. Green <u>and Blue</u> Spaces must be open to the Public and not be territorial c. serve multifunctional purposes for human health, recreation, ecology, carbon capture and adaptation to the impacts of climate change d. make use of existing features of sites such as GBI assets, corridors and topography e. usable for recreation including facilitating movement, play – both formal and informal, rest and observing nature	For consistency so all green spaces amended to green and blue spaces and to provide inclusivity for all users of green and blue space

			<ul style="list-style-type: none"> f. work comprehensively for the occupiers of the development and the local community as a whole g. spaces must not be isolated, narrow, exclusively linear, fragmented and have natural surveillance for safety h. accessible for all users (including disabled people). i. provision of seating that is designed for all users in appropriate locations j. clearly defined boundaries and access points to ensure spaces feel safe and legible for all users k. boundary treatment planting to soften edges, maximise biodiversity value and improve air quality l. suitable for informal games and community gatherings. m. must include new tree planting unless justified otherwise <u>n. show how the space has been designed to be safe and welcoming for girls and young women</u> <u>n.o.</u> a mix of formal and in-formal play provision with innovative spaces using natural materials and varied planting to allow imaginative play and connection to nature <u>p.is suitable for children and young people of different ages and abilities</u> <u>q. Any play provision needs to be designed in accordance with national guidance such as Fields in Trust</u> 	
124	GREEN AND BLUE INFRASTRUCTURE Green and Blue Space	POLICY G4C	<p>Amend POLICY G4C to read:</p> <p>POLICY G4C – MAINTENANCE OF GREEN <u>AND BLUE</u> SPACE</p> <ol style="list-style-type: none"> 1. Arrangements to secure on-going maintenance <u>in perpetuity</u> for all new Green <u>and Blue</u> Space are required. 2. Where the Council is asked to adopt spaces: <ol style="list-style-type: none"> a. a financial contribution will be required to cover maintenance for 15 years b. arrangements must be agreed with the Council prior to commencement of the development. 3. Where private arrangements are proposed the Council must be satisfied that 	For consistency so all green spaces amended to green and blue spaces and to provide clarity

			<p>a. the Green Space will be maintained in perpetuity.</p> <p>ba. the liability to maintain the Green and Blue Space transfers with title to the land management and quality arrangements decided at the planning stage to be maintained to ensure no loss of GBI assets.</p>	
125	GREEN AND BLUE INFRASTRUCTURE Green and Blue Space	5.5.35	<p>Amend paragraph to remove “must show benefit to the users of the development. Also:”</p> <p>Amend criteria 1 to “<u>Green and Blue Space related benefit to the users of the development must be shown or/and. The scheme on which the contribution money is to be spend should relate to the development using the distance standards in G3</u>”.</p> <p>Amend criteria 2 to read “<u>A The</u> scheme on which the contribution money is to be spent is <u>one</u> identified as part of a wider Green <u>and Blue</u> Space Strategy for the City.”</p>	To provide a clear rationale of how commuted sums will be spent
126	GREEN AND BLUE INFRASTRUCTURE Green and Blue Space	POLICY G6	<p>Amend POLICY G6 to read:</p> <p>POLICY G6: PROTECTION OF EXISTING GREEN <u>AND BLUE</u> SPACE</p> <p>(i) <i>Green and Blue Space is defined as:</i></p> <ul style="list-style-type: none"> • <i>Sites designated in the Local Plan including Neighbourhood Plans</i> • <i>Green Spaces created through the application of Development Plan Policy</i> • <i>Open Space and Pedestrian Corridors in the City Centre</i> • <i>Other spaces which meet the NPPF definition of Open space that have not been allocated for alternative land uses in the Local Plan</i> <p>(ii) Green <u>and Blue</u> Space will be protected from development <u>unless A) the green and blue space is not required for the purposes of climate change adaption such as tree planting or local food growing</u></p>	For consistency so all green spaces amended to green and blue spaces and to reconfigure some of the wording for clarity

			<p>And (ii) (B) one of the following criteria are met.</p> <p>1) there is an adequate supply of all typologies of accessible green and blue space within the analysis area and the development site offers no potential for use as an alternative deficient open space type; or</p> <p>2) the green space lost is re-provided by an area of at least equal size, accessibility and quality in the same locality; or</p> <p>3) where supported by evidence and in the delivery of wider planning benefits, redevelopment proposals demonstrate improvements to existing green space in the same locality; <i>and</i></p> <p>4) the green space is not required for the purposes of climate change adaption such as tree planting or local food growing.</p>	
127	GREEN AND BLUE INFRASTRUCTURE		<p>Insert text</p> <p><u>“[Replace paragraphs 5.5.28 - 5.5.29 as follows]”</u></p>	
128	GREEN AND BLUE INFRASTRUCTURE Nature Conservation and Biodiversity	5.5.42	<p>Delete the first “and” in the 1st criteria</p> <p>Amend 2nd criteria “...Biodiversity Net Gain, is by fully considered ing and that opportunities for enhancement...”</p> <p>Renumber criteria as 1 to 6 (to replace 12 to 17)</p>	For clarity
129	GREEN AND BLUE INFRASTRUCTURE Nature Conservation and Biodiversity	5.5.42	<p>Amend title accompanying diagram to read:</p> <p><u>“Designated Nature Conservation Sites hierarchy in Leeds”</u></p>	For presentation
130	GREEN AND BLUE INFRASTRUCTURE	5.5.44	<p>Amend 2nd sentence to add “(2021)” following the Environment Act</p>	To provide additional detail

	Nature Conservation and Biodiversity			
131	GREEN AND BLUE INFRASTRUCTURE Nature Conservation and Biodiversity	5.5.44	Amend 3 rd sentence to read “ e <u>C</u> onservation e <u>C</u> ovenants”	To correct capitalisation
132	GREEN AND BLUE INFRASTRUCTURE Nature Conservation and Biodiversity	Following 5.5.44	Amend text following 5.5.45 [New Policies G8A and G8B r Replace Policy G8 of the Core Strategy 2019 <u>with new</u> Policy G8A]	To update policy reference
133	GREEN AND BLUE INFRASTRUCTURE Nature Conservation and Biodiversity	POLICY G8A	Amend POLICY G8A to read: POLICY G8A: PROTECTION OF IMPORTANT SPECIES AND HABITATS (i) Development will not be permitted which would <u>cause any unacceptably</u> harm, either directly or indirectly, <u>to</u> any sites designated <u>of international or</u> national, regional or local biodiversity or geological importance or unless it is clearly evidenced that such harm cannot be avoided by locating on an alternative site with less harmful impacts, can be adequately mitigated, or, as a last resort, compensated for. which would cause any harm to internationally designated sites, or would cause serious harm to any Habitat or Species of Principal Importance. (ii) In considering development proposals affecting any designated sites and UK Biodiversity Action Plan Priority species or habitats, the needs of the development and the requirements to maintain and enhance biological and geological diversity will be	To align the policy more explicitly with the NPPF, to specifically mention international sites and clarify any harm to international or national designated sites must be considered

			<p><u>assessed. Development will not be permitted which would cause significant harm, either directly or indirectly, to any site designated of regional or local importance or any Habitat or Species of Principal Importance (Section 41 List) unless it is clearly evidenced that such harm cannot be avoided by locating on an alternative site with less harmful impacts, can be adequately mitigated, or, as a last resort, compensated for.</u></p> <p>(iii) <u>In addition, particular account will be taken of In considering development proposals affecting any designated sites and Habitat or Species of Principal Importance, the needs of the development and the requirements to maintain and enhance biological and/or geological diversity will be assessed. Particular account will be taken of:</u></p> <ul style="list-style-type: none"> • The extent and significance of potential harm to the interest of any <u>international</u>, national, regional or local site, or Habitat or Species of Principal Importance, and • Evidence demonstrating that the need for the development outweighs the importance of any <u>international</u>, national, regional or local site, or Habitat or Species of Principal Importance, and • The extent that any adverse impact could be reduced and minimised through protection, mitigation, enhancement and compensatory measures secured through planning conditions or obligations and which would be subject to appropriate monitoring arrangements. • The submission of comprehensive and robust maintenance and management measures and a commitment to implement them. • <u>Any candidate potential sites for a Local Wildlife Site designation that have been assessed against recognised criteria and are awaiting formal designation</u> 	<p>To align the policy more explicitly with the NPPF and clarify a higher threshold of "significant harm" to regional and local designated sites must be considered.</p> <p>To clarify when the bulleted factors will be considered.</p> <p>To explicitly mention international sites</p> <p>To relocate this information elsewhere in the policy as it sits</p>
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			<p>or are clearly identified on an assessment work programme.</p> <ul style="list-style-type: none"> The priorities of the relevant Local Nature Recovery Strategy for West Yorkshire and the national Nature Recovery Network. <p>(iv) <u>Any candidate/potential sites for a Local Wildlife Site or Local Geological Site designation that have been assessed against recognised criteria and are awaiting formal designation will be afforded the same level of protection as a designated Local Wildlife Site or Local Geological Site.</u></p>	<p>better outside the bulleted factors for consideration.</p> <p>Relocated text from elsewhere and greater clarification of what non-designated sites will be protected</p>
134	GREEN AND BLUE INFRASTRUCTURE Nature Conservation and Biodiversity	5.5.46	Amend 2 nd sentence to read: "...Schedule of Nature <u>Conservation</u> dDesignated sSites..."	For clarity
135	GREEN AND BLUE INFRASTRUCTURE Leeds Habitat Network	5.5.47	Amend subheading title to " Leeds Habitat Network"	To clarify which Habitat Network
136	GREEN AND BLUE INFRASTRUCTURE Leeds Habitat Network	5.5.47	Insert new text at end of 2 nd sentence to read: " <u>that results in significant adverse impacts. Lesser adverse impacts should be compensated for through enhancement and/or expansion of the Network.</u> "	To clarify the difference between adverse impacts and significant adverse impacts
137	GREEN AND BLUE INFRASTRUCTURE Leeds Habitat Network	5.5.48	Amend 1 st sentence to add " <u>Map XX and</u> "	

138	GREEN AND BLUE INFRASTRUCTURE Leeds Habitat Network	5.5.48	Delete the 3 rd sentence of paragraph and replace to read: “New sites identified through work such as neighbourhood plans will be added to the Network on a regular basis. Local extensions identified through Neighbourhood Plans must also be taken into account.”	To clarify that neighbourhood plan extensions must be considered even if they are not reflected in the Leeds Habitat Network shown on the Policies Map.
139	GREEN AND BLUE INFRASTRUCTURE Leeds Habitat Network	5.5.48	Amend the 5 th sentence to read: “It will also should...”	It is not currently clear what will be in the LNRS as it has not been drafted.
140	GREEN AND BLUE INFRASTRUCTURE Leeds Habitat Network	After 5.5.48	Insert new map “Map XX: Leeds Habitat Network”	To show the boundary of the Leeds Habitat Network in the Local Plan
141	GREEN AND BLUE INFRASTRUCTURE Leeds Habitat Network	POLICY G8B	Amend POLICY G8B to read: <u>POLICY G8B: LEEDS HABITAT NETWORK</u> 1. The Leeds Habitat Network, as designated through this policy and shown on Map XX and the Policies Map , identifies areas of wetland, woodland, heathland, grassland and other semi-natural habitats which have been recognised for their value to the natural capital of Leeds. 2. Any development proposals located within the Leeds Habitat Network must not result in significant adverse impacts on the value, integrity and connectivity of the Leeds Habitat Network. Any adverse local impacts should be compensated for by enhancements to, and/or the physical expansion of the Network. Enhancement and expansion of the Network will be sought through measures that will contribute positively to the long term	To clarify where the boundary of the LHN is shown and to confirm that new sites will form part of the LHN

			<p>protection of those areas and improve connectivity of the Network. <u>Any new sites delivered during the plan period will be deemed to be part of the Leeds Habitat Network.</u></p>	
142	<p>GREEN AND BLUE INFRASTRUCTURE Biodiversity Net Gain</p>	5.5.49	<p>Amend paragraph to read:</p> <p>“The Environment Act (2021) has introduced a mandatory requirement for most certain developments types to deliver of a minimum 10% Biodiversity Net Gain (BNG). <u>BNG means that biodiversity is measurably better off as a result of a development compared to the pre-development state. The Council supports BNG that is underpinned by the “Biodiversity net gain Good practice principles for development. A practical guide” (report ref. C776a 2019 by CIEEM, CIRIA and IEMA), which sets an industry-standard and benchmark of ‘what good BNG should look like’.</u>”</p> <p>Defra’s The Biodiversity Metric will be replaced by the statutory Metric once BNG becomes mandatory is the nationally recognised tool to measure and quantify biodiversity on sites and will be used to assess initial biodiversity value, guide measures to deliver an improvement and assess the resulting post-development biodiversity value to ensure adequate gain is achieved.</p> <p><u>The Biodiversity Metric requires the minimum 10% BNG to be delivered separately for all three types of habitats that may be present: Habitat Biodiversity Units; Hedgerow Biodiversity Units; and Watercourse Biodiversity Units. It should be noted that Watercourse Biodiversity Units include the 10 metre zone adjacent to the watercourse, which therefore (for example) requires any development within 10 metres of the River Aire in Leeds City Centre to also apply the Watercourse Biodiversity Metric.</u></p>	<p>To give more detail on what BNG should look like.</p> <p>To allow for if the Metric is not produced by Defra in the future.</p> <p>To remove text that will soon be out of date</p>

			<p><u>The Environment Act (2021) requires BNG to be delivered for a minimum of 30 years and for any monitoring and reporting to be carried out for at least that length of time. Where the consented development lasts beyond 30 years then the BNG should also last beyond 30 years.</u></p> <p><u>In order to assess and monitor success of any on-site BNG delivery there will be a requirement to submit progress reports on the management and habitat monitoring through planning conditions for the minimum period of 30 years, but the ongoing implementation of a BNG Management Plan will be expected to continue beyond the 30 year period. The same applies to any off-site BNG delivery through a s106 Agreement, which is used to secure the off-site biodiversity works i.e. the management progress reports and habitat monitoring will need to be submitted to the Council for the first 30 years but the ongoing implementation of the BNG Management Plan will also be expected to continue beyond the 30 year period to achieve a long-lasting biodiversity gain i.e. at least for the lifetime of the development.</u></p> <p><u>In addition to the numerical calculation of BNG measured in Biodiversity Units, developments will need to demonstrate clearly how good design and protection of the natural environment have been at the heart of any scheme and that a professional ecologist has been instrumental in ensuring meaningful BNG will be delivered in a way that leaves a legacy for the natural world.</u></p> <p><u>BNG will be delivered on-site unless robust evidence is submitted to demonstrate that this is not feasible. In such a case, off-site delivery of the required residual number of Biodiversity Units will be required. Off-site delivery of Biodiversity Units will only be considered acceptable as a last resort.</u></p>	
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			<p><u>In cases whereby delivery of off-site Biodiversity Units is considered acceptable (as a last resort) it is expected that it will be delivered by one of the following scenarios:</u></p> <ul style="list-style-type: none"> • <u>On land owned by the developer or other land which the developer has a legal interest in</u> • <u>On private land</u> • <u>On land registered with a private habitat bank</u> • <u>On land owned by Leeds City Council or like-minded partners it chooses to work with in the role of a habitat bank</u> • <u>National Biodiversity Credits (only where none of the above options are available)</u> <p><u>On-site Strategic Significance</u></p> <p><u>The on-site location score for Strategic Significance in the Biodiversity Metric is based on the geographical importance of the site's biodiversity value. In Leeds the designated nature conservation sites are the most important locations for biodiversity, followed by the Leeds Habitat Network – which together also includes the largest and most important watercourse features in Leeds.</u></p>	
143	GREEN AND BLUE INFRASTRUCTURE Biodiversity Net Gain	5.5.50	<p>Delete paragraph</p> <p>“In addition to the numerical calculation of gain in biodiversity units, developments will need to demonstrate clearly how good design and the natural environment have been at the heart of scheme creation and a professional ecologist has been instrumental in ensuring BNG will be delivered. BNG will be delivered on-site unless robust evidence is submitted to demonstrate that this is not feasible. In this case, off-site delivery of the required residual number</p>	Due to changes in other text, this is no longer required.

			of Biodiversity Units will be required. Off-site delivery of Biodiversity Units will only be considered as a last resort.	
144	GREEN AND BLUE INFRASTRUCTURE Biodiversity Net Gain	5.5.51	Insert new subheading: "Off-site Strategic Significance"	To give more detail on off-site strategic significance.
145	GREEN AND BLUE INFRASTRUCTURE Biodiversity Net Gain	5.5.52	Amend 1 st and 2 nd sentence to read: "As well as the As well as the locations that provide the best biodiversity outcomes (designated designated are existing nature conservation designated sites and the Leeds Habitat Network), including new land sites land sites that provides the opportunity to create new connections and linkages thereby expanding the habitat network, the Leeds Habitat Network is also important. This approach is supported by the "Making Space for Nature: A review of England's Wildlife Sites and Ecological Network" 2016 Leeds Habitat Network is also important. This approach is supported by the "Making Space for Nature: A review of England's Wildlife Sites and Ecological Network" 2016 ^{obj} by Professor"	To clarify
146	GREEN AND BLUE INFRASTRUCTURE Biodiversity Net Gain	5.5.53	Delete paragraph: "All applications delivering BNG should be accompanied with sufficient, high quality information to assess each application and allow monitoring and reporting of where Biodiversity Units are being delivered both on-site and off-site. This should include clear scaled maps showing not just the UK Habitat Classification land parcels before and after development but also annotated with where the Biodiversity Units occur on the same maps."	Due to changes elsewhere this paragraph is no longer required.
147	GREEN AND BLUE INFRASTRUCTURE Biodiversity Net Gain	5.5.54	Delete paragraph: "It is expected that this information will be contained within a Biodiversity Net Gain Plan report which will be submitted in support of a planning application Where on-site Biodiversity Units are to be delivered there will need to be a BNG"	Due to changes elsewhere this paragraph is no longer required.

			<p>Management & Monitoring Plan which clearly identifies which parts of the site it applies to. This may be addressed via a planning condition. The Council will have a duty to monitor the implementation of the Plan and enforce any non-compliance therefore only parts of the site that are accessible and outside of private ownership/curtilage should be shown to be included. Any areas not to be included in the BNG Management & Monitoring Plan should be excluded as contributing to BNG through any Biodiversity Metric calculations (such as private gardens)."</p>	
148	GREEN AND BLUE INFRASTRUCTURE Biodiversity Net Gain	New para	<p>Insert new subheading and paragraph:</p> <p><u>"Public access and new nature reserves</u></p> <p><u>Where the baseline biodiversity value of a piece of land chosen to deliver Biodiversity Unit is relatively low, the Council encourages good design of BNG delivery that can accommodate both improved biodiversity and better access for people. Where the size of such sites allows this should seek the establishment of new nature reserves both on-site and off-site. Parts of such sites could be fenced to restrict public access and encourage ground-nesting birds while other parts of the site having appropriate infrastructure that can accommodate visitors in order to raise their awareness of the biodiversity near where people live and work. Many designated nature conservation sites have no public access and may be high value for biodiversity due to the lack of recreational disturbance – it is not the intention to encourage public access into such areas if this adversely impacts on the biodiversity value of that site."</u></p>	To provide more details
149	GREEN AND BLUE INFRASTRUCTURE	5.5.55	<p>Insert new subheading:</p> <p><u>"Mitigation Hierarchy"</u></p>	For consistency

	Biodiversity Net Gain			
150	GREEN AND BLUE INFRASTRUCTURE Biodiversity Net Gain	5.5.55	<p>Amend paragraph to read:</p> <p>“All applications for on-site and off-site BNG will be expected to submit</p> <ul style="list-style-type: none"> • a reasoned justification for the measures proposed which considers the 10 BNG Principles set out in “BNG. Good practice principles for development. A practical guide” by Ciria 2019 (as updated). (on-site only) • accurate scaled drawings and GIS files showing where Biodiversity Units are to be lost and delivered • a BNG Management Plan that demonstrates: <ul style="list-style-type: none"> o how the uplift in Biodiversity Units will be delivered to achieve the target Condition o the cost of implementation of any biodiversity works including monitoring for a minimum 30-year period o who will be responsible for the creation and/or enhancement works and monitoring. <p><u>The Council wants to see retention of any valuable biodiversity features on-site and this means an evidence-based approach whereby any habitat that is defined in the Biodiversity Metric as Medium Distinctiveness (or higher) has been properly considered for retention. This will require input of an ecological consultant into the master-planning and design process. Where a Design & Access Statement is submitted it should include a section on BNG showing the different layout scenarios with such habitats retained in full and/or partially retained together with a rationale why this has not been considered feasible if they are shown to be removed in the proposed layout.</u></p>	To reflect changes elsewhere to text and to provide more details and clarity

		<p><u>Any habitats that are Very High Distinctiveness (including Irreplaceable habitats) such as Ancient Woodland or Habitats of Principal Importance, should not be scored through the Biodiversity Metric. Policies G2B and G8a set out a strong presumption that any such habitats will be retained in full, and where loss is considered acceptable as a last resort there will need to be substantial bespoke compensation.</u></p> <p><u>Disputes in application of the Metric</u></p> <p><u>Where there is any dispute regarding the Habitat Type, Distinctiveness or Condition category score to be applied to any habitat, hedgerow or other linear feature the LPA may require an opinion from a different ecological consultant who is a member of CIEEM (Chartered Institute of Ecology and Environmental Management) or a Chartered Ecologist. In relation to assigning the correct Habitat Type and Distinctiveness these should be based on the definitions in the UK Habitat Classification Version 2.0 (or any subsequent versions) and through use of the UK Habitat Classification Field.</u></p> <p><u>Unless otherwise agreed with the Council, the Habitat Type category of “Modified Grassland” should only be applied to grassland according with NVC MG7 grassland (and some NVC MG6 communities) - which is reflective of agricultural pasture often with Perennial Rye Grass as the dominant grass species and/or recreational/amenity grassland such as sports pitches. Modified types of grassland are often regularly disturbed through repeated cutting and lack areas of vegetation left uncut (for structural diversity). NVC MG1 community grasslands should be classed as Other Neutral Grassland Habitat Types.</u></p>	
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			<p><u>The Metric scores are a proxy and professional judgement is required to ensure the appropriate Habitat Type, Distinctiveness and Condition category is selected, which may require discussion with the Council's Nature Team.</u></p> <p><u>Individual Urban and Rural Trees</u></p> <p><u>Where new Individual Urban and Rural Trees of the Small or Medium Size class, as shown below in Table 8-1 from The Biodiversity Metric 4.0 User Guide (first published March 2023), are being proposed as part of the on-site or off-site BNG proposals there will need to be sufficient information to demonstrate the proposed trees will attain the specified target Diameter at Breast Height within the specified time range (within 30 years) and sufficient soil volumes and soil depths for the canopy spread at maturity. This information should be provided prior to determination to give assurance the associated numbers of Biodiversity Units can be delivered. Soil volumes should be calculated using the methodology in the LCC Guidance: Ancient Urban Tree Planting (SC Rev C-Dec 2018) and will need consideration of the potential canopy spread of the different tree species being proposed (which is available in the Trees & Design Action Group's "Tree Species Selection for Green Infrastructure: A Guide for Specifiers" Issue 1.3/2019)."</u></p> <p><u>Guidance: Ancient Urban Tree Planting (SC Rev C-Dec 2018) and will need consideration of the potential canopy spread of the different tree species being proposed (which is available in the Trees & Design Action Group's "Tree Species Selection for Green Infrastructure: A Guide for Specifiers" Issue 1.3/2019).</u></p>	
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Table 8-1 Tree size classes and area equivalents

Size class	Diameter at breast height (cm)	Metric RPA radius (m)	Metric area equivalent (ha)
Small	greater than 7cm and less than or equal to 30cm	3.6	0.0041
Medium	greater than 30cm and less than or equal to 90cm	10.8	0.0366
Large	greater than 90cm	15.6	0.0764

Watercourse Biodiversity Units

Rivers, streams and becks are examples of biodiversity features that are strategically valuable across a wider area than the Leeds District - being linked through their respective Management and Operational Catchments, and this will be reflected where off-site Watercourse delivery is required.

BNG information to be submitted

All applications delivering BNG should be accompanied with sufficient, high quality information to assess each application and allow monitoring and reporting of where Biodiversity Units are being delivered both on-site and off-site. This should include clear scaled maps showing not just the UK Habitat Classification land parcels before and after development but also accurate, scaled maps of where the Biodiversity Units occur.

The required BNG information may be contained within a Biodiversity Net Gain Plan submitted in support of a planning application. For both on-site and off-site delivery of Biodiversity Units there will need to be an accurate, scaled map clearly showing which parts of the site will be covered

			<p><u>by a BNG Management Plan and be subject to BNG Habitat Monitoring for a minimum of 30 years.</u></p> <p><u>Under the Environment Act (2021) the Council is expected to be the Enforcement body for implementation of BNG on-site. Therefore only parts of the site that are accessible (for the Council to monitor and enforce BNG delivery) and outside of private garden-space should be shown to be included in the BNG Management Plan. In order to achieve a meaningful and long-lasting BNG legacy, any scoring areas (such as private gardens) not covered by the BNG Management Plan and BNG Habitat Monitoring should be excluded as contributing to the 10% BNG – but can be included in the scoring to go beyond the minimum 10% BNG target.</u></p> <p><u>BNG Monitoring and Reporting Body</u></p> <p><u>Under the Environment Act (2021) the Council has a responsibility to monitor and report on the implementation of any on-site and off-site Biodiversity Units for the minimum 30 year period. This BNG Monitoring and Reporting Body role will ensure on-site and off-site BNG delivery is operating to the same standards. A charge will be put in place on all applications delivering off-site BNG to cover this new role provided by the Council and will be available on the Council's BNG webpage.</u></p> <p><u>A Biodiversity Net Gain SPD is to be produced to provide further detail on how on-site and off-site BNG will be delivered in Leeds. It is expected that secondary legislation for the Environment Act (2021) will be produced prior to November 2023. It is also anticipated that a West Yorkshire Local Nature Recovery Strategy will be produced during the timescale of the Local Plan and may subsequently need to be reflected in the Strategic Significance aspects of the Metric</u></p>	
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			<u>calculations. The BNG SPD will make it clear how such changes and updates will be implemented in Leeds.</u>	
151	GREEN AND BLUE INFRASTRUCTURE Biodiversity Net Gain	Before Policy G9	Amend text to read: “ [New Policy G9 + R] Replaces Policy G9 of the Core Strategy 2019 <u>with new Policy G9</u> ”	Typographic change
152	GREEN AND BLUE INFRASTRUCTURE Biodiversity Net Gain	Policy G9	Amend Policy G9 to read: POLICY G9 – BIODIVERSITY NET GAIN A. All new development will provide a minimum of 10% biodiversity net gain (BNG) in line with the Environment Act (2021) <u>apart from the following types of development (which are exemptedcluded from delivering 10% BNG)</u> <ul style="list-style-type: none"> • <u>development impacting habitat of an area below a ‘de minimis’ threshold of 25 metres squared, or 5m for linear habitats such as hedgerows</u> • <u>householder applications</u> • <u>biodiversity gain sites (where habitats are being enhanced for wildlife)</u> • <u>Small scale self-build and custom housebuilding</u> <p>and the latest version of Natural England’s Biodiversity Metric will be used to measure the baseline and post-development impacts in terms of biodiversity units.</p> <p><u>All three separate types of Biodiversity Units (Habitats, Hedgerows and Watercourses) which are present must demonstrate a 10% BNG.</u></p>	To more accurately reflect national policy and procedures and to provide additional detail and clarification of processes and requirements

			<p><u>The Watercourse Biodiversity Metric will need to be used where covered culverts or any land within 10 metres of a water course is part of the application.</u></p> <p>The presumption is for BNG to be delivered on-site. Off-site delivery will only be acceptable where there is clear evidence that the mitigation hierarchy has been applied to the satisfaction of the Local Planning Authority (LPA).</p> <p><u>Proposed Individual Trees need to be accompanied with sufficient technical information per tree to demonstrate the Diameter at Breast Height at 30 years and soil volumes and soil depth to achieve their potential canopy spread.</u></p> <p><u>Implementation of all on-site and off-site BNG delivery will be monitored by the LPA through its role as the BNG Monitoring & Reporting Body.</u></p> <p><u>B) On-site BNG Delivery</u></p> <p>On-site Biodiversity Units that are Medium or High Distinctiveness should be retained in full and enhanced unless it is clearly demonstrated and justified by an appointed ecological consultant to the satisfaction of the LPA that the mitigation hierarchy has been fully considered through a range of costed options that includes retention of these habitats.</p> <p><u>Strategic Significance for the development site will be calculated as follows:</u></p> <ul style="list-style-type: none">• <u>High = Nature Conservation Designations and Leeds Habitat Network</u>• <u>Medium = Immediately adjacent to the above locations</u>• <u>Low = Anywhere else in the District</u>	
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			<p><u>Where they occur on-site, any covered sections of water courses should be re-opened and any artificial water channels re-naturalised to contribute to delivery of Watercourse Biodiversity Units.</u></p> <p><u>Private garden space is not considered reasonable by the LPA to be deliverable through a BNG Management Plan and therefore will not be considered to contribute to the minimum 10% BNG target Metric calculations. Any such areas can be scored but will need to contribute to above the 10% BNG target.</u></p> <p>Any land to be in private ownership or other land that it is not considered reasonable by the LPA to enforce compliance in accordance with the BNG Management Plan will be scored as zero value in the Biodiversity Metric calculations.</p> <p>All applications delivering on-site BNG will provide:</p> <ul style="list-style-type: none">• a reasoned justification for the BNG proposed• <u>how all 10 BNG Principles set out in “BNG: Good practice principles for development. A practical guide” by CIEEM, Ciria and IEMA 2019 (as updated) have been met</u>• full Spreadsheet Biodiversity Metric calculations• <u>accurate, scaled maps and GIS data showing parts of the site:</u><ol style="list-style-type: none">i. <u>where Biodiversity Units are to be lost</u>ii. <u>where Biodiversity Units are to be delivered</u>iii. <u>where Biodiversity Units are to be retained and/or enhanced and protected through the construction phase</u>iv. <u>to be covered by a BNG Management Plan and BNG Habitat Monitoring</u>	
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			<ul style="list-style-type: none"> • <u>the habitat creation and/or enhancement and management actions to deliver the uplift in Biodiversity Units to achieve the stated target Conditions</u> • <u>who will be responsible for funding the: initial creation, establishment and/or enhancement works; long-term management works; and habitat monitoring.</u> • <u>the projected cost for implementing the first 5 years of: the BNG Management Plan after any creation and establishment works,; and habitat monitoring</u> • <u>who will be responsible for implementing the: initial creation and/or enhancement; long-term management works; and habitat monitoring</u> • <u>whether any off-site Biodiversity Units are intended to be purchased from a Habitat Bank or other third party or national statutory credits.</u> <p>• Where 1 or more Biodiversity Units are to be delivered on-site, <u>a planning condition will be used to ensure approval of: a BNG Management Plan; annual management progress reports for the first 5 years; updated BNG Management Plan every 5 years with a progress report; and habitat monitoring reports for a minimum 30-year period to the LPA providing the BNG Monitoring and Reporting Body role. All Biodiversity Units delivered as part of the minimum 30-year period will be retained thereafter for the lifetime of the development.</u></p> <p><u>Prior to determination, Outline applications will need to carry out Baseline and Post-Development Metric calculations based on an indicative layout in order to demonstrate that a minimum 10% BNG can be achieved on-site. Where 10% BNG can not be demonstrated as deliverable on-site there will need to be an appropriate off-site area of land identified and</u></p>	
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			<p><u>proposed biodiversity works agreed with the LPA prior to determination.</u></p> <ul style="list-style-type: none"> • _____ details of where Biodiversity Units are to be lost and delivered • _____ An outline BNG Management Plan. <p><u>C)</u> Off-site BNG Delivery</p> <p>Subject to the agreement of the LPA, any required residual number of <u>Habitat, Hedgerow or Watercourse</u> Biodiversity Units will be delivered off-site in the same locality and in one of the following biodiversity priority locations (in decreasing order of preference):</p> <ol style="list-style-type: none"> 1. Within or immediately adjacent to a <u>designated nature conservation site or Habitat of Principal Importance (as per Policy G8a) (- High Strategic Significance)</u> West Yorkshire Local Wildlife Site or Local Nature Reserve 2. Within or immediately adjacent to the Leeds Habitat Network <u>(- Medium Strategic Significance)</u> 3. Outside the Leeds Habitat Network but in a location that forms a new strategic connection between two separate parts of the Network <u>(- Low Strategic Significance)</u> 4. Any other location but with clearly defined public access to provide the function of a nature reserve <u>(Habitat and Hedgerow Biodiversity Units only) (- Low Strategic Significance)</u> <p>If no suitable sites can be identified <u>in the same locality</u>, sites within the wider Leeds District that meet wider biodiversity objectives and are in one of <u>the biodiversity priority locations (in decreasing order of preference)</u> set out above can be considered.</p>	
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			<p><u>5 Any other location (Watercourse Biodiversity Units only) inside the same Management Catchment area (but which can be outside the Leeds District) = Low Strategic Significance</u></p> <p>All applications delivering off-site BNG will provide:</p> <ol style="list-style-type: none"> 1. full Spreadsheet Biodiversity Metric calculations 2. details of where Biodiversity Units are to be delivered <u>including accurate scaled maps and GIS data</u> 3. <u>accurate scaled drawing of parts of the site to be covered by a BNG Management Plan and BNG Habitat Monitoring</u> 4. <u>the habitat creation and/or enhancement and management actions to deliver the uplift in Biodiversity Units to achieve the stated target Conditions</u> 5. <u>who will be responsible for funding the: initial creation and/or enhancement; long-term management works; and habitat monitoring</u> 6. <u>who will be responsible for implementing the: initial creation and/or enhancement; long-term management works; and habitat monitoring</u> 7. <u>whether any off-site Biodiversity Units are intended to be purchased from a Habitat Bank or other third party.</u> <p>Unless otherwise agreed by the LPA Aa s106 and/or Conservation Covenant will need to be put in place to ensure submission of: a BNG Management Plan; annual management progress reports for the first 5 years; updated BNG Management Plan every 5 years with a progress report; and habitat monitoring reports for a minimum 30-year period to the LPA as the BNG Monitoring and Reporting Body. All Biodiversity Units delivered as part of the minimum 30-year period will be retained thereafter for the lifetime of the development.</p> <p>3 An outline BNG Management Plan</p>	
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153	GREEN AND BLUE INFRASTRUCTUR E Species Biodiversity Enhancements	Following Policy G9	<p>Insert new subheading and paragraphs following Policy G9:</p> <p><u>“Species Biodiversity Enhancements</u></p> <p><u>Policy G9 (BNG) only applies to habitat enhancements for biodiversity and the Biodiversity Metric does not try to assess the value of any site for species even though development can impact species as well as habitats. It is important to understand any adverse impacts on species resulting from development should be assessed through submission of an Ecological Impact Assessment, and planning conditions may be used to then ensure impacts are minimised and enhancements agreed.</u></p> <p><u>In recognition of the importance of species in securing biodiversity enhancement, development will be expected to incorporate features and infrastructure that will benefit species such as through new integral bat roosts, integral swift bricks, bee bricks and hedgehog highways. All new build and alteration schemes should provide integral features bat roosting and integral Swift Bricks. Details of these features (e.g. how many, where, specifications of features) should be submitted prior to determination in the Ecological Impact Assessment (EclA) report and on a General Layout type drawing to ensure the housebuilder does not overlook them. For outline applications, there should be a commitment to providing integral bat roosting and integral Swift Bricks together with an indication of how many.</u></p> <p><u>An appropriately qualified ecological consultant should be appointed to assess the site and types of buildings in order to put forward a scheme that has the highest chance of being successfully used by locally occurring species of bats and birds. Considerations need to include: height of feature; aspect of the building; avoidance of external lighting; no windows or doors below. The appointed ecological</u></p>	To insert a new supporting text to address species features, including swift bricks
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			<p><u>consultant must liaise with the relevant building architect to confirm the specification of bat roosting/ bird nesting feature is suitable for the building materials being used. Any such features installed into Listed buildings and other Listed structures must be sensitively designed to not detract from the architectural/cultural features of interest (separate Listed Building consent may be required if the impact is more than de minimis). Installation should follow best practice guidance where possible.</u></p>	
154	GREEN AND BLUE INFRASTRUCTURE Species Biodiversity Enhancements	New policy G10	<p>Insert new policy to read:</p> <p><u>“Policy G10 - Biodiversity Enhancements for Species</u></p> <p><u>All development should provide biodiversity enhancement for species commensurate with the scale of development.</u></p> <p><u>All Minor and Major development which consists of new buildings or works to existing buildings should provide integral bat and/or integral Swift nest features as per the following requirements:</u></p> <p><u>1. Residential schemes (apart from flats): a minimum of 3 features and a minimum ratio of one feature per number of dwellings whichever number is the greater</u></p> <p><u>2. Residential flats and non-Residential schemes: a minimum of 5 features for the first 1000m² footprint and one additional feature for every additional 100m²</u></p> <p><u>The specification of features and their location should be submitted to, and approved by, the Local Planning Authority”</u></p>	To protect species through the provision of biodiversity enhancements and species features.
155	GREEN AND BLUE INFRASTRUCTURE	5.5.56	Amend 1 st sentence to add <u>“food security and food system resilience”</u>	In response to request that food system

	Local Food Production			resilience and food security is included
156	GREEN AND BLUE INFRASTRUCTURE Local Food Production	5.5.59	Amend 3 rd sentence to add " <u>system</u> " after cornerstone of food	For clarity
157	GREEN AND BLUE INFRASTRUCTURE Local Food Production	POLICY F1	Amend POLICY F1 to read: "POLICY F1: FOOD <u>SYSTEM</u> RESILIENCE To support food <u>system</u> resilience and <u>food</u> security, Leeds will: <ul style="list-style-type: none"> • Support food growing and the necessary associated infrastructure, throughout the District • Encourage farming and food production practices that support a low carbon approach including movement of food. • Encourage farming and food production practices that promote greater Biodiversity and re-naturalisation of land. • Support modern food production methods in suitable locations including (where balanced with other priorities) within the urban area, on brownfield sites and in vacant premises and where low carbon and renewable heat and power can be sourced. • Support community food growing. • 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 • Require that the residential developments with private gardens shall be required to provide at least 1 semi-mature fruit tree per garden and should explore opportunities to plant semi-mature fruit trees under policies on new greenspace and GBI." 	In response to request that food system resilience and food security is included
158	PLACE MAKING		Add paragraph numbering to supporting text within the Place Making Section "4.1.16 - 4.1.35"	For clarity

159	PLACE MAKING Achieving Complete, Compact and Connected Places in Leeds	SP1A	Amend title of section to read: “Achieving 20– complete, compact and connected places Minute Neighbourhoods in Leeds ”	Amendment made to provide clarity on the role of the policy in line with nationally recognised terminology.
160	PLACE MAKING Achieving Complete, Compact and Connected Places in Leeds	1 st para. under PLACE MAKING	Amend sentence to read Complete, compact and connected places is based on the 20 Minute Neighbourhoods ² concept is a , which is used to plan for towns and cities where people can access their essential daily needs within a walkable/ wheeled distance from their home.	Amendment made to provide clarity and new terminology. The word “wheeled” is added to ensure inclusivity.
161	PLACE MAKING Achieving Complete, Compact and Connected Places in Leeds	1 st para. under PLACE MAKING	Insert footnote (²) to provide reference to the “ Town and Country Planning Association (TCPA) - The 20-Minute Neighbourhood Guide, March 2021 ”	Footnote added to provide link to TCPA Guidance note – adds clarity to principles of approach,
162	PLACE MAKING Achieving Complete, Compact and Connected Places in Leeds	2 nd para. under PLACE MAKING	Amend COVID to Covid-19	To reflect correct use of grammar
163	PLACE MAKING Achieving Complete, Compact and Connected Places in Leeds	3 rd para. (1 st and 2 nd sentences) under PLACE MAKING	Amend sentence to read: Research shows that the maximum time people are willing to walk/ wheel to meet their local daily needs is 20 minutes. This represents an 800 metres walk to a destination and back again. Or 10 minutes’ walk out and 10 minutes back to home.	Language amended to ensure inclusivity.
164	PLACE MAKING Achieving Complete, Compact and Connected Places in Leeds	3 rd para. (5 th Sentence) under PLACE MAKING	Insert “ wheel ” after walk	Terminology added to ensure inclusivity
165	PLACE MAKING Achieving Complete, Compact and	4 th para. (1 st sentence) under PLACE MAKING	Amend 1 st sentence to read: A 20-minute neighbourhood ‘ complete, compact and connected place scenario...”	Amendment made to provide clarity on the role of the policy in line with nationally

	Connected Places in Leeds			recognised terminology. .
166	PLACE MAKING Achieving Complete, Compact and Connected Places in Leeds	4 th para (5 th Sentence). under PLACE MAKING	Amend sentence to read: In turn this <u>mixed use local areas</u> can help reduce car usage.	Deleted superfluous words for clarity.
167	PLACE MAKING Achieving Complete, Compact and Connected Places in Leeds	4 th para (7 th Sentence) under PLACE MAKING	Add " <u>wheeled</u> " after walking	Terminology added to ensure inclusivity
168	PLACE MAKING Achieving Complete, Compact and Connected Places in Leeds	5 th (4 th sentence) para. under PLACE MAKING	Amend text to read "... in order to achieve <u>the 20-minute neighbourhood complete, compact and connected places principles</u> it is..."	Amendment made to provide clarity on the role of the policy in line with nationally recognised terminology.
169	PLACE MAKING Achieving Complete, Compact and Connected Places in Leeds	5 th para. (last sentence) under PLACE MAKING	Amend sentence to read "...the Council will set more detailed density expectations <u>in Development Plan Documents, which when allocating land for housing.</u> "	Change made to reflect that density expectations are not limited to DPDs – language outdated. Also the change is to reflect that density expectations are not limited to housing development.
170	PLACE MAKING Achieving Complete, Compact and Connected Places in Leeds	9 th para. (1 st sentence) under PLACE MAKING	Amend the sentence to read: "Whilst planning has a role in the creation of <u>complete, compact and connected places 20-min Neighbourhoods</u> their successful creation <u>of 20min neighbourhoods</u> goes beyond planning with reliance on others <u>sectors</u> including..."	For clarity to reflect change in terminology.
171	PLACE MAKING Achieving Complete, Compact and	9 th para. (last sentences) under PLACE MAKING	Delete " <u>access</u> " and replace with " <u>connection</u> "	For clarity. To reflect connected places.

	Connected Places in Leeds			
172	PLACE MAKING What are daily needs and local services?	1 st para. under What are daily needs and local services	Amend the second sentence to insert “ including ” before playground and within brackets	For clarity
173	PLACE MAKING What are daily needs and local services?	Table LPU4	Amend title of the table to read: “ Complete, compact and connected - services and facilities expectations ” instead of “ 20min Neighbourhood expectations ”	For clarity
174	PLACE MAKING What are daily needs and local services?	2 nd para. under What are daily needs and local services	Amend paragraph to read “ For mapping purposes, Leeds has been divided in equally sized hexes (measuring circumradius/circumdiameter of 200m/400m). Based on the assigned weightings, the total achievable score for any hex (shown on Map ‘LPU 5’ below) is 18. The outputs are presented by their total weighting score, underpinned by a series of individual scores associated with individual amenities. This means that any hex can be analysed to understand the extent to which services are accessible by walking/wheeling. The Hex Maps will be kept up to date (on an annual basis) and published online on the Councils webpages.”	Text amendments to provide flexibility within the plan with detail in an implementation guide and online mapping “dashboard/hex map).
175	PLACE MAKING What are daily needs and local services?	3 rd para. under What are daily needs and local services	Delete paragraph “ Hexes shaded darker red on this map are those with higher overall accessibility scores, meaning that a greater range of services are accessible within a 20-minute return trip on foot. The scale graduates through orange and yellow shades for lower accessibility scores, through to dark blue for areas with the least number of accessible amenities ”.	Better placed in an implementation note.
176	PLACE MAKING What are daily needs and local services?	3 rd para. under What are daily needs and local services	Amend the paragraph to delete “ ..the scale of 0-18 from... ” and delete “ Score 13.5 – 18 ”; “ Score 9 - 13.49 ”; “ Score 4.5 – 8.99 ” and “ Score 0 – 4.49 ”. Amend percentages to read; “...Good accessibility (50- 7 45 %) Limited accessibility (25- 49 50 %) Ppoor accessibility (0- 2 45 %)...”	Minor amendment to remove any doubt on overlap within % range).

177	PLACE MAKING What are daily needs and local services?	Map LPU5 and Map LPU6	Delete Maps and titles LPU5: Leeds 20-minute neighbourhood accessibility mapping and LPU6: Leeds 20-minute neighbourhood accessibility classifications.	Shown in the Publication draft as illustrative, if retained will become out of date. Online mapping to be made available.
178	PLACE MAKING What are daily needs and local services?	4 th para. under What are daily needs and local services	Amend paragraph to read: "Policy SP1A <u>uses the principles of complete, compact and connected places to help guide the location of</u> also considers how housing developments are to be permitted on land that was too small to allocate or becomes available unexpectedly <u>(windfall)</u> ". It concerns the principle of housing development rather than details which may be controlled through other Policies. For example, development of a residential garden for housing would depend on how much the garden contributes to the <u>GBI green infrastructure</u> , visual and spatial character of an area, not on the quality of design which is the domain of Policy P10. <u>Policy SP1A reads alongside other policies in the Leeds Local Plan to assist in the balance of considerations of high-quality development in sustainable places.</u> "	Add clarity on the purpose of the policy and that this is a replacement Policy to CS Policy H2. Added text makes cross reference to other policies and that SP1A it to be used in balanced judgements.
179	PLACE MAKING What are daily needs and local services?	Policy SP1A	Amend policy to read: "POLICY SP1A - ACHIEVING <u>20-MINUTE NEIGHBOURHOODS IN LEEDS COMPLETE, COMPACT AND CONNECTED PLACES</u> i) To improve liveability <u>(living locally)</u> across the communities of Leeds the focus of new development should be to meet the principles of <u>complete, compact and connected places 20-minute neighbourhoods.</u> ii) A <u>complete, compact and connected place 20-minute neighbourhood in Leeds</u> is one that: i. Delivers development that maximises densities (unless there are overriding reasons concerning townscape,	Amendment made to title to provide clarity on the role of the policy in line with nationally recognised terminology. For clarity and inclusion

			<p>character, design and environmental impact) to support a critical mass for multiple local services/facilities and the viability of public transport, and</p> <ul style="list-style-type: none"> ii. Provides at least good accessibility* to a range of local services/facilities within a 10-minute walk [*as defined by paragraph X above] iii. Is safe, secure, pleasant, and well connected for pedestrians walking, wheeling and cycling cyclists and optimises active transport; and iv. Facilitates safe and easy access to quality public transport that connects people to jobs and services/facilities further away, and v. Offers high-quality public realm and open greenspaces with emphasis on inclusion, local play and nature connectedness, and vi. Provides services and destinations that support healthy local living, and vii. Delivers a mix of housing types and range of affordable housing types to support a diverse population mix, allowing for more resilient, multi-generational communities that support our ageing population to age in place, and viii. Encourages mixed uses and innovative and flexible design of buildings and spaces to provide multifunctional uses to facilitate thriving local economies and inclusion; important for sustaining a wider range and level of services and infrastructure as well as creating a sense of place with a recognisable centre and identity. <p>iii) Under the terms of this policy windfall housing development (5 or more units) will be acceptable in principle on non-allocated land, providing that:</p> <ul style="list-style-type: none"> a. the site is located in those parts of the district that demonstrate the functionality of a complete, compact and connected place 20-minute neighbourhood as defined above, or 	
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			<ul style="list-style-type: none"> b. development can clearly address how deficiencies in accessibility to services/facilities will be met (and delivered), and c. The number of dwellings does not exceed the capacity of transport, educational and health infrastructure, as existing or provided as a condition of development, and d. Green Belt Policy is satisfied for sites in the Green Belt and e. Areas of high flood risk to be avoided, and f. Greenfield land should not be developed if it has intrinsic value for: <ul style="list-style-type: none"> i. amenity space for recreation ii. nature conservation iii. makes a valuable contribution to the visual, historic and or spatial character of and area iv. can contribute to the adaptation to climate change especially in inner urban parts of the City where the capacity to deal with climate change is low. <p>iv) All proposals will be required to accord with Policy T2 and accessibility standards.”</p>	
180	PLACE MAKING What are daily needs and local services?	Policy SP1	Delete Publication Change proposal. Retain Policy SP1 as per 2014 version	The policy is no longer proposed for amendment as part of LPU. The existing Policy SP1 is proposed to be retained as per the Adopted Core Strategy. This allows greater flexibility to review as part of LLP2040
181	PLACE MAKING	1 st para after Reducing Car	Delete paragraph:	The Paragraph is a direct duplicate of a

	Reducing Car dependent development	dependent development	“Through the Connecting Leeds Strategy, Leeds has adopted a vision to be a City “where you don’t need a car” and where priority is first given to pedestrian and cycle movements. Transport currently contributes up to 40% of carbon emissions in Leeds, so to meet the targets set in Policy SP0 action is required to reduce these emissions. The City Council encourages the uptake of zero emission vehicles and a modal shift away from private vehicles, which in turn will reduce the number of vehicles in the District. At the same time, current levels of public transport infrastructure investments alone are unlikely to deliver sufficient incentives to significantly change behaviours or deliver the desired modal shift to reduce carbon emissions”.	paragraph in the supporting text to Policy SP1A. Removed for clarity.
182	PLACE MAKING Reducing Car dependent development	2 nd para after Reducing car dependent development	Amend paragraph to read: <u>“Section 4.0: Planning for Climate Change outlines the ambitions for aiming for net zero by 2030. Related to this</u> C car-dependent development...	Minor amendment for added clarity and introduction to Policy EN9 resulting from deletion of paragraph above.
183	PLACE MAKING Reducing Car dependent development	3 rd para (2 nd sentence) after Reducing car dependent development	Amend second sentence to read: “Therefore, and operating alongside national guidance and Core Strategy policy on town centres and retail uses, the following policy is necessary. will operate alongside national guidance and Core Strategy Policy on Town Centres and retail uses.	
184	PLACE MAKING Reducing Car dependent development	Policy EN9 – NEW DRIVE THRU’ DEVELOPMENT	Amend criterion b. to read: b. The proposal is located with other commercial centres/existing facilities well served by public transport ¹ See Policy T2 on accessibility standards. <u>¹ see Appendix 3: Table 1 Accessibility Standards</u>	Amended for clarity. Appendix 3 to be used to define “well served by Public Transport”

185	PLACE MAKING Design		Amend explanation text in [] to read: [The following explanatory text and new policy will replace Core Strategy Policy P10 and UDP Policy GP5 to be inserted after para 5.3.40 with a new Policy SP1B to sit after follow new paragraphs and Policy on complete, compact and connected places 20-minute neighbourhoods to be inserted after 4.1.15 and before 4.2 of the Core Strategy]	Amended for consistency and clarity
186	PLACE MAKING Design	1 st para. under Design	Amend para to read: “High quality design is a key aspect of , alongside sustainable and resilient development, and is essential in creating places in which current and future generations can enjoy a high quality of life which is fulfilling and healthy. Good High Quality design should address the connections between form and function , people and places and the integration of new development into the built and natural environment. Design is at the forefront of issues such as climate change, energy use, car dependence, community cohesion and health and wellbeing. The vast majority of people who live and work in the Leeds City Region do so in an urban environment. Their quality of life of people who live and work in Leeds relies heavily upon the quality of their environment. In order to continue its economic success in a sustainable manner, and in order to achieve its aim of being the Best City in the UK by 2030, Leeds must build upon and retain the high quality of its built, historic and natural environment.	Paragraph updated from when it was originally first written in the UDP to reflect that high quality design is not limited to urban environments and terminology of “High Quality” to be used to reflect consistency of language used in NPPF.
187	PLACE MAKING Design	2 nd para. under Design	Add new criterion “a” and reorder “a-g” to “ b-h ”. a. “Form, function and aesthetics appropriate to their location”	Added clarity on role of high quality design.
188	PLACE MAKING Design	3 rd para under Design	Delete paragraph: “ Development requiring planning permission will be subject to development control considerations, including the acceptable provision of vehicular access, surface and foul water sewer disposal, car parking, greenspace, landscape ”	Paragraph carried across from the UDP, but unnecessary to this section. Guidance on how planning

			and detailed design considerations. Landscaping concerns will include the retention of trees. Development proposals may be submitted for planning approval in two ways. Outline applications need to resolve those requirements which establish in principle whether a site is physically developable for the development intended. Detailed applications need to resolve all development control considerations."	applications can be submitted can be found elsewhere.
189	PLACE MAKING Design	4 th para. Under design	Delete paragraph: "There are a variety of issues that require consideration at the outset of the design process which include but are not limited to; context and character, natural environment, scale, mass, integration with existing communities and neighbourhoods, designing out crime; disabled access; the orientation of buildings to address amenity issues such as air quality, daylight, noise and privacy; waste and recycling storage; and car and cycle parking. These considerations are set out across the Local Plan and in particular Policy P10".	Paragraph carried across from the UDP, but unnecessary to this section. Guidance on how planning applications can be submitted can be found elsewhere
190	PLACE MAKING Design	5 th para. under design	Amend 1 st and 2 nd sentences to read: "Developers are required to cross reference other Local Plan Policies on relevant issues such as flood risk mitigation, renewable energy measures and , sustainable construction and <u>Green & Blue Infrastructure etc</u> to ensure that they are integral to the design process. Guidance on the achievement of these requirements or provision of facilities may be set through area or site development frameworks, Neighbourhood Plans, Supplementary Planning <u>Documents or</u> Guidance, planning briefs and frameworks or <u>Design Codes</u>"	Clarity to better cross reference to GBI policies and correct terminology.
191	PLACE MAKING Design	After 5 th para. under Design	Insert new paragraph: <u>"In considering internal and external accessibility and inclusion the British Standards BS8300:2018 'Design of an accessible and inclusive built environment. Buildings – code of practice (or latest version) should be used. This provides recommendations on inclusive and accessible design of buildings and the spaces within them and covers development of inclusive design strategy; strategic</u>	New supporting text to add clarification and reference to British Standards for considering accessibility and inclusion.

			<p><u>site and building layout; arriving at a destination and parking; access routes to and within buildings; entering a building - doors, access control systems, entrance and reception areas; horizontal movement - corridors and passageways; vertical movement - steps, stairs, ramps, slopes, handrails, lifts; surface finishes; provision of signs and information; audible communication systems; lighting; facilities in buildings - seating, storage, windows, building services, assistance dog toilets; counters and reception desks; audience and spectator facilities; sanitary accommodation - showers, baby changing, toilets; individual rooms - kitchens, bedrooms, quiet spaces; and various building types.</u></p>	
192	PLACE MAKING Design	6 th para. under Design	<p>Delete 2nd sentence: <u>“Sites may also need to be subject of stability investigations.”</u></p>	Deletes duplicated text.
193	PLACE MAKING Design	Policy SP1B 1	<p>Amend policy to read:</p> <p>POLICY SP1B: ACHIEVING WELL-DESIGNED SUSTAINABLE PLACES</p> <p><u>1. All development in all parts of Leeds will be required to achieve high quality design that is reflective of a thorough contextual analysis and understanding of the scheme within the surrounding area and where appropriate, through community consultation. High quality, sustainable and well-designed places will be achieved in all parts of Leeds by taking a proactive and collaborative approach at all stages of the planning process for all new development.</u> This will be achieved by new development proposals ensuring that:</p> <p><u>i.</u> A thorough understanding, appraisal and assessment of the site and its context (including local character and landscape) is undertaken prior to <u>the start of the design process and submission of</u> a planning application.</p>	<p>Changes reflect perceived duplication between SP1B and P10. Reps sought deletion of SP1B, however, the importance of making sure design and contextual understanding of sites/applications is important and justifies retention of proposed SP1B policy.</p> <p>To remove duplication between SP1B and P10, the first 5 requirements from Policy P10 are</p>

			<p><u>ii. Development proposals for new buildings/uses, routes and spaces, and alterations/extensions, should minimise carbon emissions and be able to adapt to climate change (through relevant Local Plan policies) and be appropriate to its location, scale, form (including massing and appearance) and function</u></p> <p><u>iii. Development proposals should address access, drainage, contamination, stability, landscaping and design</u></p> <p><u>iv. Development Proposals should address internal and external accessibility and inclusion for all</u></p> <p><u>v. Development proposals should seek to avoid problems of environmental harm, loss of natural features, loss of amenity, pollution danger to health or life, and highway congestion, to maximise highway safety (vision zero), minimises carbon emissions and the prevention of crime.</u></p>	<p>proposed to be migrated to Policy SP1B</p> <p>Additional text added to reflect inclusion and accessibility and the link to vision Zero (within the Transport Strategy).</p>
194	PLACE MAKING Design	1st para. before Policy P10	<p>Amend paragraph to read :</p> <p>5.3.42 Leeds has a rich and diverse urban and rural environment. It ranges from leafy suburbs, rural villages, to free standing market towns, industrial settlements, inner urban areas and a vibrant City Centre. Excellent High quality Urban Design including the provision of works of art or craftsmanship that enhance buildings and their surroundings can reinforce the distinctiveness of these unique and special places and contextual analysis, it should inform opportunities for contextual development that to enhances our City as a whole.</p>	<p>Text changes made for clarity and better reading. Text referring to art and craftsmanship has been relocated. Consistency of language used in the use of 'High Quality' to reflect language in NPPF.</p>
195	PLACE MAKING Design	2 nd para. before Policy P10	<p>Delete the word “also” after “Leeds and “environment”:</p> <p>“Leeds also has a rich and varied natural landscape. The natural environment gives space for Leeds’ residents to engage with nature, recreation and sports, benefitting their health and wellbeing. The natural environment also supports biodiversity, providing space for flora and fauna,…”</p>	<p>For clarity.</p>

196	PLACE MAKING Design	3 rd para. before Policy P10	Amend paragraph to read: 5.3.43 “The City Council has a long-standing commitment to delivering excellent high quality urban -design. This is reflected in the Ten Urban Design Principles (adopted by Executive Board in January 2005) as a basis to inspire and enhance the design quality in Leeds and provide a robust framework for creating successful places at all levels . Together with early stakeholder working in the form of design workshops and consultation (as is set out in the Statement of Community Engagement), investing in good high quality design can create economically successful development that functions well and has a lasting effect now and into the future”.	For consistency and clarity
197	PLACE MAKING Design	After 3 rd para before Policy P10	Add new paragraph to read: <u>“The Council is keen to encourage the provision of works of art or craftsmanship that enhance buildings and their surroundings. Such works might include decorative ironwork, paving, sculpture, or many other forms. This is particularly appropriate to buildings used by the public and for large scale developments”.</u>	Replacement text and context on public art and craftsmanship which has been moved from para 5.3.41.
198	PLACE MAKING Design	Policy P10	Amend policy to read: POLICY P10: DEVELOPMENT PRINCIPLES FOR HIGH-QUALITY DESIGN & HEALTHY PLACE MAKING 1. All development will be required to achieve high quality design that is reflective of a thorough contextual analysis and understanding of an area and where appropriate, through community consultation. 2. Development proposals for new buildings, routes and spaces, and alterations to existing, should minimise carbon emissions and be able to adapt to climate change (through relevant Local Plan policies) and be appropriate to its	Criteria 1-4 and Criteria 6 moved to SP1B to address duplication of wording in between SP1B and Policy P10

			<p>location, scale, form (including massing and appearance) and function</p> <p>3. Development proposals should address access, drainage, contamination, stability, landscaping and design</p> <p>4. Development proposals should seek to avoid problems of environmental harm, loss of natural features, loss of amenity, pollution, danger to health or life, and highway congestion, to maximise highway safety, minimises carbon emissions and the prevention of crime.</p> <p>5. All development shall be inclusive and accessible to all users.</p> <p>6. All development will therefore be expected to:</p> <p><u>In accordance with Policy SP1B: Achieving well-designed and sustainable places; all development will be expected to:</u></p> <p>CONTEXT</p> <p>1. Contribute positively to an area’s character and identity, creating high quality design that reinforces local distinctiveness with respect to existing landscapes, natural features, boundaries, topography, waterscapes, streets, spaces, buildings and, materials and incorporate craftsmanship and public art.</p> <p>EXISTING ASSETS</p> <p>2. Preserve or enhance the district’s existing historic and natural assets, in particular, historic and natural site features and locally important buildings, spaces, skylines and views, and mMaximise the potential contribution towards addressing climate change and improving air quality by capitalising on</p>	
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			<p>opportunities to re-use existing buildings and structures,²⁷ Development should augment existing and create new green and blue and open infrastructure (such as additional planting, hedges, green roofs/walls, street trees, integrating flood alleviation and drainage measures,) linked to corresponding features beyond the site boundary, where applicable.</p> <p>MOVEMENT AND LEGIBILITY</p> <p>3. Promote accessibility, permeability and inclusion for all¹ by ensuring that the development connects appropriately to existing routes and street patterns and creates safe and accessible buildings, routes and spaces that are easy to move through (that avoid severance); promote legibility through the provision of recognisable and understandable places, routes, intersections spaces and points of reference;</p> <p>HEALTHY LIFESTYLES</p> <p>4. Create buildings and spaces that have penetration of sunlight and daylight.</p> <p>5. Particular regard shall be given to promoting and enabling Promote and enable active travel to support healthy lifestyles as the easy choice, maximising opportunities for pedestrian (walking and wheeling) and cycle movement, reducing dominance of vehicles (whether stationary or moving) on streets and ensuring everyone has low carbon travel choices and maximising opportunities to reduce the causes of ill health, improving health and reducing health inequalities by providing a healthy living environment (including improving street safety, spaces to dwell, greener (more pleasant and amenity) supporting both mental and physical health;</p> <p>LAYOUT</p>	<p>New footnote added to provide clarity to link “inclusion” to the 9 protected characteristics in the Equality Act.</p> <p>The addition of reference to ‘avoidance severance’, ‘reducing dominance of vehicles’ and ‘street safety’ is to provide clarity. To link the text more closely to the Healthy Street Indicators as suggested by Yorkshire & Humber Climate Commission.</p>
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			<p>5 6. Establish a coherent hierarchy of buildings, routes and open spaces, and deliver an integrated built form that clearly defines public and private space with plot boundaries formed in accordance with established local character. Diversity and choice will be secured through the delivery of a balanced mix of compatible buildings and uses, reflects and connects with the established street pattern and responds to features <u>beyond the site boundary</u></p> <p>6. NEW BUILDINGS AND EXTENSIONS AND ALTERATIONS</p> <p>6-7. <u>Create buildings and settings that respond to their</u> Particular regard shall be given to the setting of the building in the wider environment <u>including</u>, the location of the building on the plot, <u>the gradient of the plot</u>, the scale, <u>form</u>, massing, materials, relationships with <u>adjoining building(s)</u>/ open space. C, creation of legible entrances and active frontages, <u>highest standards of landscaping and public realm; accessibility and inclusion</u> as well as the adaptability of the building, the gradient of the plot, transport infrastructure, landscaping and public realm;</p> <p>PUBLIC REALM</p> <p>7. Deliver a safe, healthy, attractive, usable, <u>accessible</u>, inclusive, resilient and, well-managed and <u>well-maintained</u> public realm <u>comprising</u>; high quality green spaces, public places and landscaping, <u>public art and evident craftsmanship. Development will which</u> maximise opportunities for passive surveillance and spaces defined by active frontages. Provide opportunities for nature connectedness and safeguard the amenity of existing development and environment to reduce opportunities for crime and antisocial behaviour without compromising community cohesion;</p> <p>SERVICING AND OPERATION</p>	
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			<p>8. Parking, cycle, waste, and recycling storage should be designed in a positive manner and to be integrated so that it does not dominate the public realm.</p> <p><u>MAXIMISING OPPORTUNITIES ADAPTATION</u></p> <p>9. Create buildings and spaces that have penetration of sunlight and daylight. Avoid impacts on the microclimate including wind, overshadowing and glare and make efficient use of natural resources, including passive solar gain. Design places that are adaptable and resilient to changing social, technological, economic and environmental conditions.</p> <p>TALL BUILDINGS</p> <p>10. Buildings that are points of height (defined as either being over 30m tall or twice as tall as surrounding buildings) will meet an exceptional standard of design <u>require special consideration</u>. Monolithic, ‘slab-like’ buildings will not be supported, and issues of wind and the cumulative impact on the skyline will be appropriately addressed to ensure that the skyline and streetscape is improved as a result of the proposed development.</p> <p><u>¹ Inclusion should focus on the 9 protected characteristics in the UK – age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.</u></p>	
199	PLACE MAKING The Health Impacts of Development	2 nd Para after The Health Impacts of Development	Amend 2 nd sentence to read: “ <u>The Leeds Joint Strategic Assessment 2021 evidences This is highlighted by</u> the gap in life expectancy between some...”	To provide clarity on the source of evidence of the life expectancy statistics.
200	PLACE MAKING The Health Impacts of Development	Policy P10A: THE HEALTH IMPACTS OF DEVELOPMENT	Amend criterion 4. to read: “4. Where significant impacts are identified, measures to mitigate the <u>significant</u> adverse impact of the development will be provided and/or secured by planning conditions or obligations.”	To provide consistency and clarity.
201	SUSTAINABLE INFRASTRUCTURE		Insert paragraph numbering in Sustainable Infrastructure Section ...	For clarity and consistency

202	SUSTAINABLE INFRASTRUCTURE Mass Transit and Rail Infrastructure	2 nd para. under Mass Transit and Rail Infrastructure	Amend 4 th sentence to add “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> ” and remove “ where mass transit is being planned ”	To clarify the meaning of ‘identified’ in the context of policy SP11A
203	SUSTAINABLE INFRASTRUCTURE Mass Transit and Rail Infrastructure	3 rd para. under Mass Transit and Rail Infrastructure	Add new sentence at end of paragraph: “ <u>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.</u> ”	To support additional policy wording added on Park and Ride
204	SUSTAINABLE INFRASTRUCTURE Mass Transit and Rail Infrastructure	4 th para. under Mass Transit and Rail Infrastructure	Amend 1 st sentence to insert “complete, compact and connected places” and remove “20 minute neighbourhoods”	Incremental change to reflect change to Policy SP1A
205	SUSTAINABLE INFRASTRUCTURE Mass Transit and Rail Infrastructure	POLICY SP11A	Amend POLICY SP11A to read: <u>POLICY SP11A: MASS TRANSIT AND RAIL INFRASTRUCTURE</u> 1. Plans and projects that enable the delivery of a West Yorkshire Mass Transit network in Leeds will be supported to deliver improved connections in the following locations; <ul style="list-style-type: none"> • East Leeds • Leeds - Bradford • South Leeds – Dewsbury • Bradford and North West Leeds • North Leeds • <u>Wakefield and Five Towns</u> 2. Once any Mass Transit routes are identified, proposals which would prejudice its implementation will be refused. 3. Mass Transit and railway networks must be positively integrated into existing and proposed development, with stops and interchanges that provide well-designed and safe	To provide factual correction to reference Wakefield and Five Towns, add reference to park and ride facilities and reference to new bridge crossings in response to representations and clarification of reference to sustainable drainage

			<p>connections to key destinations and the wider active and public transport networks. <u>The provision of park and ride facilities linked to the Mass Transit network will be supported in appropriate locations.</u></p> <p>4. Mass Transit and rail infrastructure improvement schemes will be supported where they are designed to ensure that any potential adverse environmental, social and economic impacts are minimised and mitigated, and that any potential benefits or opportunities are maximised. Plans, projects and development proposals associated with the delivery of Mass Transit or the improvement of railway infrastructure must;</p> <ul style="list-style-type: none">o Be holistically designed to ensure that their potential to stimulate investment, regeneration and positive place-making is maximised, responding to the distinct characters and opportunities of the places along its routes, and delivering enhancements to the public realm, where appropriate, as part of the scheme.o Maximise the potential contribution towards addressing climate change, capitalising on opportunities to create new green and blue infrastructure under and around the line. Tree loss shall be minimised as far as possible and additional planting should occur, in accordance with Policies G2A-C, promoting connections with the wider GI network and integrating flood alleviation and drainage measures.o Support permeability across the route corridor, including through the promotion of pedestrian and cycling routes. <u>New bridge crossings must consider the impact on travel through the spaces below the structure.</u> Existing public rights of way and bridleways will be protected and	
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			<p>enhanced wherever possible. Diversions, if required, will be minimised and well designed for users.</p> <ul style="list-style-type: none"> o Protect or enhance heritage assets (including non-designated heritage assets) along the route corridor, ensuring that opportunities are taken to minimise overhead line equipment fixings, integrate the benefits of the project into their settings and maximise the potential for sustainable use and re-use of heritage assets. o Minimise any risk of flooding to surrounding areas and, where possible, contribute to reducing the existing flood risk. Any drainage measures shall be based on Sustainable Urban Drainage principles and seek to reduce run off and improve water quality to any receiving watercourse or sewers. o Encourage temporary ‘meanwhile use’ of land for temporary greening measures and cultural uses, where appropriate, to maintain the vibrancy and vitality of areas affected by long term construction programmes. This includes use as amenity areas of grass and planting, boundary planting, wildflower meadows, trees in containers to mark walking and cycling routes, community allotments, art workspaces and installations, and temporary sport / recreation uses and public event spaces. Temporary commercial uses, including main town centre uses within Centre boundaries, will also be encouraged. 	
206	SUSTAINABLE INFRASTRUCTURE Digital Connectivity	POLICY DC1 and supporting paragraph	<p>Delete POLICY DC1 DIGITAL CONNECTIVITY and supporting paragraph.</p> <p>Good digital connectivity is a vital element of modern everyday life and has become an increasingly essential part of our ordinary activities such as working, education and running of the household. Our services such as health,</p>	The need for the policy has been overtaken by changes in national legislation. Since the end of the Publication draft consultation period

			<p>shopping and utilities have increasingly become more reliant on digital provision, it is therefore important that the continued enhancement of digital capability is sustained in the longer term to allow Leeds to realise its true potential in moving forward and develop as a modern city that offers its citizens the best digital connections.</p> <p>POLICY DC1: DIGITAL CONNECTIVITY</p> <p>All new build development* must;</p> <ol style="list-style-type: none"> 1. Provide as a minimum, as part of site development, a contribution to the enhancement of Leeds' digital infrastructure provision gigabit capable network infrastructure with the installation of physical infrastructure necessary for gigabit capable connection; 2. Include infrastructure capable of accommodating more than one network operator to ensure that choice is offered to the end user; 3. Provide a 'digital connectivity statement' to support planning applications which must provide evidence that issues related to digital connectivity have been considered as an integral part of site development and design. In particular as part of this; <ul style="list-style-type: none"> — Demonstrate that the proposed development will be supported by infrastructure at commencement (upon first occupation) and that gigabit-ready physical infrastructure necessary for connections (consisting of infrastructure including ducts, chambers and termination points) is provided. — Provide information in the form of a layout plan of the site showing digital connectivity plans/strategy for each building in the development. — Evidence that the developer has partnered with infrastructure providers to have gigabit capable networks designed into the development as part of site 	<p>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. Given the new Building Regulations came into immediate effect from the 26th December 2022 the proposed policy in LPU1 is no longer needed and will be withdrawn from LPU1.</p>
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			<p>development. It is encouraged that network providers are engaged as early as possible (minimum of two network operators), this is to ensure that end users have as much choice as possible in terms of network providers.</p> <p>4. Non-compliance with this policy will only be considered in exceptional circumstances where the developer provides robust evidence within the 'digital connectivity statement' the following:</p> <ul style="list-style-type: none"> • What constraints to compliance exist; • Where it is not possible to service the development with a fixed line connection the developer should evidence that they have explored alternative technology to deliver gigabit connection, and; • What is proposed as suitable alternative provision. <p>*(to exclude minor and householder development)</p>	
207	PROPOSED GLOSSARY CHANGES		<p>Amend to read:</p> <p>AEP – Annual Exceedance Probability: The probability, as expressed as a %, of a flood event occurring in any given year</p> <p><u>Ancient Woodland: Woodland dating back to 1600 or before, which acts as is a very important habitat, including providing for more rare and threatened species than any other UK habitat.</u></p> <p>Carbon sequestration: The process of capturing, securing and storing carbon dioxide (CO2) from the earth's atmosphere in plants, soils, geologic formations, and the ocean.</p> <p><u>Complete, compact, connected (20 Minute Neighbourhoods):</u> Neighbourhoods where most daily journeys need take no longer than 10 minutes out and 10 minutes back by walking wheeling or cycling.</p>	For clarity and information

			<p>Craftsmanship/public art: Permanent and physical design or works of art that enhances buildings or the spaces around them. Such works might include decorative ironwork, paving, sculpture, or many other forms.</p> <p><u>Drainage infrastructure: The infrastructure used to carry surface water away from land , and to collect, store, treat or divert the water into natural or artificial watercourses. Drainage is the process of moving water from a space to avoid collection and potential damage brought on by uncontrolled water management. It involves diverting water away from an area and into suitable outlets by using a variety of systems, techniques, and natural processes.</u></p> <p><u>Flood Design Event: This is a flood event of a given annual flood probability, which is generally taken as: river flooding likely to occur with a 1% annual probability (a 1 in 100 chance each year); or tidal flooding with a 0.5% annual probability (1 in 200 chance each year); or surface water flooding likely to occur with a 1% annual probability (a 1 in 100 chance each year), plus an appropriate allowance for climate change. NPPG Paragraph: 002 Reference ID: 7-002-20220825</u></p> <p><u>Functional floodplain: Flood Zone 3b, defined as land with a 3.3% annual probability of flooding, or land where water has to flow and/or be stored in times of flood</u></p> <p>Green Space: All open space and vegetation, whether public or private, used for formal or informal recreation of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.</p>	
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			<p>Health Impact Assessment: Health Impact Assessment (HIA) is a tool to identify and optimise the health and wellbeing impacts of planning. An HIA helps the Local Planning Authority make choices about actions to best prevent ill-health, promote good health and reduce health inequalities. HIA seek to address both health improvement and health protection issues, reflecting on how health outcomes relate to the wider determinants of health and wellbeing such as access to services and amenities, traffic and transport, social and economic factors, and land use factors.</p> <p>Long Established Woodland: 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>Monolithic/ slab like: Tall high block buildings that appear as “slabs” in their composition and in the townscape and have high visual impact.</p> <p>Nature Connectedness: Nature connection can be viewed in terms of engaging with nature through our senses and immersing ourselves in our natural surroundings. It can also be seen as the mental, physical and emotional benefits that can be felt as a consequence of spending time in nature.</p> <p>Performance Gap: The difference between predicted and actual energy performance.</p> <p>Territorial: In relation to public open spaces territorial means Spaces which are designed exclusively for particular users, through location, access and features. E.g. spaces which are closely surrounded by dwellings, very overlooked, screened from the wider area, exclusively accessed through a private building or up steps.</p>	
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			<u>Veteran Tree: A tree which, because of its great age, size or condition is of exceptional value for wildlife, in the landscape, or culturally.</u>	
208	SCHEDULE OF LEEDS LOCAL PLAN POLICIES TO BE SUPERSEDED BY LOCAL PLAN UPDATE 1 POLICIES		<p>Amend table to add:</p> <p><u>“G2 CREATION OF NEW TREES COVER CSSR, SEPT 2019 SUPERSEDED by LPU1 Policy G2A, G2B, G2C and G2D”</u></p> <p>Amend table to delete:</p> <p><u>SPATIAL POLICY 1 LOCATION OF DEVELOPMENT CS, NOV14 SUPERSEDED BY LPU1 Policy SP1</u></p> <p>Amend table to amend:</p> <p>LAND2 DEVELOPMENT AND TREES NR&WPD, JAN 2013 SUPERSEDED BY LPU1 G2<u>DC</u></p>	To reflect changes to policy