



## Report of the Director of City Development

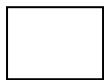
### Development Plan Panel

Date: 11<sup>th</sup> May 2010

Subject: Leeds LDF Core Strategy – ‘Preferred Approach’ Analysis of Consultation Responses: Green Infrastructure (Natural Environment) Theme

#### Electoral Wards Affected:

All



Ward Members consulted  
(referred to in report)

#### Specific Implications For:

Equality and Diversity

Community Cohesion

Narrowing the Gap

### Executive Summary

1. At Development Plan Panel on 2 February, members received a report concerning the Leeds LDF Core Strategy ‘Preferred Approach’, setting out an initial report of consultation and a headline summary of the initial comments received.
2. Within this context, the purpose of this report, is to provide further detailed consideration of the comments received in respect of the Green Infrastructure theme.

#### 1.0 Purpose of this report

- 1.1 At Development Plan Panel on 2 February, members received a report concerning the Leeds LDF Core Strategy ‘Preferred Approach’, setting out an initial report of consultation and a headline summary of the initial comments received. Within this context, the purpose of this report is to provide further detailed consideration of the comments received in respect of the Green Infrastructure theme.

#### 2.0 Background information

- 2.1 As noted in previous reports to Panel, the Core Strategy is the overarching and central document of the LDF process. Government Guidance (PPS12, 2008), emphasises the key role of the Core Strategy in setting out an overall spatial vision for an area and how the places within it should develop, to provide a link to the Community Strategy (Vision for Leeds) and Local Area Agreements, and the provision of an Infrastructure Delivery Plan (IDP).
- 2.2 Following consideration of the ‘Preferred Approach’ document by Development Plan Panel on 30 September, a period of informal public consultation has been undertaken across the District (26 October – 7 December 2009). In support of this, a range of consultation activity has taken place. In response to this consultation activity 142 comments have been

received in response to the Green Infrastructure theme. These are summarised in section 3 below and a more detailed summary scheduled is attached as Appendix 1 to this report.

### 3.0 Main issues

#### Introduction

- 3.1 As regional capital, the Leeds district is facing significant development pressures; for housing, employment, community facilities and the infrastructure to support this growth. A key challenge is therefore to manage this growth in ways, which will maintain the setting of Leeds within an attractive network of connected greenspaces and enhance its environment and distinctiveness. This means that alongside the conventional infrastructure which is needed to support growth, (such as roads, public transport, schools and other community facilities), the amount of accessible and multi-functional greenspace must be kept at a level which keeps pace with the number of people living and working in the District to ensure that a decent quality of life can be provided for everybody. The term 'Green Infrastructure' has been coined to describe this.
- 3.2 The concept of Green Infrastructure is being adopted at a national level. In Leeds, the Council has applied it in consultation with English Nature and with neighbouring local authorities through the Leeds City Region initiative. This approach has defined Green Infrastructure as:
- "The network of multi-functional green spaces, both urban and rural, which includes protected sites, woodlands, nature reserves, river corridors, public parks and amenity areas, together with green linkages. It extends from urban centres through green corridors to open countryside and supports the natural, recreational and ecological processes which are integral to the health and quality of life of sustainable communities".*
- 3.3 This definition explains that many different uses take place in Green Infrastructure and, in that regard, it is different from Green Belt. Whereas the Green Belt essentially helps to prevent the uncontrolled spread of development and avoid the coalescence of settlements, by comparison, GI is the strategic networks of accessible, multi-functional sites (including playing fields, parks, woodlands, informal open spaces, nature reserves and historic sites) as well as linkages (river and canal corridors, floodplains, wildlife corridors and greenways that penetrate into and through the developed areas from the countryside.
- 3.4 This approach enables the City Council to consider 'greenspaces' as an overall, inter-connected system rather than as a collection of individual sites. In this way, the GI 'system' of linked greenspaces helps to shape the growth of Leeds alongside socio-economic 'drivers.'
- 3.5 Although GI is relevant at all spatial levels, in the context of the Core Strategy it is confined to strategic areas and sets the scene for the growth of Leeds to be based upon a sustainable approach to development.

#### Summary of Comments Received

- 3.6 Appendix 1, attached, sets out the comments received on the Green Infrastructure theme during public consultation on the 'Preferred Approach' and the recommended Council response on the issues raised. People were asked to agree/disagree with the statement "that the policies will sufficiently protect and enhance Leeds' green infrastructure?". A total of 54 respondents agreed with the statement and 25 disagreed. In relation to biodiversity, in response to the statement "that the policies will sufficiently protect and enhance habitats and biodiversity, including woodlands and wetlands?", a total of 47 respondents agreed and 16 disagreed. The comments can be summarised as follows:

#### Green Infrastructure

- The inclusion of Kirkstall Valley within the defined GI is welcomed
- The following areas should be included with the defined area: Hunger Hills, Rawdon Billing, Gipton Wood and the Morley-Middleton-Holbeck corridor.
- Policies should be flexible enough to allow limited expansion of existing development

- In relation to Policy G2, commuted sums could be used towards restoring areas of historic interest in the vicinity of development sites which are “at risk” (English Heritage).
- The important greenspace corridors in South Leeds, which are valuable to the sub-region and penetrate the built up areas, are not sufficiently protected, especially given that two (out of 8) potential housing growth areas are located in this area.
- Developer contributions for GI must be appropriate, proportional and directly mitigate impacts on the green network caused by development and not undermine viability. There is a danger that Policy G2 will place unreasonable burdens on development over and above that normally required. Consideration should be given to the introduction of a threshold and criteria to clarify the terms of any contributions. It may be better to have only one policy, which deals with developer contributions in the round.
- There is not a clear evidence base or detailed justification for the extent of the GI as proposed.
- The GI Policies are mainly about the protection and enhancement of greenspace, public access and the natural environment. Recognition should also be given to the principal role of agricultural land for the production of food.
- The policies and supporting text would benefit from a greater emphasis on the role that GI can play in boosting economic performance by providing a high quality environment, which helps to attract inward investors and retain existing businesses.
- The role of GI in helping to address Flood Risk should be emphasised more, including the importance of watercourses and opportunities for sustainable drainage systems.
- GI plays an important role in shaping the future pattern of growth in Leeds, in adapting to climate change and in conserving and enriching Leeds’ distinctive landscape character (Natural England). However, an up-to-date landscape character assessment is an essential part of the evidence base and Leeds should refresh and review this work to inform the Core Strategy.
- Housing growth areas should be genuine exemplars of sustainable development with networks of multi-functional green infrastructure providing a wide range of environmental and quality of life benefits at the outset. This should go beyond successfully assimilating proposals into adjoining green infrastructure and require developers to demonstrate how green infrastructure can be genuinely multi-functional and deliver sustainability objectives.

#### Natural Environment

- The need for an area specific policy for the Aire Valley is questioned given that specific strategies/policies are not included for other key corridors.
- The policies will only be effective if they are adhered to and are enforced.
- Contributions to the habitat network should be directly proportional to any adverse impact on identified species from new development and should not impact on viability, especially in regeneration areas. Where possible, mitigation should be through design and not via a financial contribution.
- The need to protect natural habitats must be carefully balanced against the need to make efficient use of brownfield land. Policies should be sufficiently flexible to allow solutions, which reflect individual site circumstances.
- Natural England suggest illustrating the habitat network on the Proposals Map when they become available. Natural England support efforts to increase woodland cover in Leeds and the intention to develop a network of wetland nature reserves in the Lower Aire Valley (Policy G6).

## **4. Key Issues arising from the consultation**

### Developer contributions

- 4.1 One of the key areas raised by the development industry and their consultants related to a concern that Policy G2 (developer contributions for GI) might place unreasonable burdens on development over and above that normally required and that this could undermine viability. The point was made that developer contributions must be appropriate, proportional and directly mitigate impacts on the green network caused by development.
- 4.2 In response it is proposed to re-word Policy G2 to clarify where and how the Policy would be applied and also to suggest to replacing saved UDP Policy N8 (Urban Green Corridors). The

key point is that the Council will seek developer contributions to improve the quality of the Green Infrastructure, where appropriate and in accordance with the advice contained in Circular 05/2005 (which advises on developer contributions). A policy framework of the kind proposed is needed to ensure that the development control process is able to deliver improvements to the wider GI network. The main objective is to ensure that greenspace is provided on site in accordance with established policies (e.g. saved policy N2) but, given its location within or adjacent to GI, there will be a requirement for developers, through the design process, to integrate the site with the surrounding GI and add value to its character and quality. This will necessitate developers linking up existing greenspaces where appropriate.

#### Greenspace Infrastructure in Housing Growth areas (Policy G3)

- 4.3 A number of developers argued that this policy requires clarification or that it should be deleted on the basis that it is not considered necessary to identify growth areas specifically for providing greenspace. A further criticism was that there was no reference to the location or size threshold to these sites.
- 4.4 Major Growth Areas will be defined elsewhere in the Core Strategy. The purpose of Policy G3 is to ensure that Green Infrastructure forms an integral part of dealing with areas subject to significant housing growth. Therefore, in addition to applying greenspace standards (and on site provision), developers within or close to areas defined as forming part of Leeds' Green Infrastructure network, will be expected link into it successfully, in seeking to ensure such areas can be genuinely multi-functional and deliver sustainability objectives, including sustainable drainage systems, where necessary.

#### Level of Policy detail consistent with the strategic nature of the Core Strategy

- 4.5 Whilst Policy G5 (the creation of new woodlands) received support, a number of representations expressed the view that the related Policy G5A (Tree Preservation Orders) and Policy G5B (Ancient Woodlands) were too detailed for the Core Strategy and were more development control type policies, which should therefore be deleted. Upon reflection, it is agreed that these two policies are not of a strategic nature and as the issues are covered in separate legislation, they are proposed to be deleted from the Plan.

#### Physical Extent of the Green Infrastructure in Leeds

- 4.6 Map 1 in the 'Preferred Approach Map Book' shows the physical extent of GI in the Leeds district. Given the strategic nature of the Core Strategy, the area covered by GI is intended to be diagrammatic, showing the broad swathes of land covered rather than be tied to identifiable boundaries. A number of representations received suggested that there were 'gaps' in the area covered and that additional areas be included. Whilst some of these suggestions are considered too detailed for the Core Strategy, it is accepted that a number of additions are justifiable on the basis of their current functions and/or their importance as links in GI corridors. The additional areas are:

- South Leeds corridor
- Morley-Middleton-Holbeck Corridor
- Woodland along the Outer Ring Road (Addyman Woods), linking in to Roundhay Park.

#### 5.0 Next Steps

- 5.1 In the 'Preferred Approach' document the Green Infrastructure theme followed immediately after the overall 'Vision' for the Core Strategy. This was a deliberate attempt to signal the importance of Green Infrastructure to Leeds' distinctive character and to 'set the scene' for managing growth in a sustainable manner. However, in response to a representation from the Government Office, it is suggested that the Core Strategy needs to be reconfigured to give greater prominence to issues relating to 'managing the needs of a growing City', in particular meeting the housing challenge, developing Leeds' role in the City Region and supporting the local economy. Within this context, GI will still need to play an important role as part of the overall spatial strategy.

5.2 The chapter on the GI theme is also to be reconfigured to do the following:

- Add South Leeds, the Limestone Ridge, and the Lower Aire Valley (including the City Centre) to the list of the broad geographic areas of GI in Policy G1 in order to clarify the areas covered.
- Amend Appendix 6 of the Preferred Approach in order to list the key components of Leeds GI under each of the broad areas listed in Policy G1.
- Amend Policy G2, as detailed in the attached schedule, in order to clarify the Council's intentions and to explain that this will replace UDP Policy N8 Urban Green Corridors.
- Carry out a number of minor text changes as detailed in the attached schedule.
- Insert a paragraph to list the benefits of Green Infrastructure in order to assist in responding to detailed points made in some of the representations received.
- Amend the wording of Policy G3 to make it clearer that this applies to growth areas that lie within or on the edge of those areas defined as GI
- Amend Policy G5 to refer to "developer contributions" and to re-title the policy as 'Creating New Woodland.'
- Delete Policies G5A and G5B

5.3 In addition to the above, consideration needs to be given to Natural England's suggestion that the Council should carry out an up-to-date landscape character assessment to help strengthen the evidence base for the GI theme. It is most unlikely that the Council will have the resources (manpower and financial) to commission such a piece of work within an acceptable timeframe. However, the possibility of refreshing the work that was done for the UDP with the help of the Council's Sustainable Development Unit is to be considered.

## **6. Implications for council policy and governance**

6.1 None, other than to reiterate that the LDF Core Strategy needs to be in general conformity with the adopted Regional Spatial Strategy (2008)

## **7 Legal and resource implications**

7.1 A number of the consultation responses make reference to the City Council's evidence base in support of the Core Strategy. Following the detailed consideration of comments received, it may be necessary to undertake further technical studies and research, to underpin particular policy approaches where necessary. Subject to the scope of such work, it is likely that there may be resource implications in terms of staffing and the commissioning of technical work, as required. Such work and resource commitments will need to be addressed within the context of existing provision and the City Council's overall budget position and priorities.

## **8 Conclusions**

8.1 This report has provided further analysis of the comments received in respect of Green Infrastructure, as part of the Core Strategy Preferred Approach consultation. In response to comments received the schedule attached as Appendix 1. details the changes and next steps in preparing the draft Core Strategy Publication document for Panel consideration in due course.

## **9 Recommendation**

9.1 Development Plan Panel is recommended to:

- i). To note and comment on the contents of the report and the course of further action (as detailed in Appendix 1) in preparing a draft Publication Core Strategy.

**APPENDIX 1**

**LCC RESPONSES TO REPRESENTATIONS ON THE GREEN INFRASTRUCTURE  
THEME**

## CORE STRATEGY PREFERRED APPROACH

### LCC RESPONSES TO REPRESENTATIONS ON THE GREEN INFRASTRUCTURE (& NATURAL ENVIRONMENT) THEME

#### Questions asked during consultation

<b>Question 2</b>	Do you agree that the policies will sufficiently protect and enhance Leeds' green infrastructure?
<b>Question 3</b>	Do you agree that the policies will sufficiently protect and enhance habitats and biodiversity, including woodlands and wetlands?

<b>Name / Company</b>	<b>Representor Comment</b>	<b>LCC Initial Response</b>	<b>Action</b>
<b>General Comments</b>			
GOYH	Agree that green infrastructure is an important part of the strategy but it should not lead it. The strategic policy areas covered in this section should inform the spatial strategy. The management policies would be better with other environmental policies.	Agree to reconfigure Chapter order but put some of this GI context (character of Leeds) in Spatial Vision.	Amend Spatial Vision to incorporate reference to importance of GI
LGYH	GI is an important component of ensuring that future development provides positive benefits for the region and helps to deliver sustainable communities. The RPB is encouraged that the issue of GI has been covered in the Core Strategy.	Comments noted	None
Sport England	A PPG17 compliant assessment is required to underpin all of the policies in the GI Section of the core Strategy to ensure that open space, sport and recreation are properly planned for in terms of type, location, quantity and quality and to provide for current and future needs.	Comments noted. A district-wide PPG17 Audit & Needs Assessment for Leeds is nearing completion. This will have more implications for the Site Allocations Development Plan than for the Core Strategy.	None

<p>Natural England</p>	<p>Supports the emphasis placed on GI, esp. the role it plays in shaping the future pattern of growth in Leeds, in adapting to climate change and in conserving and enriching Leeds' distinctive landscape character.</p> <p>However, an up-to-date landscape character assessment is an essential part of the evidence base and Leeds should refresh existing work in this area to ensure that it is useful in informing the objectives of this Core Strategy.</p>	<p>Comments noted</p> <p>As part of the Leeds UDP a comprehensive landscape assessment was completed. Since completion much of the landscape remains largely the same, consequently it is unlikely a comprehensive review is therefore needed. There maybe scope however, subject to resources to target selected areas for review, where key changes are apparent and the need arises.</p>	<p>None</p> <p>Review within context of the preparation of the Core Strategy Publication draft</p>
<p>Drivers Jonas</p>	<p>Acknowledge the principles of sustainable development and the contribution which GI can make. However, a realistic balance needs to be achieved between the provision of open space for well being and ensuring that the best use is made of previously developed land. In particular, consideration should be given to alternative types of GI (e.g. woodland areas, improved riverside connections etc) which could contribute towards achieving this objective.</p>	<p>Noted and agree. The Council is trying to make the best use of brownfield land as well as formulate GI policies. Consideration is already given to woodlands, wetlands, riverside connections etc which make up the component parts of Leeds GI</p>	<p>No change required</p>



Carter Jonas	<p>The overwhelming message from the GI Policies is that the countryside surrounding Leeds is a playground of greenspace, public access and the natural environment. The Core Strategy should equally recognise the principal role of agricultural land for the production of food.</p> <p>CS should reflect the principles of PPG17. It is not just the quantity that matters but also the accessibility and quality of the resource, particularly where it is 'public greenspace'.</p> <p>GI policies G1 to G6 should be revisited to ensure that they provide an overarching and strategic context. In doing so, balance the various pressures between statutory, local and non-statutory (nature conservation) designations, the competing uses of land and the interests of various stakeholders, user groups and the rights and responsibilities of landowners.</p>	<p>GI is concerned with multi-functional greenspace, not land solely in use for agriculture. However, a reference to the importance of agriculture to the rural economy could be included in the Local Economy section.</p> <p>Agree – Amend supporting text to reflect this.</p> <p>Agree that the GI Policies can be rationalised – see below - but reconciling the various interests as requested is too detailed for Core Strategy.</p>	<p>Include ref in Economy section</p> <p>Amend text</p> <p>Delete GI policies that are too detailed for CS</p>
Cllr John Illingworth	<p>Welcomes inclusion of Kirkstall Valley Park as GI but concerned that the blue line on the map follows a mill goit rather than the river which results in the omission of most of the valley floor from the designated area.</p> <p>Like to see a policy statement that, subject to protection of wildlife and sensitive habitats, the Council welcomes proposals for new waterside pedestrian access, will accept developer contributions to improve access and will itself seek to connect isolated segments into continuous waterside links through the district.</p>	<p>Noted. The blue line is intended to be a diagrammatic representation of the importance of the River and Canal corridor. It is important to recognise that this lies within a broader (green) GI corridor on the map.</p> <p>The need to provide access alongside waterways is already acknowledged in para 5.1.8.</p>	None
Horsforth Civic Society	Hunger Hills and Rawdon Billing should be included as part of the GI as they are important to communities in North Leeds	Hunger Hills is included in the area defined as GI on the map. Rawdon Billing is an important area of local open space but it is not considered to form part of the strategic area of GI.	None
Walsingham Planning	Agree in general terms but policies should be flexible enough to allow limited expansion of existing development.	Policies wouldn't preclude limited extensions of existing developments. Permitted development rights are unaffected.	None

Barwick in Elmet & Scholes PC	Particular support for GI in areas which are subject to regeneration. Parish Council agrees that there is a need to improve and enhance the PROW network.	Comments noted.	None
The Coal Authority	As part of proposals to enhance or create new areas of open space and GI, coal mining information should be considered and where necessary appropriate treatment/mitigation measures should be incorporated to ensure future public safety.	Comments noted. This point is covered in the Natural Resources and Waste DPD	None
Mrs Helen Longfield	The policies will not protect or enhance the most valuable areas to the south of the city. The south Leeds corridor and the sub regional green belt areas which penetrate the built up areas of south Leeds are highlighted as important components of the GI but two of the eight potential housing growth areas are located in this area. This demonstrates a weakness in these policies before they have been tested	Agree, we should look at extending the GI in these areas where this can be justified. However, it should be noted that there are other policies to protect greenspace other than GI.	Modify Map to include additional areas of GI in Sth. Leeds
Roundhay Planning Forum	Map 1 doesn't recognise the value of playing fields. Green spaces in existing suburban and urban areas are just as important as large swathes of Green Belt.  The woodland belt along the A6120 Outer Ring Road, esp. Addyman Wood and Moortown Plantation should be included in the GI as it is an important link between the countryside north of Leeds and other green spaces such as Gledhow Valley Woods, Roundhay Park and Gipton Woods	The Core Strategy only looks at GI at a strategic level. The value of playing fields and smaller greenspaces that lie within the fabric of the urban area are recognised and will be addressed in a future Site Allocations DPD. Agree that Addymans Wood would be a logical extension to the GI corridor in this part of north Leeds. The value of Moortown Plantation further along the Leeds Outer Ring Road is acknowledged but this is not considered to be a logical part of the strategic GI and it will, instead be recognised in the more detailed Site Allocations DPD..	Modify Map to include Addymans Wood.

<p>Peacock &amp; Smith</p>	<p>Whilst Map 1 is intended simply illustrate the broad areas of GI across the district, there does not appear to be any detailed justification as to the extent of these areas, nor does the Core Strategy define a hierarchy of GI as required by the RSS.</p> <p>Leeds City Region has only recently instructed consultants to develop a GI strategy which will inform planning policy across the region. Therefore Leeds GI will have to be reviewed in the light of the forthcoming GI regional strategy</p>	<p>Justification for the Strategic GI is provided in the CS Appendix. The table that was agreed with Natural England should be included in the Appendix or as part of a background paper or as part of the Sustainability Appraisal.</p> <p>The emerging Leeds GI is based upon the <u>existing</u> strategic ‘multi-functional’ greenspaces in the district and then representing these in a diagrammatic form to fit the strategic format of the Core Strategy. It therefore represents a generalised picture of what is important strategically and then adds aspirational GI where there are obvious ‘gaps’ or ‘opportunities’ to enhance Leeds’ GI. It is accepted that there needs to be a hierarchy of GI but the Core Strategy only deals with GI at a strategic level. The more detailed level of the GI hierarchy will be covered in a Site Allocations Plan. The GI work at the LCR level is not intended to provide a policy base or substitute the work in each Local Planning Authority to incorporate GI within Core Strategies. LCR work is geared to coordinating the work across the region and decide on priorities for funding bids. This is a two-way process with the Council informing and being informed by GI work at the regional level. The approach being followed in the Core strategy is entirely consistent with that being done at the City Region level.</p>	<p>Include Nat. England table of GI in SA or background paper.</p>
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Yorkshire Forward	<p>The policies and supporting text would benefit from including a greater emphasis on the role that GI can play in boosting economic performance by providing a high quality environment which helps to attract inward investors and retain existing businesses.</p> <p>It would also help for the GI section to highlight and give greater emphasis to the potential links to renewable energy which would help to support CO2 emission reduction and new employment opportunities. For example Policy G5 (woodland) is likely to increase the availability of waste wood resulting from the management of the woodland which could provide a valuable feed source for small and medium scale biomass plants.</p>	<p>Agree. Insert appropriate wording to supporting text. Also insert a short bullet point list of the benefits of GI to clarify the point made by Yorkshire Forward</p> <p>The links between woodland and renewable energy will be addressed in the Natural Resources and Waste DPD. The Sustainability Appraisal for the CS should also address this point.</p>	<p>Amend text</p> <p>Check link in the Nat. Resources &amp; Waste DPD</p>
Weetwood Residents Association	Strongly support priority of improving people's access to GI. However, should commit to increasing the amount of greenspace in deprived areas in the inner city alongside that proposed in the city centre.	The PPG17 Audit will draw attention to areas deficient in greenspaces and the outcome of this work will be addressed in the Site Allocations DPD.	None
Leeds Local Access Forum	ROWIP has now been adopted, it is no longer draft.	Comments noted, amend text accordingly	Amend text
Aire Action Leeds	Request that fish passage and the return of migratory fish is included in the GI section. The R. Aire corridor is a real asset and with passage for migratory fish, it has the potential to deliver more for recreation and wildlife.	Include a brief reference to this in para 5.1.24	Amend text
<b>POLICY G1</b>			
Sport England	Paras 5.1.18 & 5.1.19 recognise that green networks are important "for wildlife but they also enable local communities to access greenspace for recreation and exercise close to where they live." However, this function has not been reflected in Policy G1.	Agreed. Suggest that the following is added to Policy G1: " <u>.....seek ways to enhance the following key corridors for wildlife, amenity and to enable local communities to access greenspaces for sport and recreation.</u> ".....	Amend text

<p>ID Planning and Dacre, Son &amp; Hartley</p>	<p>It is inappropriate to identify areas of restraint in the absence of a full consideration of all land use requirements, including housing &amp; employment land. GI would be more appropriate to an Allocations DPD where competing demands can be balanced appropriately.</p> <p>If GI policy is retained it should be made clear that GI notation doesn't preclude development and should set out a criteria based policy assessment for allowing development/allocations within green infrastructure corridors.</p> <p>Policy G1 is not sound and cannot be justified as it is not based on a sound and credible evidence base.</p>	<p>Para 5.1.20 already states that “the inclusion of an area within the defined GI does not necessarily mean that no development can take place in those areas.” The representation does not address the need to establish a hierarchy of GI <u>at all spatial levels</u>, as required by RSS. A Site Allocations DPD will consider GI at a much more detailed level where competing demands for other site-specific land uses will be taken fully into account. The strategic GI in the core Strategy is focussed upon broad areas and corridors which are not fixed to specific boundaries.</p> <p>It also states that each constituent part of the GI has its own individual character and tolerance to accommodate sympathetic development of an appropriate scale.</p> <p>The Core Strategy is effectively implementing the requirement in RSS (Policy YH8) to “define a hierarchy of GI, in terms of location, size and levels of use <u>at every spatial scale</u> (our underlining). In Leeds this has been done at a strategic level, in partnership with Natural England, by analysing existing natural, historic, cultural, sport and playing field, and river and landscape assets. This work has also included the identification of new assets required to deliver GI. The Appendix to the CS includes this evidence base.</p>	<p>None</p> <p>None</p> <p>None</p>
<p>Leeds Civic Trust</p>	<p>The Policy should include private gardens to prevent ‘garden grabbing.’</p>	<p>This is too detailed for inclusion in the Core Strategy</p>	<p>None</p>
<p>British Waterways</p>	<p>Support the policy as it promotes the canal network, including the canal towpath as part of the district's green infrastructure. However, the benefits of GI such as waterways should not be viewed purely in environmental terms as waterways have the ability to deliver economic and social benefits as well.</p>	<p>Agreed. The GI will not preclude the Council and British Waterways working together to enliven the waterfront and deliver schemes which are of economic and/or social benefits.</p>	<p>None</p>

<p>Scott Wilson</p>	<p>Important that designation as GI does not become a barrier to development as there will be situations where development will provide an opportunity to enhance its quality and improve access within it.</p> <p>Suggest that all areas to be designated as GI should be listed in Policy G1, rather than just the selected list. Using the 13 areas listed in Appendix 6 could be appropriate.</p>	<p>This is already accepted – see para 5.1.20</p> <p>Agree, it could be clearer. Within the context of the Core strategy, areas of GI are intended to be broad swathes and corridors. However, the Appendix should be amended to list the broad areas listed in Policy G1, adding South Leeds and the Limestone Ridge, and then list all the areas defined as GI under those broad headings.</p>	<p>None</p> <p>Amend list in Policy G1 and reconfigure the Appendix</p>
<p>Dacre, Son &amp; Hartley</p>	<p>There is no evidence base to support the broad areas selected.</p>	<p>The areas selected are based upon existing strategic 'multi-functional' greenspaces which are represented in a diagrammatic form or broad swathes to fit the strategic nature of the Core Strategy (see Appendix). Added to this are obvious 'gaps' or 'opportunities' to enhance Leeds' GI.</p>	
<p>Natural England</p>	<p>Reference to seeking ways to strengthen GI links across the city centre should be incorporated into Policy G1. Also, reference to the north-south corridor running along the limestone ridge in the eastern part of the district should be identified as an area for enhancement due its importance as a habitat network at a national scale.</p> <p>Also, key corridors do not include corridors in South Leeds that have previously identified by Natural England i.e. Morley-Middleton-Holbeck corridor. Given the regeneration focus in this part of Leeds, a GI corridor would bring multiple benefits, such as improving quality of place and encouraging walking &amp; cycling.</p>	<p>This is covered in Para. 5.1.9 and expanded on in the Appendix to show the links.</p> <p>All the GI is important and the importance of the Limestone Ridge is properly recognised. Leeds City Region is considering priorities for enhancement at the regional level.</p> <p>Agree - need to re-consider the South Leeds area. Also, amend Policy G1 to refer to the Lower Aire Valley (including the City Centre) and add Limestone Ridge and South Leeds</p>	<p>Amend main text (Policy G1) and Appendix</p>

<b>POLICY G2</b>			
Sport England	Is it the Council's intention to draw up a 'Developer Contributions SPD to further explain and implement this policy? If so, Sport England has a document which may be of assistance (Spatial Planning for Sport & Recreation: Sport and Recreation in Supplementary Planning Documents).	There has been no decision to draw up such an SPD but it is likely that existing SPG4 will need to be updated and replaced. Sport England's offer of support and advice is welcomed.	None
CB Richard Ellis	Policy G2 seeks to extend developer contributions to pay for green infrastructure provision in areas which may be completely unrelated to the development being proposed, contrary to Circular 05/05, as the enhancement of strategic sites cannot be reasonably viewed as necessary to mitigate the localised impact of a development.	<p>Suggest a re-wording of Policy G2 to make the Council's intentions clearer and to replace saved Policy N8 (new additions underlined):</p> <p><b>Policy G2 Where a level of development is considered to be acceptable within or <u>immediately</u> adjoining areas defined as Green Infrastructure on Map 1, <u>development proposals should ensure that:</u></b></p> <ul style="list-style-type: none"> <li>- <b><u>any existing Green Infrastructure/corridor function of the land is retained and improved; and</u></b></li> <li>- <b><u>where appropriate, the opportunity is taken to extend the GI by <u>linking greenspaces</u> or by filling in gaps in Green Infrastructure corridors, including (<u>where relevant</u>) extending green corridors into Leeds City Centre.</u></b></li> </ul> <p><b>The Council will, <u>where appropriate</u>, seek developer contributions to improve the quality of the Green Infrastructure, in accordance with the advice in <u>Circular 05/2005</u>.</b></p> <p>Also, make it clearer in supporting text that, in complying with policy requirements for residential schemes, the opportunity is taken to create greenspaces on site, which will enhance the quality and character of the surrounding GI.</p>	<p>Review boundaries of N8 and GI to see how they compare – amend as necessary</p> <p>Amend Policy G2 and supporting text</p>

GVA Grimley Ltd	Developer contributions for GI must be appropriate, proportional and directly mitigate impacts on the green network caused by development and not undermine viability, esp. in regeneration areas.	Any contributions /planning obligations would need to be consistent with guidance contained in Circular 5/2005.	None
Savills	Only developments that are directly related to the greenspace shown on the Map should provide a monetary contribution towards Green Infrastructure and the natural environment.	A development which is situated within an area of GI will require a different approach. A policy framework is needed to ensure that the development control process is able to deliver improvements to the wider GI network where this is appropriate rather than just standard on-site greenspace. This will necessitate developers linking up or connecting into existing greenspaces where appropriate.	
ID Planning	There is a danger that Policy G2 will place unreasonable burdens on development over and above that normally required that would be directly and fairly limited to the development itself. The policy is vague and consideration should be given to the introduction of a threshold and criteria to clarify the terms of any contributions. It may be better to have only one policy which deals with developer contributions in the round.	See proposed revised wording to Policy G2 above	
Barton Wilmore Planning	Agreed that contributions to improve the quality of GI or to fill in gaps should be sought where appropriate but there should be just one policy in the CS which deals with developer contributions in the round, which has regard to the five tests in Circular 5/05.		None
Aspinall Verdi	Object to Policy G2. Development control powers should be used to ensure that a proposal which is situated in an area of GI is designed with this in mind, and in such a way as to enhance the GI.		
Dacre, Son & Hartley	Policy G2 unreasonable. Developments outside Greenspace designation should not be required to have any regard to designation save for appropriate design & landscaping. The policy is not fully justified and is not founded on any robust and credible evidence base.		



Carter Jonas	<p>Whilst agreeing with this policy, it is not clear that how it will be delivered or enforced. Further it is not clear whether the green infrastructure requirements are in addition to or included within the broader requirements for open space.</p> <p>Greenspace/amenity open space which no longer serves a useful amenity/greenspace function should be considered for more efficient land uses including, but not limited to, development for housing where this is appropriate.</p>	<p>This policy specifically applies to sites <u>within</u> or <u>adjacent</u> to GI, therefore it does say where it applies. The main objective of the Policy is to ensure that greenspace is provided on site in accordance with established policies. However given its location within or adjacent to GI, there is clearly a presumption that developers, through the design process, will attempt to integrate the site with the GI and to give added value to its character and quality.</p> <p>This issue will be identified in the PPG17 Audit and will be addressed in a future Site Allocations DPD.</p>	<p>Amend Policy G2 as suggested.</p> <p>No further action needed at this stage</p>
English Heritage	<p>Support Policy G2 as a number of areas within the GI network are either designated as being of historic performance, contributing towards the character of Conservation Areas or provide a setting for listed buildings. Commuted sums could be used towards restoring areas of historic interest in the vicinity of development sites which are "at risk".</p>	Comments noted	None
Peacock & Smith	<p>Para 5.1.20 states that some parts of the GI have very limited or no potential for development, whereas in other areas such as the Lower Aire Valley, carefully considered housing growth may mean that GI can be delivered and/or enhanced. The appraisal seems to be highly selective and additional broad guidance would be beneficial, including that there are other locations closely related to the settlements within the GI that will be capable of development without adverse effects on the objectives of the GI.</p>	<p>The approach in the Core Strategy reflects the fact that the majority of the strategic GI is rural and by its very nature sensitive to development pressures. The Lower Aire Valley is specifically mentioned because it is a major regeneration and growth area for the city, where major structural greenspace will be required to ensure that such growth is sustainable and that green links along the river corridor are strengthened, particularly the wetland reserves/habitats.</p>	

British Waterways	Supports the use of the towing path as sustainable transport routes for both walking and cycling in line with 'Planning a Future for the Inland Waterways, 2001.' Also comment that whilst waterside developments and regeneration schemes benefit from their waterside location, they can place extra burdens on the waterway infrastructure, such as towpaths. Therefore policies should be framed to support the imposition of conditions or planning obligations to help mitigate such impacts.	Comments noted. The general point is covered by the clear desire to improve access to areas defined as GI. Developer contributions to GI are addressed in Policy G2	None
<b>Policy G3</b>			
GVA Grimley	Provision of greenspace must relate to existing provision and surroundings and consider the existing/proposed function, use and quality of greenspace alongside the use of national standards to maximise community benefit and use.	Comment Noted	
ID Planning	Absence of any definition as to what a major growth area is in terms of location, site size or other threshold. Policy therefore requires greater clarity and explanation.	This will be dealt with elsewhere in the Core Strategy once these have been identified. However, it is important that the amount of GI keeps pace with housing growth and we need to keep in mind the following:  The District's housing target is 4,300 dwgs (net). As a frame of reference, applying existing UDP Policies N2-N4, this equates to an annual need for 17.2 ha of greenspace. Multiplying this by 16 years, the remaining life of the RSS (to 2026), this means that Leeds would need to plan for an <b>additional 275 ha</b> of new greenspace. By way of comparison, one would need the equivalent of <b>Roundhay Park (180 ha.) Horsfall Hall Park (14.5 ha.). Golden Acre Park (42 ha.), Dartmouth Park, Morley (6.0 ha.), Churwell Park (2.0 ha. and Kirk Lane Park, Guiseley (24 ha.) to achieve an area close to this figure.</b>	To be considered as part of the Housing Background paper.

Barton Wilmore	Not considered necessary to identify the major growth areas specifically for providing greenspace. Proposes that Policy G3 is deleted and that only saved policy N2 is applied.	<p>The representation misunderstands the purpose of the policy which is to ensure that <u>in addition to</u> applying greenspace standards, developers within or close to areas defined as forming part of Leeds' Green Infrastructure will be expected 'key into it' successfully. The key point is that GI forms an integral part of dealing with housing growth. Major Growth Areas will be defined elsewhere in the Core Strategy.</p> <p>Areas of Leeds proposed for significant longer term growth should, within the context of the Core Strategy, be exemplars of sustainable development. This will mean achieving environmental, social and economic objectives concurrently. Consequently, developers should go beyond simply applying saved policy N2. Developers should demonstrate how GI can be genuinely multi-functional and deliver sustainability objectives, including Sustainable Urban Drainage (SuDS).</p>	Need to be clearer that G3 applies to housing growth areas within or on the edge of areas defined as GI
Dacre, Son & Hartley	Major growth areas needs further clarification. There is no reference to the location or size threshold to these sites.	As above	
Natural England	Support the policy. Natural England sees such areas as helping to contribute to the emerging Leeds City Region GI Strategy. Growth areas should be genuine exemplars of sustainable development. Networks of multi-functional GI need to be designed into all major developments and regeneration schemes from the outset. This goes beyond "successfully assimilating" proposals into adjoining GI. Developers should be required to produce a site based plan to accompany a development proposal in order to demonstrate how GI can be genuinely multi-functional and deliver sustainability objectives. Policy G3 and supporting text should be amended to clarify this objective.	<p>Comments noted. However, it is important to note that GI work at the Leeds City Region level is not intended to provide a policy base or substitute the work in each Local Planning Authority. LCR work is geared to coordinating the work across the region and decide on priorities for funding bids.</p> <p>The suggestion of requiring developers to produce a site based plan to demonstrate how their schemes can be successfully assimilated into GI is too detailed for the Core Strategy and will be addressed at a more detailed master planning level.</p>	None
<b>Policy G4</b>			
Natural England	NE support the policy. They will send a copy of their Habitats Map when it becomes available.	Comments noted.	None

Leeds Civic Trust	Policy should be strengthened. The word “usually” in the context of the prevention of development with an adverse impact provides a significant get-out clause.	Disagree – the word ‘usually’ is appropriate	None
Turley Associates	Policy is too detailed for the Core Strategy which should focus on overall vision and strategic themes. Policy would be more appropriate to a DPD addressing development management policies	Disagree – the Policy is entirely consistent with strategic planning and the approach being adopted in the Core Strategy	None
Drivers Jonas	Broadly agree with the need to protect wildlife habitats and diversity but this must be balanced against the need to make efficient use of brownfield land.	Noted and agree. The Council is trying to make the best use of brownfield land as well as formulate policies to protect wildlife habitats.	None
Dacre, Son & Hartley	Where development sites are to be located within a habitat network of any significance, the mitigation of any impact should be through design and not via a financial contribution.	It would be the Council’s preference to mitigate potentially adverse effects through design rather than a financial contribution. However, this may not always be possible and the Council’s ability to secure financial contributions should be retained. In reality it could be ‘either/or’.	None
Carter Jonas	<p>Not clear how the policy seeks to give habitats and biodiversity a level of protection proportionate to their importance and status.</p> <p>The Site Allocations DPD will identify the physical extent of protected habitats. The CS should provide an appropriate overarching policy hook.</p> <p>There is a duplication of policy between G4 and biodiversity policies B1-B5. The linkage between these needs to be explained.</p>	<p>This is dealt with in the biodiversity section.</p> <p>Boundaries to nature conservation sites are defined by West Yorkshire Ecological Advisory Service and Natural England. These will be reflected in a Site Allocations DPD. The ‘policy hook’ for specific allocations is the habitat network.</p> <p>One is dealing with the details of biodiversity, the other (Core Strategy) is dealing with the broader ‘network.’</p>	None
GVA Grimley	Contributions to the habitat network should be directly proportional to any adverse impact on identified species from new development and should not impact on viability, especially in regeneration areas.	Comments noted. Any contributions /planning obligations would be consistent with Circular 5/2005	None

Univ of Leeds	Is Policy G4 strong enough in saying that development will not usually be permitted which would have a significant adverse impact on the integrity and connectivity of the habitat network.	The use of the word 'significant' is important as it requires an element of judgement and provides some form of flexibility in the application of the policy.	None
<b>Policy G5</b>			
Natural England	Policy G5 is wholly appropriate and NE support Leeds' efforts to increase woodland cover.	Comments noted. However, it might be a clearer intention of the policy if we titled Policy G5 as "CREATING NEW WOODLAND" Also, it might also be clearer if we referred to developer contributions in the policy as follows:  <b>"Policy G5: Creating New Woodland The Council will on its own initiative and through the development process, including developer contributions, work towards ....."</b>	
Barton Wilmore	Policies G5A and G5B (and SC8) are development control type policies that should not be contained in the Core Strategy and should be deleted	Agree - Suggest that Policies G5A & G5B are deleted. Issues are covered in separate legislation and anything additional can be covered in the Site Allocations DPD.	Delete Policies G5A & G5B
Scott Wilson	Support this policy and Parlington Estate is a possible location to accommodate increased woodland cover as part of a leisure proposal. Suggest amendment to wording of Policy G5B as follows "...will be resisted <u>unless proposals can demonstrate a positive contribution to the habitat network.</u> " (suggested change underlined)	Comments noted  Policy to be deleted	Delete Policy G5B
Carter Jonas	Not clear what the purpose of this policy is other than to increase tree cover for its own sake. Therefore question its soundness. May be better subsumed within a broader GI Policy.  Policies G5A & G5B are not strategic matters and should be deleted	The CS is surely the correct place to articulate an aspiration to increase woodland cover over the whole district to address amenity, wildlife, biodiversity, recreational & climate change issues. The Core Strategy has an integrated approach which seeks to bring these issues together in a coherent way.  Suggest that Policies G5A & G5B are deleted.	Delete Policies G5A & G5B

Barwick in Elmet & Scholes PC	Support policies to increase woodland cover throughout the district and preserve important ancient woodlands.	Comments noted	None
Turley Associates	Policies G5A and G5B are too detailed for the Core Strategy which should focus on overall vision and strategic themes. They would be more appropriate to a DPD addressing development management policies	Suggest that Policies G5A & G5B are deleted.	Delete Policies G5A & G5B
<b>Policy G6</b>			
Natural England	NE support the development of a network of wetland nature reserves and complementary greenspaces within the Lower Aire Valley. This will be a key resource for the community of Leeds as a whole.	Comments noted. Suggest that the word “reserves” is deleted from the policy as not all of them have this formal status. Instead, use the phrase “wetland areas”, i.e.  <b>Policy G6: Lower Aire Valley</b> <b>The Council will support the development of a network of wetland nature areas and complementary Greenspaces .....</b>	None
Turley Associates	Policy is too detailed for the Core Strategy which should focus on overall vision and strategic themes. Policy would be more appropriate to a DPD addressing development management policies. Map 1 appears to indicate the majority of AVL to be within the GI network even though it contains commercial sites and brownfield sites with planning permissions in place. The GI notation should more closely follow existing areas of wildlife importance.	Disagree. The Lower Aire Valley is a strategic growth/regeneration area and proposed urban eco-settlement. As such, an appropriate and commensurate emphasis on the need to incorporate GI is essential part of this planned growth. This should not be restricted to existing greenspace/wildlife areas as it would weaken the Council’s aspiration to ensure that overall development is sustainable and to promote a green corridor along the whole of the Aire Valley corridor. This is not inconsistent with realising the area’s development potential.	None
Carter Jonas	No justification as to why an area specific policy is included or that specific strategies/policies are not included for other key corridors and areas.	Disagree. The Lower Aire Valley is a strategic growth/regeneration area and proposed urban eco-settlement. As such, an appropriate and commensurate emphasis on the need to incorporate GI is essential part of this planned growth.	None

<b>Policy G7</b>			
Natural England	Policy is supported. The PPG17 audit will help to identify the quantity and quality of greenspaces in the district and ensure that Leeds residents are able to benefit from access to such spaces, including improved physical and mental health.	Comments noted. May need to delete this policy prior to Publication once the PPG17 Audit & Assessment has been published.	None
<b>Miscellaneous</b>			
Stanks and Swarcliffe Residents Association	There is a need to invest in flood prevention in the Wyke Beck Valley	Noted. No amendments to GI Chapter required. The Environment Agency are doing this as part of the Flood Alleviation Scheme for the Wyke Beck Valley	None
Drivers Jonas	The wording of <b>Policy SC8</b> should be amended to demonstrate that the retention of some natural features within the context of a comprehensive redevelopment or master planning of a site may be inappropriate and that their removal may in some instances be integral to a site's successful redevelopment. Request that the wording be altered to reflect that the need to retain such features should be made on a site by site basis.	Disagree. The emphasis should be on retaining natural features and their removal should be an exception to policy.	None