



Report of the Director of City Development

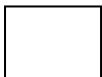
Development Plan Panel

Date: 22 June 2010

Subject: Leeds LDF Core Strategy – ‘Preferred Approach’ Analysis of Consultation Responses: Managing Environmental Resources 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. The purpose of this report, is to provide further detailed consideration of the comments received in respect of the Managing Environmental Resources 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. The purpose of this report, is to provide further detailed consideration of the comments received, in respect of the Managing Environmental Resources theme.

2.0 Background information

- 2.1 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 a number of comments have been received in response to the managing Environmental Resources 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

- 3.1 The Managing Environmental Resources chapter has four main objectives:
MER 1. Protect natural habitats and take opportunities to enhance biodiversity,
MER 2. Promote development that respects environmental limits, mitigates and adapts to climate change, protects the high quality built and natural environment and protects air and water quality,
MER 3. Promote opportunities for low carbon and energy efficient power supply,
MER 4. Make efficient use of natural resources and the effective minimisation and management of waste.

A summary of the main comments received is given below, and full details and responses are included in Appendix 1. The number of specific objections received, slightly out-weigh supports, although consultation responses are on the whole generally supportive of the broad thrust of the Managing Environmental Resources chapter. Within this context, the majority of respondents on this section are developers, who have expressed concern, regarding, the number of policy requirements.

Biodiversity

Biodiversity is an essential element of a quality environment and helps make Leeds unique. Policies are designed to not only protect but also to improve our biodiversity. Comments range from support and reinforcement of biodiversity policies to the view that biodiversity policies are not needed in a Core Strategy. Government Office for Yorkshire and the Humber (GOYH) consider that the policies are not locally specific enough but it is difficult to see how this could be achieved without specifically naming the sites, which would be lengthy as there are hundreds. A number of respondents asked for the policy approach to distinguish between nationally designated sites and locally designated sites. This is not straight forward as the

process that we go through for considering development that may effect either of these designations is the same. However, it will be helpful to explain that there is a hierarchy of designations.

Carbon Reduction

The carbon reduction policy seeks a further 20% reduction in CO2 beyond what is required by the building regulations. A key issue for this policy is the need to set a standard, which whilst challenging, will not impact detrimentally upon the viability of housing delivery. GOYH have suggested that we look for examples of what has been achieved locally. In Leeds, the Yarn Street development is being built to meet Code for Sustainable Homes level 4, however it has had the benefit of grant subsidy. It is likely that CO2 reduction will have an additional cost associated with it but over time it must be expected that land values will reflect the range of planning policies set out at national and local level. The difficulty arises where developers have already purchased the land at a time when the values were higher and in those circumstances it is inevitable that meeting this policy requirement will affect viability. As costs come down over time, then the impact on viability will be less of an issue and therefore it is appropriate to include this policy in our Core Strategy (which is a long term document). In terms of carbon reduction also, a number of responses have cited the lack of an evidence base to support the policy, however the Sustainability Appraisal carried out at Issues and options stage demonstrates that the policy is required in order to mitigate the negative effects of growth. Finally, there is some confusion between the carbon reduction policy (CC1) and the sustainable construction policy (SC7), which can be found in the sustainable communities chapter. Consequently, it makes sense to move the latter so that it follows on from CC1.

Renewable Energy

Guidance recommends that the Core Strategy gives an indication of how we might increase renewable energy in the District. Comments are generally supportive of the policy but a number of respondents have asked for it to be more spatially specific, particularly with regard to indicating suitable areas of search for wind turbines. It would be appropriate to include this within the Natural Resources and Waste Development Plan Document.

Green Infrastructure and Climate Change

The Core Strategy currently contains two suggested policies with regard to green infrastructure and climate change specifically in the city centre. Responses are split between support for the policies and a request for them to apply across the whole District and concerns about the impact on viability of delivery. There are also concerns that the Policy is not strategic enough. It is proposed to combine the two policies together to create a new CC2 policy, which will apply District-wide and will contain a broad range of measures, which then allows the developer flexibility to choose the actions which are most suited to their circumstances and thereby help to improve viability of delivery. This would then form part of our strategy for adapting and mitigating climate change.

Managing Flood Risk

There was general support for the flood risk policy, which provides a broad statement of intent. Further detailed policies on flood risk are included in the emerging Natural Resources and Waste DPD. Some minor word changes have been received (proposed by Yorkshire Water and the Environment Agency) and these are largely accepted as improvements to the policy wording. GOYH have asked us to demonstrate how flood risk has been taken into account in selecting

the locations for growth. It is recognised that this is needed and is being included as part of the housing evidence base. Finally, some reservations are expressed about the proposed Leeds Flood Alleviation Scheme (FAS), however this is not specifically a proposal in the Core Strategy, the intent of the Policy is to give guidance on how we would treat applications for development that are protected by the FAS either before or after construction.

Natural Resources and Waste Management

The Council is preparing a separate Natural Resources and Waste Development Plan Document and at the time of preparing the Core Strategy Preferred Approach it was considered appropriate to defer all detailed issues regarding waste and minerals to this DPD. However, a number of respondents have asked for strategic policies to be included in the Core Strategy and it is therefore recommended that for completeness, broad arching policies for waste and minerals should be included in the Core Strategy.

- 3.2 The consultation responses are on the whole supportive of the broad thrust of the Managing Environmental Resources chapter. It is evident however, that policies will need to skilfully strike a balance between those who want higher, more challenging standards and those who want more relaxation and fewer standards. A key issue continues to be the viability of housing delivery. This is a difficult issue in the current economic climate, however, as the Core Strategy will extend till 2026 it is appropriate to include policies which stretch beyond the current economic circumstances. Over time it must be expected that land values will reflect the range of planning policies set out at national and local level. If land values ignore planning requirements, then it becomes self-fulfilling that such requirements will render schemes non-viable. It is anticipated that there may be particular scrutiny surrounding the viability issue at Examination in Public and further work may be needed to help justify the introduction of energy efficiency measures which go beyond the building regulations requirement.

Next Steps

4.0 Implications for council policy and governance

- 4.1 None, other than to reiterate that the LDF Core Strategy needs to reflect the strategic objectives of the Council Plan and give spatial expression to the Community Strategy.

5.0 Legal and resource implications

- 5.1 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.

6.0 Conclusions

- 6.1 This report has provided further analysis of the comments received in respect of Managing Environmental Resources, 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.

7.0 Recommendation

7.1 Development Plan Panel is recommended to:

- i). 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 MANAGING ENVIRONMENTAL
RESOURCES THEME**

CORE STRATEGY PREFERRED APPROACH

LCC RESPONSES TO REPRESENTATIONS ON THE MANAGING ENVIRONMENTAL RESOURCES CHAPTER

| Representor (include agent) | Those Represented | Representor Comment | LCC Initial Response | Action |
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| Policy B1: Protection of Designated sites | | | | |
| Government Office (GOYH) 95 | Government Office | This policy should be locally specific. Currently it does not add to national guidance. | Policy B1 relates to designated sites within the Leeds District, including local sites and therefore is locally specific. | Seek Clarification from GOYH |
| Turley Associates 5670 | Swayfields (Skelton) Limited | The biodiversity policies are not needed in the Core Strategy. These policies do not relate to the critical strategic issues that the Core Strategy is intended to address. | Disagree, biodiversity is a strategic issue which is integral to the Core Strategy, see the Strategic Themes, S.T.4. | None |
| Carter Jonas 5681 | The Diocese of Ripon and Leeds, the Hatfield Estate, lady Elizabeth Hasting Charity Estate, the Ledson estate, AR Briggs & Co, Symphony Group Ltd. | The policy should ensure a proportionate level of protection of designated sites and their importance. The policy should make a distinction between sites which are recognised to be of national and international importance and those which are so protected at the discretion of the Council | Create distinction between sites by making reference to the biodiversity hierarchy, as nationally designated sites will come higher up the biodiversity hierarchy than locally designated sites. | Add reference to the biodiversity hierarchy and then add to Policy B1 the words "with regard to its status within the biodiversity hierarchy." |
| Lister Haigh Ltd 5533 | D Parker & Son | Guidelines for settlement growth, regard should be had to the physical and landscape features in determining development limits, e.g. roads, railways, woodland, hills, existing structures and the existing nature of the settlement. | These factors will be considered in the work on housing growth issues but are not specific to the biodiversity policy. | Review and revise as appropriate. |
| Natural England | Natural England | Support. Biodiversity policies consistent with PPS9 | Support Welcomed | Comments noted |

| Policy B2: Protection of Important (Biodiversity Action Plan) Species and Habitats | | | | |
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| Government Office 95 | Government Office | This policy should be locally specific. Currently it does not add to national guidance. | PPS9 requires this type of policy. Policy is locally specific because it refers to the Leeds Biodiversity Action Plan. | Cross reference to evidence base and revise to make more locally specific. |
| Turley Associates 5670 | Swayfields (Skelton) Limited | The biodiversity policies are not needed in the Core Strategy. These policies do not relate to the critical strategic issues that the Core Strategy is intended to address. | Part of Leeds' vision is for the District to have a rich and varied biodiversity. Therefore it is essential to have biodiversity policies in the Core Strategy to ensure that this strategic objective can be delivered. | Comments noted |
| Lister Haigh Ltd 5533 | D Parker & Son | Guidelines for settlement growth regard should be had to the physical and landscape features in determining development limits, e.g. roads, railways, woodland, hills, existing structures and the existing nature of the settlement. | These factors will be considered in the work on housing growth issues but are not specific to the biodiversity policy. | Review and revise as appropriate. |
| Scott Wilson 414 | PPL c/o Revera | <p>The first bullet point in Policy B2 should be deleted. This bullet point requires the applicant of a development that would have a potential adverse impact on important species and habitats to demonstrate that 'that there is no alternative site to accommodate'.</p> <p>This requirement is unreasonable and unnecessary and would prove very difficult to fulfil for many development proposals. Bullet points 2 and 3 provide adequate means of protecting important species and habitat to meet the policy aims.</p> | Agree. | Revise policy wording |
| Natural England | Natural England | Support. Biodiversity policies consistent with PPS9 | Support welcomed | Comments Noted |

Policy B3: Submission of Ecological Information in Support of planning Applications

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| Government Office 95 | Government Office | This policy should be locally specific. Currently it does not add to national guidance. | It is helpful for developers to know early on what info. Leeds requires. It helps avoid delay later on. | Revise supporting text and make reference to evidence base, RSS and Green Infrastructure. |
| Turley Associates 5670 | Swayfields (Skelton) Limited | The biodiversity policies are not needed in the Core Strategy. These policies do not relate to the critical strategic issues that the Core Strategy is intended to address. | Part of Leeds' vision is for the District to have a rich and varied biodiversity. Therefore it is essential to have biodiversity policies in the Core Strategy to ensure that this strategic objective can be delivered. | Comments noted |
| Lister Haigh Ltd 5533 | D Parker & Son | Guidelines for settlement growth regard should be had to the physical and landscape features in determining development limits, e.g. roads, railways, woodland, hills, existing structures and the existing nature of the settlement. | These factors will be considered in the work on housing growth issues but are not specific to the biodiversity policy. | Review and revise as appropriate. |
| Turley Associates 1743 | Barratt Strategic | Policy should be deleted. The inclusion is contrary to the advice in paragraph 4.1 of PPS12 which advises that the main concern of a CS should be overall vision, strategic objectives and a delivery strategy. This policy is, essentially, development control policies and should be included in a Development Policies DPD. | It is an essential part of Leeds' vision to have a rich and varied biodiversity. This must be included in the Core Strategy in order to ensure that this strategic objective can be delivered. Key principle in PPS 9 para 1 (i) requires that LPAs base decisions on the most up-to-date info. therefore we have a duty to request this info. be submitted with the planning application. Natural England have emphasized that they are particularly supportive of this Policy. | Review order of Core Strategy to make policy approach clearer. |
| Natural England | Natural England | Support. Biodiversity policies consistent with PPS9. They are particularly supportive of the stated standards for ecological assessments, which will ensure that development proposals are accompanied by good quality information. | Support welcomed | Comments Noted |

| Policy B4: Biodiversity Improvements | | | | |
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| Government Office 95 | Government Office | This policy should be locally specific. Currently it does not add to national guidance. | Suggest linking this Policy in the supporting text to the Leeds specific biodiversity opportunities in the evidence base. | Expand supporting text |
| Turley Associates 5670 | Swayfields (Skelton) Limited | The biodiversity policies are not needed in the Core Strategy. These policies do not relate to the critical strategic issues that the Core Strategy is intended to address. | Part of Leeds' vision is for the District to have a rich and varied biodiversity. Therefore it is essential to have biodiversity policies in the Core Strategy to ensure that this strategic objective can be delivered. | Revise Appendix 6 |
| Carter Jonas 05681 | The Diocese of Ripon and Leeds, the Hatfield Estate, lady Elizabeth Hasting Charity Estate, the Ledson estate, AR Briggs & Co, Symphony Group Ltd. | This policy is unclear requiring development proposals to demonstrate a net gain for biodiversity. Does this apply equally to dormer windows as much as to a development for 200+ dwellings? | Add the wording 'commensurate with the scale of the development'. | Revise as necessary. |
| Lister Haigh Ltd 5533 | D Parker & Son | Guidelines for settlement growth regard should be had to the physical and landscape features in determining development limits, e.g. roads, railways, woodland, hills, existing structures and the existing nature of the settlement. | These factors will be considered in the work on housing growth issues but are not specific to the biodiversity policy. | Review and revise as appropriate. |
| Turley Associates 1743 | Barratt Strategic | Policy should be deleted. The inclusion is contrary to the advice in paragraph 4.1 of PPS12 which advises that the main concern of a CS should be overall vision, strategic objectives and a delivery strategy. This policy is, essentially, development control policies and should be included in a Development Policies DPD. | It is an essential part of Leeds' vision to have a rich and varied biodiversity. This must be included in the Core Strategy in order to ensure that this strategic objective can be delivered. | Review order of Core Strategy to make policy approach clearer. |
| Natural England | Natural England | Support. Biodiversity policies consistent with PPS9 | Support Welcomed | Comments Noted |

| Policy B5: Monitoring and Management for Biodiversity | | | | |
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| Government Office 95 | Government Office | This policy should be locally specific. Currently it does not add to national guidance. | It is important to flag up early on to developers that Leeds requires them to factor in long term maintenance of biodiversity sites. | Cross reference to evidence base and Appendix 6. |
| Turley Associates 5670 | Swayfields (Skelton) Limited | The biodiversity policies are not needed in the Core Strategy. These policies do not relate to the critical strategic issues that the Core Strategy is intended to address. | It is an essential part of Leeds' vision to have a rich and varied biodiversity. This must be included in the Core Strategy in order to ensure that this strategic objective can be delivered. | Review order of Core Strategy to make policy approach clearer. |
| Lister Haigh Ltd 5533 | D Parker & Son | Guidelines for settlement growth regard should be had to the physical and landscape features in determining development limits, e.g. roads, railways, woodland, hills, existing structures and the existing nature of the settlement. | These factors will be considered in the work on housing growth issues but are not specific to the biodiversity policy. | Review and revise as appropriate. |
| Turley Associates 1743 | Barratt Strategic | Policy should be deleted. The inclusion is contrary to the advice in paragraph 4.1 of PPS12 which advises that the main concern of a CS should be overall vision, strategic objectives and a delivery strategy. This policy is, essentially, development control policies and should be included in a Development Policies DPD. | It is an essential part of Leeds' vision to have a rich and varied biodiversity. This must be included in the Core Strategy in order to ensure that this strategic objective can be delivered. | Review order of Core Strategy to make policy approach clearer. |
| Natural England | Natural England | Support. Biodiversity policies consistent with PPS9 | Support welcomed | Comments noted |

Policy CC1: Climate Change – CO₂ Reduction

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| <p>Government Office 95</p> | <p>Government Office</p> | <p>Transport is one of the major CO₂ emitters. GO expected sustainable transport to be mentioned and the following topics to be discussed – sustainable travel, demand management, car parking policy, low emission zones, car clubs, car sharing, electric car charging points, travel plans, school travel etc.</p> <p>The local requirements should be justified on the basis of specific local evidence and viability considerations. The targets may not be ambitious enough in light of the RSS. There is no evidence of what is achievable locally.</p> | <p>Alter supporting text to cross refer to LTP3.</p> <p>Alter supporting text to mention the three main emitters – Transport, new development and existing development. Signpost to new TP policy , Policy CC1 and the Climate change Strategy.</p> <p>Low emission zones are covered in the Natural Resources and Waste DPD, Air Quality Chapter.</p> | <p>Alter supporting text where appropriate to signpost other policies and documents.</p> <p>Create a new strategic policy on sustainable travel, between TP1, TP2 or TP3.</p> |
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| <p>Leeds Teaching Hospital 5690</p> | <p>Leeds Teaching Hospital</p> | <p>The targets set out in Policy CC1 are noted. In this regard, the NHS is implementing its own targets on carbon reduction seeking to reduce by 80% by 2050. Work being done currently may well lead to the target date being brought in from 2050. The NHS also has its own BREEAM code (BREEAM Healthcare) which affects all new-build projects. Collectively this is a considerable undertaking with huge implications for the NHS estate and much of the work which may well be required will require planning permission. A planning policy framework should exist to support projects which directly support carbon reduction.</p> <p>It is important from the Trust's viewpoint that the objectives of the main public sector bodies should work in tandem and should not produce contradictory requirements through planning policy.</p> <p>Sustainable design and building regulation requirement on carbon need to consider the unique issues of hospital provision where types of care and treatment can require a significant use of energy. Whilst this can be mitigated to a degree in new buildings the opportunities are less so in existing hospital buildings.</p> | <p>Comments noted, The BREEAM Healthcare code to be included in the text for Policy SC7.</p> <p>Alter text to state ' where specialist BREEAM standards have been developed, such as BREEAM Healthcare and BREEAM Education, then these are recommended'.</p> <p>Policy SC7 is generic to residential and commercial development and we do not have a wish to rule out other BREEAM standards that have been developed for other uses, e.g. schools.</p> <p>To detailed for Core Strategy, revise policy text for clarification, remove brackets.</p> | <p>Move policy SC7 to follow on from the Climate Change section</p> <p>Revise supporting text to cross reference to the Climate Change SPD and explain that other BREEAM standards applies as appropriate e.g. BREEAM Healthcare and BREEAM Education.</p> |
| <p>Stanks and Swarcliffe Residents Association 5052</p> | <p>Stanks and Swarcliffe Residents Association</p> | <p>CO2 emissions are a cause for concern for all future generations. Manufacturers should be answerable in the way they transport goods to destinations.</p> | <p>Comments noted, existing policies regarding non-road based freight are included in LTP2. Freight is encouraged in Core Strategy policy T3. Detailed policy on non road- based freight is being developed in the Natural Resources and Waste DPD.</p> | <p>Revise supporting text to signpost to other initiatives and documents.</p> |

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| Liberal Democrat Otley and Yeadon Councillors 4817 | Liberal Democrat Otley and Yeadon Councillors | These approaches should be integral to all developments | Economies of scale mean that these approaches are more likely to be more viable when applied to major developments. | Comments noted. |
| Scholes Community Forum 20 | Scholes Community Forum | The suggested contribution of 10% for off site renewable energy schemes is not considered as adequate. A figure of 20% is thought to be more appropriate. | 10% reflects the RSS policy as a minimum, developers have options to go higher as they wish. CO ₂ reduction requirement is set at 20% and there is flexibility for the developer as to how they achieve that. | None |
| Individual 5632 | Individual | Supports. Implementation should be urgent and a strong campaign is needed to stress the importance of this. | Support welcomed | Comments noted |
| English Heritage 99 | English Heritage | Support the principle of requiring all new development to meet a target for on site renewable energy generation, and support wording of Policy CC1 as it recognises that there may be circumstances where the requirements of the policy might not be able to be met. In the case of historic buildings or Conservation Areas, this would be where the objectives of the designation would be compromised through provision on-site. It would be helpful to explain this aspect of the policy more fully in the supporting text. | Recent guidance has come out from the Prince's Trust to demonstrate ways to incorporate energy efficiency measures in historic buildings. We would expect developers to show they have attempted to do this in the first instance however, where it can be shown that measures might compromise heritage objectives then the policy allows for off site contribution instead. | Alter text to explain this point more fully. |
| GVA Grimley Ltd 5661 | City East Limited (Rushbound Group) | Provision of low carbon and renewable resources must be considered on a site by site basis with reference to the viability of development and regeneration effects. The 10% contribution should be waived or reduced if this shown to be unviable through an economic assessment, particularly where viability issues would impact the delivery of regeneration; such benefits should not be undermined by prescriptive environmental standards. | Need policy basis so that developers can factor it in from an early stage. The Core Strategy provides a strategic context for issues relating to sustainability, renewables and CO ₂ reduction. | Comments noted |

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| ARUP 397 | ARUP | Support objective of CC1, however, would like it to be more specific about how will apply a definition of 'on site or near site', as a tight definition of generation of energy in new developments is likely to preclude the progress of more strategic low carbon and renewable energy generation projects, which have the ability to serve multiple users. The Aire Valley provides a significant opportunity for sources of low carbon and renewable energy generation that can serve multiple developments, including new housing provided as part of the Urban Eco Settlement designation and existing industrial uses and business. | The specific renewable energy/low carbon initiatives are dealt with in the Natural Resources and Waste DPD and not in this policy. The 10% renewable energy is about self sufficiency for individual developments. | Revise text. Make reference to the Aire Valley AAP, Urban Eco Settlements and the Climate change SPD. |
| Leeds Civic Trust 62 | Leeds Civic Trust | Policy CC1 should be rewritten on the lines of 10% of the predicted energy needs of the development from either site or neighbourhood scale renewable energy, the policy should extend to smaller developments and should be required to meet the 20% less than building regs target. | RSS and Draft PPS1 supplement suggest decentralised means 'local' rather than neighbourhood scale renewable energy. In practice this will also depend on opportunities as they arise. 10% reflects the RSS policy as a minimum, developers have options to go higher as they wish. CO ₂ reduction requirement is set at 20% and there is flexibility for the developer as to how they achieve that. | Comments Noted |
| Turley Associates 5670 | Swayfields (Skelton) Limited | Policy CC1 - No evidence is presented as to why policy seeks to introduce a more rigorous CO ₂ reduction target than is established in national guidance and no consideration is given to the potential impacts of setting a higher target on the viability of development and therefore the delivery of the CS's objectives. In the absence of evidence that such standards can be adopted without impacting on delivery the policy should be removed. | Evidence from the Sustainability appraisal at issues and options stage demonstrates that higher standards are required in order to mitigate the negative effects of growth. | Comments noted |

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| <p>Barton Willmore Planning Partnership – Northern 45</p> | <p>Ashdale Land and Property Company Ltd.</p> | <p>Policy CC1 is unclear. The way the policy is worded at present could mean that developments will be expected to provide under the current target. Given the supporting text relating to ‘challenging targets’, this is not believed to be the intention of the Policy. The Policy should therefore be reworded to reflect this current confusion.</p> <p>The Policy makes reference to the Building Regulations Target Emissions Rate. It does not appear that this target is stated anywhere in the policy or supporting text. This should be clarified so developers are easily able to understand what is expected of them. Whilst the RSS does indeed note that the target for the reduction of carbon emissions should be at least 10%, it is not clear why the CSPA seeks a higher target. Whilst the RSS seeks that ambitious targets it should be put into the context of wider housing and economic objectives. Given the high levels of housing growth needed in Leeds, higher targets may restrict delivery of this growth. RSS seeks higher targets where this is feasible and viable. Policy CC1 does take into consideration the feasibility of such requirements, but not viability. The policy should be reworded to enable flexibility based on a consideration of viability in addition to feasibility.</p> | <p>Respondent has misinterpreted the intent of the policy. Focus of the policy is to provide self-sufficiency for individual developments.</p> <p>The Building Regulations Target Emissions Rate is constantly changing therefore the target is for 20% beyond whatever is the current rate.</p> <p>Evidence from the sustainability appraisal at the issues and options stage demonstrates that higher standards are required in order to mitigate the negative effects of growth.</p> <p>Growth should not be at the expense of sustainability.</p> | <p>Clarify policy wording.</p> <p>Clarify policy wording around policy text point a)</p> |
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| <p>Leeds Chamber of Commerce 1736</p> | <p>Leeds Chamber of Commerce</p> | <p>The overall ambition of addressing climate change issues is acknowledged, however the specific targets set within the draft Core Strategy policy go further than those outlined in the RSS. Requiring both a reduction in carbon dioxide emissions of 20% and a minimum of 10% of energy generated from renewable or low carbon energy is excessive and the viability of achieving these levels, particularly at the lower end of the development scales, needs to be considered. The policy needs to be more closely aligned to the RSS.</p> | <p>This policy is Leeds specific and therefore goes beyond the RSS.</p> <p>The Core Strategy is a long term document and it is appropriate to include policies which stretch beyond the recession. Over time it must be expected that land values will reflect the range of planning policies set out at national and local level. If land values ignore planning requirements then it becomes self-fulfilling that such requirements will render schemes non-viable.</p> <p>Government policy sets a strong commitment to addressing climate change through the planning system and such a policy is entirely correct and appropriate. To improve overall levels of sustainability to secure long-term economic prosperity as well as social and environmental benefits.</p> | <p>Comments Noted</p> |
| <p>Savills (Northern Branch) 467</p> | <p>Harewood Estate</p> | <p>We support in general terms the need to mitigate against climate change, however, this clearly has to be relative to the scale and size of development proposed. The policy should reflect other similar adopted policies in neighbouring Local Authorities and include reference to the fact that the % figures are required unless it can be demonstrated that it is not technically feasible or financially viable to do so.</p> | <p>Leeds has a much higher level of growth than any of the other LPAs in the Region therefore mitigation needs to be set accordingly. The intent of this policy is to be proportionate to the size and scale of a development, it also conforms with RSS Policy ENV5.</p> | <p>Comments noted</p> |
| <p>Drivers Jonas LLP 5683</p> | <p>McAleer and Rushe Group</p> | <p>Object to blanket provision in policy and request that the wording be altered to demonstrate that this requirement be the subject of sustainability assessments and site specific viability testing.</p> | <p>Policy applies to major developments and not all development. Major development is being directed to key growth areas in the Core Strategy and in practice the policy will be driven towards those areas identified for growth.</p> | <p>Comments noted</p> |

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| <p>Turley Associates 1743</p> | <p>Barratt Strategic</p> | <p>here is a distinct lack of clarity in these paragraphs. It is unclear exactly what they are trying to achieve and how their objectives as expressed in Policy CC1 relate to Policy SC7 which requires development to comply with the relevant part of BREEAM or Code for Sustainable homes.</p> <p>It is unclear what the 20% CO2 reduction referred to in paragraph 5.4.17 relates to. What is the baseline against which the reduction is being measured? How does this reduction relate to the carbon savings implicit in the BREEAM and CSH standards. The confusion is compounded by Appendix 7 which also seems to be asking for improvements beyond part L of the building regulations.</p> <p>If the requirement is to achieve 20% CO2 reduction above CSH and BREEAM, then this should be more explicitly stated. However, as presented, this part of the plan fails the 'justified' test of soundness as it fails to consider the viability of what is being required. Paragraph 33 of the PPS1 climate change supplement is quite clear that requirements for decentralised energy supply should be evidence-based and viable, having regard to the overall costs of bringing sites to the market. Furthermore, in the case of housing development and when setting development area or site-specific expectations, the Council must demonstrate that the proposed approach is consistent with securing the expected supply and pace of housing development shown in the housing trajectory required by PPS3, and does not inhibit the provision of affordable housing.</p> | <p>Agree, better links between CC1 and SC7 are needed.</p> <p>The baseline refers to the energy needs of the building, which the applicant has to provide anyway – in order to satisfy building regs.</p> <p>The Buildings Regulations Target Emissions Rate is constantly changing therefore the target is for 20% beyond whatever is the current rate.</p> <p>This is not the intention, it is 20% CO₂ reduction based on current building reg targets.</p> <p>Government is committed to adopting mitigating climate change through the planning system. We have to have this policy.</p> <p>The Core Strategy is a long term document and it is appropriate to include policies which stretch beyond the recession. Over time it must be expected that land values will reflect the range of planning policies set out at national and local level. If land values ignore planning requirements then it becomes self-fulfilling that such requirements will render schemes non-viable.</p> | <p>Move policy SC7 to follow on CC1</p> <p>Clarify policy wording</p> |
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| Cont... | Con... | <p>The issue is relatively straightforward:</p> <ol style="list-style-type: none"> 1. Identify the aspirational CO2 reduction requirement; 2. Confirm what Cos reduction the relevant level of BREEAM or CSH in force at the time will achieve, 3. Assess the viability of requiring new development to meet the difference between 1 and 2. 4. Assess the viability of requiring decentralised or on site renewable energy. | | |
| Dacre son & Hartley 480 | Individuals, Redrow Plc, Taylor Wimpey, Persimmon Homes | Policy CC1 and the supporting text appear to duplicate several elements of SC7. | Improve and explain the links between SC7 and CC1. | Move policy SC7 to follow on from CC1 |
| CB Richard Ellis 354 | Hammerson PLC | Policy CC1 as rigidly worded could have a significant adverse impact on the viability of current pipeline schemes. Flexibility should be introduced here to allow for the sustainability merits of a scheme to be negotiated on an individual basis having regard to site specific constraints and development costs. | The Core Strategy is a long term document and it is appropriate to include policies which stretch beyond the recession. Over time it must be expected that land values will reflect the range of planning policies set out at national and local level. If land values ignore planning requirements then it becomes self-fulfilling that such requirements will render schemes non-viable. | Comments Noted |
| Natural England 58 | Natural England | Natural England welcomes the commitment to achieving carbon reduction at a rate of 20% less than the Building Regulations Target Rate. Also welcome the commitment to ensuring major development derive at least 10% of energy from renewable sources. | Support welcomed | Comments Noted |
| Highways Agency 5604 | Highways Agency | The Strategy does not, however, include any consideration of the traffic impact of transporting the fuels to such facilities and the potential overall negative impact (in CO2 terms) of such types of energy sources. | Refer to Policy SC7, Code for Sustainable Homes, BREEAM achievements factor this in. The Core Strategy promotes development in sustainable locations to reduce the need to travel by car. | Comments Noted |

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| University of Leeds 846 | University of Leeds | Wording/punctuation of policy is ambiguous: 'decentralised, renewable or low carbon energy' could be interpreted such that decentralised carbon-intensive energy supply could be acceptable! The only acceptable forms of energy generation will be low carbon ones so the policy should simply read: either on site or neighbourhood scale (low Carbon) renewable energy. | <p>RSS and Draft PPS1 supplement suggest decentralised means 'local' rather than neighbourhood scale renewable energy. Need to define decentralised and other terms used in the policy.</p> <p>Refer to Policy SC7, Code for Sustainable Homes, BREEAM achievements factor this in. The Core Strategy promotes development in sustainable locations to reduce the need to travel by car.</p> | <p>Comments noted.</p> <p>Add 'decentralized' to the glossary.</p> |
| Knight Frank 409 | McInerney Homes Ltd | The Core Strategy should only aim to secure contributions and requirements (of new developments) in accordance with national standards and guidelines. Any contribution and requirement beyond this should take a flexible approach, be subject to site specific details and viability and not hinder development. | <p>It's important to include the policy - to ensure that developers do their best to try to achieve CO2 reduction. The Core Strategy is a long term document and it is appropriate to include policies which stretch beyond the recession. Over time it must be expected that land values will reflect the range of planning policies set out at national and local level. If land values ignore planning requirements then it becomes self-fulfilling that such requirements will render schemes non-viable.</p> <p>Government policy sets a strong commitment to addressing climate change through the planning system and such a policy is entirely correct and appropriate and necessary to improve overall levels of sustainability to secure long-term economic prosperity as well as social and environmental benefits.</p> | Comments noted |
| Spawforths 2663 | Chapman Family Discretionary Trust, Individual, Individual | Support development control style policies which deal with the spatial direction of managing environmental resources and climate change. | Support Welcomed | Comments noted |

Policy RE1: Renewable Energy

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| <p>Government Office 95</p> | <p>Government Office</p> | <p>Really pleased with the range of renewable opportunities the Council have looked at.</p> <p>The policy would benefit from some spatial explanation, including where the areas of opportunity for the different types of energy are.</p> | <p>Support Welcomed</p> <p>Policy is seeking to achieve renewable energy provision across the district where opportunities exist.</p> | <p>Comments noted</p> <p>Clarify the scope of the policy.</p> <p>Cross reference policy with other documents and policies</p> <p>Examine the potential to revise the policy to be specific about the sustainability of areas within the District.</p> |
| <p>Individual 5610</p> | <p>Individual</p> | <p>The measures mentioned are very expensive to set up, maintain and run, and some require other energy. Also can you see the 2 or 3 car families managing with one car? Of course not.</p> | <p>Costs will reduce over time and the benefits will eventually out weigh the costs. Other issues addressed in the Sustainable Communities and the Sustainable travel sections.</p> | <p>Comments noted.</p> |
| <p>Individual 4756</p> | <p>Individual</p> | <p>More support should be given for local power generation such as community wind turbines where appropriate. Help to householders to sell surplus generated electricity to the national grid.</p> | <p>Policies CC1, RE1 and SC7 all support local power generation and do not preclude community schemes.</p> | <p>Revise wording to factor in community gains for local RE.</p> |

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| Liberal Democrat Otley and Yeadon Councillors 4817 | Liberal Democrat Otley and Yeadon Councillors | These approaches should be integral to all developments | RE1 is about grid connected and therefore not appropriate for all development. | None |
| Scholes Community Forum 20 | Scholes Community Forum | The Forum has a preference and supports Solar and Photo-Voltaic methods of renewable energy projects but consider that "Wind Farm" projects particularly within less than One kilometre of residential developments should only be supported where there is no clear evidence that alternative proposals have been considered. | All forms of renewable energy are being encouraged. The Natural Resources and Waste DPD (NR&W DPD)has a specific locational criteria policy on wind energy development. | Comments noted Improve links in the text to the NR&W DPD. |
| Individual 5632 | Individual | Supports. Implementation should be urgent and a strong campaign is needed to stress the importance of this. | Support welcomed | Comments noted |
| English Heritage 99 | English Heritage | Map 4 and Para 5.4.22 it is not clear what basis the weir points have been identified, and in policy terms what they might mean for the spatial planning of the city. | Map 4 is illustrative to demonstrate the potential for hydro-power. It is not the intention to allocate. | None |
| Individual 4694 | Individual | More emphasis in supporting retrofitting of technologies in homes. | The planning system will address this if it needs planning permission, through CC1. | None |
| Individual 5658 | Individual | Energy from waste can lead to incinerating materials that could be recycled just to maintain the viability of the Energy from Waste scheme | Policies in the Natural Resources and Waste DPD reflect the waste hierarchy. We support the waste hierarchy and to enable it we will identify appropriate sites in the Natural resources and Waste DPD. | Add a strategic policy on waste in the core Strategy. |
| Yorkshire Water 948 | Yorkshire Water | The use of renewable energy is an essential component of ensuring a sustainable and effective LDF. | Support welcomed | Comments noted |
| Leeds City Council 5660 | Chief Recreation Officer | Wind energy is already used at John Charles Centre for Sport and some additional Leeds City Council Leisure Centres would provide good sites. Additionally renewable sources of energy are likely to play a role in powering leisure provision during the duration of this plan. | Support welcomed | Comments noted |

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| ARUP 397 | ARUP | <p>Disappointed that the Core Strategy does not set a strategic direction for the provision of electricity and heat from waste, but defers to the Aire Valley AAP and the NR&W DPD. Energy from waste is a source of renewable and low carbon energy, and as LCC is clearly committed to the procurement of a residual waste management facility in the Aire Valley, this should be supported in the strategic policy direction of the CS. Identifying the Aire Valley as a potential location for new energy source would provide clear support for the wider eco-vision for the Aire Valley and would also contribute to the physical infrastructure required to support the delivery of an urban eco settlement.</p> <p>The Core Strategy makes little reference to the existing energy demands of industrial users and the resultant infrastructure demands which will be exacerbated by the additional levels of development proposed. Large industrial users require certainty of energy supply and the Aire Valley offers the potential to incorporate new energy generating technologies which should be supported by a strategic policy framework in the CS.</p> | <p>Discuss the Aire Valley within this policy</p> <p>Energy demands need to be reflected as part of the preparation of the Infrastructure Delivery Plan</p> | <p>Revise policy RE1 to indicate Aire Valley has potential for Energy from Waste.</p> <p>Incorporate energy demands as part of the Infrastructure Delivery Plan.</p> |
| Turley Associates 5670 | Swayfields (Skelton) Limited | Support in Principle the opportunities to deliver renewable and low carbon energy generation Aire Valley Leeds. | Support welcomed | Comments noted |
| British Waterways 338 | British waterways | The role that waterways can play should be recognised and supported, as appropriate, through the policy framework especially in relation to Policies RE1 and MFR2. | Dealt with in the Natural Resources and Waste DPD. | <p>Revise text to acknowledge the importance of canals in the spatial vision</p> <p>Cross reference to Policy T3, SC8 and the Green Infrastructure section.</p> |

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| Carter Jonas 5681 | The Diocese of Ripon and Leeds, the Hatfield Estate, lady Elizabeth Hasting Charity Estate, the Ledson estate, AR Briggs & Co, Symphony Group Ltd. | Policies which promote resource efficiency and forms of renewable energy generation are consistent with sustainable development objective | Support welcomed | Comments noted. |
| Scott Wilson 414 | PPL c/o Revera | This principle is supported and the Parlington estate is promoted as a potential location to accommodate a number of renewable energy sources. A specific allocation for renewable energy development would make such a scheme easier to deliver, given that the estate is within the green belt. | Possible areas of search for wind energy to be included in the Natural Resources and Waste DPD. | Identify areas of search for wind energy in the NR&W DPD |
| AGFA 5664 | AGFA | LCC should pro-actively encourage business to move to renewable energy by identifying zones where planning permission is likely to be given for wind turbines. | Possible areas of search for wind turbines to be included in the Natural Resources and Waste DPD. | Identify areas of search for wind energy in the NR&W DPD. |

Policy GR1: Green Roofs within the City Centre

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| <p>Liberal Democrat Otley and Yeadon Councillors 4817</p> | <p>Liberal Democrat Otley and Yeadon Councillors</p> | <p>These approaches should be integral to all developments</p> | <p>Create new CC2 policy to be about buildings and how they intend to adapt and mitigate to climate change, this policy should list Green Roofs and street trees as possible measures.</p> <p>CC2 should apply across the whole district. However policy GR1 is particularly relevant in the City Centre where the evidence base shows that there are gaps in the GI and opportunities for Green Infrastructure are limited.</p> | <p>Amend text to create new CC2 policy which will provide a broad range of measures from which the developer can choose which is the most appropriate</p> <p>Explain evidence base in the supporting text.</p> |
| <p>Individual 5632</p> | <p>Individual</p> | <p>Supports. Implementation should be urgent and a strong campaign is needed to stress the importance of this.</p> | <p>Support Welcomed</p> | <p>Comments Noted</p> |
| <p>Robert Halstead Chartered Surveyor 5649</p> | <p>Binks Executive Homes</p> | <p>Policy GR1 will be detrimental to large scale industrial/business development (new buildings)</p> | <p>A study by the North West Regional Development Agency has shown a link between land value and green infrastructure, see 'The Economic Value of Green Infrastructure'.</p> | <p>More links to evidence base in the supporting text.</p> |
| <p>GVA Grimley Ltd 5661</p> | <p>City East Limited (Rushbound Group)</p> | <p>Further research is needed into the environmental benefits of green roofs as well as the operational and financial viability of their installation and maintenance. As above, such requirements should be waived if shown to be unviable.</p> | <p>Policy now contained in CC2. However the measures in GR1 and ST1 are critical in the city centre to link to Green Infrastructure are to be stressed in the text.</p> | <p>Link to evidence base</p> |

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| <p>Leeds Civic Trust 62</p> | <p>Leeds Civic Trust</p> | <p>Agree with policy but feel that it should cover the whole district.</p> <p>Why are roofs measured in ha and not m.</p> | <p>Covered by revised policy CC2 which should apply across the whole district</p> | <p>Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choose which is the most appropriate</p> |
| <p>Turley Associates 5670</p> | <p>Swayfields (Skelton) Limited</p> | <p>Policy GR1 - No evidence is presented as to why policy seeks to introduce a requirement for green roofs on certain buildings and no consideration is given to the potential impacts of setting a target on the viability of development and therefore the delivery of the CS's objectives. In the absence of evidence that such an approach can be adopted without impacting on delivery the policy should be removed.</p> | <p>The supporting text to the policy CC2 will explain the evidence base more thoroughly i.e. street survey and Green Infrastructure mapping.</p> | <p>Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choose which is the most appropriate</p> |

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| Carter Jonas 5681 Spawforths 2663 | The Diocese of Ripon and Leeds, the Hatfield Estate, lady Elizabeth Hasting Charity Estate, the Ledson estate, AR Briggs & Co, Symphony Group Ltd. Chapman Family Discretionary Trust, Individual, Individual | Policy not suitable for the Core Strategy. This policy could be incorporated into sustainable design policy SC8. | Policy to be incorporated into Policy CC2 | Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choose which is the most appropriate |
| Turley Associates 1743 CB Richard Ellis 354 | Barratt Strategic Hammerson PLC | Policy GR1 is unsound as it fails to set out either the feasibility or viability of requiring new development with more than 0.25 ha roof area to incorporate green roof technology in their roof covering. Whether this policy can be delivered is unclear. What are the green roof technologies referred to? Are they suitable and practical for the type of development envisaged by the CS | The supporting text to the policy CC2 will explain the evidence base more thoroughly i.e. street tree survey and Green Infrastructure mapping. | Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choose which is the most appropriate |
| Natural England 58 | Natural England | This policy is useful in complementing the wider green infrastructure network and ensuring that vital ecosystem services such as urban cooling are delivered across the city. | Support Welcomed | Comments Noted |
| Policy ST1: Street Trees in the City Centre | | | | |
| Individual 5610 | Individual | Support, as street trees look nice. | Support Welcomed | Comments Noted |

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| Individual 5632 | Individual | Supports. Implementation should be urgent and a strong campaign is needed to stress the importance of this. Also keen on more parks and trees in the City Centre. | Support Welcomed | Comments noted |
| Roundhay Planning Forum 5057 | Roundhay Planning Forum | Would like to see Policy ST1 applied to the rest of Leeds. There are parts of Roundhay ward which could benefit from replacement and new street tree planting (see Roundhay NDS). Should plant 100,000 street trees between now and 2026 across Leeds. Tree Planting would be an effective way of repairing green infrastructure. | Policy is intended to address gaps in the green infrastructure across the city centre. However this may also apply to other parts of the district as well, there is no evidence at present for this. | Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choose which is the most appropriate |
| Turley Associates 5670 | Swayfields (Skelton) Limited | Policy is of a detailed nature and not appropriate for inclusion in the Core Strategy. It should be removed. | It is one of the few ways that we can join up the gaps in the Green Infrastructure across the city centre therefore it is fundamental to the delivery of the core strategy objective. | Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choose which is the most appropriate |
| Carter Jonas 5681 | The Diocese of Ripon and Leeds, the Hatfield Estate, lady Elizabeth Hasting Charity Estate, the Ledson estate, AR Briggs & Co, Symphony Group Ltd. | Policy not suitable for the Core Strategy. As planting 1,000 trees could be subsumed in to the woodland cover policy; however it is not a significant enough issue to deserve a unique policy reference and should be deleted. | It is one of the few ways that we can join up the gaps in the Green Infrastructure across the city centre therefore it is fundamental to the delivery of the core strategy objective. A specific need has been identified in the city centre Street Tree Survey 2009 | Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choose which is the most appropriate |

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| <p>CB Richard Ellis 354</p> | <p>Hammerson PLC</p> | <p>Support the principle behind Policy ST1 but it is not a strategic policy for a CS. The supporting text also seeks to introduce the principle of a further developer contribution where tree planting cannot be secured within a City Centre scheme. This requirement and the policy duplicates existing SPD for public realm improvements and developer contributions and also has no regard to the difficulties and costs associated with securing tree planting in the City Centre (where, for example, significant service diversions may be needed to accommodate trees). Tree planting should therefore be considered as part of the landscaping proposals of individual schemes.</p> | <p>One of the few ways that we can join up the gaps in the Green Infrastructure across the city centre therefore it is fundamental to the delivery of the core strategy objective.</p> <p>The Public Realm Contributions SPD maybe one way of collecting this contribution.</p> <p>Leeds City Council has researched practical techniques regarding city centre tree planting and is satisfied that it is feasible.</p> | <p>Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choice which is the most appropriate</p> |
| <p>Natural England 58</p> | <p>Natural England</p> | <p>This policy is useful in complementing the wider green infrastructure network and ensuring that vital ecosystem services such as urban cooling are delivered across the city.</p> | <p>Support Welcomed</p> | <p>Comments Noted</p> |
| <p>Individual 5151</p> | <p>Individual</p> | <p>All well saving 1000 trees to be planted but need policies to deliver this.</p> | <p>Policy will help secure deliver, support funding bids etc.</p> | <p>Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choice which is the most appropriate</p> |

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| Spawforths 2663 | Chapman Family Discretionary Trust, Individual, Individual | CS should not contain detailed matters such as street trees which could be within their own DPD. | It is one of the few ways that we can join up the gaps in the Green Infrastructure across the city centre therefore it is fundamental to the delivery of the core strategy objective. | Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choose which is the most appropriate. |
| Policy MFR1: Managing Flood Risk | | | | |
| Government Office 95 | Government Office | The requirement of Policy MFR1 should already be taken into account in the strategic location of development. As a development management policy it does not add significantly to PPS25. | Agree. The Growth Options Paper will include a clear statement to demonstrate how flood risk has been taken into account. MFR1 provides a parent policy hook for detailed policies in the Natural Resources and Waste DPD | None |
| Individual 4730 | Individual | Further restrictions on development are needed adjacent to the River Wharfe, particularly in the light of predicted effects of climate change. | Issue addressed in the Natural Resources and Waste DPD. | None |
| Stanks and Swarcliffe Residents Association 5052 | Stanks and Swarcliffe Residents Association | Flooding is a major issue in the City Centre. Flood risk should be minimised by raising all electricity sub stations around the city centre and place them on higher ground as soon as possible. | Not within our remit to move all existing sub stations to higher ground, but future sub stations should avoid flood risk areas. See point 1 of Policy MFR1. Decentralised energy will help reduce the potential risk of electricity sub stations flooding. | None |
| Individuals 4694, 4685 | Individual | Also need to consider the Wharfe Valley and its adjacent watersheds. Askwith in N Yorks Near Otley suffered flooding in 2009. | Policy MFR1 applies equally to the River Wharfe within the Leeds District and takes account of surface water run off. | None |
| Individual 5659 | Individual | We need to work with nature and preserve our natural flood plains, we can not hold back the forces of nature with constructed walls and barriers. | See point 5 in Policy MFR1. A balance is needed between space for development and a space for water. | None |

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| Yorkshire Water 948 | Yorkshire Water | <p>Is the drainage report that was commissioned part of the Strategic Flood Risk Assessment or a separate document? Appendix 2 does not refer specifically to a drainage report as part of the evidence base.</p> <p>Yorkshire Water supports the need to mitigate flood risk when designing a scheme. This should include surface water management in accordance with PPS25.</p> <p>Yorkshire Water supports the inclusion of this policy and Leeds' aim to manage flood risk across the district. The policy could be made more robust through the amendment of points 3 and 4, our suggested additions are shown in bold.</p> <p>3. Requiring flood risk to be considered and mitigated for all development commensurate with the scale and impact of the proposed development.</p> <p>4. Reducing the speed and volume of surface water run-off as part of new build developments.</p> | <p>Seek clarification from Yorkshire Water as to what drainage report this is.</p> <p>Support Welcomed</p> <p>Agree but with suggested amendments: 'Requiring flood risk to be considered for all development commensurate with the scale and impact of the proposed development and mitigated where appropriate.</p> <p>Agree, accept wording.</p> | <p>Comments Noted</p> <p>Amend policy text.</p> |
| Leeds Civic Trust 62 | Leeds Civic Trust | <p>Continue to support the councils in ensuring any measures implemented add to rather than detract from the amenity of waterfront – we feel that the importance of the riverside to the amenity of the city is such as to require the introduction of innovative approaches such as moving barriers, overflow channels and up/downstream storage. Policies should be extended to ensure sustainable drainage systems are employed throughout the city to restrict outflows at peak rain periods.</p> | <p>Support Welcomed</p> <p>We recognise the importance of the waterfront throughout the Core Strategy, e.g. CS8.</p> <p>This is dealt with in the Natural Resources and Waste DPD.</p> | <p>Comments noted</p> |

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| Carter Jonas 5681 | The Diocese of Ripon and Leeds, the Hatfield Estate, lady Elizabeth Hasting Charity Estate, the Ledson estate, AR Briggs & Co, Symphony Group Ltd. | It is appropriate to deal with the issue of flood risk and drainage in a proactive manner and the approach set out within Policy MFR1 is generally appropriate for dealing with direct and residual effects. | Support Welcomed | Comments Noted |
| Natural England 58 | Natural England | Natural England welcomes the approach to managing flood risk, which will have benefits for biodiversity, as functional floodplain can be a significant resource for wildlife. | Support Welcomed | Comments Noted |
| Environment Agency 46 | Environment Agency | <p>Policy MFR1 – Further justification of how the saved policies (Appendix 3) will be incorporated is requested. It is unclear as to how the core strategy incorporates issues of Culverting and Sustainable Urban Drainage Systems. The EA would like to recommend the following wording to be placed under policy MFR1:</p> <ul style="list-style-type: none"> •Not Culverting and not building over watercourses wherever practicable •Encouraging the removal of existing Culverting •Requiring the use of sustainable drainage systems or sustainable drainage techniques on all sites where feasible and practicable. <p>Para 5.4.35 - misquotes that there “are 1500 homes and 50 businesses at significant risk of flooding”. There are over 3,862 dwellings and nearly 700 businesses at risk of a 1:200 flood from the River Aire alone. When the River Wharfe and all the other becks and streams are added, it would come to a much higher figure. It would be useful at this stage if the Core Strategy provides some background as to how the figures were concluded.</p> | <p>Addressed through saved policies exercise.</p> <p>Agree wording, however there may be instances where removal of culverts increases flood risk or creates an unacceptable hazard and therefore we suggest the wording should read ‘Encouraging the removal of existing Culverting where practicable and appropriate’.</p> <p>Agree – Correct figures to reflect EA figures.</p> | <p>Add wording to Policy MFR1.</p> <p>Correct figures</p> |
| Individual 2977 | Individual | Flood planning must be part of any development | Support Welcomed. | Comments noted |

| Policy MFR2: Managing Flood Risk – Leeds Flood Alleviation Scheme (FAS) | | | | |
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| Leeds Teaching Hospital 5690 | Leeds Teaching Hospital | Draw attention to the problem flooding creates to patients and staff regarding access across the city to and from the hospital sites when key transport routes are inundated. There is also an issue of key utilities being threatened by flooding and the impact on the hospitals. | This is an Emergency Planning Issue. MFR1, MFR2 and CC2 all seek to minimise future problems. | None |
| British Waterways 338 | British Waterways | The role that waterways can play should be recognised and supported, as appropriate, through the policy framework especially in relation to Policies RE1 and MFR2. | Will incorporate discussion of waterways in the Core Strategy although may be more appropriate in the Green Infrastructure section. Para 5.4.22 looks at hydro power potential and the Core Strategy acknowledges the value of canals throughout. | Amend Core Strategy text. |
| Carter Jonas 5681 | The Diocese of Ripon and Leeds, the Hatfield Estate, lady Elizabeth Hasting Charity Estate, the Ledson estate, AR Briggs & Co, Symphony Group Ltd. | Specific reference to the LFAS as Policy MFR2 is appropriate as it is strategic affecting a swathe of the City. It would be useful for the policies on Flood Risk to make reference to the role of green infrastructure is mitigation rapid run –off and the provision of surface water storage. | Should cross reference to Green Infrastructure policies. | Alter supporting text and signpost to the Green Infrastructure Section. |
| CB Richard Ellis 354 | Hammerson Plc | Policy MRF2 should be deleted as it falls outside of current Government guidance to secure developer contributions needed to mitigate the actual impact of a development proposal. Additionally it does not have regard to the costs of the FAS, the availability of public funding, the impact on development viability, or the individual circumstances of the proposal. We consider that this requirement and that a scheme of this magnitude should be publicly funded. | Development within the extent of the 1 in 200 year event will benefit from the FAS and must mitigate flood risk in any case – therefore it is appropriate to ask for a contribution. Developers will benefit from FAS and therefore it is right that it should not be entirely publicly funded. Further information on the FAS can be found on the EA factsheet. | None |

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| <p>Environment Agency 46</p> | <p>Environment Agency</p> | <p>Policy MFR2 – In principle the EA supports this policy. Some concern that this may restrict contributions to the Flood Alleviation Scheme (FAS) from riverside development only. The EA are trying to get an agreement with Leeds Council to use the Community Infrastructure Levy or some other mechanism such as Accelerated Development Zones in the Aire Valley Area Action Plan to secure financial contributions from potentially all development in the flood zone (1:200). Whilst no agreement has been reached it is important that Leeds is aware of the current situation.</p> <p>Para 5.4.37 – The EA suggest a change in wording to state the FAS is intended to provide a 1:200 year standard of protection, (including freeboard) with a managed adaptive approach to dealing with climate change</p> | <p>Discussions will continue with the Environment Agency.</p> <p>This wording is largely included, just add a reference to ‘ managed adaptive approach’.</p> | <p>Alter text to include area of contribution as being the extent of the 1 in 200 year flood and include map.</p> <p>Alter supporting text to the reflect the changes suggested.</p> |
| <p>University of Leeds 846</p> | <p>University of Leeds</p> | <p>Reservations about the City Centre flood defences and consider that it would be more cost effective and less damaging to the amenity of the waterfront to encourage flood proofing of activities and internal fixtures and fittings at potential flood level in conjunction with effective plans for evacuation of people and belongings when flooding is likely. Some buildings that still have no waterfront walkway could be protected with walkway structures that double as flood defences by turning up through 90 degrees when the river rises above a certain level. Other building owners could replace existing walkways with such structures. It is very important to consider the suggestion for the overflow channel along Hunslet Road in conjunction with increasing channel capacity downstream from the city centre.</p> | <p>The decision whether or not to have raised defences is not the purpose of this policy. Policy MFR2 is intended to describe how we will deal with development effected by the FAS.</p> <p>Policy MFR2 is about new development, but your comment is about retro fitting.</p> <p>The FAS decision has already been made, Policy MFR2 is about development effected by the FAS.</p> | <p>Comments Noted</p> |

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| Individual 2608 | Individual | flood mitigation in the long term Leeds will flood! All the measures taken will only delay the event and make the event more sudden when a dike fails!. A sustainable approach would be short term minimal measures of flood control until the infrastructure / buildings etc can be relocated to higher low risk sites. Then let the flood plains flood as appropriate and be green. | The decision whether or not to have raised defences is not the purpose of this policy. Policy MFR2 is intended to describe how we will deal with development effected by the FAS. Much of the city centre is covered by floodplain and it would not be practical or sustainable to allow it to flood. | Comments noted. |
| Natural Resources and Waste Management | | | | |
| Government Office 95 | Government Office | Overarching waste policy is required in the Core Strategy to provide a spatial context for the detailed policies in the NR&W DPD. To assist in site identification in the DPD, the Core Strategy should provide details of volumes for capacity and requirement for waste disposal that take account of the RSS requirement for additional waste capacity. A strategic minerals policy is needed to provide a spatial context for the detailed policies in the NR&W DPD. Mineral Safeguarding policies need to be defined and shown on the key diagram. | Advice from PINS is that it is acceptable to defer to Waste DPD because both documents are being prepared at the same time. Further signposting is needed to The Natural Resources and Waste DPD. | Amend text and create a new waste policy. Further Discussions needed into the level of detail that needs to be included in the Core Strategy. |
| Individual 5658 | Individual | Conflicts with the proposed Waste Transfer Site at Evanston Ave. | Waste transfer is one aspect dealt with in the Natural Resources and Waste DPD. | None |

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| <p>ARUP 397</p> | <p>ARUP</p> | <p>RSS policy ENV14 states that the identification of sites for facilities should take into account established and proposed industrial sites which have the potential for the location of waste management facilities and the co-location of complementary activities. Such as 'recourse recovery' or sustainable growth' parks. Knostrop Wastewater Treatment Works offers this co-location opportunity. This would also enable the CS to provide a clear steer on how some of these infrastructure challenges can be solved, including the physical infrastructure required to support the urban eco-settlement. There are synergies to be gained from the co-location of a potential EfW facility in the Aire Valley which could also provide a source of CHP linked to the new eco settlement.</p> <p>The CS does not provide an adequate strategic policy direction for the minimisation and management of the District's current and future waste arisings, and so does not conform to PPS12 and PPS10. Waste is a strategic issue in the future growth and development of Leeds and a policy direction is essential to ensure that appropriate waste infrastructure is provided to treat waste in the most sustainable means reasonable available and reduce the amount of wastes sent to landfill. Waste policy is also a crucial element in ensuring a low carbon and sustainable future for Leeds.</p> <p>The CS should identify the need for a Residual Waste Facility to enable the District to minimise the amount of residual waste sent to landfill and enable the District to meet its eventual objective of zero waste to landfill.</p> <p>The CS should identify the broad locations suitable for such a facility and should consider making a strategic allocation for this facility.</p> <p>The CS, the Aire Valley AAP and the NR&W DPD need to plan coherently and consistently for waste and energy infrastructure required in the Aire Valley.</p> | <p>Allocating sites is dealt with in the Natural Resources and Waste DPD.</p> <p>Advice from PINS is that it is acceptable to defer to Waste DPD because both documents are being prepared at the same time.</p> <p>Allocating sites in the Natural Resources and Waste DPD</p> | <p>Expand and explain in supporting text and create a new waste policy.</p> |
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| Stanks and Swarcliffe Residents Association 5052 | Stanks and Swarcliffe Residents Association | The issues of incineration and Land is still is a concern. There are still waste and pollutants from incineration. | The issue of waste disposal is addressed in the Natural Resources and Waste DPD. | None |
| Individual 5634 | Individual | Supermarkets with large car parks should be forced to have at least one recycling container on their land. | This is too detailed for the Core Strategy and recycling should be considered in the early design process. | None |
| Highways Agency 5604 | Highways Agency | The Strategy also includes forecasts for an increase in municipal and commercial / industrial waste. Although there is a recognition that there is a need to find ways to reduce the amount of waste going to landfill sites, provision still needs to be made for more large scale strategic facilities and for small-scale local facilities. The sustainability appraisal showed that locating waste management facilities in accessible commercial/industrial areas is the best option environmentally. Although there are some significant commercial/industrial areas located in close proximity to the SRN, no mention is made of the potential traffic impact on the SRN. | Addressed in with in the Natural Resources and Waste DPD and potential traffic impact is integral to the site selection process. | None |
| Other Issues/ General | | | | |
| Government Office 95 | Government Office | There is scope for a locally distinctive strategic sustainability policy in the Core Strategy that could signpost policies for a low carbon community in the AAP along the lines suggested for ecotowns in PPS1. Consideration should be given to including a locally specific policy link to provide a hook for the Aire Valley AAP to PPS1. This could set higher targets for dealing with waste and consider the use of locally generated waste as a fuel source for combined heat and power generation. | The evidence base for any higher targets will be developed in the Aire Valley Leeds AAP, which will be signposted to throughout the Core Strategy. | Create new CC2 policy |
| English Heritage 99 | English Heritage | Welcomes the recognition of the importance of a high quality environment and the acknowledgement that the continued protection and enhancement of the Leeds' environmental assets is fundamental to the future competitiveness, quality of life and the creation of a liveable city. | Support welcomed | Comments noted |

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| Yorkshire Water Services 948 | Yorkshire Water services | Surprised to see a lack of policy on natural resources and waste management contained within the Core Strategy. The LDS states that the Waste DPD will follow a chain of conformity that includes the Core Strategy. As the Core Strategy does not contain a policy related to waste management we are unsure how the NR&W DPD will be able to conform to the Core Strategy as there is nothing to Conform to. | Advice from PINS is that it is acceptable to defer to Waste DPD because both documents are being prepared at the same time. | Expand and explain in supporting text and create a new waste policy |
| Savills (Northern Branch) 467 | MEPC | <p>MEPC feel that the policies contained in this chapter are entirely laudable in so much as they help to minimise the environmental and ecological impact of future developments and help tackle the wider threat of climate change. The major concern of MEPC however is again the lack of an up to date and robust evidence base that would support the majority of these presumptions, thresholds and targets outlined in the policies in this section.</p> <p>The justification for some of the policies appears to emanate from the RSS. MEPC would contend that this is not an appropriate evidence base as it only considers these issues on a regional, rather than local basis. The RSS makes it clear than when formulating policies regarding the environment, that whilst policies should have regard the content of the RSS, they also need to reflect local circumstances and be based on a local study covering these issues.</p> <p>It is therefore MEPC's opinion that this section needs to be re-examined with fresh evidence and to take a flexible and pragmatic view when looking at managing environmental resources to ensure that policies are not too onerous and unviable that they could discourage some areas of the city from being regenerated</p> | <p>Support welcomed</p> <p>Agree</p> | <p>Comments noted</p> <p>Alter text to make more Leeds Specific</p> |
| NHS Leeds 5693 | NHS Leeds | We would fully support the proposals to manage resources and recognise the positive contribution this makes to health in improvement of air quality, supporting the retention of open space and the protection of the natural environment | Support welcomed | Comments noted |