

Report of the Director of City Development

Report to: Development Plan Panel

Date: 7th August 2012

**Subject: LDF Core Strategy – Publication Draft, Analysis of Consultation
Responses: Urban Design, Conservation, Landscape & Managing Environmental
Resources**

Are specific electoral Wards affected? If relevant, name(s) of Ward(s):	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Summary of main issues

1. The Core Strategy Publication Draft was subject to six weeks public consultation during 28th February to 12 April 2012. This report covers the following Core Strategy topics Urban Design, Conservation, Landscape and topics contained within the Managing Environmental Resources theme. Section 3 of this report summarises the issues raised and the table. For each of these topics in turn Appendix 1 suggests how the City Council should respond and Appendix 2 illustrates how the text of the Core Strategy would need to be altered.
2. The majority of the changes are minor, with the exception of a major change to incorporate a new policy and supporting text concerning the delivery of new cemeteries and burial space. Other comments raise issues which can be addressed by minor text changes to add clarification and aid understanding. The analysis and suggested changes are set out in Appendices 1 and 2.

Recommendations

Development Plan Panel is requested to:

i) Endorse the analysis of the issues raised and any suggested Core Strategy text and policy changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval.

1.0 Purpose of this Report

- 1.1 Within the context of the Core Strategy Initial Report of Consultation (6th June), the purpose of this report is to review consultation responses in relation to the Core Strategy topics Urban Design, Conservation, Landscape and Policies contained within the Managing Environmental Resources theme. Appendix 1 attached for each topic, summarises the representors key issues, the City Councils response and proposed action. This is followed by an Appendix 2, which sets out how the Core Strategy text should be altered in response to proposed changes.

2.0 Background Information

- 2.1 Following Consideration by the Development Plan Panel and Executive Board, a 6 week period of public consultation has been undertaken, commencing on 28th February to 12th April 2012. Consistent with the LDF regulations, this is a targeted stage of consultation, with emphasis upon requesting responses in relation to the “soundness” of the plan. Within this context, the consultation material comprised of a range of documents, which were subsequently made available on line or as paper copies, including:

- Core Strategy Publication Draft (Main Document)
- Sustainability Appraisal (& Non Technical Summary)
- Habitats Regulations Assessment Screening
- Equality Impact Assessment Screening
- Draft Infrastructure Delivery Plan
- Draft Core Strategy Monitoring Framework
- Health Topic Paper
- Report of Consultation on Preferred Approach (October – December 2009)

- 2.2 Links were also incorporated to the consultation web pages to the evidence based material, which has been prepared to help inform the emerging document (including the Employment Land Review, Leeds City Centre, Town and Local Centres Study, Housing Growth in Leeds, Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment and the Leeds Open Space, Sport and Recreation Assessment.

3.0 Main Issues

- 3.1 In relation to the Core Strategy topics covered in this report, alongside a number of representations expressing support, the main issues raised during the consultation period can be summarised as:

Urban Design

- Need to strengthen and improve the clarity of Policy P 10 and supporting text,

Conservation

- Need to strengthen and improve the clarity of Policy P 11 and supporting text,

Landscape

- Need to improve the clarity of the supporting text in relation to the importance of landscape and the analysis of landscape character,

Green Infrastructure & Greenspace Policies

- Confusion over users incorrectly interpreting the key diagram as a site specific proposals plan & identification of additional areas which respondents feel should be identified as green infrastructure due to some misconceptions and misinterpretation over the strategic green infrastructure definition,
- The open space standard for the city centre is too low and should be 25 sq.mtrs per unit,
- Greenspace and open space standards are unsound as they have not been viability tested & are too high and will make development unviable and are too onerous,
- CIL would be the most appropriate mechanism to deal with greenspace provision
- Greenspace standards: The council do not have an up-to-date playing pitch strategy to support the outdoor green space standard, There are no indoor sports standards, the open space assessment (PPG17 study) is out of date and did not consult relevant sport governing bodies, there is no policy on new cemeteries and burial space for local needs, the access standard for playing pitches and bowling greens at a 10 minute drive is too far and should be a 15 minute walk as for tennis courts, concern that the development industry is becoming entirely responsible for making good identified greenspace deficiencies, greenspace standards are not appropriate to all development such as old people's accommodation,
- There is no reference to protection of sports facilities in the community,
- The open space evidence base is unsound and contains errors which require correction. Analysis areas obscure serious shortages in some inner city areas. Requires more local analysis areas.
- Document is flawed in relation to public health and recreational open space.

Protection of Important Species & Habitats and Biodiversity Improvements

- Need to clarify and strengthen the protection of species and habitats and for improved technical information.

Energy & Natural Resources

- Policy EN1 repeats national policy by replicating the Building Regulations targets within the Core Strategy,
- There is a lack of evidence for Policy EN1, that the renewables and CO₂ targets won't make development unviable.
- Policy EN2, changes to the BREEAM and CfSH methodologies, BREEAM and CfSH being abandoned by Government viability of applying all aspects of BREEAM and CfSH, need for flexibility for special cases such as historic buildings/conversions/extensions/special purpose buildings.
- Policy EN3, need to clarify and strengthen the supporting text.
- Policy EN4, concerns regarding viability issues.

Flood Risk

- Need to clarify the supporting text and Policy wording (EN5) to regarding the application of the sequential test and requirements of the NPPF,

Minerals

- Need to make more explicit reference to the identification of Minerals Safeguarding Areas (MSAs)

3.2 For each of these topics in turn, the analysis and suggested changes are set out in Appendices 1 and 2 attached.

4.0 Corporate Considerations

As noted above, the Core Strategy, forms part of the Local Development Framework and once adopted will form part of the Development Plan for Leeds.

4.1 Consultation and Engagement

4.1.1 As outlined in this report, the Core Strategy Publication draft has been subject to a further 6 week period of consultation. This has been undertaken in accordance with the LDF Regulations and the council's adopted Statement of Community Involvement (SCI).

4.2 Equality and Diversity / Cohesion and Integration

4.2.1 An Equality Impact Assessment Screening was undertaken on the Core Strategy Publication draft, prior to consultation (see Core Strategy Executive Board Report, 10th February 2012). This concluded that equality, diversity, cohesion and integration issues had been embedded as part of the plan's preparation. For information and comment, the Screening assessment has also been made available as part of the supporting material for the Publication draft consultation. Within this overall context, it will be necessary to continue to have regard to equality and diversity issues, as part of the ongoing process of preparing the Core Strategy, including considering representations and next steps.

4.3 Council Policies and City Priorities

4.3.1 The Core Strategy, plays a key strategic role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to the 'the best city in the UK'. Related to this overarching approach and in meeting a host of social, environmental and economic objectives, where relevant the Core Strategy also seeks to support and advance the implementation of a range of other key City Council and wider partnership documents. These include the Leeds Growth Strategy, the City Priority Plan, the Council Business Plan and the desire to be a 'child friendly city'.

4.4 Resources and value for money

4.4.1 The DPD is being prepared within the context of the LDF Regulations, statutory requirements and within existing resources.

4.5 Legal Implications, Access to Information and Call In

- 4.5.1 The DPD is being prepared within the context of the LDF Regulations and statutory requirements. The DPD is a Budgetary and Policy Framework document and as such this report is exempt from call-in by Scrutiny.

4.6 Risk Management

- 4.6.1 The Core Strategy is being prepared within the context of the LDF Regulations and the need to reflect national planning guidance. The preparation of the plan within the context of ongoing national reform to the planning system and in responding to local issues and priorities, is a challenging process. Consequently, at the appropriate time advice is sought from a number of sources, including legal advice and advice from the Planning Advisory Service and the Planning Inspectorate, as a basis to help manage risk and to keep the process moving forward.

5. Conclusions

- 5.1 This report provides an overview of the issues raised in relation to the Urban Design, Conservation, Landscape topics and Policies contained within the Managing Environmental Resources theme. The majority of responses can be addressed as minor changes, with the exception of a major changes to introduce a new criteria based policy for Cemeteries and Burial grounds.

6. Recommendations

- 6.1 Development Plan Panel is requested to:

i) Endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval.

7. Background documents¹

- 7.1 A substantial number of documents are available representing various stages in preparation of the DPD and the background evidence base and Equalities Impact Assessment Screening. These are all available on the city council's web site (LDF Core Strategy Pages) or by contacting David Feeney on 247 4539.

¹ The background documents listed in this section are available for inspection on request for a period of four years following the date of the relevant meeting. Accordingly this list does not include documents containing exempt or confidential information, or any published works. Requests to inspect any background documents should be submitted to the report author.

Appendix 1

Core Strategy Publication Draft - Analysis of Consultation Responses

Policy P10 and General comments on Urban Design

Representor/Agent	Representor Comments	LCC Initial Response	Action
Leeds Civic Trust	<p>1) The 10 urban design principles mentioned in 5.3.38 (and adopted in 2005) should be spelled out in Policy P10. These are not currently SPD and therefore should be included in the policy to give them statutory status.</p> <p>2) Under point (iii) there is some potential conflict about protection and enhancement, especially as far as skylines are concerned. At least reference should be made here to the adopted Tall Buildings Strategy.</p> <p>3) Also in this policy, cross-reference should be included to Neighbourhoods for Living, the Sustainable Construction and Design Guide and the green infrastructure policies in the CS. It is suggested that the 10 urban design principles mentioned in 5.3.38 (and adopted in 2005) in Policy P10. Reference should be made here to the adopted Tall Buildings Strategy. Cross-references should be included to Neighbourhoods for Living, the</p>	<p>1) The Ten Urban Design Principles are adopted (Executive Board, January 2005) and it is considered sufficient that they are mentioned in para 5.3.38.</p> <p>2) iii) Skylines: Fundamental approach to good urban design is to protect and enhance skylines, views, vistas, glimpses. It is not considered essential to modify this element but a further pointer towards Tall Buildings Strategy may be appropriate.</p> <p>3) Noted</p>	<p>1) No change</p> <p>2) Proposed change Include reference to Tall Buildings Strategy in 5.3.39 <i>The following policy sets out an overarching approach to a consideration of design. This policy approach is supported by a range of SPD's supporting design including Neighbourhoods for Living; City Centre Urban Design Strategy; Tall Buildings Strategy;</i></p> <p>3) Proposed change, Suggest links to documents and SPD guidance at the end of the Design section in</p>

	Sustainable Construction and Design Guide and the green infrastructure policies in the CS		para 5.3.39 <i>The following policy sets out an overarching approach to a consideration of design. This policy approach is supported by a range of SPD's supporting design including Neighbourhoods for Living; City Centre Urban Design Strategy; Tall Buildings Strategy; Building for Tomorrow Today; and the wealth of Village and Neighbourhood Design Statements.</i>
British Library (via Drivers Jonas Deloitte)	1) Support para 2 in particular in relation to the approach taken to consultation on design. The British Library is committed to the exploration of high quality and innovative design as exemplified through its recent planning approvals. The need to develop and pursue a consultation strategy that is appropriate to the nature and location of the development is considered essential and felt to be appropriate recognised within the wording of P10.	1) Support welcomed. British Library proposals were a success due to early engagement with stakeholders and design teams.	1) No change
West Yorkshire Archaeology Advisory Service	1) The National Planning Policy Framework makes clear (para.6) the purpose of the planning system is to deliver sustainable development. Para 7 of the NPPF is explicit in	1) NPPF is explicit in its support for good design to run throughout the planning process. This has been supported by two recent NPPF based Inspectorate decisions where the importance of design was paramount.	1) Proposed change Suggest minor rewording of Policy P10 principle ii) <i>and enhances the district's existing, historic</i>

	<p>stating that the environmental aspect of sustainable development is to help protect and enhance "our natural, built and historic environment"</p> <p>The following changes are proposed, Policy P10 Design is too narrow and restrictive in specifically identifying only "historically and locally important buildings" as being the aspect of the historic environment that needs to be protected and enhanced.</p>	<p>However, would tend to agree that the Policy is too narrow and does not cover the many aspects and wide remit that design has.</p>	<p><i>and natural assets, in particular, historic and natural site features and locally important buildings, spaces, skylines and views.</i></p>
<p>The Ledston Estate, The Hatfeild Estate, The Diocese of Ripon and Leeds, Meadowside Holdings Ltd, The Bramham Park Estate, A R Briggs and Co, Estate Charity, Lady Elizabeth Hastings Estate Charity (via Carter Jonas).</p>	<p>1) Previous comments relating to this policy would suggest that it should be a strategic spatial policy as it relates to all development in the District. We would maintain this position. Good quality design lies at the heart of Government guidance and the principles of sustainable development.</p>	<p>1) Comments noted. Design is an integral part of the document as reflected by Policy P10 and within Spatial Vision in Place making (iii)</p>	<p>1) No change</p>
<p>Inner NW Area Committee Planning Sub Group</p>	<p>Concern that P10 is unsound, within the context of the Planning Inspectorate document 'Local Development Frameworks: Examining Development Plan Documents: Soundness Guide'.</p> <p>1) The first part of Policy P10 which the group would like to comment on is point iv) of Policy P10 which states:</p>	<p>1) Comments noted. 'Practical issues' such as car, cycle parking, waste etc do present some challenges to new developments and the suggestion of 'positive' design is welcomed and supported. Such suggestions</p>	<p>1) Proposed change (iv)Car parking, cycle, waste and recycling storage <i>should be</i></p>

	<p>[Proposals will be supported where they accord with the following key principles:]</p> <p>(iv) Car parking, cycle, waste and recycling storage are integral to the development. The group believes that it is not simply enough to require that 'car parking, cycle, waste and recycling storage are integral to the development' but that an emphasis should be placed on the requirement to design these aspects positively. The group notes that this is an emphasis placed by national government in the National Planning Policy Framework. It is also considered that the drafted wording of point iv) significantly reduces the effectiveness of this policy and does not reflect the emphasis placed on amenity issues which is shown in para. 5.3.39. As has been demonstrated in many recent housing (and other) developments in Leeds where the design of car parking and cycle, waste and recycling storage has not been given sufficient consideration, this has had a significant impact on the character and sustainability of the overall developments. The absence of an emphasis on 'positive design' in relation to car parking and cycle, waste and recycling storage would leave the Council with a policy which leads to ineffective development management</p>	<p>should be defensible at Planning appeal if necessary and an application was refused for such a reason.</p>	<p><i>designed in a positive manner and be are integral to the development</i></p>
--	--	---	--

	<p>outcomes.</p> <p>2) The group would also like to comment on paragraph 5.3.39. The group welcomes the emphasis on good quality design but feels that the above paragraph is a suitable point to make reference to Neighbourhood and Village Design Statements which include detailed character assessments of local areas and place an emphasis on design principles which should be given consideration as part of prospective developers design process. It is noted that Neighbourhood Design Statements are mentioned on page 60 of the Core Strategy in paragraph 5.2.8 in relation to housing density and the group feels that paragraph 5.3.39 is also a relevant point to give reference to these documents.</p> <p>The INWAC Planning Sub Group consider that the following redraft of Policy P10 would address the concerns raised in section 5. “New development for buildings and spaces, and alterations to existing, should be based on a thorough contextual analysis to provide good design appropriate to its scale and function. New development will be expected to deliver high quality innovative design that has evolved, where appropriate, through</p>	<p>2) Support comments to refer to Neighbourhoods for Living and the various local design guidance that is being produced. It should also be noted that designing out crime is just one aspect of good design and perhaps this policy places greater emphasis on these issues than is necessary. Perhaps a rewording of these elements could better capture the wide remit of design guidance available rather than simply focus on very specific issues. The existing saved guidance that exists (‘Neighbourhoods for Living’ and VDS/NDS etc) should also be noted together with the national guidance set out in ‘Secured by Design’ to ensure consistency with the requirements set out by the NPPF</p>	<p>2) Proposed Change Suggest links to documents and SPD guidance at the end of the Design section in para 5.3.39 <i>The following policy sets out an overarching approach to a consideration of design. This policy approach is supported by a range of SPD’s supporting design including Neighbourhoods for Living; City Centre Urban Design Strategy; Tall Buildings Strategy; Building for Tomorrow Today; and the wealth of Village and Neighbourhood Design Statements.</i></p>
--	---	---	--

	<p>community consultation and which respects and enhances the variety of existing landscapes, streets, spaces and buildings according to the particular local distinctiveness and wider setting of the place, contributing positively towards place making and quality of life and be accessible to all. Proposals will be supported where they accord with the following key principles;</p> <ul style="list-style-type: none">(i) The size, scale and layout of the development is appropriate to its location and respects the character and quality of the external spaces and the wider locality,(ii) The development protects the visual, residential and general amenity of the area including useable space, privacy, noise, air quality and satisfactory penetration of daylight and sunlight,(iii) The development protects and enhance the district's historic assets in particular existing natural site features, historically and locally important buildings, skylines and views,(iv) Car parking, cycle, waste and recycling storage should be designed in a positive manner and be integral to the development,(v) The development creates a safe and secure environment that reduce the opportunities for crime without compromising community cohesion,(vi) The development is accessible		
--	---	--	--

	<p>to all users. The INWAC Planning Sub Group consider that the following redraft of paragraph 5.3.39 would address the concerns raised in section 5. 5.3.39</p> <p>There are a variety of issues that require consideration at the outset of the design process which include but are not limited to; designing out crime; disabled access; the orientation of buildings to address amenity issues such as air quality, daylight, noise and privacy; waste and recycling storage; and car and cycle parking. Developers are required to cross reference other development plan policies on relevant issues such as flood risk mitigation, renewable energy measures and sustainable construction to ensure that they are integral to the design process. Developers should also give careful consideration to Neighbourhood and Village Design Statements which place an emphasis on area specific character and design principles.</p>		
C/o Hileys Solicitors (via LDP Planning)	<p>1) Encouraged by the policies seeking to ensure the protection of existing nature conservation interests, green space and the historic environment, as well as policies seeking to achieve highest possible design standards. Standards in P10 are not unduly onerous but it is considered that highest possible standards of design</p>	<p>1) Broad support for policy noted. Disagree with philosophy that highest quality of design should not be aimed for in all locations as this could undermine the NPPF and Core Strategy's approach to place making and local distinctiveness. New developments such as those near or within Conservation Areas often require higher attention to the way the building looks by definition. However good design is about much more than this, the functionality, practicality, sustainability and aesthetics are all equally important and this is reflected</p>	<p>1) No change</p>

	<p>should be integrated into developments which are located close to sensitive locations. P10 refers to the protection and enhancement of the districts historic assets with reference to particular site features, however greater appreciation should be given to the wider benefits of development, including connectivity between spaces, sustainability and promoting the reuse of redundant (not necessarily Previously Developed) and inefficiently used land.</p>	<p>strongly in the NPPF. It is important to note that design is important throughout Leeds, regardless of location, with no exceptions.</p>	
<p>Leeds, York and North Yorkshire Chamber of Commerce</p>	<p>1) 8.4 With reference to the City Centre connectivity to the 'City rim' (Diagram 6), concern is expressed that insufficient emphasis is placed upon the importance that quality public realm should play in enhancing this connectivity. (c) Policy CC3 talks about improving connections to the City Centre. Again the role of quality public realm needs to be emphasised as a mechanism to deliver this objective. Good public realm plays a vital part in connecting the City Centre to the Rim. This policy should be redrafted to reflect this.</p>	<p>Agree that public realm is highly important and wholeheartedly agree that connections over the rim are essential for the future sustainability of the City. Sites at the city centre margins are essential to achieve good connections to the 'rim' areas and the principle of this should be recognised. The quality of links is not completely concerned with the physical appearance of public realm but more about the way the spaces and routes function, i.e. are there active frontages etc to create a sense of belonging and safety.</p>	<p>1) Proposed change</p> <p>Emphasise public realm and importance of well designed and desirable linkages in P10 Design. See revised P10 i) <i>appropriate to its context and respects the character and quality of surrounding buildings; the streets and spaces that make up the public realm and the wider locality</i></p> <p>Revise CC1 (iv) 'Supporting services and open spaces <i>and improvements to the public realm.</i>'</p>

<p>Leeds, York and North Yorkshire Chamber of Commerce</p>	<p>1) We strongly recommend that the core strategy contains a specific aspirational policy on the improvement and creation of Public Realm that includes our City Centre, suburbs and surrounding towns and villages. The distinctive character of these areas should be enhanced and encouraged to create a richness that makes up the overriding character of Leeds.</p>	<p>Two points here. One regarding the public realm improvements and secondly regarding the appreciation and enhancement of the respective distinctive characters of Leeds. Noted but considered there is sufficient mention in the CS about local distinctiveness and public realm. Reference is made to greenspaces and public realm in the supporting text for policy G5. Suggest additional wording in CC1 and P10 to include specific mention of public realm.</p>	<p>1) Proposed change wording changed in P10 <i>appropriate to its context and respects the character and quality of surrounding buildings; the streets and spaces that make up the public realm and the wider locality.</i> Revise CC1 (iv) 'Supporting services and open spaces and improvements to the public realm.'</p>
<p>Leeds, York and North Yorkshire Chamber of Commerce</p>	<p>As a guide the Urban Design Principles formed by the Chamber's QPS Group should be adopted as policy (perhaps through incorporation into Policy P10). The principles are: a) Provide a context and venue for social interaction. b) Designed primarily for the pedestrian. c) Design the space as 'an outdoor room'. d) Create a clear and lively relationship between indoor and outdoor uses. e) Cater for different uses; provide an inclusive not exclusive place. f) Plan a 24 hour space. g) Key elements must be robust and attractively designed. h) Ensure the space becomes of the existing urban hierarchy.</p>	<p>Noted. Broad principles are consistent with our Ten Urban Design Principles but it is considered that this level of detail on the public realm is beyond the scope of the Core Strategy. However, it should be noted that the QPS'Group's principles have been well received and are used on a day to day basis, as guiding principles in public realm work.</p>	<p>1) No change</p>
<p>Leeds, York and North Yorkshire</p>	<p>Public Realm forms a vital part of our City's infrastructure forming the</p>	<p>Important points noted but it is considered there is sufficient mention in the CS about high quality design</p>	<p>1) Proposed Change wording changed in</p>

<p>Chamber of Commerce</p>	<p>majority of open space between developments. This space provides the connections that make out City work, and space for recreations, leisure, relaxation and social intercourse. The importance of the quality both in design, materials and maintenance is well recognised in enhancing both the quality of our built environment and people's wellbeing. The relationship between our buildings, transport infrastructure and public realm must be recognised as a vital element in improving the quality of our city and neighbouring towns and villages. The adoption of this quality is paramount if the city is to attain its status as the best City ion the UK by 2028.</p>	<p>and the public realm. Socially and economically the importance of public realm (spaces, streets, parks etc) is recognised on several levels. Reference is also made to the public realm in the supporting text for policy G5. Suggest additional wording in CC1 and P10 to include specific mention of public realm.</p>	<p>CC1(iv) and Policy P10 as above and supporting text</p> <p><i>5.3.36 Good design is central to making successful places. The Council supports good design that conserves and responds to local character. This is evident in the Vision for Leeds 2011-2030 and the City Priority Plan (2011-2015), which states that "Our purpose is to improve life for the people of Leeds and make our city a better place", and in the wealth of design documents the Council has adopted. Good design is a key aspect of sustainable development and essential in creating places in which current and future generations can live a high quality of life which is fulfilling and healthy. Good design goes beyond aesthetic considerations and should address the connections between people and places and the integration of new development into the</i></p>
----------------------------	--	---	---

			<p><i>built environment. Design can also assist in tackling the most cross cutting issues of sustainable development such as climate change, car dependence, community cohesions and health and wellbeing. The vast majority of people who live and work in the Leeds City Region do so in an urban environment. Their quality of life depends heavily upon the quality of their environment. In order to continue its economic success in a sustainable manner, and in order to achieve its aim of being the Best City in the UK by 2030, Leeds must build upon and retain the high quality of its built and natural environment.</i></p> <p>5.3.37 Leeds' townscape is rich in quality and ranges from leafy suburbs and villages to market towns, former mining towns, inner urban areas and a vibrant City Centre Centre. The urban</p>
--	--	--	--

			<p><i>environment of Leeds is rich in quality and ranges from leafy suburbs and rural villages to market towns, industrial towns, inner urban areas and a vibrant city centre. Good Urban Design can help understanding of these unique and special places and inform opportunities for appropriate development that is respectful and enhances our City as a whole. An overarching aim is to create and sustain people-friendly places for the benefit of the residents and businesses of Leeds and endeavouring to support developers seeking to deliver highest quality design solutions.</i></p> <p>5.3.38 Leeds recommends the ten Urban Design Principles, which were adopted by the City Council (Executive Board in January 2005), for creating successful design. An essential element is to include representatives from a</p>
--	--	--	--

			<p>wide range of disciplines to form a Design Team, as for design to be successful all disciplines need to be considered from the early onset of a project. Design workshops are a useful tool for developing the design and can provide an opportunity for local people to be involved, ensuring that the end result is fit for purpose. They will help to develop the best outcome and will inform the production of Design and Access Statements. This will encourage the design and retention of attractive, walkable neighbourhoods, serving residents, businesses and visitors well. Creativity and appropriate innovation is encouraged to achieve excellent place-making for the 21st century, with sustainable solutions respecting and providing for future generations. <i>The City Council has a long-standing commitment to delivering high quality urban</i></p>
--	--	--	---

			<p><i>design. This is reflected in the Ten Urban Design Principles (adopted by Executive Board in January 2005) as a basis to inspire and enhance the design quality in Leeds and provide a robust framework for creating successful places at all levels. Together with early stakeholder working in the form of design workshops and consultation, investing in good urban design can create economically successful development that functions well and has a lasting effect now and into the future</i></p> <p>5.3.39 Add following text after "...design process".</p> <p><i>The following policy sets out an overarching approach to a consideration of design. This policy approach is supported by a range of SPD's supporting design including Neighbourhoods for</i></p>
--	--	--	--

			<p><i>Living; City Centre Urban Design Strategy; Tall Buildings Strategy; Building for Tomorrow Today; and the wealth of Village and Neighbourhood Design Statements.</i></p> <p><i>Neighbourhoods for Living and the City Centre Urban Design Strategy contain principles and process guidance which should be used to lead to excellence and responsive design.</i></p>
Leeds, York and North Yorkshire Chamber of Commerce	Green Infrastructure plays a key role in the vitality and quality of the City and the distinctiveness of Leeds as an urban settlement can be enhanced through greater emphasis being placed upon its existing assets, in particular the 'green corridors' which run into the City Centre. Their role and quality should be better recognised in order to ensure that Leeds is a distinctive and beautiful city for future generations.	Noted. GI is another essential ingredient in the overall desirability, biodiversity and ultimately sustainability of the City. Detailed policies for GI are included as Strategic Policy 13 and Policy G1. The supporting text for G5 specifically mentions green infrastructure in the city centre	1) No change
Leeds, York and North Yorkshire Chamber of Commerce	Support is provided to the general recognition in the document of its quality and importance in improving the environment, connectivity and people's wellbeing as well as enhancing a sense of place. However, whilst the core strategy	Agree, Although public realm is considered important it is in general covered by other wider design policies. Suggest additional wording in supporting text of P10 and revise wording in P10 i) and CC1 (iv)	2) Proposed change Emphasise public realm and importance of well designed spaces and linkages in supporting text of P10 and revised

	<p>does make reference to design quality at various points through the document in very broad terms, insufficient emphasis is placed upon the importance of public realm in both the City Centre and the remainder of the District. There are large areas of poor open space within the City Centre and across the wider area. Much greater emphasis should be placed upon enhancing quality rather than blanket protection of spaces (e.g. Para 5.1.20).</p>		<p>P10 i) and CC1 (iv) <i>appropriate to its context and respects the character and quality of surrounding buildings; the streets and spaces that make up the public realm and the wider locality</i></p> <p>Revise CC1 (iv) 'Supporting services and open spaces <i>and improvements to the public realm.</i>'</p>
English Heritage	<p>Policy P10: We support this Policy especially Criterion (iii) relating to the historic environment. It is essential that new developments respect those elements which contribute to the distinctive character of the various parts of the District and, in the case of Criterion (iii), to the significance of its heritage assets.</p>	Support welcomed	1) No change
Aberford Parish Council	<p>Policies P10 - P12 We believe there is a strong role to play in these policy areas for village and neighbourhood design statements where these have been adopted by the City Council or are in preparation. Specific reference to the status of these plans and the need for reference to be made to them should be outlined in these policies (and others where</p>	<p>Agree. It should be noted that where Village and Neighbourhood Design Statements have been prepared and adopted as SPD's, these are recognised as part of the LDF and will be used to inform planning decisions.</p>	1) No change

	appropriate).		
Barwick in Elmet & Scholes Parish Council	Policy P10 Design as drafted is strongly supported along with the content of Paragraph 5.3.39.	Support welcomed	1) No change
Leeds Residential Property Forum (via Bury & Walker Solicitors)	<p>Recycled waste and recycling storage - Often it is not feasible/practical to meet the kind of requirements that can be imposed by the Council which mean that otherwise appropriate development cannot go forward. The Forum objects to the inclusion of this provision.</p> <p>Accessibility for all users - Whilst the Forum is supportive of ensuring that so far as is practicable access is made available to all it has to be recognised that in certain types of properties, especially conversions, this is simply not feasible and therefore to expect this in all types of development is unrealistic and inappropriate.</p>	These issues are dealt with on their own merits in every application and the weight given to such policies will be at the officer's discretion. Where such solutions can be accommodated the policy shall be applied, however it is recognised that in all cases such standards cannot be implemented and a balanced decision will have to be taken place in such cases.	1) No change
The Victorian Society	Policy P10: we support this policy in general and in particular section (iii) "The development protects and enhances the district's historic assets...historically and locally important buildings.	Support welcomed	1) No change
Hammerson UK Properties Ltd (via Barton Willmore)	Support the general aim of this policy. However, the policy should allow flexibility for developments which accord in principle with the Spatial Development Strategy and Spatial Policies. Policy P10 should therefore be reworded to allow for exceptions to the key principles on a	Support welcomed. It is possible that accommodation may have to be made for different circumstances and every case is judged on its respective merits. However it is not felt that the principles are unduly onerous.	1) No change

	<p>case by case basis. For example, a scheme may offer a number of wider benefits that would outweigh failure to comply with one of the key principles, or compliance with all of the listed key principles may have an adverse impact on the overall viability and delivery of future development schemes. As drafted the policy makes no allowance for such exceptions.</p>		

APPENDIX 2 – CHANGES TO CORE STRATEGY TEXT

POLICY CC1: CITY CENTRE DEVELOPMENT

The City Centre will be planned to accommodate at least the following:

- (i) 655,000 sqm of office floorspace.
- (ii) 31,000 sqm of net additional retail space (comparison), following completion of the Trinity and Eastgate schemes and subject to need being confirmed in a further retail study.
- (iii) 10,200 dwellings.
- (iv) Supporting services and open spaces *and improvements to the public realm*

Design, Conservation and Landscape

Design

~~5.3.36 Good design is central to making successful places. The Council supports good design that conserves and responds to local character. This is evident in the Vision for Leeds 2011-2030 and the City Priority Plan (2011-2015), which states that “Our purpose is to improve life for the people of Leeds and make our city a better place”, and in the wealth of design documents the Council has adopted.~~ *Good design is a key aspect of sustainable development and essential in creating places in which current and future generations can live a high quality of life which is fulfilling and healthy. Good design goes beyond aesthetic considerations and should address the connections between people and places and the integration of new development into the built environment. Design can also assist in tackling the most cross cutting issues of sustainable development such as climate change, car dependence, community cohesions and health and wellbeing. The vast majority of people who live and work in the Leeds City Region do so in an urban environment. Their quality of life depends heavily upon the quality of their environment. In order to continue its economic success in a sustainable manner, and in order to achieve its aim of being the Best City in the UK by 2030, Leeds must build upon and retain the high quality of its built and natural environment.*

~~5.3.37 Leeds’ townscape is rich in quality and ranges from leafy suburbs and villages to market towns, former mining towns, inner urban areas and a vibrant City Centre.~~ *5.3.37 Leeds’ townscape is rich in quality and ranges from leafy suburbs and villages to market towns, former mining towns, inner urban areas and a vibrant City Centre. The urban environment of Leeds is rich in quality and ranges from leafy suburbs and rural villages to market towns, industrial towns, inner urban areas and a vibrant city centre. Good Urban Design can help understanding of these unique and special places and inform opportunities for appropriate development that is respectful and enhances our City as a whole. An overarching aim is to create and sustain people-friendly places for the benefit of the residents and businesses of Leeds and endeavouring to support developers seeking to deliver highest quality design solutions.*

5.3.38 Leeds recommends the ten Urban Design Principles, which were adopted by the City Council (Executive Board in January 2005), for creating successful design. An essential element is to include representatives from a wide range of disciplines to form a Design Team, as for design to be successful all disciplines need to be considered from the early onset of a project. Design workshops are a useful tool for developing the design and can provide an opportunity for local people to be involved, ensuring that the end result is fit for purpose. They will help to develop the best outcome and will inform the production of Design and Access Statements. This will encourage the design and retention of attractive, walkable neighbourhoods, serving residents, businesses and visitors well. Creativity and appropriate innovation is encouraged to achieve excellent place making for the 21st century, with sustainable solutions respecting and providing for future generations. *The City Council has a long-standing commitment to delivering high quality urban design. This is reflected in the Ten Urban Design Principles (adopted by Executive Board in January 2005) as a basis to inspire and enhance the design quality in Leeds and provide a robust framework for creating successful places at all levels. Together with early stakeholder working in the form of design workshops and consultation, investing in good urban design can create economically successful development that functions well and has a lasting effect now and into the future*

5.3.39 There are a variety of issues that require consideration at the outset of the design process which include but are not limited to; designing out crime; disabled access; the orientation of buildings to address amenity issues such as air quality, daylight, noise and privacy; waste and recycling storage; and car and cycle parking. Developers are required to cross reference other development plan policies on relevant issues such as flood risk mitigation, renewable energy measures and sustainable construction to ensure that they are integral to the design process. *The following policy sets out an overarching approach to a consideration of design. This policy approach is supported by a range of SPD's supporting design including Neighbourhoods for Living; City Centre Urban Design Strategy; Tall Buildings Strategy; Building for Tomorrow Today; and the wealth of Village and Neighbourhood Design Statements. Neighbourhoods for Living and the City Centre Urban Design Strategy contain principles and process guidance which should be used to lead to excellence and responsive design.*

POLICY P10: DESIGN

New development for buildings and spaces, and alterations to existing, should be based on a thorough contextual analysis to **and** provide good design **that is** appropriate to its **location**, scale and function.

New development will be expected to deliver high quality innovative design that has evolved, where appropriate, through community consultation and which respects and enhances the variety of existing landscapes, streets, spaces and buildings according to the particular local distinctiveness and wider setting of the place, contributing positively towards place making and quality of life and be accessible to all. *inclusive design that has evolved, where appropriate, through community consultation and thorough analysis and understanding of an area. Developments should respect and enhance existing landscapes, streets, spaces and buildings according to the*

particular local distinctiveness and wider setting of the place with the intention of contributing positively to Place Making, quality of life and wellbeing.

Proposals will be supported where they accord with the following key principles;

- (i) The size, scale, *design* and layout of the development ~~is appropriate to its location and respects the character and quality of the external spaces~~ is appropriate to its *context* and respects the character and quality of *surrounding buildings; the streets and spaces that make up the public realm and the wider locality,*
- (ii) The development ~~protects the visual, residential and general amenity of the area including useable space, privacy, noise, air quality and satisfactory penetration of daylight and sunlight,~~ *and* enhances the district's existing, *historic* and natural assets, in particular, historic *and natural site features and locally important buildings, spaces, skylines and views.*
- (iii) The development ~~protects and enhance the district's historic assets in particular existing natural site features, historically and locally important buildings, skylines and views,~~ the visual, residential and general amenity of the *area through positive design that protects and enhances surrounding routes, useable space, privacy, air quality and satisfactory penetration of sunlight and daylight.*
- (iv) Car parking, cycle, waste and recycling storage *should be designed in a positive manner and be* are integral to the development,
- (v) The development creates a safe and secure environment that reduce the opportunities for crime without compromising community cohesion,
- (vi) The development is accessible to all users.

Appendix 1

Core Strategy Publication Draft - Analysis of Consultation Responses

Policy P11 - Conservation

Representor/Agent	Representor Comments	LCC Initial Response	Action
0023 Otley Conservation Task Force	<p>(1) References are exclusively to “Leeds’ identity” and does not include Otley and other settlements.</p> <p>(2) Objection to the word “mimic” in respect of new buildings and preference for contextual architecture that responds to character of the conservation area.</p> <p>(3) Typo in last para of boxed text : “conservation area” should be changed to “conservation areas”.</p> <p>(4) New clause required referring to Living over the Shop.</p>	<p>(1) Throughout the CS “Leeds” is used as shorthand for Leeds MD which includes the urban area and its hinterland.</p> <p>(2) “Mimics” can mean ludicrous or ridiculous imitation and a better word is “copies”.</p> <p>(3) Intention is to refer to conservation areas in general.</p> <p>(4) Policy P2 last para has commitment to providing housing in town centres, which includes Otley, above ground floor in the primary and secondary shopping frontages.</p>	<p>(1) No change.</p> <p>(2) Proposed change para 5.3.41: word “copies” should be substituted for “mimics”.</p> <p>(3) Proposed change to last paragraph of P11 to “conservation areas”.</p> <p>(4) No change.</p>
Rep no 0062 Leeds Civic Trust	<p>(1) Support for ‘local listing’.</p> <p>(2) <i>Require</i> rather than encourage archaeological investigations in specified areas.</p> <p>(3) Obligations should tie refurbishment of listed buildings to development (as distinct from enabling development), and that where entered into these should be enforced.</p> <p>(4) Council’s Building at Risk Register not kept up to date and should not be the only indicator of risk.</p>	<p>(1) The production of a “local list” has a role, but the resource implications need to be established before a commitment can be given to such a list. Neighbourhood plans could be a means to identify “locally listed” buildings.</p> <p>(2) Para 3 repeats section 128 and 129 of the NPPF and should be omitted. Leeds Civic Trust’s comment is therefore irrelevant.</p> <p>(3) This is covered by the fifth para of P11.</p> <p>(4) It is the most comprehensive survey of the condition of historic assets and is considered to be reasonably accurate.</p>	<p>(1) No change.</p> <p>(2) Proposed change: omit para 3 of P11.</p> <p>(3) No change.</p> <p>(4) No change.</p>

		It is hoped to combine the resources of the City Council and the Leeds Civic Trust to improve its accuracy.	
0085 CAMRA	(1) DCS does not include a section on heritage. (2) Pubs given insufficient importance, especially in regeneration schemes.	(1) P11 is a heritage policy with associated justification text. (2) Although there are several listed pubs in Leeds, they do not represent a building type which defines the character of Leeds as, say, mills do.	(1) No change. (2) No change.
0099 English Heritage	(1) para 1 reformulates national planning policy guidance and gives no indication of which assets are considered to be of special importance to the character of the city. (2) Para 5 should refer to English Heritage's Buildings at Risk Register and the range of assets in the City Council's register should be widened. (3) Para 5.3.43 should identify Regeneration Priority Areas. (4) No indication of how locally significant non-designated heritage assets will be identified. (5) Enabling development can be applied to Registered Parks and Gardens and other assets. This policy repeats national policy and is redundant. (6) Para 3: archaeological investigations are not optional but a requirement. (7) Para 2: impact on significance should be assessed. (8) Para 5.3.42: Conservation Area Appraisals and Management Plan should be used to determine appropriateness of development	(1) Section 10 of the NPPF says that "Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas." There is an opportunity to reflect the local priorities for Leeds to maintain its distinct identity and P11 should be amended. (2) The City Council's register incorporates English Heritage's register and does not have to be explicitly referred to. It would better reflect Government policy which requires local authorities to set out a positive strategy for the conservation and enjoyment of the historic environment as a totality (not just listed buildings), including heritage assets most at risk through neglect, decay or other threats. (3) Regeneration Priority Areas in Section 4.4 of the DCS are major regeneration areas which address social and economic deprivation. Opportunities may exist within these Areas for area-based conservation-led regeneration schemes, but schemes	(1) Proposed change to para 1 of P11 adding: <i>"...and their settings will be conserved, particularly those elements which help to give Leeds its distinct identity: - the Victorian and Edwardian civic and public buildings, theatres, arcades, warehouses and offices within the City centre and the urban grain of yards and alleys. - the nationally significant industrial heritage relating to its textile, tanning and engineering industries, including its factories, chimneys and associated housing. - its legacy of public parks, gardens and cemeteries. The 19th century transport network, including the Leeds and Liverpool Canal.</i>

	<p>proposals.</p>	<p>outside these Areas cannot be ruled out. Amend policy accordingly. (4) Non-designated heritage assets will be identified as development proposals come forward or in advance in a "local list" (but see response (1) Rep no 0062 above). (5) The NPPF, paras 203-206 set out the requirements for the use of planning conditions and obligations. Development plan policies are therefore a crucial pre-determinant in justifying the seeking of any planning obligations since they set out the matters which, following consultation with potential developers, the public and other bodies, are agreed to be essential in order for development to proceed [emphasis added]." It is therefore considered appropriate to include this para. (6) Para repeats section 128 and 129 of the NPPF and should be omitted to avoid duplication. (7) Agreed. Amend text. (8) Agreed. Amend text.</p>	<p>(2) Proposed change to para 5 to refer to "<i>register of historic assets at risk</i>" instead of "buildings at risk register." (3) Proposed change: add further paragraph to P11: "<i>Conservation-led regeneration schemes will be promoted. Priorities for new schemes will be in Regeneration Priority Areas, but schemes outside these areas may be identified where eligibility criteria are met.</i>" (4) No change. (5) No change. (6) Proposed change: delete para 3 of P11. (7) Proposed change to second sentence of para 3: "Heritage statements assessing the significance of assets, <i>the impact of proposals</i> and mitigation measures..." (8) Proposed change: add new second sentence to 5.3.42: "<i>Within conservation areas, development proposals will be assessed against the respective conservation</i></p>
--	-------------------	--	--

			<i>area appraisal and the Council will seek to conserve those elements which have been identified as contributing to the special interest of that conservation area.”</i>
0106 Aberford Parish Council	(1) There is a strong role for village and neighbourhood design statements.	(1) Agree. It should be noted that where village and neighbouring design statements have been prepared and adopted as SPDs, these are recognised as part of the LDF and will be used to inform planning decisions.	(1) No change.
0420 White Young Green for Airebank Developments	(1) Para 6 does not provide a robust cast for enabling development. (2) Para 5.3.43: economic development should be the priority where heritage assets are uneconomic.	(1) No change. Para 6 clearly articulates the justification for enabling development. (2) No change. NPPF seeks to balance social, economic and environmental objectives and provides the justification for setting aside presumption in favour of preserving heritage assets.	(1) No change. (2) No change.
29500 Conservative Group	(1) Should be reference to NPPF which requires justification for loss of historic assets.	(1) The intent of the NPPF is reflected in the DCS.	(1) No change.
3059 The Victorian Society	(1) 5.3.44: Buildings at Risk policy not strong enough and needs enforcement. (2) Industrial buildings need special policy. (3) Local listing required to protect buildings outside conservation areas. (4) A timescale for the objective of appraising the conservations areas should be set. The absence of Article 4 Directions in conservation areas is a concern.	(1) Para 5 of P11: should refer to appropriate action to secure repairs and sustainable use, including use of provisions in P(LB&CA)A 1990. Amend wording of P11 (2) Agreed. See response (1) to Rep no 0099 which refers to importance of conserving Leeds’ industrial buildings. (3) See response (1) to Rep no 0062 above. (4) The City Council is committed to carrying out appraisals for all of its	(1) Proposed change by adding extra sentence to para 5 P11: <i>“Where appropriate, the City Council will use the statutory provisions of the planning acts to secure repairs.”</i> (2) Proposed change – see response (1) to Rep no 0099. (3) No change.

		conservation areas, but the timescale for this has yet to be established. Article 4 directions have not been appropriate to the conservation areas appraised so far, but may be identified as appropriate in future appraisals.	(4) No change.
4816) Barton Willmore for Hammerson, UK Properties	(1) Exception to P11 where historic environment cannot be conserved.	(1) No change. NPPF seeks to balance social, economic and environmental objectives and provides the justification for setting aside presumption in favour of preserving heritage assets.	(1) No change.
5051 West Yorkshire Archaeology Advisory Service	(1) As Rep no 0099 (1). (2) As Rep no 0099 (7) (3) As Rep no 0023 (1) (4) As Rep no 0099 (6)	(1) Agreed. See response (1) to Rep no 0099. (2) Agreed. See response (7) to Rep no 0099 (3) Not agreed. See response (1) to Rep no 0023. (4) Not agreed. See response (6) to Rep 0099.	(1) Proposed change to para 1 of P11. See wording (1) Rep no 0099. (2) Proposed change to second sentence of para 3. See wording (7) Rep no 0099. (3) No change. (4) Proposed change – deletion of para. See Rep 0099 (6).
5681 Carter Jonas for -The Hatfield Estate, the Ledston Estate, the Diocese of Ripon and Leeds, Lady Elizabeth Hastings, AR Briggs and Co, the Bramham Park Estate	(1) No strategic objective relating to built or historic environment.	(1) Objective 12 supports the “positive use of the historic environment.”	(1) No change
Leeds Chamber of Commerce	(1) Provision for conservation is confined to a review of the City Centre Conservation Area boundary following an appraisal. (2) More proactive approach required in line with Section 12 of NPPF.	(1) Policy 11: Conservation applies City-wide. (2) Policy 11 <i>is</i> a positive approach to managing the historic environment.	(1) No change. (2) No change.

APPENDIX 2 – CHANGES TO CORE STRATEGY TEXT

Conservation

- 5.3.40 The historic environment of buildings and spaces is one of the key contributors to Leeds' identity, making it visually distinct from other cities. Leeds' historic environment is a finite resource which needs careful management, particularly in the balance between preservation and change.
- 5.3.41 In all cases change, especially harmful change, should be justified. The good management of the historic environment relies on informed conservation which identifies the historic significance of buildings and spaces and strategies to overcome harm. On the whole, considered innovation should be encouraged, except where the context demands a response which mimics *copies* the host. Sustainable construction is as relevant in an historic context as it is elsewhere.
- 5.3.42 Character assessments and management plans will be prepared and reviewed for conservation areas and other areas of significance. *Within conservation areas, development will be assessed against the respective conservation area appraisal and the Council will seek to conserve those elements which have been identified as contributing to the special interest of that conservation area.* Characterisation studies will be used to inform and understand the contribution of the historic environment.
- 5.3.43 The link between conservation and regeneration is strong and not mutually exclusive. Leeds has been fortunate in being awarded funding for several area-based conservation-led regeneration schemes, attracting inward investment from the public sector which has been more than matched by the private sector. There have been dramatic changes in the perceptions of the area caused by relatively small incremental enhancement which has at the same time sustained local identity and reinforced local pride. Opportunities for area-based conservation-based *led* regeneration schemes will be identified and applications for funding will be submitted where resources allow. These schemes shall be targeted at areas of the city which possesses an historic character and where there are significant regeneration opportunities.
- 5.3.44 The strong economy of Leeds has ensured that the stock of historic buildings are in use, but there is a significant number of listed buildings which are in poor repair and can be called Buildings at Risk. Where appropriate the repair and refurbishment of Buildings at Risk will be secured through planning condition or planning obligation.

POLICY P11: CONSERVATION

The historic environment, consisting of archaeological remains, historic buildings townscapes and landscapes, including locally significant undesigned assets and their settings, will be conserved *and their settings will be conserved, particularly those elements which help to give Leeds its distinct identity:*

- *the Victorian and Edwardian civic and public buildings, theatres, arcades, warehouses and offices within the city centre and the urban grain of yards and alleys.*
- *the nationally significant industrial heritage relating to its textile, tanning and engineering industries, including its factories, chimneys and associated housing.*
- *its legacy of public parks, gardens and cemeteries.*
- *the 19th century transport network, including the Leeds and Liverpool Canal.*

Development proposals will be expected to demonstrate a full understanding of historic assets affected. Heritage statements assessing the significance of assets, *the impact of proposals* and mitigation measures will be required to be submitted by developers to accompany development proposals.

~~Archaeological investigation as part of development will be encouraged and information gained shall be used to enhance the Historic Environment Record.~~

Innovative and sustainable construction which integrates with and enhances the historic environment will be encouraged.

Conservation-led regeneration schemes will be promoted. Priorities for new schemes will in Regeneration Priority Areas, but schemes outside these areas may be identified where eligibility criteria are met.

The Council maintains a ~~buildings at risk register~~ *register of historic assets* to help it prioritise action and will seek to impose planning conditions or obligations for their repair and refurbishment where appropriate. *Where appropriate, the City Council will use the statutory provisions of the planning acts to secure repairs.*

Enabling development may be supported in the vicinity of Listed Buildings and in Conservation Area *Areas* where linked to the refurbishment or repair of heritage assets. This will be secured by planning condition or planning obligation.

Appendix 1

Core Strategy Publication Draft - Analysis of Consultation Responses

Policy P12 – Landscape

Representor/Agent	Representor Comments	LCC Initial Response	Action
0018 Harrogate Borough Council	Policy could be more effective if it referred to related documents such as any Landscape Character Assessment	Agree. Refer to Leeds Landscape Assessment and to the list of relevant background documents that will be in the Core Strategy	'Proposed Change' Add a note regarding related documents under para 5.3.49 (1)
0023 Otley Conservation Task Force	<p>The comments are very much confined to Otley but they also refer to “cross – boundary” issues relating to Landscape context.</p> <p>The comments make reference to various sections of the Core Strategy that are not relevant to Landscape Policy</p> <p>The comment suggests that paragraph 5.3.49 should be expanded to clarify the term “<u>mitigated against</u>” to prevent mitigation being relocated to another site where it will not be relevant.</p>	<p>Note: these comments are almost identical to comment 5890 by Mr I Andrew</p> <p>Agree that there is inter-visibility beyond the boundaries of Leeds</p> <p>These comments will be considered in the relevant sections of the analysis.</p> <p>Comment accepted.</p>	<p>'Proposed Change' Add a note under para 5.3.49 (2) that refers to landscapes beyond Leeds city boundaries</p> <p>No change</p> <p>'Proposed Change' Add wording under para 5.3.49 (3) that refers to mitigation being <u>appropriate</u></p>

	<p>The comment suggests another paragraph should be added to reinforce the references in Paragraphs 5.3.47 and 5.3.48 to nationally-important landscapes just outside the administrative boundary (such as Nidderdale AONB in this instance)- this is another reference to cross – boundary issues which has been dealt with above (2)</p> <p>The comment suggests changing the actual policy P12 where it refers to “Leeds’ townscapes and landscapes” to a broader list to include market towns etc.</p>	<p>This is another reference to cross – boundary issues which has been dealt with above (2)</p> <p>The existing description is adequate for the purpose.</p>	<p>No change</p> <p>No change</p>
0062 Leeds Civic Trust	<p>The policy seems only to be concerned about the effect of new development on existing landscapes. Mention should be made of creating new distinctiveness</p> <p>The LA is required to carry out landscape character assessments which will guide development, as indicated within the recently published NPPF</p>	<p>New distinctiveness is covered by the word “enhance” in para 5.3.48 i.e. <i>The Council seeks to protect and enhance the varied landscapes of Leeds</i></p> <p>NPPF clause 170 states: <i>Where appropriate, landscape character assessments should also be prepared.....</i></p> <p>Leeds has a recently updated Landscape assessment already which is sufficient for present needs. Also clause 170 of the NPPF is written in the context of Historical Landscape Assessment which is not directly relevant to this policy.</p>	<p>No change</p> <p>No change</p>

	<p>Policy appears weak because the saved policies in the UDP cover detailed aspects</p> <p>The comments make reference to sections of the Core Strategy that are not relevant to Landscape Policy</p> <p>The comments recommend that a new policy should be created on existing and proposed Public Realm.</p>	<p>This has been addressed in a proposed change (1) in reply to 0018 above. The text of the policy will now make reference to related documents which will include saved policies.</p> <p>These comments will be considered in the relevant sections of the analysis.</p> <p>The Public Realm is a very broad term but it does relate to landscape so we would agree that some mention should be made in the policy text. The term may also be related to other policies.</p>	<p>No change</p> <p>No change</p> <p>'Proposed Change' Add the phrase "<i>Public Realm</i>" in para 5.3.47</p>
0099 English Heritage	<p>The Policy is very generic and provides no indication which landscapes might be of special importance. It is suggested to amend the Policy to provide more locational specificity</p>	<p>The policy actually does state in para 5.3.47 that all types of landscape are important. Para 5.3.49 also states that landscape assessments are not limited but can be appropriate to any form or scale.</p> <p>Specific locations are identified in the Leeds Landscape Assessment. The figure entitled Management Strategies within this document does give some evaluation of quality as does the Special Landscape Areas.</p>	<p>No change</p>
0106 Aberford Parish Council	<p>Strong role for village and neighbourhood design statements.</p> <p>Specific reference to the status of these plans and the need for reference to be made to them in these policies (and others where appropriate).</p>	<p>The role of Village and Neighbourhood Design Statements is recognised and a number of these have been adopted as guidance and as Supplementary Planning Documents as a basis to inform planning decisions.</p>	<p>No change</p>
2656 CPRE	<p>CPRE would welcome an inclusion</p>	<p>All documents relevant to the Landscape policy</p>	<p>No change</p>

<p>Yorkshire & Humber</p>	<p>of conserving existing landscape designations as defined in the Unitary Development Plan, in order to strengthen the Policy.</p> <p>The comment also refers to Policy EN3 Low Carbon Energy, and to the desire to protect internationally designated nature conservation sites.</p>	<p>P12 will be listed under relevant documents in the Core Strategy. A change is already proposed to reference Saved Policies within the text of the Landscape policy in para 5.3.49 in response to 0018 above</p> <p>These issues are addressed in the relevant policy sections.</p>	<p>No change</p>
<p>5051 West Yorkshire Archaeology Advisory Service</p>	<p>WYAAS is currently carrying out an English Heritage-funded project to characterise West Yorkshire's Historic Landscape (expected completion by c2015). They are urging that the Historic Landscape Characterisation work be mentioned in the Core Strategy as influencing what might be appropriate in maintaining local character as per the NPPF (see para 170 and para. 156, bullet point 5)</p> <p>They claim that this, maintaining of local character, would be directly relevant to Policy P12: Landscape.</p>	<p>Historic Landscape Characterisation is an emerging document which may be available c 2015. This document will be relevant so it can be added to the list of relevant documents that will be in the Core Strategy. It is already proposed to add a reference in the Landscape policy to the list of relevant documents in the Core Strategy (as in para 5.3.49 in response to 0018 above)</p> <p>Maintaining landscape character is adequately covered in the policy wording under para 5.3.47 and 5.3.48</p>	<p>No change</p> <p>No change</p>
<p>5681 Meadowside Holdings Ltd; The Hatfeild Estate; The Bramham Park Estate; The Ledston Estate; The Diocese of</p>	<p>Supportive comment of the policy as it recognises the intrinsic value of much of the landscape around the City which makes up 70% of the District by area.</p> <p>Arbitrary local designations should</p>	<p>The wording of the policy does equally recognise the whole of the Leeds district including the urban areas</p> <p>Non specific comment</p>	<p>No change</p> <p>No change</p>

Ripon & Leeds; Lady Elizabeth Hastings, Estate Charity; AR Briggs and Co, via Carter Jonas	be avoided.		
5890 Mr Ian Andrew	the same as those in 0023 (Otley Conservation Task Force)	These comments have already been responded under 0023 above	No change

APPENDIX 2 – CHANGES TO CORE STRATEGY TEXT

Landscape

- 5.3.45 Leeds is the second largest metropolitan authority area in the country, encompassing a wide variety of landscapes and land-uses. As well as the intensive urban landscape of the City Centre, and the associated landscapes of the outer urban settlements, almost 70% of the authority is made up of rural landscapes.
- 5.3.46 Landscape provides the setting for our day-to-day lives and contributes towards our 'sense of place'. Its distinctiveness is a consequence of its character, quality, biodiversity, cultural, archaeological and historical form, to function as an environment for plants, animals and us, and as a recreational resource.
- 5.3.47 Landscape does not just mean special or designated landscapes, for example Special Landscape Areas or Sites or Local Nature Areas, nor does it only apply to the countryside. Landscape can also mean landscape character which is the pattern that arises from the combination of both natural and cultural components. Landscape can be perceived *in numerous forms including large open spaces, the public realm, a park, a small patch of land, a garden or a single tree.* All are important elements in their own right.
- 5.3. 48The Council seeks to protect and enhance the varied landscapes of Leeds and the assets they contain. Landscape assets can mean anything from locally valued trees, to the countryside or nationally designated landscape, fauna and flora. The Council also seeks to provide stewardship of valued existing landscapes in the absence of development.
- 5.3.49 Landscape is integral to the planning and design process of development. *Consideration shall be given to relevant Council Documents such as UDP saved policies and background information including the Leeds Landscape Assessment.* Landscape assessments are not limited to Environmental Impact Assessments but can be appropriate for any form or scale of development. Early engagement with the City Council is encouraged to ensure that any negative impacts on landscape *(either within or beyond Leeds city boundaries)*, as a result of development proposals, are averted. ~~or mitigated against~~ *Where negative impacts cannot be averted then appropriate mitigation must be provided.*

POLICY P12: LANDSCAPE

The character, quality and biodiversity of Leeds' townscapes and landscapes, including their historical and cultural significance, will be conserved and enhanced to protect their distinctiveness through stewardship and the planning process.

Appendix 1

Core Strategy Publication Draft - Analysis of Consultation Responses

SP13, G1 to G6

SP13 Strategic Green Infrastructure

Representor/Agent	Representor Comments	LCC Initial Response	Action
0106 Aberford Parish Council	This policy rightly identifies the importance of the Limestone Ridge as key strategic green infrastructure for the district. However, the key diagram and map 14 only identifies part of this character area as defined by the Countryside Commission (character area 30). The whole of the magnesian limestone area should be included and include the settlements contained within it.	The character area exercise was not an exercise to identify areas of Green Infrastructure. The countryside commission character areas include land outside the scope of SGI as explained at para 4.10.5. The explanation of SGI could be improved in this section by reordering of the paragraphs. The cross reference to the information shown on map 14 and the key diagram could also be improved.	Minor change: Reorder paragraphs 4.10.3 to 4.10.6 and improve cross reference to map 14 and key diagram.
0112 Boston Spa Parish Council	There is little reference to hedgerows and the important contribution that they make to the landscape. <i>More emphasis should be placed on the importance of hedgerows and in particular trees within hedgerows.</i>	SGI is not limited to landscape but to the many functions that it can perform. However, agree that hedgerows can form an equally important role within SGI and, therefore, should be referenced.	Minor change. Insert reference to <i>hedgerows</i> in paragraph 4.10.3
4572 Leeds Local Access Forum	the absence from the document of any reference to public rights of way (PROW)	Agree with objector. This was addressed in the preferred approach but is absent from the	Minor change. Insert new paragraph between 4.10.3 & 4.10.4.

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>and the PROW network is a serious omission. The Strategy can be made more effective by inclusion of the following paragraphs:</p> <p>Not all of Leeds' GI is easily accessible, and therefore one of the key objectives of the Core Strategy is to improve people's access, wherever they live, to a network of greenspaces, including major city parks, green corridors, river and canal corridors, nature reserves and woodlands.</p> <p>The network of public rights of way (PROW) represents the arteries that help people access the countryside and urban greenspace, linking people with place, and linking urban to rural. Leeds has a total path network of 799km of footpaths, bridleways and byways, plus a number of 'permissive' paths that enhance this network.</p> <p>Included within this total are key strategic routes (such as the Leeds Country Way), local recreational routes (such as the Meanwood Valley Trail)</p>	<p>publication draft. Additional paragraph to be inserted similar to that suggested with some minor amendments.</p>	<p><i>"4.10.3 a Not all of Leeds' strategic Green Infrastructure is easily accessible. An objective of the core strategy is to improve access. The network of public rights of way (PROW) represents the arteries that help access the countryside and urban green space, linking people with place, and linking urban to rural. Leeds has a network of 799km of footpaths, bridleways and byways. Leeds City Council has prepared a Rights of Way Improvement Plan (ROWIP), which sets out an Action Plan over the period 2009-2017. There is an interdependent relationship between the need to protect, enhance and add to the strategic Green Infrastructure and supporting improvement of the PROW network in planning the future of Leeds. All development proposals should have regard to the ROWIP where relevant."</i></p> <p>Add reference to ROWIP in glossary.</p>

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>and open access land, with Hawksworth Moor the largest area.</p> <p>The Council has prepared a Rights of Way Improvement Plan (ROWIP), which sets out an Action Plan over the period 2009-2017. There is therefore a strong and interdependent relationship between the need to protect, enhance and add to the GI and the corresponding need to support the improvement of the PROW network in planning the future of Leeds at all spatial levels. All development proposals should have regard to the ROWIP where relevant.</p>		
<p>5121 Directions Planning on behalf of Mr Haigh</p>	<p>We cannot understand why agricultural land has been identified as Green Infrastructure, as it does not fit within the description of Green Infrastructure and it does not perform several of the functions.</p> <p>In particular, we object to the inclusion of land to the west of Dewsbury Road and east of Morley, as shown on the Key Diagram, because it does not perform any of the functions</p>	<p>The Key Diagram is indicative. Map 1 in the Map Book of the Core Strategy Preferred Approach is deliberately blurred in that location, to demonstrate a mixture of GI and non GI, as the open land adjoins the settlement limits of Morley. The diagram is not site specific. The use of strips as a notation was designed in order to avoid having any site specific edge but to indicate the strategic location. Agree that a Green Belt designation is not sufficient in its own right to</p>	<p>Minor change: Amend text at 4.10.4 to assist understanding of SGI shown on plan 14 and key diagram. Also legend needs amending to refer to SGI and not GI.</p>

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>set out in diagram 5, and certainly does not perform several of the functions as stated is a requirement of Green Infrastructure under paragraph 4.10.5. The land is ploughed for crops, which limits the biodiversity value of the land. The size of the land means it is of limited economic value. There are no rights of way over the land so it does not provide a recreational function and also does not deliver health and well-being value. It is not in an areas subject to flood risk, and it does not contribute to the townscape of Morley given it is beyond the limits of the settlement and borders relatively modern housing development. The land is currently Green Belt, but this designation should not automatically result in reaching the conclusion that the land also fulfils the function of Green Infrastructure. The Council appear to be layering constraints unnecessarily. The definition and functions of</p>	<p>generalise land as fulfilling the multi-functionality of SGI. It is not necessary to establish the definition of SGI within a policy.</p>	

Representor/Agent	Representor Comments	LCC Initial Response	Action
	Green Infrastructure should be spelt out in the actual policy rather than the supporting text. If the policy is intended to maintain and enhance key corridors then it is necessary for the policy itself to set out all policy considerations.		

G1 Enhancing and Extending Green Infrastructure

Representor/Agent	Representor Comments	LCC Initial Response	Action
0046 Environment Agency	The policy should set out a requirement that development proposals should ensure that opportunities for flood storage creation are incorporated as appropriate.	Disagree. This issue is adequately accommodated at policy EN5 and explained as one of the functions of GI at SP13. Further direction as part of this policy is not appropriate.	No change
0050 Leeds, York and North York Chamber of Commerce	Green infrastructure plays a key role in the vitality and quality of the City and the distinctiveness of Leeds as urban settlement can be enhanced through greater emphasis being placed upon its existing assets, in particular the 'green corridors' which run into the City Centre. Their role and quality should be better recognised in order to ensure that Leeds is a distinctive and beautiful city for future	Noted. These themes run through the document from the objectives through to the specific policies regarding GI.	No change

Representor/Agent	Representor Comments	LCC Initial Response	Action
0062 Leeds Civic Trust	<p>generations.</p> <p>Whilst G2 mentions biodiversity, this is an important aspect of green infrastructure which is not mentioned in the justification and policy G1. Add to G1 (v) provision for and retention of biodiversity and wildlife</p>	Agree	<p>Minor change. Insert additional criterion to policy G1 as follows: “(v) provision for and retention of biodiversity and wildlife”.</p>
0111 Barwick in Elmet & Scholes Parish Council and 5874 Barwick in Elmet & Scholes Neighbourhood Development Plan Steering Group	<p>Maintaining a Green Buffer Zone between the Leeds urban area and the villages of Scholes, Thorner and Barwick in Elmet in the outer North East Quadrant has long and historically been the position of Leeds City Council. MAP 14 indicates no such protection. It is appreciated that allocated land for the East Leeds Urban Extension and an Orbital Road is projected in this area, therefore the importance of green infrastructure at this location is deemed essential.</p>	<p>No buffer zone is identified or referred to in the Leeds UDP, unless this is a reference to the fact that the land is identified as Green Belt.</p> <p>The majority of the land referred to currently functions as intensively managed agriculture. This land does not satisfy the Strategic Green Infrastructure multi-functional requirements established at para 4.10.5.</p>	No change.
1982 Sport England	<p>This policy and the supporting text read as solely being concerned with natural conservation. This term also includes sporting facilities and informal recreation. GI maps include key area areas of</p>	<p>Agree that sport and recreation needs referencing within the supporting text, but disagree that this requires inclusion within the policy. Not all functions are listed, nor is that the purpose of the policy.</p>	<p>Minor change: Amend supporting text at para 5.5.1 to include reference to “<i>sport</i>”</p>

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>outdoor sports facilities and routes used by runners and cyclists. Policy G1 and others in this section should acknowledge sport and recreational needs of GI and deal with potential conflicts between these uses and natural conservation. Sport England propose bullet i) is expanded to include “and where sites have a sporting or recreation function” after the semi colon.</p>		
<p>2391 Yorkshire Wildlife Trust</p>	<p>Welcome this policy and particularly support the use of green roofs. It would be beneficial if developers produced a site based plan to demonstrate how green infrastructure would be multifunctional and deliver sustainability objectives as suggested by Natural England. This is supported by the NPPF which states that 'Local planning authorities should: set out a strategic approach to their Local Plans, planning positively for the creation, protection, enhancement and management of networks of</p>	<p>Noted. These issues are also addressed in G2, G7, G8 and SP13.</p>	<p>No change</p>

Representor/Agent	Representor Comments	LCC Initial Response	Action
	biodiversity and green infrastructure’.		
4572 Leeds Local Access Forum	Recommend the Strategy be made more consistent with national planning policy. In particular, paragraph 75 of the recently-published National Planning Policy Framework states: Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks, including National Trails.	Agree, include additional text Opportunities are taken to enhance public rights of way (PROW) by adding links to the existing PROW network.	Minor change. Insert additional criterion into policy G1 <i>“Opportunities are taken to protect and enhance the public rights of way PROW network through avoiding unnecessary diversions and by adding new links.”</i>
5121 Directions Planning on behalf of Otley Town Council and Mr and Mr A Haigh	Criterion (i) contradicts the first part of the policy, as the Green Infrastructure function cannot be retained or improved if land is to be developed. This needs to be removed or more clearly explained, as otherwise it will lead to conflicts. The circumstances in which criterion (iv) will be applied requires clarification. It is not appropriate to simply state ‘opportunities’, as appropriate opportunities need to be	The initial observation is incorrect. Development and the retention of GI function and enhancement are not mutually exclusive. The proposed development will need to be sympathetic to its location within SGI to achieve the policy goal. This is the approach advocated by the policy. Agree that criterion (iv) is not specific, but not all sites are appropriate for tree cover depending on site specific issues. Opportunities do not need to be defined.	No change.

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>defined within the Policy. We therefore object to Policy G1 in its present form. However, we do support the aim of the Policy in general, particularly as Otley has an aspiration to improve the green network by securing improvements to the river banks and increasing public access. Whilst much of the riverbank is open to the public, there are stretches which remain inaccessible due to historic development patterns. Redevelopment of sites along the river corridor, such as Ashfield Works, provides opportunities to improve accessibility. This Policy will help secure those improvements and supports the Otley Riverside Plan.</p>	<p>Overall support of policy intent is noted.</p>	
<p>5681 Carter Jonas on behalf of The Bramham Park Estate, Meadowside Holdings, The Diocese of Ripon & Leeds, The Hatfield Estate, Lady Elizabeth Hastings</p>	<p>Whilst supporting the basis of this policy we would question the effectiveness of the policy, and the Council's ability to deliver green infrastructure, where land required may be in third party ownership or otherwise beyond the control of a developer, particularly the ability to link networks and to</p>	<p>The concern over delivery is noted This reality is true of all strategically ambitious projects which require an extended time frame and the cooperation of many parties to be delivered. The links can only ever be delivered over the longer term as and when sites come forward for development or large funded capital works schemes are created such as</p>	<p>No change</p>

Representor/Agent	Representor Comments	LCC Initial Response	Action
Estate Charity, The Ledston Estate, AR Briggs & Co,	provide transition as required by provisions (ii) and (iii).	the Trans-Pennine Trail.	
5719 RED Property Services on behalf of Scarborough Development Group	Support	Noted	No change
5867 LDP Planning on behalf of Hileys Solicitors	G1 could effect the delivery of housing in some areas of the district	Noted	No change
5872 Mr Martin Gostling	Map 14 is unsound as it is not effective as it does not recognise the green infrastructure located around Rawdon. There is substantial green infrastructure to the North of Rawdon. The area sits between Rawdon, the airport and Horsforth. The Billing is a fantastic landscape feature that commands impressive far reaching views towards the Dales to the North, across the entire city and beyond to countryside around the A1 to the East and to the fells south of West Yorkshire. This is one of the many reasons why this area of green land is much used by residents.	This land is not strategic in scale and does not satisfy the SGI requirements established in para 4.10.5. It is not the purpose of SGI to identify the landscape quality.	No change

G2 Creation of New Tree Cover

Representor/Agent	Representor Comments	LCC Initial Response	Action
0062 Leeds Civic Trust	welcome the intention to increase tree cover, particularly in urban areas. However, there appears to be a resistance to this because of the perceived effect on underground services and street management. The wording of the last sentence of the policy will not ensure street tree planting. Replace with "Development in the urban area of the city, including the city centre will include the planting of street trees in appropriately designed pits to increase the area of tree canopy cover".	Agree wording needs to be strengthened.	Minor change. Replace final sentence of G2 as follows: <i>"Development in the urban area of the city, including the city centre, will include the planting of street trees in appropriately designed pits to increase the area of tree canopy cover"</i>
2391 Yorkshire Wildlife Trust	We support the planting of trees within the district however it should be highlighted that trees should not be planted on land which is already of high biodiversity value unless it is appropriate to the ecology of the site.	Noted, but if the site in the scenario highlighted is of such high biodiversity value it is most unlikely that the council will ever be required to consider an application for development. The policy includes the term 'appropriate' which would accommodate this remote possibility.	No change.
4825 Morley Town Council	Agree that woodlands are deficient in Morley. Wasteful coal-burning between about	Noted.	No change.

Representor/Agent	Representor Comments	LCC Initial Response	Action
	1850 and 1970 killed many trees. Since the 1960s there has been much planting and some self-seeding, so the landscape is less bald than it was forty years ago.		
5681 Carter Jonas on behalf of The Bramham Park Estate, Meadowside Holdings, The Diocese of Ripon & Leeds, The Hatfield Estate, Lady Elizabeth Hastings Estate Charity, The Ledston Estate, AR Briggs & Co,	The policy is not strategic and can be deleted as it can be dealt with under the provision (iv) of G1.	Incorrect assertion. Policy G1 is concerned with enhancing green infrastructure. Policy G2 concerns both rural and urban locations; specifically mentioning street trees and increasing tree cover in the city centre. Some of these areas, where additional tree planting is required do not fall into the provisions of policy G1.	No change.

G3 Standards for Open Space, Sport and Recreation

Representor/Agent	Representor Comments	LCC Initial Response	Action
0062 Leeds Civic Trust	Generally support the new and improved standards set out in these three policies. However, the open space standard for city centre residential development at 4sqm /person is pitiful in comparison to the 80sq m per residential unit for development outside the city centre. Families need to be attracted to the city	The evidence and justification for the city centre open space standard is set out in the council's open space study at chapter 12. This document also explores the definitions of open space, green space and civic space. The study accepts that the city centre is deficient in open space and green space for the needs of the residents	Minor changes. Add definition of open space to the glossary as follows: <i>"Open space – Greenspace with the addition of civic space, usually comprising hard landscaped open areas for public gathering and churchyards.</i>

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>centre especially city centre south and this figure needs upward revision, if only for City Centre South, where the intention should be to attract existing and newly-formed families from those singles and couples already living in the city centre. The city centre requirement is for “open space” which is not defined in the glossary, whereas elsewhere the requirement is for “greenspace”. This reflects the apparent reluctance of the city council to provide “green” areas (i.e. grass) in the city centre as opposed to paved areas. Yet grassed areas are important oases in the heavily built up city centre, as can be witnessed on any sunny summer day when the few such areas there (Park Square and Merrion Gardens to name more or less the only two) are crowded with people taking advantage of the cool grass. There should be clear identification of locations for aspirational new greenspace provision, especially when it is a case of connecting green corridors for wildlife and footpaths/cycleways. These should not be substituted for ‘off-site’ green space provision. Need</p>	<p>and visitors. Deficiencies will be explored in more detail through the site allocations document. However, the deficiencies of an area need to be balanced with the crucial role of the city centre as the centre of commerce for the region, the size of sites which are likely to become available and land values. Policy decisions need to be both viable and deliverable –see NPPF 2012).</p>	

Representor/Agent	Representor Comments	LCC Initial Response	Action
	to identify areas deficient of green space		
0092 Home builders Federation	Stipulating that major developments must contribute to sports and play provision in accordance with standards set out in the policy is unsound as it has not been assessed for its impact on the viability of housing delivery as required by the NPPF. The requirement may also be unlawful as being contrary to the CIL Regulations.	Policy ID2 considers the potential duplication between S106 obligation financial contributions and the introduction of CIL. This does not become an issue until the council adopts CIL or April 2014 when pooling of five financial contributions sought through s106 agreements will be contrary to the CIL regulations. Until this time the three revised tests will continue to be applied to any financial contribution sought through a planning obligation. Viability testing is currently being considered as part of the council's preparations for adoption of CIL. Viability testing of green space contributions, both on-site and off-site was also considered as part of the viability testing undertaken by DTZ for the affordable housing SPD. On-site delivery of green space for residents of new residential development will remain unaffected by the introduction of CIL.	No change.
1186 ID Planning on behalf of TG & MF Emsley 5671 ID Planning on behalf of ELE	The increased green space requirements are unsound as the increased green space standards have not been justified or its impact viability tested. It is	The standards are explained and justified in considerable detail in the council's open space assessment which forms part of the evidence for the core strategy. Viability testing is	

Representor/Agent	Representor Comments	LCC Initial Response	Action
<p>Northern Quadrant Consortium, Wortlea Estates, Great North Developments Ltd c/o Evans Property Group, Barratt Homes, David Wilson, Great North Developments, Robert Ogden Partnership Ltd, Redrow Homes (Yorkshire) Ltd, Edmund Thornhill Estates, Housebuilder Consortium 5867 LPD Planning on behalf of Hileys Solicitors 5895 Barratt Homes, David Wilson Homes, Yorkshire Homes</p>	<p>maintained the increased standards would compromise the delivery of family dwellings due to the percentage of each development site that would be given over to meet this requirement.</p>	<p>currently being considered as part of the council's preparations for the adoption of CIL.</p> <p>The overall green space standards do not differ from the UDP standards. It is the policy application of the standards and the split between the various typologies which is different.</p>	
<p>1982 Sport England</p>	<p>Although we would welcome the aims of this section it has not been founded on a robust and credible evidence base. This requirement is reiterated in the NPPF at paragraph 158 which states that local authorities should ensure that local plans are based on adequate, up to date and relevant evidence.</p>	<p>To update this study every three years is unrealistic. The detailed data collection took over a year to complete and involved considerable staff resources. Over 2,000 sites were quality assessed and plotted. However, major influences on playing field and outdoor sports supply such as remodelled BSF and PFI schools were not audited until</p>	<p>No change.</p>

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>The Leeds Open Space and Recreation Assessment is already out of date with much of the data collection dating back to 2008/09. Sport England advise that to be up to date research should ideally be reviewed annually and as a minimum reviewed or monitored every three years. Leeds has seen huge changes in its playing field stock since 2008.</p> <p>This evidence is weak in terms of its methodology which does not follow fully the requirements of a playing pitch strategy and should not be substituted as such. Sport England has fundamental concerns over the identification of standards for outdoor sports facilities in policy GS3. This evidence is flawed in that it has lacked any consultation with the sport's governing bodies concerned, who have a strategic role and knowledge of demand and supply as well as their own targets to drive up participation through their whole sport plans. We understand a pitch strategy was produced by the authority in 2002 but has never been revisited since.</p> <p>On the basis of an up to date</p>	<p>completion of the construction works in order to ensure the data was robust. The indoor sports data considered the latest closures at East and South Leeds sports centres to ensure the audit data was as robust as possible.</p> <p>The open space assessment was never intended to fulfil the role of a playing pitch assessment. Indeed, the PPG17 assessment acknowledges that the 2002 playing pitch assessment requires an update, see paragraphs 3.38, 3.41 and in Chapter 13, action point 19.</p> <p>The standard for outdoor sports provision safeguards the status quo pending the production of an up-to-date playing pitch strategy.</p> <p>Sports bodies and strategic sports partnerships were consulted at various stages during preparation of the study.</p> <p>Protection of green space using these standards is considered at policy G6. Protection of community facilities is considered at policy P9. See amendments to P9 to specifically reference sport and</p>	

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>evidence base, the Core Strategy should contain policies that protect and enhance both indoor and outdoor sport facilities. The policy should also encourage the development of new sport facilities in locations where they will serve demand. The policy should be clear that the loss of such facilities should only be acceptable where a suitable replacement is provided, or a robust assessment of need has demonstrated that the facility is genuinely surplus to requirement.</p>	<p>recreation facilities.</p>	
<p>2391 Yorkshire Wildlife Trust</p>	<p>Whilst we understand that NE's Accessible Natural Green space standard cannot be achieved within the area we feel that the standards set in Policy G3 should be seen as a minimum and that consideration should be given to how this can be improved in the future. Opportunities to create new areas of green spaces which link into the green infrastructure network should be identified at an early stage to ensure that they can be protected from development. Larger sites should also be required to create a green infrastructure delivery plan.</p>	<p>Noted.</p>	<p>No change</p>
<p>5666 J and J Design</p>	<p>Core Strategy is silent on the need</p>	<p>Agree that this is currently an</p>	<p>Major change</p>

Representor/Agent	Representor Comments	LCC Initial Response	Action
<p>on behalf of Horsforth Gospel Trust</p>	<p>for Cemeteries and Burial Space. The increasing population in Leeds will result in increased need for burial facilities in order to meet the needs of members of the community who require Christian burial (and other religions) and will not accept cremation. The failure to provide policy support to address local needs will be likely to result in the Council failing to meet its Vision for Leeds and especially Objectives 11 and 24. For these reasons we submit that the CS will fail the test of 'effectiveness'.</p> <p>ADD 5.3.35A Leeds City hosts three crematoria and 22 cemeteries, which were opened between 1845 (Beckett Street) and 1932 (Lofthouse). Several of these, particularly in the north west of the City, have reached capacity. These continue as an integral part of the Green Infrastructure of the City. The need to travel to remote alternative cemeteries if contrary to the Core Strategy objective 16. It is recognised that provision of new cemetery space will be required during the plan period. The</p>	<p>omission, given the impending shortages of burial space and its spatial importance.</p> <p>Although the objector has raised the objection as an omission under community facilities it is also related to the other green space types discussed in the environmental resources section, although a provision standard will not be created.</p> <p>A criteria based policy would be more efficient than that suggested. The policy as suggested duplicates existing legislation which requires the authority to provide sufficient burial space to meet need.</p>	<p>Insert new policy and supporting text as <i>"The city accommodates three crematoria and 22 cemeteries. Several of these, particularly in the north west of the city, are near capacity. Provision of new cemeteries and burial space will be required during the plan period. Future provision will be in the form of extensions to existing cemeteries combined with new smaller, locally based sites.</i></p> <p><i>Policy xx – Cemeteries and Burial Space</i></p> <p><i>Development proposals for cemetery and burial facilities will be permitted where they can demonstrate:</i></p> <ul style="list-style-type: none"> • <i>easy access by public transport, walking and cycling;</i> • <i>easy and safe access to people with disabilities;</i> • <i>there would not be demonstrably harmful impact on the character of the surrounding area and the amenities of nearby residential properties and other uses; and</i> • <i>the scale is appropriate to identified local need.</i>

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>Council will also make provision for green burials. Cemetery provision is not inappropriate development within the green belt.</p> <p>Policy 9A – Cemeteries and Burial Grounds.</p> <p>New cemetery space and burial grounds will be provided to meet the needs of communities during the plan period. The scale of provision will reflect the level of need within the community and its proposed location will have regard to the accessibility of the site together with appropriate environmental considerations including ground conditions.</p>		
<p>5681 Carter Jonas on behalf of The Bramham Park Estate, Meadowside Holdings, The Diocese of Ripon & Leeds, The Hatfield Estate, Lady Elizabeth Hastings Estate Charity, The Ledston Estate, AR Briggs & Co,</p>	<p>We have no comment upon this policy but would reiterate the position that quantity of provision should be balanced against quality and accessibility to areas of open space.</p>	<p>Noted</p>	<p>No change</p>
<p>5857 Friends of Allerton Grange Fields</p>	<p>Support Principle of G3 and the exclusion of education from Outdoor Sports Provision as it is</p>	<p>The justification for the 10 minute drive time (i.e. 3.2km) standard to playing fields and bowling greens is</p>	<p>No change</p>

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>recognised that school outdoor sports facilities are not always available or desirable for open public use.</p> <p>Question why a 3.2km accessibility criterion has been set for bowling greens and grass playing pitches? It is not clear from the PPG17 Leeds Open Space, Sports and Recreation Assessment as to how this accessibility criterion has been justified. Feel that grass playing pitches should be within walking distances of residential areas. It is noted that 720metres is used as the accessibility criteria for Tennis Courts. Believe that there is a strong case to apply the same accessibility criteria (720 metres) for grass playing pitches (as tennis courts and grass playing pitches are both Outdoor Sports open space types as recognised by PPG17). Support the 720metres accessibility criteria for Parks and Gardens.</p> <p>From reviewing the PPG17 'Leeds Needs and Opportunities for Open Space, Sport and Recreation Report' (July 2011), note that the western part of Roundhay Ward (as part of Inner Leeds North East) has a deficiency in green space</p>	<p>detailed at paragraphs 7.61, 7.67 to 7.68 of the Leeds open space assessment.</p> <p>Support is welcomed for the other standards.</p>	

Representor/Agent	Representor Comments	LCC Initial Response	Action
	provision.		

G4 New Greenspace Provision

Representor/Agent	Representor Comments	LCC Initial Response	Action
0062 Leeds Civic Trust	<p>Generally support the new and improved standards set out in these three policies. However, the open space standard for city centre residential development at 4sqm /person is pitiful in comparison to the 80sq m per residential unit for development outside the city centre. Families need to be attracted to the city centre especially city centre south and this figure needs upward revision, if only for City Centre South, where the intention should be to attract existing and newly-formed families from those singles and couples already living in the city centre. The city centre requirement is for “open space” which is not defined in the glossary, whereas elsewhere the requirement is for “greenspace”. This reflects the apparent reluctance of the city council to provide “green” areas (i.e. grass) in the city centre as opposed to paved areas. Yet grassed areas are important oases in the heavily built up city centre, as can be witnessed on any sunny summer day when the few such</p>	<p>The evidence and justification for the city centre open space standard is set out in the council’s open space study at chapter 12. This document also explores the definitions of open space, green space and civic space. The study accepts that the city centre is deficient in open space and green space for the needs of the residents and visitors. However, this needs to be balanced with the crucial role of the city centre as the centre of commerce for the region, the size of sites which are available and land values.</p> <p>Proposals already exist which identify sites in the southern part of the city centre for new public realm and green space enhancements. The sites at South Bank and Sovereign Street will significantly increase the quantity and accessibility of open space in the central and South area.</p>	No change

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>areas there (Park Square and Merrion Gardens to name more or less the only two) are crowded with people taking advantage of the cool grass. There should be clear identification of locations for aspirational new greenspace provision, especially when it is a case of connecting green corridors for wildlife and footpaths/cycleways. These should not be substituted for 'off-site' greenspace provision.</p>		
0092 Home Builders Federation	<p>Stipulating that developments of 10 or more dwellings outside the city centre must contribute green-space of 80 square metres per unit is unsound as it has not been assessed for its impact on the viability of housing delivery as required by the NPPF. The requirement may also be unlawful as being contrary to the CIL Regulations.</p> <p>The NPPF requires that any requirements infrastructure contributions or other requirements should be assessed for viability to ensure that the CS is deliverable. The Council has not carried out such an assessment. The Economic Viability Assessment makes no allowance for the cost of this requirement. If the Council wishes to provide for green-space then the CIL</p>	<p>Policy ID2 considers the potential duplication between S106 obligation financial contributions and the introduction of CIL. This does not become an issue until the council adopts CIL or April 2014 when pooling of five financial contributions sought through s106 agreements will be contrary to the CIL regulations. Until this time the three revised tests will continue to be applied to any financial contribution sought through a planning obligation. Viability testing is currently being considered as part of the council's preparations for adoption of CIL. On-site delivery of green space for residents of new residential development will remain unaffected by the introduction of CIL.</p>	No change.

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>provides the most appropriate mechanism for raising the funds for doing so. Requiring that all developments make a contribution could be contrary to the CIL Regulations.</p>		
<p>480 Dacre Son and Hartley on behalf of Taylor Wimpey and Ashdale, Miller Homes, Kebbell, Keyland Developments, Mirfield, Chartford, Warner, Redrow, Barratt York, Barratt Leeds 1938 Redrow Homes Yorkshire</p>	<p>Object to G4 as this implies that in areas of existing deficiency development projects alone, and specifically residential development will become entirely responsible for making good identified deficiencies. A more flexible and balanced approach is required which is more consistent with policies G1, G3 and G6 and the content of the NPPF. The proposed standard of 80sqm/dwg would mean that for a one hectare site of 30 dwellings the on-site green space requirement would be 2,400 sqm, equivalent to nearly one quarter of the total. This is a significant increase on the UDP requirement which equated to 40sqm/dwg which is currently required on the basis of provision on or adjacent to the site.</p>	<p>The policy only requires that new residential development provide new green space proportionate to the needs generated by the development whilst complying with the standards for provision established in G3. New provision on residential development will do nothing to tackle existing quantitative green space deficiencies in an area. The population increase resulting from the development will off-set the new greenspace supply.</p> <p>The UDP N2 and N4 green space hierarchy if properly calculated resulted in a requirement of 80 sq.mtrs per dwelling. Only the amenity space requirement was 40 sq.mtrs per unit. The council has actually reduced the standard for amenity space, but this is compensated by the new requirements</p>	

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>At paragraph 5.5.13 of the text to G3 and elsewhere in this section the Council recognise that there is a need to more fully investigate deficiencies in provision and the ways in which these might be rectified. We would like the text to recognise that where there is a requirement to improve provision this has to be balanced against the requirements of other infrastructure shortcomings e.g. affordable housing, density, highway networks.</p>	<p>for allotment and natural greenspace. The text at paragraph 5.5.17 allows for alternative methods of greenspace delivery in lieu of on-site, taking into account the specific circumstances of the individual development.</p>	
<p>1935 McCarthy & Stone</p>	<p>Object to G4's proposal of 80sqm of green space to be provided per dwelling. The quality external greenspace and well designed internal communal areas are most important for our elderly residents. Residents will use high quality external seating areas but don't require large spaces to play sports! When considering amenity space the residents' lounge and the other communal facilities contained within the building need to be taken account of as these are well used. Residents of this form of specialised housing are on average 78 years of age upon entry, and therefore tend to spend a considerable amount of time in their apartments. It is therefore appropriate that, wherever possible,</p>	<p>This policy does not expect any provision of play facilities. It is not included within the 80 sq.mtrs as the council has opted for an equipped facility per 1,000 children standard. The equipped play facilities standard identified at G3 would not apply to elderly persons development as it would not generate occupants under the age of 18 years. Paragraph 5.5.17 already allows for alternative approaches to greenspace provision.</p>	<p>No change</p>

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>lively or interesting views or pleasant and peaceful scenery should be visible from all rooms, but with an emphasis on quality of provision and not quantity. Often the more favoured aspects are those on the busiest road frontage or those facing the main entrance and car parking area where activity is present. Review this policy and the unnecessary burden it seeks to impose which will impact on the viability and ultimately the supply of new housing.</p>		
1982 Sport England	<p>The policy makes no requirement or allowance for indoor sport despite being included in the open space assessment. This Sport England's facilities planning model is referenced in the indoor facilities chapter however the paragraph and bullet points overlapping pages 168-9 have no dates against these statements apparently extracted from our annually run national modelling. In 2009 Sport England did do some discrete modelling using the FPM, using base data from 2008 and specifically looking at swimming pool provision in the south east of the district. This is now 3 years old and while robust in its time would benefit from updating to take account of closures and refurbishments that</p>	<p>Protection of outdoors sports green space green space is considered at policy G6. Protection of community facilities, such as indoor sports provision is considered at policy P9. See amendments to P9 to specifically reference sport and recreation facilities.</p>	<p>No change.</p>

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>have occurred since that time. On the basis of an up to date evidence base, the Core Strategy should contain policies that protect and enhance both indoor and outdoor sport facilities. The policy should also encourage the development of new sport facilities in locations where they will serve demand. The policy should be clear that the loss of such facilities should only be acceptable where a suitable replacement is provided, or a robust assessment of need has demonstrated that the facility is genuinely surplus to requirement.</p>		
<p>1186 ID Planning on behalf of TG & MF Emsley 5671 ID Planning on behalf of ELE Northern Quadrant Consortium, Wortlea Estates, Great North Developments Ltd c/o Evans Property Group, Barratt Homes, David Wilson, Great North Developments, Robert Ogden Partnership Ltd, Redrow Homes</p>	<p>The increased greenspace requirements of G4 are unduly onerous and unsound as the increased green space standards have not been justified or its impact viability tested. It is maintained the increased standards would compromise the delivery of family dwellings due to the percentage of each development site that would be given over to meet this requirement. UDP requirement is 40 m2 per dwelling. Where OT is submitted, 10% is required of site area. The CS doubles the amount of public open space contribution to be provided. If 500 dwellings are provided on site at</p>	<p>The standards are explained and justified in considerable detail in the council's open space assessment which forms part of the evidence for the core strategy. Viability testing is currently being considered as part of the council's preparations for adoption of CIL. The overall greenspace requirement for new residential development in areas of deficiency does not differ from the UDP standards. It is the policy application of the standards and the split between the various typologies which is different.</p>	<p>No change</p>

Representor/Agent	Representor Comments	LCC Initial Response	Action
(Yorkshire) Ltd, Edmund Thornhill Estates, Housebuilder Consortium 5867 LPD Planning on behalf of Hileys Solicitors 5895 Barratt Homes, David Wilson Homes, Yorkshire Homes	<p>a density of 40 units/ha, than public open space requirement on a site measuring 12.5 ha would be 4 ha. This is unrealistic and severely reduces viability of development. It is considered that the requirement in the UDP of 40m²/unit is more appropriate. It states within the CS that where sufficient open space exists than contributions of equal value will take priority. What 'equivalent value' would be for 4 ha of land (as in scenario listed). Secondly, this provides no benefit for the development of sites located in close proximity to existing areas of green space and community facilities. Although contributions may be payable for the upkeep of existing open spaces and facilities the cost of upkeep should be significantly less than the cost of providing new areas where locations are deficient in Public Open Space.</p>		
5681 Carter Jonas on behalf of The Bramham Park Estate, Meadowside Holdings, The Diocese of Ripon & Leeds, The Hatfield Estate, Lady Elizabeth Hastings	<p>No comment upon this policy but would reiterate the position that quantity of provision should be balanced against quality and accessibility to areas of open space.</p>	<p>Noted</p>	<p>No change</p>

Representor/Agent	Representor Comments	LCC Initial Response	Action
Estate Charity, The Ledston Estate, AR Briggs & Co,			

G5 Open space provision in the city centre

Representor/Agent	Representor Comments	LCC Initial Response	Action
0062 Leeds Civic Trust	<p>Generally support the new and improved standards set out in these three policies. However, the open space standard for city centre residential development at 4sqm /person is pitiful in comparison to the 80sq m per residential unit for development outside the city centre. Families need to be attracted to the city centre especially city centre south and this figure needs upward revision, if only for City Centre South, where the intention should be to attract existing and newly-formed families from those singles and couples already living in the city centre. The city centre requirement is for “open space” which is not defined in the glossary, whereas elsewhere the requirement is for “greenspace”. This reflects the apparent reluctance of the city council to provide “green” areas (i.e. grass) in the city centre as opposed to paved areas. Yet grassed areas are important oases in the heavily</p>	<p>The evidence and justification for the city centre open space standard is set out in the council’s open space assessment at chapter 12. This document also explores the definitions of open space, greenspace and civic space. The study accepts that the city centre is deficient in open space and greenspace for the needs of the residents and visitors. However, this needs to be balanced with the crucial role of the city centre as the centre of commerce for the region, the size of sites which are available, land values and deliverability.</p> <p>Proposals already exist which identify sites in the southern part of the city centre for new public realm and green space enhancements. The sites at South Bank and Sovereign Street will significantly increase the quantity and accessibility of open space in the central and South area</p> <p>Agree that it is not always appropriate to seek equivalent off-site contributions when on site open space would be more</p>	<p>Minor change.</p> <p>Amend the text in policy G5 to improve delivery of open space and ensure the policy impact endures beyond adoption of CIL.</p> <p>Within the City Centre, open space provision will be sought for sites over 0.5 hectares as follows:</p> <ul style="list-style-type: none"> (i) Commercial developments to provide an equivalent <i>minimum</i> of 20% of the total site area. (ii) Residential development to provide an equivalent <i>minimum</i> of 0.41 hectares of open space per 1,000 population. (iii) Mixed use development to provide <i>the greater area</i> an equivalent of either 20% of the total site area, or a minimum of 0.41 hectares per 1,000

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>built up city centre, as can be witnessed on any sunny summer day when the few such areas there (Park Square and Merrion Gardens to name more or less the only two) are crowded with people taking advantage of the cool grass. There should be clear identification of locations for aspirational new greenspace provision, especially when it is a case of connecting green corridors for wildlife and footpaths/cycleways. These should not be substituted for 'off-site' green space provision.</p> <p>Increase requirement for greenspace for residential development in the city centre to at least 25 sq m per residential unit: this requirement could be related to development within City Centre South.</p>	<p>appropriate given that opportunities are limited. The policy is also likely to become redundant on the introduction of CIL or April 2014 due to the restriction on pooled contributions. The policy will require rewording to achieve a more balance approach and remain effective. Criterion (iii) requires additional guidance on which of the calculations will be used for mixed use development.</p> <p>No evidence is offered for the suggested increase of 25 sq. mtrs per unit.</p> <p>Such a provision standard would require the delivery of approximately 25 hectares of new open space provision over the plan period based on estimated numbers of new residential units within the city centre. To provide a comparison, there is currently 28.45 hectares of open space within the city centre. The policies within the core strategy need to be realistic and deliverable.</p>	<p>population of open space.</p> <p><i>In areas of adequate open space supply or where it can be demonstrated that not all the required on site delivery of open space can be achieved due to site specific issues, contributions towards the City Centre park and new pedestrianisation will take priority.</i></p>

Representor/Agent	Representor Comments	LCC Initial Response	Action
0092 Home Builders Federation	<p>Stipulating that housing sites over 0.5 ha in size must contribute open-space of 0.41 ha per 1,000 population, and mixed use sites 20% of the site area etc is unsound as it has not been assessed for its impact on the viability of housing delivery as required by the NPPF. The requirement may also be unlawful as being contrary to the CIL Regulations.</p> <p>The NPPF requires that any requirements infrastructure contributions or other requirements should be assessed for viability to ensure that the CS is deliverable. The Council has not carried out such an assessment. The Economic Viability Assessment makes no allowance for the cost of this requirement. If the Council wishes to provide for green-space then the CIL provides the most appropriate mechanism for raising the funds for doing so. Requiring that all developments make a contribution could be contrary to the CIL Regulations.</p>	<p>Policy ID2 considers the potential duplication between S106 obligation financial contributions and the introduction of CIL. This does not become an issue until the council adopts CIL or April 2014 when pooling of five financial contributions sought through s106 agreements will be contrary to the CIL regulations. Until this time the three revised tests will continue to be applied to any financial contribution sought through a planning obligation. Viability testing is currently being considered as part of the council's preparations for adoption of CIL. On-site delivery of green space for residents of new residential development will remain unaffected by the introduction of CIL.</p>	No change.
4816 Hammerson UK Properties Ltd (via Barton Wilmore)	<p>Concerned that this policy does not allow flexibility for developments which accord in principle with the Spatial Development Strategy and Spatial Policies. Policy G5 should</p>	<p>The policy already allows for sufficient flexibility to take into account site specific circumstances.</p>	No change.

Representor/Agent	Representor Comments	LCC Initial Response	Action
	therefore be reworded to allow for exceptions to the open space requirements on a case by case basis. For example, a scheme may offer a number of wider benefits that would outweigh failure to comply with one of the open space requirements, or compliance with all of the listed requirements may have an adverse impact on the overall viability and delivery of future development schemes within the City Centre. As drafted the policy makes no allowance for such exceptions.		
5681 Carter Jonas on behalf of The Bramham Park Estate, Meadowside Holdings, The Diocese of Ripon & Leeds, The Hatfield Estate, Lady Elizabeth Hastings Estate Charity, The Ledston Estate, AR Briggs & Co,	No comment upon this policy but retain the right to do so if the situation changes.	Noted	No change

G6 Protection and Redevelopment of Existing Green Space

Representor/Agent	Representor Comments	LCC Initial Response	Action
0062 Leeds Civic Trust	Private residential gardens and landscaped grounds of other uses also	These issues are already addressed in policies P10 design,	No change.

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>make a significant contribution to the landscape quality of places, and evidence of this is contained in most of the Village and Neighbourhood Design Statements which include character appraisal of local areas. However, such areas are not protected because the policy only refers to greenspace which is defined as publicly accessible. Extend to include the same protection for those areas of open space such as gardens and other private land which make a visual contribution to the character of an area.</p>	<p>P12 landscape and UDP GP5.</p> <p>NDS and conservation area appraisals will where necessary and appropriate consider this in a greater level of detail.</p>	
0099 English Heritage	<p>Policy H2 seeks to safeguard from future housing development greenfield land that has intrinsic value as amenity space or which makes a valuable contribution to the visual, historic and/or spatial character of an area. Under the provisions of Policy G6, however, existing greenspaces within the District's settlements could be developed if the applicants satisfy one of its three Criteria. Policy G6 needs to include similar provisions to Policy H2 in order to protect areas of amenity value within settlements. Add an additional Paragraph following Policy G6 Criterion (iii) along the following lines:- "Development of greenspace which is of intrinsic value as amenity space or makes a valuable contribution</p>	<p>These issues are already addressed in policies P10 design, P12 landscape and UDP GP5.</p>	No change.

Representor/Agent	Representor Comments	LCC Initial Response	Action
	to the visual, historic or character of the area will not be permitted.”		
2703 Cllr John Illingworth	<p>The conclusion of the PPG17 assessment that sports provision is generally adequate (with some localised areas of deficiency) and that few major policy adjustments are required is insecure for the following reasons:</p> <p>(1) Arithmetical and classification issues. Much of the recreational land identified in North West Leeds is private open space and not effectively open to the public or has been earmarked for disposal and will not be permanently available for sporting use. When this land is excluded from the totals there is a severe deficiency in provision which has not been adequately reflected in core policies. Calculations for other areas should be checked.</p>	<p>(1) An error relating to the University of Leeds pitches at Lawnswood; West of Lawnswood Cemetery and the YMCA pitches adjacent has been corrected. The impact of the error is 5 playing pitches and three tennis courts are stated as public, when they are private.</p> <p>The data is continually being cleaned and refined to improve reliability. The error above has been corrected and will inform the ongoing work on the site allocations DPD.</p> <p>There are 715 playing pitches in Leeds. The data currently indicates that 315 are public. This would reduce to 310 when the above error</p>	No change.

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>(2) The boundaries of the assessment areas obscure the very serious lack of recreational open space in the most deprived communities close to the city centre. If the boundaries mirrored community boundaries more closely, it would reveal a very serious deficiency near the city centre which is currently hidden.</p> <p>(3) The guidance from the National Institute for Health and Clinical Excellence (NICE) envisages a substantial increase in physical activity, particularly among disadvantaged groups, and it is difficult to see how this can be accommodated within the currently identified provision under PPG17. The Core Strategy is fundamentally flawed in relation to Public Health and Recreational Open Space. Council statistics are misleading. Public Consultation should be repeated when these arithmetical issues have been resolved.</p>	<p>is corrected. As an error it is less than 2% of the public pitches or less than 1% of the playing pitch total.</p> <p>(2) The assessment areas were based on the 10 area committee areas applicable at the time. The observation is correct and can be viewed visually on the various open space plans throughout the assessment. The proposed standards can be applied at different spatial scales and reveal different results. This work will be undertaken as part of the site allocations preparation.</p> <p>(3) The assessment notes that many sites throughout the city are currently underused. There are many reasons for a lack of use, most relating to quality. Quality improvements are continuously being sought where resources are available. Other areas simply lack provision of any green space. These areas of acute deficiency will be highlighted in future LDF documents such as the site allocations DPD where site specific issues can be considered.</p> <p>Public health bodies have</p>	

Representor/Agent	Representor Comments	LCC Initial Response	Action
		<p>commented on the previous iterations of the core strategy. Their suggested alterations and actions have been accommodated where possible. They have assisted in the preparation of various evidence base documents. The core strategy has also been subject to a Health Impact Assessment (HIA), prepared with the assistance of health professionals and public health bodies. No specific evidence is provided regarding where the 'flaws' exist. The council are continuing to work with health professionals on a range of implementation issues such as the East Leeds Extension proposals and the large site to the rear of Seacroft hospital.</p>	
<p>5681 Carter Jonas on behalf of The Bramham Park Estate, Meadowside Holdings, The Diocese of Ripon & Leeds, The Hatfield Estate, Lady Elizabeth Hastings Estate Charity, The Ledston Estate, AR Briggs & Co,</p>	<p>No comment upon this policy but retain the right to do so if the situation changes.</p>	<p>Noted</p>	<p>No change</p>

APPENDIX 2 – CHANGES TO CORE STRATEGY TEXT

4.10 Managing Environmental Resources and Green Infrastructure

4.10.1 The district's environmental resources are crucial, not just in ensuring quality of life, but also sustaining life itself. The natural world regulates the atmosphere and climate, and plays a part in breaking down waste. It provides the resources that we all use for our daily lives by providing clean air and water, land for growing food, open spaces for our health and well being, minerals to use for building and the resources to provide heat and power. We have an obligation to protect our environmental resources and to pass on to future generations the natural wealth that we have inherited. In addition, there is the requirement to safeguard and conserve biodiversity. Biodiversity in Leeds is not constrained to designated nature conservation sites or merely concerned with rare or threatened species or habitats, it is equally about ensuring that widespread and common species remain an integral part of a sustainable natural environment. *The Leeds Habitat Network seeks to show where the most important ecological areas and ecological corridors are in relation to each other (see Map 16).*

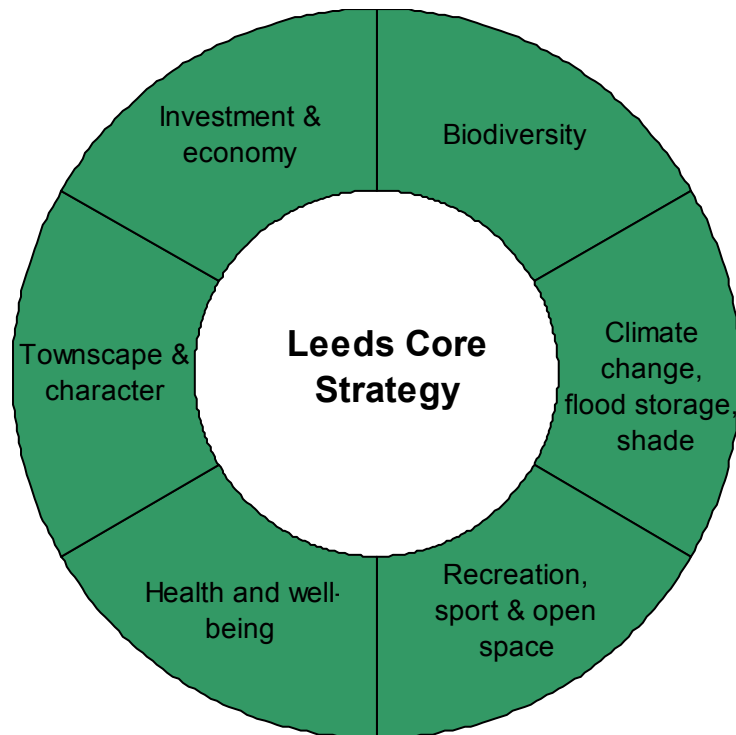
4.10.2 The rivers Aire and Wharfe and their tributaries are a dominant feature of the Leeds district. This means that there is a large proportion of the population at risk from flooding. Parts of Leeds City Centre are subject to a 1 in 20 year risk of flooding from the River Aire. There are also a number of settlements at risk along the River Wharfe in the North of the district. The South Eastern area of the district also experiences flooding from the River Calder. In considering areas of the district where future growth should take place, the Council has sought to avoid areas of high flood risk. The Leeds Flood Alleviation Scheme is intended to provide a 1 in 200 year standard of protection against flooding along the River Aire in the long term.

Strategic Green Infrastructure is that which has strategic importance across the district due to its size and significance to the city. At this strategic level, Green Infrastructure can include natural and managed green areas in both urban and rural settings. It also includes the strategic connections between green areas for the benefit of people and wildlife. The inclusion of areas forming part of the Strategic Green Infrastructure network does not necessarily mean that no development can take place in these areas (unless precluded by other policies). Development opportunities in appropriate circumstances can provide a basis to ensure that Green Infrastructure can be delivered or achieved (for example within the lower Aire Valley).

4.10.3 Green Infrastructure is the network of multi-functional green spaces, both urban and rural, which includes protected sites, woodlands, *hedgerows*, nature reserves, river corridors, public parks and amenity areas, together with green links. 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. A key function of Green Infrastructure is to help maintain and enhance the character and distinctiveness of local communities and the wider setting of places. *The other possible functions are shown in diagram 5 below.*

4.10.4 Integral to Leeds' resilience to climate change is the importance of identifying, linking and extending Strategic Green Infrastructure as shown on *Map 14* and increasing the amount, distribution and accessibility of green space. The Core Strategy and the LDF will ensure that the Strategic Green Infrastructure networks found across Leeds are maintained and strengthened in order to fulfil the functions illustrated below and any potential conflicts are minimised.

Diagram 5: Functions of Green Infrastructure



4.10.5 Green Infrastructure has to carry out several of these functions in order to create robust and multifunctional networks. Integral to the overall spatial approach of the Core Strategy is the desire to maintain and enhance an integrated network of Strategic Green Infrastructure in the long term *as shown on Map 14*.

SPATIAL POLICY 13: STRATEGIC GREEN INFRASTRUCTURE

The Strategic Green Infrastructure for the Leeds district is *indicated* on the Key Diagram. This infrastructure performs many important functions and provides for opportunities for recreation. Within these areas the Council will maintain and, in partnership with others, enhance the following key corridors:

- (i) The Aire Valley, along the river and canal corridors and including; West Leeds Country Park and Kirkstall Valley Park to the north; Fairburn Ings; St Aidans and Aire Valley Leeds to the South, incorporating the proposed Urban eco-Settlement (which has particular aims to strengthen green links to Leeds City Centre, the lower Aire Valley, Temple Newsam, and Rothwell Country Park);
- (ii) South Leeds (including the Morley-Middleton-Holbeck corridor);
- (iii) The Limestone Ridge (which runs North-South at the Eastern edge of the district);
- (iv) The Wharfe Valley;
- (v) Wyke Beck Valley;
- (vi) Woodhouse Ridge;
- (vii) Meanwood Valley;
- (viii) Tong Cockersdale;
- (ix) Gledhow Valley.

4.10.7 In complementing the whole network of Green Infrastructure as Leeds develops and grows, it is essential to improve the quantity, quality and accessibility of green spaces serving the people living and working in the district. The provision of green space is vital for the continued health and well being of the residents and visitors of Leeds. Across the district there are 1,750 green space sites, 278 children's play facilities and 154 indoor sports sites serving the Leeds population. Overall there is good green space provision in Leeds, which is influenced by the presence of six city parks and many large natural spaces on the edge of the urban area.

5.5 MANAGING ENVIRONMENTAL RESOURCES AND GREEN INFRASTRUCTURE

a) Green Infrastructure and Greenspace

Opportunities to Enhance Green Infrastructure

5.5.1 One of the key distinguishing features of the Leeds district is the way in which the countryside runs into the main built up areas along corridors and valleys. These corridors are important for wildlife, local distinctiveness and character, but they also enable communities to access green space for *sport*, recreation and exercise close to where they live, including providing easy access to the countryside. These corridors and valleys are evidence that urbanising development can retain the functions and enhance the quality of Green Infrastructure. New development will need to integrate Green Infrastructure functions within the proposals.

5.5.2 There are important opportunities to enhance Green Infrastructure within and around such corridors which are illustrated on the Key Diagram and identified in Spatial

Policy 13: Strategic Green Infrastructure. In advancing this approach to maintaining and enhancing the strategic network of Green Infrastructure in Leeds, Policy G1 provides a framework to manage long term provision. In securing such opportunities, consideration will need to be given to the proximity of the South Pennine Moors Special Protection Area and Special Area of Conservation (Hawksworth Moor). Within this context, developers will need to liaise closely with the Local Planning Authority and Natural England, regarding any significant effects upon this area. Specifically, they should check that their contribution to Green Infrastructure and location with respect to existing networks and corridors, are consistent with the longer nature conservation objectives of this site.

POLICY G1: ENHANCING AND EXTENDING GREEN INFRASTRUCTURE

Where a development is considered to be acceptable within or adjoining areas defined as Green Infrastructure on Map 14 or on any future LDF allocation documents, development proposals should ensure that:

- (i) Green Infrastructure/corridor function of the land is retained and improved, particularly in areas of growth;
- (ii) Where appropriate, the opportunity is taken to extend Green Infrastructure by linking green spaces or by filling in gaps in Green Infrastructure corridors, including (where relevant) extending these into Leeds City Centre. Street trees and green roofs are particularly encouraged;
- (iii) A landscaping scheme is provided which deals positively with the transition between development and any adjoining open land;
- (iv) The opportunity is taken to increase appropriate species of woodland cover in the district;
- (v) *Provision for and retention of biodiversity and wildlife;*
- (vi) *Opportunities are taken to protect and enhance the public rights of way (PROW) network through avoiding unnecessary diversions and by adding new inks.*

Trees and Woodland

5.5.3 Trees and woodland cover are important components of Leeds' landscape character. West Yorkshire Ecology information (2003) show that there were 3,660 hectares of woodland (sites of over 2 hectares) within the Leeds district, representing 6.45% of the land area. Over 1,282 hectares (sites over 2 hectares) is owned and managed by the Council. These woodlands vary in size and complexity, from the large estates at Temple Newsam and Chevin Forest Park, to small, urban woodlands such as Skelton Wood in North East Leeds. The Council plans to increase the amount of woodland cover for the benefit of both people and wildlife as well as improve landscape quality. The need to maintain and increase tree cover also helps to combat the effects of climate change such as providing valuable shade in the densely developed areas that will suffer most from rising temperatures.

5.5.4 Woodland Trust research recommends that everyone should have access to a minimum of 2 hectares of woodland within 500 metres of where they live, and a minimum of 20 hectares of woodland within 4km of where they live. This information

is shown on Map 15 below and identified a general deficiency in South West Leeds of large woodland sites.

- 5.5.5 If this is applied to the Leeds district, it would mean an increase in woodland cover of 577 hectares, a 16.5% increase on current cover, taking the total area up to 4,260 hectares (or 7.5% of the land area of Leeds). It would also mean the creation of one new large woodland (20 hectares in size) located in the South West area of the district.
- 5.5.6 This represents a very ambitious target, creating on average 30 hectares a year for 20 years and it takes no account of the need to increase the urban tree population, such as individual trees, including street trees, and small copses. However, given that tree and woodland planting will help Leeds respond to climate change and flood alleviation, as well as improve biodiversity and levels of amenity, it is considered that a specific target is required. Priority will be given to advance planting sites of woodland blocks, copses and linear tree belts in areas where:
1. There is a local deficiency of woodland (see Map 15),
 2. It would link existing isolated small woods and associated valuable habitats,
 3. It would enhance the landscape character or screen negative views.
- 5.5.7 In taking forward such proposals, the City Council (and other bodies as appropriate), will need to liaise with Natural England, should there be any tree-planting proposals in the near vicinity of the South Pennine Moors Special Protection Area, to ensure its protection from habitat change or the adverse impact of predator species.
- 5.5.8 Trees in Towns II (DCLG 2008) noted that the mean tree canopy cover in towns and cities in England is an average of 8.2%. In Leeds it is 6.9%, considerably below the national average. Considering that the main conurbation will suffer adverse impacts from the heat island effect in the future, the amount of tree cover in Leeds needs to increase. The initial target is equivalent to the national average, which will require the planting of an additional 32,000 trees in the urban area during the Plan period.

POLICY G2: CREATION OF NEW TREE COVER

Development which would result in harm to, or the loss of, Ancient Woodland and Veteran Trees will be resisted.

In supporting the need and desire to increase native and appropriate tree cover, the Council will, on its own initiative and through the development process, including developer contributions, work towards increasing appropriate species of woodland cover in the district. Delivery will involve planting in both urban and rural areas, and partnership with the Forestry Commission, Natural England and landowners. Development in the urban area of the city, including the city centre will *include* the *planting* of street trees *in appropriately designed pits* to increase the area of tree canopy cover.

Greenspace Standards

- 5.5.9 Leeds is a city which benefits from good overall provision of greenspace. However, this is not distributed evenly across the city and as a result, some areas have very little local greenspace. Greenspace in Leeds is under pressure from both

development and increased usage as the city's population grows. Those areas with the least access to greenspace are often the same areas under the greatest pressure for development. Given these pressures, greenspace needs to be protected to ensure its continued valuable contribution for existing and future generations, as once lost to development it is likely gone forever. The Council will protect existing green spaces where required and appropriate, and seek to enhance their quality and accessibility. Where supported by evidence and in the delivery of wider planning benefits, opportunities to improve existing greenspace quality may be delivered through redevelopment of greenspace.

5.5.10 Where opportunities arise, the Council will use the development process to increase the amount of greenspace consistent with population growth and to address areas of greenspace deficiency and quality. In considering the future growth of Leeds, there is a need to ensure that there is an adequate provision of quality and accessible greenspace, including publicly accessible natural greenspace, and space for more formal recreation and allotments. The green space needs of the district have been identified in the Leeds Open Space, Sport and Recreation Assessment.

5.5.11 In application of the greenspace standards, an average household size is used to calculate the population of existing areas and the impact of proposed developments. The City Council used 2.4 persons per dwelling to convert the greenspace standards in Policy G3 to calculate the combined new greenspace provision per dwelling in Policy G4.

5.5.12 In developing Policy G3, the City Council has achieved the highest standard of Natural England's Accessible Natural Greenspace Standard (ANGSt), that is possible given the inherent limitations of the district, due to the large extent of the urban area. This has included a review of natural greenspace available in the district. The Council aspires to maximise recreation near to where people live, which can help to avoid adverse impact and the more sustainable use of sensitive nature conservation sites for recreational purposes.

POLICY G3: STANDARDS FOR OPEN SPACE, SPORT AND RECREATION

The following open space standards will be used to determine the adequacy of existing supply and appropriate provision of new open space:

Type	Quantity (per thousand people)	Accessibility	Quality*
Parks and gardens	1 hectare	720 metres	Good (7)
Outdoor sports provision	1.2 hectares (excludes education provision)	Tennis court 720 metres, bowling greens and grass playing pitches 3.2 km, athletics tracks, synthetic pitches 6.4 km	Good (7)
Amenity Green space	0.45 hectares	480 metres	Good (7)
Children and Young People's equipped play facilities	2 facilities	720 metres	Good (7)
Allotments	0.24 hectares	960 metres	Good (7)
Natural green space	0.7 hectares main urban area and major settlements, 2 hectares other areas	720 metres and 2 km from site of 20 hectares	Good (7)
City Centre open space provision all types (including civic space)	0.41 hectares	720 metres	Good (7)

**Sites were scored out of 10. See the Leeds Open Space, Sport and Recreation Assessment for information about quality standards.*

5.5.13 Through future LDF documents, the Council will investigate the potential to remedy existing deficiencies in provision and quality of green spaces, outdoor sports and children's play facilities in the areas of greatest deficiency in accordance with the above standards, other Council open space and leisure strategies, and relevant legislation.

New Greenspace

5.5.14 In areas of deficiency, the priority is provision of new green space and improved green links to existing greenspace. In areas where sufficient green space already exists, even for communities which are growing, the most efficient use of land may not be achieved by seeking new provision. In these circumstances, developments should make the best use of existing provision by contributing towards improving the access and quality of existing greenspace to ensure the needs of the expanded community can be accommodated.

5.5.15 Normally, the minimum acceptable size of new greenspace provision is 0.2 hectares, which should be integral to the development and provided as a contiguous greenspace area. Aggregated, fragmented spaces, scattered across development sites will not be acceptable due to their limited functionality. However, it is recognised that there is a role for smaller areas of green space or 'pocket parks' in

densely developed areas, subject to suitable management arrangements being in place.

Where development of two or more contiguous sites is planned to be implemented over a number of years, on-site greenspace may be sought on individual sites, even below the 0.2 hectares minimum, in a manner that will eventually allow the co-location of greenspaces to create a viable community greenspace area in excess of 0.2 hectares.

5.5.17 Not every development site is capable of accommodating the required greenspace within the site boundary. The majority of these cases arise in town centre or high rise locations. In these circumstances, and taking into account the characteristics of the site, it may be acceptable to deliver the greenspace off-site, within the same locality, or potentially a combination of off-site and on-site.

5.5.18 The new greenspace provision in policy G4 is based on the application of the provision standards in Policy G3.

POLICY G4: NEW GREENSPACE PROVISION

On site provision of green space of 80 square metres per residential unit, will be sought for development sites of 10 or more dwellings that are outside the City Centre and in excess of 720 metres from a community park and which are located in areas deficient of green space.

In areas of adequate supply, contributions of an equivalent value towards safeguarding and improvement of existing green space will take priority over the creation of new areas.

City Centre Greenspace

5.5.19 The City Centre, as illustrated on the Key Diagram, is a focus for both residential and economic growth, limiting the potential for provision of all greenspace types. The green space standards have been modified for the densely developed location and take into account the likely greenspace requirements of the larger City Centre population by 2028.

5.5.20 New development in the city centre will be required to support implementation of the new city park at the South Bank of the River Aire and creation of a network of improved green spaces and public realm infrastructure throughout the city centre. This support could be in the form of land or off-site financial contributions. Improved links to this network should also consider access to the larger greenspaces located at the boundary of the city centre, such as Woodhouse Moor.

POLICY G5: OPEN SPACE PROVISION IN THE CITY CENTRE

Within the City Centre, open space provision will be sought for sites over 0.5 hectares as follows:

- (i) Commercial developments to provide a *minimum* of 20% of the total site area.
- (ii) Residential development to provide a *minimum* of 0.41 hectares of open space per 1,000 population.
- (iii) Mixed use development to provide the *greater area* of either 20% of the total site area, or a minimum of 0.41 hectares per 1,000 population of open space.

In areas of adequate open space supply or where it can be demonstrated that not all the required on site delivery of open space can be achieved due to site specific issues, contributions towards the City Centre park and new pedestrianisation will take priority.

Protection and Redevelopment of Greenspace

- 5.5.21 The quality of a greenspace is as important as its size and location. A large space which does not drain, on a steep gradient with old and broken facilities, offers very little to attract users to the space. However, a modest site which is well maintained with a variety of quality facilities will likely be well used and valued by the community. Access to the spaces can be considered in both its proximity to users and any physical barriers such as busy roads, rivers or railway lines. In addition, a site should have convenient access points that reflect its physical size and function.
- 5.5.22 The areas of the city with the lowest overall green space provision in terms of quantity and accessibility are predominantly traditional high density housing areas of inner city Leeds. Improving the level of greenspace provision in these areas is a priority for the council. However, the development sites which come forward in these areas are usually small, make these areas the greatest challenge in delivering new greenspace provision. Where useable and functional greenspace cannot be provided on site, the deficit will be mitigated by improving access, quality and links to existing greenspace in the locality. When addressing replacement greenspace or in a situation where green space cannot be provided on site, 'locality' is defined as the area within the accessibility standard for the green space typology identified in Policy G3.
- 5.5.23 There will only be an adequate supply of greenspace, where the needs of the existing community are satisfied in all space types as set out in policy G3 (greenspace standards), and there is an additional capacity of 10% of the total accessible green space, taking into account the impact of the development proposal under consideration. An allowance capacity of 10% is required to maintain the existing supply whilst absorbing the cumulative pressure on greenspace from small developments that do not contribute towards the quantitative provision or improvement of greenspace.
- 5.5.24 If the above calculation reveals a type of greenspace is in excess of adequate supply, then prior to release for other uses it must also be assessed to ensure that it offers no potential for transformation to any other green space type deficient in the same area. For example, an area may have an adequate supply of amenity

greenspace, but a deficiency of allotments. Prior to release of the surplus amenity greenspace for redevelopment, the potential of the amenity space to be used for allotments should be thoroughly assessed.

5.5.25 The precise nature of the green space improvements sought or new green space provided as a result of new residential development will be subject to the circumstances of the local areas and community consultation. The Leeds Open Space, Sport and Recreation Assessment (PPG17 Audit) identified a range of sites across the city that would benefit from qualitative improvement to increase their function and value.

5.5.26 Where supported by evidence and in the delivery of wider planning benefits, opportunities to improve existing green space quality may be delivered through redevelopment of green space. Such an approach will need to demonstrate a clear relationship between the loss of greenspace, improved quality of greenspaces in the same locality and support of the local community living in the locality.

POLICY G6: PROTECTION AND REDEVELOPMENT OF EXISTING GREEN SPACE

Greenspace (including open space in the City Centre) will be protected from development unless one of the following criteria is met:

- (i) There is an adequate supply of accessible greenspace/open space within the analysis area and the development site offers no potential for use as an alternative deficient open space type, as illustrated in the Leeds Open Space, Sport and Recreation Assessment, or,
- (ii) The green space/open space is replaced by an area of at least equal size, accessibility and quality in the same locality; or
- (iii) Where supported by evidence and in the delivery of wider planning benefits, redevelopment proposals demonstrate a clear relationship to improvements of existing greenspace quality in the same locality.

Cemeteries and Burial Space

5.5xx The city accommodates three crematoria and 22 cemeteries. Several of these, particularly in the north west of the city, are near capacity. Provision of new cemeteries and burial space will be required during the plan period. Future provision will be in the form of extensions to existing cemeteries combined with new smaller, locally based sites

Policy Gx – Cemeteries and Burial Space

Development proposals for cemetery and burial facilities will be permitted where they can demonstrate:

- easy access by public transport, walking and cycling;*
 - easy and safe access to people with disabilities;*
 - there would not be demonstrably harmful impact on the character of the surrounding area and the amenities of nearby residential properties and other uses; and*
- the scale is appropriate to identified local need.*

Appendix 1

Core Strategy Publication Draft - Analysis of Consultation Responses

Policy G7 - Protection of Important Species and Habitats

Representor	Representor Comments	LCC Initial Response	Action
0058 Natural England Consultation Service	Habitats Regulations Assessment Taking into account Regulations 102 of The Conservation of Habitats and Species Regulations 2010, Natural England agrees that the Core Strategy will not lead to a likely significant effect on any European site. Therefore an Appropriate Assessment is not required.	The comment is “for information only” – no need for an Appropriate Assessment as no significant impact on any international sites.	No Change
5681 The Ledston Estate, Meadowside Holdings Ltd, Lady Elizabeth Hastings, Estate Charity, The Hatfeild Estate, The Diocese of Ripon and Leeds, AR Briggs and Co The Bramham Park Estate (via Carter	Previous comments upon this Policy sought to distinguish between nationally designated species and habitats and those which are of local importance. This is not assisted by Map 16 which indicates no variation in the Habitat network. The Policy does not address this matter and we would repeat the position that the protection of species, habitats and sites must be proportionate to their status and designation. Whilst that remains the case we consider that Policy G7 is not	Saved Policy N50 has a clear explanation of the hierarchy of designated sites through the UDP’s supporting text and they are clearly referred to in Policy N50. The comments also question the habitats shown on Map 16 in relation to whether they are of an equal importance. This can be resolved by amending the text referring to Map 16 in two different sections of the supporting text to make it clearer what it is trying to achieve: Amend the text in 4.10.1 to refer to the Leeds Habitat Network. Amend the text in 5.5.29 to explain the features that make up Map 16. There is also a justifiable concern that Map 16 includes some areas of habitat value that are too low to justify inclusion on this map (Phase 1 habitat survey data has been included that shows Arable land and	No Change Minor Change – amendments to existing supporting text at 4,10.1 and 5.5.29 Minor Change - amendments to Map 16

Jonas)	consistent with Government policy and is therefore unsound.	<p>Improved Grassland but these are too low habitat value to be included and so need to be removed): Amend Map 16 to only include: designated sites, mapped watercourses, UK BAP Priority habitats, woodlands, Phase 1 data (minus low habitat value categories) – this amended map will be amended through working with West Yorkshire Ecology and will be ready by the time of the final Core Strategy publication.</p> <p>The comments refer to the need to “distinguish between nationally designated species and habitats” and this is a justifiable concern as the policy text and supporting text does not refer to “species” – only habitats. By adding in some wording to the policy this can be addressed by including UK Biodiversity Action Plan (UK BAP) Priority Species which have been identified nationally by the Joint Nature Conservation Committee (a statutory adviser to the Government on nature conservation) and are available on their website www.jncc.defra.gov.uk and also West Yorkshire BAP Priority Species that have been identified by the West Yorkshire Biodiversity Partnership (list available from West Yorkshire Ecology).</p> <p>There is also a lack of reference to UK Biodiversity Action Plan (UK BAP) Priority Habitats. In order for the policy to be consistent in relation to the hierarchy of habitats and species it seeks to recognise, a reference needs to be made to UK BAP Priority Habitats that have been identified nationally alongside the UK BAP Priority Species (referred to above). These UK BAP Priority Habitats can be seen on the Defra Multi Agency Geographic Information for the Countryside (MAGIC) website http://magic.defra.gov.uk/</p>	<p>Minor Change – amend policy text to refer to UK and West Yorkshire BAP Priority Species</p> <p>Minor Change – amend policy text to also refer to UK BAP Priority Habitats</p>
--------	---	--	--

APPENDIX 2 – CHANGES TO CORE STRATEGY TEXT

Policy G7- Protection of Important Species and Habitats

4.10 Managing Environmental Resources and Green Infrastructure

4.10.1 The district's environmental resources are crucial, not just in ensuring quality of life, but also sustaining life itself. The natural world regulates the atmosphere and climate, and plays a part in breaking down waste. It provides the resources that we all use for our daily lives by providing clean air and water, land for growing food, open spaces for our health and well being, minerals to use for building and the resources to provide heat and power. We have an obligation to protect our environmental resources and to pass on to future generations the natural wealth that we have inherited. In addition, there is the requirement to safeguard and conserve biodiversity. Biodiversity in Leeds is not constrained to designated nature conservation sites or merely concerned with rare or threatened species or habitats, it is equally about ensuring that widespread and common species remain an integral part of a sustainable natural environment. *The Leeds Habitat Network seeks to show where the most important ecological areas and ecological corridors are in relation to each other (see Map 16).*

Natural Habitats and Biodiversity

5.5.27 Biodiversity is not just about rare or threatened species or habitats, it is equally concerned with ensuring that widespread and common species remain an integral part of a sustainable natural environment. There are many undesignated areas of habitat that are of value as part of the ecosystem. These include areas of woodland, grasslands, hedgerows, waterways and water bodies, gardens, allotments, shelter belts, farmland and field margins, scrub, and other open spaces. The Core Strategy provides broad overarching policies for biodiversity, whilst also addressing related climate change issues and provide the strategic support for future LDF allocation documents and any other emerging policy guidance.

5.5.28 Central to this approach is the need to:

- Protect and enhance the natural environment of the district,
- Ensure that biodiversity is fully considered and that opportunities for enhancement are sought in decisions affecting the use and development of land,
- Seek opportunities to enhance the permeability (the ability to move between habitats) and connectivity of habitat networks and green infrastructure to increase biodiversity. Permeability and the recognition of the need for a variety of habitats for the sustainability of biodiversity will become increasingly important as part of species adaptation to the effects of climate change,
- In partnership with relevant agencies, review the local wildlife and geological site designation system in line with Government recommendations and keep these updated.

POLICY G7: PROTECTION OF IMPORTANT SPECIES AND HABITATS

Development will not be permitted which would seriously harm, either directly or indirectly, any sites designated of national, regional or local importance for biodiversity or geological importance or which would cause any harm to internationally designated sites, *or would cause harm to the population or conservation status of UK or West Yorkshire Biodiversity Action Plan (UK BAP and WY BAP) Priority species and habitats*. In considering development proposals affecting any designated sites *and UK or WY BAP Priority species or habitats*, the needs of the development and the requirements to maintain and enhance biological and geological diversity will be examined.

Other than the above requirement particular account will be taken of:

- The extent and significance of potential damage to the interest of any national, regional or local site, *or UK or WY BAP Priority species or habitat*; and
- Demonstration that the need for the development outweighs the importance of any national, regional or local site, *or UK or WY BAP Priority species or habitat*; and
- The extent that any adverse impact could be reduced and minimised through protection, mitigation, enhancement and compensatory measures imposed through planning conditions or obligations and which would be subject to appropriate monitoring arrangements.

5.5.29 Networks of natural habitats provide a valuable resource. They can link sites of biodiversity Importance and provide routes or stepping stones for the migration, dispersal and genetic exchange of species in the wider environment. To avoid fragmentation and isolation of natural habitats, networks need to be protected from inappropriate development, and, where possible, development should strengthen or integrate with the network. This will *partly* be achieved as part of a wider strategy for the protection and extension of Green Infrastructure, including open space and access routes such as canals and rivers, including those within the urban area and rural settlements. The existing network of habitats is shown on Map 16, which combines the results of Phase 1 habitat survey and existing national and local ecological and nature conservation designations and protections, *and UK Biodiversity Action Plan UK Priority Habitats and other criteria that have been agreed with West Yorkshire Ecology. In order to map the Leeds Habitat Network in more detail at a local level there may be the need for additional up-to-date Phase 1 habitat surveys.*

POLICY G8: BIODIVERSITY IMPROVEMENTS

Development will be required to demonstrate:

- (i) That there will be an overall net gain for biodiversity commensurate with the scale of the development, including a positive contribution to the habitat network through habitat protection, creation and enhancement; and
- (ii) The design of new development, including landscape, enhances existing wildlife habitats and provides new areas and opportunities for wildlife; and
- (iii) That there is no significant adverse impact on the integrity and connectivity of the Leeds Habitat Network.

Appendix 1

Core Strategy Publication Draft - Analysis of Consultation Responses

Policy G8 - Biodiversity Improvements

Representor	Representor Comments	LCC Initial Response	Action
Yorkshire Wildlife Trust	The Trust fully supports this policy. The NPPF which states that 'The planning system should contribute to the natural and local environment by: minimising impacts on biodiversity and providing net gains in biodiversity where possible... including by establishing coherent ecological networks that are more resilient to current and future pressure' (paragraph 109).	Positive general comment.	No Change
5681 The Ledston Estate Meadowside Holdings Ltd Lady Elizabeth Hastings Estate Charity, The Hatfeild Estate (via Carter Jonas), The Diocese of Ripon and Leeds AR Briggs and Co The Bramham Park Estate (via Carter Jonas)	As with the comments with G7 above, it is not clear how this policy adds to national policy. It makes no distinction between features of national importance or of local merit. The policy is not effective and should be deleted.	Comments all addressed through LCC Response for G7	Changes made to Policy G7 and supporting text but none needed for Policy G8

Appendix 1

Core Strategy Publication Draft - Analysis of Consultation Responses

EN1: Climate Change – Carbon Dioxide Reduction

Representor/Agent	Representor Comments	LCC Initial Response	Action
	Energy efficiency, fabric first		
Hallam Land Management Ltd; Templegate Developments; Ashdale Land and Property Company Ltd (via Barton Willmore Planning Partnership- Northern)	the Council should encourage improved energy efficiency to the building fabric in the first instance (the ‘fabric first approach’ endorsed by the Carbon Trust), before seeking an element of on-site renewable energy generation	The intention of EN1i) is to allow developers total flexibility in how they meet the CO2 reduction target and we would support fabric 1 st approach	Proposed minor change (ii): clarify intention of the policy to encourage fabric first.
Redrow homes, barratt david Wilson, great north development, housebuilder consortium, ELE northern quadrant, Robert Ogden, Wortlea Estates, Edmund Thornhill	Government moving away from code towards zero carbon standards which takes a fabric first approach. As this may change during plan period, the CS should just refer to latest national policy.	As above. The council cannot write core strategy policy based on speculation about national policy changes. If changes occur during the plan period, they will be taken into account in planning decisions and incorporated as and when the Core Strategy is updated.	No change
	Off site low carbon contribution		
Hallam Land Management Ltd; Templegate Developments; Ashdale Land and Property Company Ltd (via Barton Willmore Planning Partnership- Northern)	Our Client would also question the effectiveness of the proposed ‘low carbon scheme’ and the lack of any guidance in the Core Strategy as to how any off-site contribution might be calculated.	The council accepts that we do need to develop guidance about how off site contributions will be calculated but this doesn’t need to be contained within the core strategy.	No change

Sainsbury's (via Turleys)	Should mirror national approach and timetable for allowable solutions.	Our policy approach is entirely consistent with NPPF and the policy is flexible to allow the most cost effective and appropriate mix of on/off site contributions.	Proposed minor change (ii): clarify allowable solutions in section 6.1.
CDP Ltd	Financial contributions as alternative to meeting policy is contrary to government policy/legislation	We have made a unilateral undertaking to support development.	No change
	Standards higher than national/Viability		
Hallam Land Management Ltd; Templegate Developments; Ashdale Land and Property Company Ltd (via Barton Willmore Planning Partnership- Northern)	Council has not assessed the local standards to ensure that development is deliverable which would provide competitive returns to land owners and developers (paragraph 173 of the NPPF).	The council is working hard to strike a balance between viability and achieving policy objectives. In terms of viability issues, any implications on the Core Strategy Policy in terms of viability is being addressed as part of the background work in the developing Community Infrastructure Levy (CIL).	No change
Hallam Land Management Ltd; Templegate Developments; Ashdale Land and Property Company Ltd (via Barton Willmore Planning Partnership- Northern)	it is important that any commuted sum/off-site provision is also subject to the same test of viability in the context of other developer contributions that may be required	We can confirm that this is the process that will be followed.	No change
Home Builders Federation	Unsound to require 20% in excess of building regulations for 10 dwellings or more. NPPF requires that local standards are assessed to ensure that development is deliverable and provides competitive returns. Viability very precarious in parts of district, 20% policy will derail housing delivery.	* This makes larger developments with better opportunities for cost effective carbon savings go beyond building regulations in order to build the supply chain necessary to meet future more challenging targets for all buildings.	No change
White Young Green Planning	It is unreasonable to require new developments to meet standards that are	As * above	No change

Leeds Trinity University College Caddick Developments Harrow Estates D Westwood & Son	more onerous than national standards and these should be removed. Such an approach is not compliant with NPPF para 95 which advises that applicants should adopt nationally prescribed standards. Should not impede economic growth.		
Leeds Civic Trust	Same target as proposed for the building regulations which go further and cover existing buildings	As * above	No change
Dacre Son and Hartley (Miller, Barrett York, Chatford, Taylor Wimpey, Kebbell, Keyland, Barratt Leeds, Tayor Wimpey and Ashdale, Redrow, Mirfield, Warner)	Policy repeats national policy and there is no need for inclusion in core strategy	As * above	No change
Airebank, muse, (via WYG planning)	EN1 could make some schemes unviable. Does not have flexibility. Should be amended to include flexibility.	The intention of EN1i) is to allow developers total flexibility in how they meet the CO2 reduction target and we would support fabric 1 st approach.	No change
SJS Property (via David Lock)	20% policy is not justified as there is no evidence that it will not render major developments unviable. Jeopardises housing/employment land needs. Not consistent with national policy as local plans need to be underpinned by robust evidence base.	In terms of viability issues, council will consider CO2 implications on the CS Policy in terms of viability is being addressed as part of the background work in the developing Community Infrastructure Levy (CIL).	No change
Aviva and Crown Estate (via Indigo)	Admirable aspirations and support proposal to reduce co2 and achieve wider sustainability objectives. Policies should be consistent with national zero carbon standards (not exceed) and adopt nationally described standards. York Inspector raised 'key concerns' that there were a large number of costs in the core strategy ... and no evidence that shows the development still deliverable with all the extra costs.	As * above In terms of viability issues, council will consider CO2 implications on the CS Policy in terms of viability is being addressed as part of the background work in the developing Community Infrastructure Levy (CIL).	No change

Quod	20% could be very onerous given forthcoming changes to BRs	As * above	No change
Sainsbury's (via Turleys)	Welcomes sustainability and co2 reductions but objects to EN1,2,4. Should be delivered through national standards.	As * above	No change
Sainsbury's (via Turleys)	Wetherby application used significant amounts of renewables and yet a technical and commercial challenge to go 20% below 2010 BR standards.	The council recommends pursuing a fabric first approach rather than focussing on renewables as this is likely to be most cost effective.	No change
Sainsbury's (via Turleys)	Meeting current and proposed changes to BR will significantly reduce CO2 emissions from all dev, therefore contributing to Leeds' targets.	This statement is unfortunately incorrect. Leeds is a growing city and all new development that is not carbon neutral adds to total emissions from Leeds, therefore need to constrain emissions from dev as soon as possible	Proposed minor change (ii) Strengthen contextual info in 5.5.33 to include this fact.
Ledstone Estate, bramham park estate, meadowside holdings, diocese of ripon and leeds, AR Briggs, hatfield estate, lady Elizabeth hastings estate (via carter jonas)	Policy should refer to the role of BR and how they compliment the planning/dev management process. Aspiration is laudable but is not consistent with national policy.	We believe that this is entirely consistent with national policy and reflects the growing importance of localism, where a local authority has greater freedoms to address issues of significant local importance.	No change
Chamber of Commerce	We fully support the strategic principles of the core strategy and the need to encourage low carbon development in Leeds but do strongly recommend that technical work is undertaken to fully understand the implications of these policies and the difficulties that are likely to arise during their implementation. We are concerned to ensure that the aspiration to encourage low carbon development in Leeds does not impede economic growth and the viability of developments and that the policies on carbon reduction targets are not inconsistent with the NPPF.	The Council is working hard to strike a balance between viability and achieving policy objectives. In terms of viability issues, any implications on the CS Policy in terms of viability is being addressed as part of the background work in the developing Community Infrastructure Levy (CIL).	No change

	Energy assessment		
CDP Ltd	Requiring an energy assessment at the initial planning stage, prior to specified end user occupant requirements, is time consuming and costly. Submission of the EA prior to construction should instead be a condition of planning permissions.	It is essential that an Energy Assessment is completed and submitted with the initial planning application in order for the developer to demonstrate that they have complied with policies EN1(i)&(ii) and for planning officers to verify the statement. This should be based on expected end user requirements; where this changes, an updated EA should be submitted prior to construction	Proposed minor change (ii) to clarify expectation
	Flexibility		
Hammerson (via Barton Willmore)	Support policy but request flexibility to relax this policy where developments deliver wider benefits which outweigh failure to meet carbon policies.	** Expectation is that this would be negotiated on an exceptional basis if the developer presented convincing arguments.	No change
British Library (driver jonas deloitte)	Some buildings have very particular needs (i.e. British Library has low oxygen needs) so should reword to indicate the aspirational nature of the targets.	As ** above.	No change
Scarborough Development Group	Support EN2 and reference to ambitious carbon reduction targets. However, a fair policy should allow for debate about detailed solution for each development.	The intention of EN1i) is to allow developers total flexibility in how they meet the CO2 reduction target.	No change
Hileys Solicitors (via LDP planning)	Support principle of EN1, need to reduce CO2 accepted. BUT need to consider whether all new developments can be carbon neutral after 2016? Look to give more flexibility in the wording to allow future schemes in highly sustainable locations or which provide community benefit to have more flexibility.	As ** above Additionally, off-site contributions can be used where carbon neutral is not viable on site.	No change
	Conversions		
Leeds Residential Property Forum (via Bury)	No dispensation for conversions to account for the additional problems and costs.	We agree with this point. The policy should not make conversions impossible as existing buildings contain high levels	Proposed minor change (ii) Add a qualification for conversions in same way as for EN2

		of embedded carbon.	
--	--	---------------------	--

Appendix 1

Core Strategy Publication Draft - Analysis of Consultation Responses

EN2 Sustainable Design and Construction

Representor/Agent	Representor Comments	LCC Initial Response	Action
<p>TGMF, consortium of housebuilders, Great north developments c/o Evans Property Grp, ELE Northern quadrant, Edmund thornhill estates, Barratt david Wilson homes, barratt david wilson homes Yorkshire homes, wortlea, redrows (via ID planning)</p>	<p>BREEAM/CODE out of date</p> <p>Policy will be out of date. Gov moving from BREEAM/Code to zero carbon standards, which takes a fabric first approach. Should refer to latest national guidance rather than set specific local targets. Repeats national standards so no need to include.</p>	<p>*The Building Research Establishment updates their methodology and standards regularly, supporting the transition to a low carbon future in a changing climate. It is important to recognise that BREEAM and CfSH cover wider issues than reduction of Global Warming Gasses. There is no known move by the Government to abandon the CfSH, and if they did BRE Global will continue with this methodology which existed before the Government adopted it. BREEAM and CfSH are accepted as consistent and systematic means to ensure development address climate mitigation & adaptation and wider sustainability issues.</p> <p>It is essential to the LDF that the core documents contain improving output targets for development, and that these targets cover local as well as national sustainable construction objectives.</p>	<p>Proposed modification to clarify text ii) minor change in 5.5.35 to 5.5.37</p>
<p>Templegate, Hallam land mgmt, Ashdale land and property (via Barton Willmore planning partnership northern)</p>	<p>BREEAM/Code requirements can change over time so this policy may become obsolete very quickly. Suggested change that development meets the relevant & prevalent sustainable</p>	<p>We want major developments to meet higher than national standards and the BRE methodology ensures flexibility for developers within a certifiable standard that will achievable improving standards</p>	<p>No change,</p>

	construction standards for that type of development.	over time.	
Dacre Son and Hartley (Miller, Barrett York, Chatford, Taylor Wimpey, Kebbell, Keyland, Barratt Leeds, Taylor Wimpey and Ashdale, Redrow, Mirfield, Warner)	Object to this policy, it is likely to be out of date by the time the CS is adopted.	As * above	No change
Redrow	Policy will be out of date. Gov moving from BREEAM/Code to zero carbon standards, which takes a fabric first approach. Should refer to latest national guidance rather than set specific local targets. Policy repeats national.	As * above	No change
Sainsbury's	BREEAM standards change periodically therefore highly likely that Excellent today will be superseded in future.	This is the benefit of the BRE methodology, that it continually improves as it updates its standards regularly every few years After 2016 we will review the targets, and if there are any significant changes to the BRE methodology, reflect this in the Core Strategy as part of ongoing monitoring, through the AMR (Authority Monitoring Report).	No change
Chamber of Commerce	We fully support the strategic principles of the core strategy and the need to encourage low carbon development in Leeds but do strongly recommend that technical work is undertaken to fully understand the implications of these policies and the difficulties that are likely to arise during their implementation. We are concerned to ensure that the aspiration to encourage low carbon development in Leeds does not impede economic growth and the viability of developments and that the policies on	Issue with regard to carbon reduction targets already covered in response for EN2 Analysis of Consultation Responses document	No change

	carbon reduction targets are not inconsistent with the NPPF.		
	National standards		
Leeds Civic Trust	Same target as proposed for the building regulations which go further and cover existing buildings	BREEAM and CfSH standards are wider, as well as giving the opportunity to go beyond, Building Regulations.	No change
Leeds Civic Trust	No reference to Sustainable Development Design Guide	Would be useful to reference and agree to cross reference.	Proposed minor mod (ii) Add reference to Sustainable Design SPD in 5.5.37
White Young Green Planning, Leeds Trinity University College Caddick Developments, Harrow Estates D Westwood & Son	It is unreasonable to require new developments to meet standards that are more onerous than national standards and these should be removed. Such an approach is not compliant with NPPF para 95 which advises that applicants should adopt nationally prescribed standards. Should not impede economic growth.	The NPPF calls for local authorities to secure radical actions in relation to measures to address climate change. The use of the CfSH and BREEAM standards is consistent with Government policy and nationally described standards, and although the changes for the construction industry are challenging, the stepped increases are appropriate and achievable.	No change
Muse, Airebank (via WYG)	All non residential buildings must achieve BREEAM Excellent, does not recognise that not all can economically achieve that score. Should be amended for flexibility. Also goes further than NPPF does.	Only major developments are required to meet these standards, which are stepped increases and the BRE methodology ensures flexibility for developers within a certifiable standard that will be achievable improving standards over time.	No change
Home Builders Federation	There is no national standard that requires compliance with the Code as Council erroneously states.	To clarify we state in 5.5.37 that we take account of the Government's recommended increases in the code over time. The standards have been used by Government as a means to ensure systematic improvements in sustainable construction outputs on the path to meet EU carbon reduction targets and address climate change adaptation.	No Change
Ledstone Estate,	See no justification for housing or	The NPPF calls for local authorities to	No change

<p>Bramham Park Estate, Meadowside Holdings, diocese of Ripon and Leeds, AR Briggs, Hatfield estate, Lady Elizabeth Hastings Estate (via Carter Jonas)</p>	<p>commercial dev to exceed the national stds set out by Code/BREEAM</p>	<p>secure radical actions in relation to measures to address climate change. The use of the CfSH and BREEAM standards is consistent with Government policy and nationally described standards, and although the changes for the construction industry are challenging, the stepped increases are appropriate and achievable.</p>	
	<p>Viability</p>		
<p>Home Builders Federation</p>	<p>Prescribing full compliance with Code (not just energy) goes further than BR so this is a local requirement exceeding national standards. Therefore needs to be assessed for impact on housing viability in combination with all other policies in CS.</p>	<p>A large part of the code applies to climate change issues and is therefore essential. The flexibility within the codes allows developers to respond efficiently to site conditions and constraint. Early identification of the required improving sustainable construction outputs allows developers to effectively integrate and reduce the cost of these essential works, accommodate this into their economic models and land-price negotiations. Adopting the CfSH improves the built environment and the quality of the buildings. In terms of viability issues, any implications on the CS Policy in terms of viability is being addressed as part of the background work in the developing Community Infrastructure Levy (CIL)</p>	<p>No Change</p>
<p>Aviva and Crown Estate (via Indigo)</p>	<p>Admirable aspirations and support proposal to reduce co2 and achieve wider sustainability objectives. Policies should be consistent with national zero carbon standards (not exceed) and adopt nationally described standards. York Inspector raised 'key concerns' that there were a large number of costs in the core strategy and no</p>	<p>Focussing on larger developments with better opportunities for cost effective carbon savings to go beyond building regulations will help to build the supply chain necessary to meet future more challenging targets for all buildings. CS policies are consistent with local and national policies and in accordance with</p>	<p>No Change</p>

	evidence that shows the development still deliverable with all the extra costs.	the NPPF requirement to support the transition to a low carbon future in a changing climate and to secure high quality design and good standards of amenity.	
Evans Homes no. 2 (via Driver Jonas Deloitte)	Object to requirement for all developments of 10 or more homes to be code 6. No flexibility and potential to make a number of schemes unviable, particularly smaller ones. Insufficient evidence behind policy. Revisit requirement to include flexibility – unsound if inflexible.	The CfSH allows developers flexibility in the means to meet the targets, and the minimum standards are lower to start with, increasing in step with the need to improve sustainable construction standards across Leeds.	No change
Asda stores (via Osborne clark)	BREEAM Excellent is a challenging target and not developed in relation to any local evidence. Wording in appropriate as requires developers to comply with standards without ability to negotiate. First evidence base to support policy and ensure viability not frustrated is required. Second, policies should have flexibility to review on case by case basis.	The BREEAM assessment method allows negotiations over appropriate flexible outputs whilst setting improving minimum standards over time that need to be met. It ensures that there is a consistent and systematic improvement in the built environment across the city	No Change
	Changes to BREEAM method		
Sainsburys	Requests that council considers the implication of meeting BREEAM Excellent under new 2011 guidance, which has significantly increased cost and complexity.	The costs and complexity relating to development are increasing as the need to meet climate change mitigation and adaptation increases. The Government recommends a step approach to allow for the industries involved to learn to integrate change better, reduce costs and make allowances for these necessary changes. The BREEAM method allows this to take place in a measured and considered manner.	No Change
CDP Ltd	BREEAM excellent places considerable financial and practical challenges re viability and may be technically unfeasible. Needs to be reviewed in light of recent changes to	The usefulness of BREEAM as a standard setting tool is that it is based on a methodology that allows developers flexibility. It appropriately	No Change

	BREEAM std, especially since changes were made after publication of Sustainable Design and Construction SPD, which this policy is based on. Will affect viability and deliverability of non residential development.	adjusts internal targets through independent research and progressively tightens the minimum requirements to meet the growing challenge of addressing EU and national climate change targets. Development that follow these changes become increasingly more energy efficient and economically resilient to the effects of climate change.	
	Flexibility/special cases		
English Heritage	Support wording of EN2 to only apply to conversions where feasible, recognising the special needs of some historic buildings	**Conversions, refitting, refurbishment and buildings of historic significance can provide a challenge for developers in regard to meeting the proposed targets. The Planning process allows for developers to suggest an appropriate resolution if a lower target is justified.	*Proposed minor change ii) Insert in 5.5.36 area
Sainsbury's	No objection in principal to use of BREEAM but significant concerns over mandatory Excellent. Experience has shown for building extensions, BREEAM is not practical given the constraints of extension.	BREEAM can be applied to re-fits, conversions and extensions. It would be inappropriate that changes to major developments are not subject to BREEAM methodology, and the minimum that would be expected is that they would not jeopardise the sustainable construction achievements of the existing building	Proposed minor ii) As * above
Sainsbury's	Request that council replace Excellent with 'very good with an aspiration to excellent'. OR reword the policy to state flexibility applied depending on the size, location and development status of the application.	The BREEAM assessment method allows negotiations over appropriate flexible outputs of development whilst setting improving minimum standards over time that need to be met. It ensures that there is a consistent and systematic improvement in the built environment across the city.	No change.
Hammerson (via Barton Willmore)	Support general aim of policy but request flexibility to relax this policy where developments which accord in principle with	Expectation is that this would be negotiated on an exceptional basis if the developer presented convincing	No change

	<p>general aims of sustainable development and spatial policies. Request that reworded to allow for exceptions on a case by case basis where a scheme offers wider benefits that would outweigh not meeting SD requirements or where compliance would impact overall viability. Code/ BREEAM ratings should be targets not minimum requirements.</p>	<p>arguments in relation to other overwhelming benefits, technical issues relating to the BRE methodology or as part of an overall viability application.</p>	
<p>British Library (via Drivers Jonas Deloitte)</p>	<p>BREEAM Excellent is a challenging target and not developed in relation to any local evidence. Wording in appropriate as requires developers to comply with standards without ability to negotiate. Not always appropriate i.e. BL specialist storage needs. Reword to make target aspirational and give recognition to operational and design requirements of specific developments.</p>	<p>As ** above</p>	<p>Proposed minor ii) As * above</p>

APPENDIX 2 – CHANGES TO CORE STRATEGY TEXT

b) Energy and Natural Resources

Climate Change

- 5.5.30 The Climate Change Act 2008 established a new approach to managing and responding to climate change in the UK. The Act created a legally binding target to reduce the UK's emissions of greenhouse gases to at least 80% below 1990 levels by 2050. This is delivered through a series of five year 'carbon budgets', designed to ensure that the Council make steady progress towards this long term target. A carbon budget is a cap on the total quantity of greenhouse gas emissions emitted in the UK over a specified time. Under a system of carbon budgets, every tonne of greenhouse gas emitted between now and 2050 will count. Where emissions rise in one sector, corresponding falls in another sector will have to be achieved.
- 5.5.31 In May 2009, the Government introduced legislation creating the first three legally binding carbon budgets. The budgets are 2008-2012 (22% reduction in CO₂ emissions below 1990 levels), 2013-2017 (28% reduction) and 2018-2022 (34% reduction).
- 5.5.32 These carbon budgets, whilst owned and delivered at a national level, will have a profound effect on all activities at a local level. Policy tools and financial incentives have been put in place to drive down emissions from transport, housing and business across the country. Building Regulations have introduced tighter CO₂ targets and a trajectory has been put in place to reduce emissions from new housing to zero by 2016, and from non-domestic development to zero by 2019. As Leeds is forecast to grow both in terms of housing numbers and new business premises, it is particularly important to ensure that these are as close to zero emission as possible, as soon as possible, to avoid the need for deeper cuts in other sectors.
- 5.5.33 The Leeds Climate Change Strategy (2009) was developed through the Leeds Initiative in partnership with the public, private and third sector. This contains a target to reduce emissions from Leeds by 80% between 1990 and 2050. In 2010, the Council adopted a further target to reduce emissions by 40% between 2005 and 2020. In the four years to 2009, the city reduced emissions by 14.4%, requiring a *further* reduction of approximately 2.5% per year until 2020. *Leeds is a growing city and all new development that is not carbon neutral adds to total emissions from Leeds (both on site emissions and emissions associated with transport). Therefore, there is a strong policy imperative to constrain emissions from all development as soon as possible.*
- 5.5.34 The Core Strategy climate change policies are designed so that new development contributes to our ambitious carbon reduction targets. However, the Council aim to do this in a flexible way that supports developers to achieve carbon reductions at lowest cost and in a way that benefits future building occupants. Building Regulations set a minimum energy efficiency standard applicable to all buildings, and in order to keep on track to achieve the 2050 target, the Government will increase this standard over the next decade. Developers currently have to demonstrate that proposed developments are within the Target Emissions Rate. However, because of the need to maintain a decent standard of living in the face of

significant growth, the Council is seeking a 20% CO2 reduction beyond the Building Regulation standard. Energy efficient buildings also reduce household fuel bills (and support initiatives for 'affordable warmth'), improve business competitiveness and create jobs in the energy service sectors. Economies of scale mean that energy efficiency measures are less costly on larger developments, and the policies are, therefore, only applied to 'major development.' *It is important to note that policy EN1(i) is highly flexible, allowing developers to choose the most appropriate and cost effective carbon reduction solution for their site. We would expect developers to take a 'fabric first' approach and, over time, supplement this with increasing levels of on-site district heating and low/zero carbon technologies. It must be remembered that the cost implications of installing carbon reduction measures are much lower when included in a new building than when they are retrofitted.*

POLICY EN1: CLIMATE CHANGE – CARBON DIOXIDE REDUCTION

All developments of 10 dwellings or more, or over 1,000 square metres of floorspace, *(including conversion where feasible) whether new-build or conversion*, will be required to:

- (i) Reduce total predicted carbon dioxide emissions to achieve 20% less than the Building Regulations Target Emission Rate until 2016 when all development should be zero carbon; and,
- (ii) Provide a minimum of 10% of the predicted energy needs of the development from low carbon energy.

Carbon dioxide reductions achieved *through in-meeting* criteria ~~(i)~~ *(ii)* will contribute to meeting criteria ~~(ii)~~ *(i)*.

Criteria (ii) will be calculated against the emissions rate predicted by criteria (i) so reducing overall energy demand by taking a fabric first approach will reduce the amount of renewable capacity required.

If it can be demonstrated that decentralised renewable or low carbon energy generation is not practical on or near the proposed development, it may be acceptable to provide a contribution equivalent to the cost of providing the 10%, which the council will use towards an off-site low carbon scheme. The opportunity to aggregate contributions to deliver larger scale low carbon projects would be implemented independent of the development. Wherever possible, the low carbon projects would be linked with local projects that would bring local benefits.

It is likely that the approach of pooling off-site contributions through planning obligations will be replaced by CIL in April 2014.

Applicants will be required to submit an Energy Assessment with their application *based on expected end user requirements* to demonstrate compliance with this Policy. *Where end user requirements change significantly, an updated EA should be submitted prior to construction.*

Sustainable Design and Construction

5.5.35 The Vision for Leeds (2011–2030), City Priority Plan (2011–2015) and Council Business Plan (2011–2015), commit the city as a whole and the Council specifically,

to make Leeds a lower carbon city. Within this overall context and through the City Council's Carbon & Water Management Plan (March 2011), BREEAM (Building Research Establishment Environmental Assessment Method) is an aspiration but essential in any new build and Very Good in major refurbishment projects. City carbon reduction targets are to reduce CO₂ emissions by 40% between 2005 and 2020. At the same time climate change adaptation needs to be addressed systematically and progressively in regard to the built environment and development across the city. To ensure there is a consistent approach to development improvements the Building Research Establishment's (BRE) approach has been identified as an independent and systematic methodology based on a robust environmental weighting system that covers a wide range of sustainable construction issues yet allows flexibility in relation to site and developer options.

5.5.36 For residential development, the relevant standard is the 'Code for Sustainable Homes' (CfSH). For non residential development, the relevant standard is the Building Research Establishment Environmental Assessment Method (BREEAM). The Council aims to make increasingly higher levels of the Code a requirement for major development in the district. will require developers to apply these assessments to major development in the district (see Policy EN2 table) as the additional costs of attaining improved sustainable construction outcomes are best met by economies of scale. In cases involving conversions, refitting, refurbishment, and historic buildings, a pragmatic approach will be taken with the expectation that the BRE methodology will still be applied, with agreed areas of lower achievement if shown to be appropriate. The BRE methodology allows for flexibility across a wide range of environmental areas, and consistently improves key environmental issues, covering improvements to; energy and CO₂ emissions, water use, materials, surface water run off, waste, pollution, health and well being, management and ecological value

5.5.37 To take account of the Government's recommended increases in the code over time, a gradually increasing target for the Code and BREEAM requirement is proposed for Leeds. This is shown in the table within Policy EN2, and it is for developers to decide how they meet the standard in conjunction with addressing Policy EN1 (carbon emissions reduction and on-site Low and Zero Carbon (LTZ) energy targets) (apart from the carbon emissions reduction requirement). The energy efficiency requirement is explained in Policy EN1. The targets for CO₂ reductions in Policy EN1 are challenging, being higher than those currently proposed in the code, but this is considered necessary longer term in Leeds to help tackle climate change. The dates are effective at the time of submission of a planning application, although in cases with delayed implementation, or delayed phases, there is an expectation that those parts of the development will be built to the higher sustainable construction standards of the later date. Further guidance, information and advice on sustainable construction in Leeds is set out in 'Building for Tomorrow for Today: Sustainable Design and Construction Supplementary Planning Document'. Developers should also follow the guidance in the Sustainable Development Design Guide and adopt where possible the Secure by Design code.

POLICY EN2: SUSTAINABLE DESIGN AND CONSTRUCTION

To require developments of 1,000 or more square metres or 10 or more dwellings (including conversion where feasible) to meet at least the standard set by BREEAM or Code for Sustainable Homes as shown in the table below. A post construction review certificate will be required prior to occupation.

	2012	2013	2016
Leeds Code for Sustainable Homes requirement	Code level 3	Code level 4	Code level 6
Leeds BREEAM standard for non-residential buildings requirement	Very Good	Excellent	Excellent

Low Carbon Energy Infrastructure

5.5.38 The Council aims to achieve a grid-connected renewable energy target of 75 MW by 2021. A breakdown of how this target could be achieved from different sources of renewable energy is included in the Natural Resources and Waste DPD. Potential exists for a number of sources of renewable energy within Leeds, including electricity from wind power, water power (hydro-power), solar energy (active solar), landfill gas, electricity and heat from biomass treatment and waste plants, and combined heat and power (CHP). Heat network distribution is expected to be extensively progressed during the plan period. As well as larger, more commercial projects for renewable energy (0.5 MW and above), potential also exists for smaller, community based projects where the benefits are fed back into the local area. *For clarity, policy EN3 is specifically designed to encourage commercial scale electricity generation. Policies EN1 and EN4 also support low carbon heating and cooling technologies.*

Wind Power

5.5.39 Beyond the urban area there are opportunities for large-scale wind energy generation in areas of higher wind speeds. The average wind speed at 45 metres above ground level is shown on Map 17. However, there are constraints due to the operation of Leeds Bradford International Airport and other local airfields and the need to protect the amenity of residents. Detailed policy criteria against which wind energy applications will be judged is set out in the Natural Resources and Waste DPD.

5.5.40 There are also opportunities for wind micro-generation, and the Council is currently investigating the potential for grid-connected turbines on land in its own ownership. These could potentially contribute 36 MW of energy towards the 75 MW target. More information on this is included in the city council's Carbon and Water Management Plan 2011 – 2021.

Hydro Power

5.5.41 Potential exists for the development of hydropower facilities on the rivers Wharfe, Aire and Calder. Whilst these are likely to have capacity for small-scale generation producing up to 100 kw, some of the weirs are large enough to have potential to contribute to the overall requirement for grid-connected renewable energy. *All development that potentially has a negative impact on hydro power use of the weirs, and or the associated works, must be developed to integrate their use as renewable*

energy sites, or protect future use. It is believed that the rivers Wharfe and Aire have potential to physically accept up to ten small-scale waterpower devices. If all were to go ahead the total capacity is unlikely to exceed 2 MW. Such schemes will be supported subject to environmental impact assessments, and provision of integrated fish passes. The Council is progressing hydro-power schemes at Armley Mills and Thwaite Mill on the River Aire, and the other weirs also offer potential for new hydro power generation. These locations are shown on Map 18. The waterways serve a multitude of uses, from a route for freight to forming part of the landscape as well as facilitating renewable energy.

Biomass Treatment

5.5.42 Biomass can be used in chip or pellet form to be combusted for heat and combined heat and power. Sources of biomass are food waste, green waste and agricultural waste from households, commerce, landscape/ forestry contractors and agricultural waste.

Solar Energy (Active Solar)

5.5.43 Solar energy is collected through either photovoltaic or solar thermal panels. Electricity can be produced from photovoltaic panels, however, these have limited potential for large-scale electricity generation. As most installations require connections to the national grid (as they produce the most electricity at times of low demand) they can still contribute towards renewable energy targets. Solar thermal systems capture energy from sunlight to meet a proportion of a building's hot water demands.

5.5.44 Approximately 8sqm of photovoltaics is needed for each 1 kW of installed capacity on a favourably orientated façade or roof. To install just 1 MW of electricity from photovoltaics, therefore, require 8,000 m² of panels. Leeds has a huge resource of facades and roofs facing into the southerly quadrant, enough to produce several MWs of electricity if fitted with photovoltaics. Feed in Tariffs (FITs) for large solar installations are now available and help provide a viable business case for retrofitting existing buildings.

Landfill Gas

5.5.45 Landfill gas qualifies as a renewable energy because it is a low-carbon source. Within Leeds, there has been recent production investment of an additional 2MW at Skelton Grange, Aire Valley and 1 MW at Peckfield, Micklefield landfill sites. However, it should be recognised that landfill gas generation will decrease with time as the resource becomes exhausted. A reasonable assumption is that by 2021 the output from landfill gas would be approximately 9 MW, but will tail off thereafter, depending on commercial factors, as well as gas yield.

Electricity and Heat from Waste

5.5.46 Substantial potential exists for energy from waste through the provision of strategic waste management facilities to deal with municipal waste and commercial and industrial waste. The Natural Resources and Waste DPD allocates sites suitable for energy from waste. Developments within a viable distance from these facilities are expected to connect into the heat distribution network.

POLICY EN3: LOW CARBON ENERGY

The Council supports appropriate opportunities to improve energy efficiency and increase the large scale (above 0.5MW) commercial renewable energy capacity, as a basis to reduce greenhouse gas emissions. This includes wind energy, hydro power, biomass treatment, solar energy, landfill gas, and energy from waste.

Protection of internationally designated nature conservation sites will be a key consideration, including relevant Policies contained as part of the Natural Resources & Waste Development Plan Document. Proposals for biomass power generation are required to supply an assessment of the potential biomass resource available (including location) and the transport implications of using that resource. Any development that may lead to an adverse effect on the integrity of a European site will not be supported.

Heat Distribution Networks (District Heating)

- 5.5.47 By distributing heat to multiple users through a pipe network, up to several thousand homes and businesses can be connected to the same sustainable heat source.
- 5.5.48 Future Energy Yorkshire have completed a study which recommends the establishment of a strategic body ('Energy Leeds') whose role would be to take responsibility for the delivery of energy related activities. These activities could include the co-ordination and delivery of heat networks. This role is particularly important to enable developments to reach code levels 5 and 6 of the Code for Sustainable Homes (as required under Policy EN2). Heat distribution is most likely to be viable in areas of higher density. Opportunities exist around Leeds City Centre (for example major development proposals for the Eastgate area, in the provision of an new energy centre, low carbon heating, cooling, electricity generation and potentially other utilities), the Aire Valley, the universities and St James University Teaching Hospital, as a consequence of high heat loads, which offer the potential for low carbon energy for local communities.
- 5.5.49 The Council has mapped the areas of greatest potential for the creation of heat networks across the district (see Map19). Where there is an existing heat network then it is expected that new developments will make the necessary connections. Where there is no heat network, but there is a low cost heat source such as energy from waste facilities, then opportunities should be taken through proposals for developer to investigate the potential for connection. Where neither existing heat networks nor low cost heat sources are available or feasible then a new heating plant/energy centre needs to be provided.
- 5.5.50 Heat Density is the annual heat demand in KWh divided by 8,760 (the number of hours in a year), to give a heat demand, and then divided by the area of land concerned. This calculation is key to evaluating heating network viability. Research conducted by the Department of Energy and Climate Change into the potential for district heating in the UK has found that areas with a heat density above 3,000 kWh/km² is currently required to create a viable network. The higher the heat density the more cost effective the network. As technology and expertise improve the current viability threshold will decrease.

POLICY EN4: DISTRICT HEATING

Where technically viable, *appropriate for the development*, and in areas with sufficient *existing or potential* heat density, developments of *1,000 or more square metres or 10 dwellings or more (including conversions where feasible)* should propose heating systems according to the following hierarchy:

- (i) Connection to existing *district heating* networks,
- (ii) ~~Use Construction of a site wide district heating network served by a new low carbon heat source/communal heating system supplied with low carbon heat where technically viable/feasible,~~
- (iii) *Collaboration with neighbouring development sites or existing heat loads/sources to develop a viable shared district heating network,*
- (iv) In areas where *district heating is currently not viable, but there is not potential for future district heating networks*, all development proposals will need to demonstrate how *sites have been designed are future proofed* to allow for connection to a *future an area-wide district heating network*.

(iv)

All major developments will be expected to contribute (either financially or in-kind) towards the creation of new, or enlargement of existing, district heating networks. Such contributions will be secured through the use of legal agreements and subsequently financial contributions through the CIL once introduced.

Carbon savings and renewable energy generation achieved under this policy will contribute to EN1(i) and EN1(ii).

Appendix 1

Core Strategy Publication Draft - Analysis of Consultation Responses

Policies EN5 (Managing Flood Risk – EN7 Minerals)

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>Policy EN5 - Managing Flood Risk</p>		
<p>0046 Environment Agency</p>	<p>Para 5.5.51: This paragraph states: ‘In considering areas of the district where future growth should take place, the Council has therefore sought to avoid areas of high flood risk in accordance with the sequential approach.....’.</p> <p>The Technical Guidance accompanying the NPPF sets out that development should be steered to areas with the lowest probability of flooding first (flood zone 1) moving onto flood zone 2 (medium probability) then flood zone 3 (high probability). Without definition of the term ‘high flood risk’, the above paragraph does not make clear that the Council will be applying the sequential approach. On face value, this paragraph could be read that the Council have sought to avoid Flood Zone 3 only. This approach would be contrary to the NPPF.</p> <p>We welcome the policy relating to flood risk and the way in which it signposts to the relevant polices within your Natural Resources and Waste</p>	<p>Managing the implications of flood risk, is a key issue for development, as part of the Development Management process and the LDF. It is not intended that the sequential approach will only be applied to Flood Zone 3 sites. The Council will apply the sequential approach as set out in the NPPF. In developing the Core Strategy’s overall approach to housing growth, background technical work has been undertaken to map a range of key attributes and constraints. This includes flood risk areas including Zones 3a and 3b (high probability & functional flood plain). The purpose of the work at this stage is to provide an initial assessment and a basis upon which to undertake more detailed assessment in relation to specific sites as part of the Site Allocations DPD. Consideration of the sequential approach is therefore integral to this technical work. The City Council intends to provide a technical background note to explain the approach taken.</p>	<p>Further background information to be provided.</p> <p>No change.</p>

	<p>DPD.</p> <p>With regard to Policy EN5, the broad approach of the policy is welcomed, however as currently worded part (i) of policy EN5 is not in conformity with the NPPF in so far as the application of the flood risk sequential test is concerned. We consider that the policy is ambiguous as to whether the flood risk sequential test will be applied. As written, the policy does not state clearly that it is necessary for the sequential test (avoidance) to be carried prior out to the consideration of mitigation measures.</p> <p>Suggested change that the Council have favoured sites in flood zone 1 and sought to avoid flood zones 2 and 3 in accordance with the sequential approach. We do wish to propose some changes. This policy needs to more robust in that it should clearly state avoidance before mitigation. Consideration should be given to the opportunity to include a requirement for developed functional floodplain to be returned to functional floodplain wherever possible within this policy and accompanying text.</p>	<p>Support welcomed and recognition that the NR&WDPD includes a series of detailed policies regarding the management of flood risk. In terms of the Policy EN5, the need for clarity is accepted and minor wording changes are therefore proposed, to the supporting text and to the policy wording, to acknowledge the importance of avoiding areas of flood risk and to confirm that the sequential approach will not only apply to Flood Zone 3 sites only In addition, the policy as drafted predates the introduction of the NPPF and therefore reference to PPS25 will need to be replaced with the NPPF.</p> <p>The point regarding the need to take opportunities for developed functional floodplain to be returned to functional floodplain is noted.</p>	<p>Minor change</p> <p>Amend final sentence of Para. 5.5.51 to read;</p> <p>In considering areas of the district where future growth should take place the Council has therefore sought to avoid areas of high flood risk in accordance with the sequential approach set out by the National Planning Policy Statement 25. , the sequential approach set out in the NPPF, will be applied.</p> <p>Amend Policy EN5 to read: (i) Avoiding or Avoiding development in flood risk areas by applying the sequential approach and where this is not possible, mitigating development in flood risk areas in line with guidance in PPS25 by mitigating measures,</p>
--	--	---	--

			<i>in line with the NPPF, both in the allocation of sites for development and in the determination of planning applications.</i>
2391 Yorkshire Wildlife Trust	SUDs schemes should be used to help reduce the amount of runoff. The Trust would recommend that SUDS be designed with biodiversity in mind, the CIRIA website http://www.ciria.com/suds/ gives information on designing SUDs to enhance biodiversity. Green roofs can also be part of a sustainable drainage system and can enhance biodiversity	The City Council has extensive planning guidance in place which recognised the importance of sustainable urban drainage. More recently this has been incorporated into the Sustainable Design and Construction SPD. The importance of Green roofs is noted and is currently reflected in Core Strategy Policy G1.	No change.
5681 The Ledston Estate, The Bramham Park Estate, The Hatfeild Estate, Lady Elizabeth Hastings Estate Charity, The Diocese of Ripon and Leeds, AR Briggs and Co, Meadowside Holdings Ltd (via Carter Jonas)	Management of flood risk is an important consideration which can affect the lives of the community and business activity. Recent announcements regarding be availability of home insurance indicates that areas of flood risk should be avoided. We would suggest that it is important in reviewing the suitability of future housing allocations including current PAS sites that areas of flood risk should be avoided	Comments Noted	No change
	Policy EN6 - Strategic Waste Management		
0046 Environment Agency	We welcome this policy and feel it is in line with your Natural Resources and Waste DPD. We do feel however that where you state “The Council will ensure that sufficient sites are provided across” this could be replaced by “The Council will ensure that sufficient sites are provided without detriment to the environment across the district”.	Support welcomed. The desire to manage any detrimental impacts upon the environment of Leeds, which may arise from such proposals, is integral to the policy approach of the NRWDPD and through existing saved UDP Development Management policies.	No change.
	Policy EN7 - Minerals		
0099 English Heritage	Paragraph 5.5.56 states that “the Core Strategy	The importance of building stone as	No change.

	<p>ensures the protection of resources for the future”. However, although there are various minerals resources in the District, only three (surface coal, sand and gravel) are protected under the provisions of Policy EN7. From our perspective, the District is an important supplier of building stone. In line with national policy guidance, it is important that this resource is also given adequate protection through the LDF. If it is the intention of the Core Strategy to provide protection for the range of minerals detailed in Paragraph 5.5.56, the wording of Policy EN7 should be amended.</p> <p>Suggested change to amend Policy EN7 to make it clear that protection for the mineral resource of the District is not simply limited to surface coal and sand & gravel.</p>	<p>an important resource for the repair and restorations of vernacular building has been recognised through the provision of a specific policy within the NR&WDPD</p>	
0414 PPL (via Scott Wilson)	<p>The policies and references to minerals in the draft Core Strategy and the Natural Resources and Waste DPD to which the Core Strategy refers are considered to be sound.</p>	<p>Support Welcome</p>	<p>No change</p>
1922 The Coal Authority	<p>The Coal Authority supports in principle Policy EN7 which sets out the strategic framework for the Mineral Safeguarding Area for the surface coal resource which has been designated through the Natural Resources DPD. This has ensured internal consistency between the DPDs which make up the overall Leeds LDF. However, the Mineral Safeguarding Areas identified in Policy EN7 are not illustrated within the Core Strategy either on the Key diagram or a separate plan. The text in the Core Strategy is also not explicit in where the reader can find these MSAs delineated which reduces the effectiveness of Policy EN7. This is not supported.</p>	<p>The issue of MSA has been considered in detail as part of the NR&WDPD Examination process. Through this process a MSA plan has been developed and will be incorporated into the DPD and Proposals Map upon adoption. The suggested minor wording change, to improve clarity and cross referencing is therefore agreed.</p>	<p>Proposed change to incorporate the words: <i>“The MSA for coal and sand and gravel is considered in detail as part of the Natural Resources and Waste DPD. The Proposals Map will be updated to show these areas, following adoption of the DPD”.</i></p>

	<p>Suggest the following minor wording addition at the end of paragraph 5.5.58: “The MSAs for coal and sand and gravel are shown on the Proposals Map which accompanies the Natural Resources and Waste DPD”, To ensure that the spatial extent of the MSAs contained in Policy EN7 is appropriately referenced to allow the reader to know where the MSAs are actually illustrated. The Coal Authority would be happy to negotiate alternative suitable wording and to enter into discussions ahead of any examination hearing process to try and reach a negotiated position</p>		

APPENDIX 2 – CHANGES TO CORE STRATEGY TEXT

Flood Risk

5.5.51 The rivers Aire and Wharfe and their tributaries are a dominant feature of the Leeds district. However, parts of Leeds City Centre have a 1 in 20 year risk of flooding from the River Aire, and the Environment Agency estimates that there are over 3,862 homes and nearly 700 businesses at risk of river flooding from the River Aire alone. Redevelopment of land within this area will be generally acceptable, subject to appropriate mitigation, including the Leeds Flood Alleviation Scheme. Leeds also experiences flooding from the River Calder adjacent to the district's south eastern boundary. In considering areas of the district where future growth should take place ~~the Council has therefore sought to avoid areas of high flood risk in accordance with the sequential approach set out by the National Planning Policy Statement 25. ,~~ *the sequential approach set out in the NPPF, will be applied.*

5.5.52 In recent years Leeds has also experienced problems created by surface water flooding. Smaller watercourses and drains are far more susceptible than the larger river systems to flash flooding as a result of localised intense rainfall. With changing climate patterns it is expected that storms of this nature will become increasingly common, potentially increasing the risk posed to properties situated in close proximity to local water courses. Policy EN5 has been developed in order to manage both fluvial and pluvial sources of flooding. Further details on the actions identified in Policy EN5 are in the Natural Resources and Waste DPD.

POLICY EN5: MANAGING FLOOD RISK

The Council will manage and mitigate flood risk by:

- (i) ~~Avoiding or~~ *Avoiding development in flood risk areas by applying the sequential approach and where this is not possible, mitigating development in flood risk areas in line with guidance in PPS25 by mitigating measures, in line with the NPPF,* both in the allocation of sites for development and in the determination of planning applications.
- (ii) Protecting areas of functional floodplain as shown on the Leeds SFRA from development (except for water compatible uses and essential infrastructure).
- (iii) Requiring flood risk to be considered for all development commensurate with the scale and impact of the proposed development and mitigated where appropriate.
- (iv) Reducing the speed and volume of surface water run-off as part of new build developments.
- (v) Making space for flood water in high flood risk areas.
- (vi) Reducing the residual risks within Areas of Rapid Inundation.
- (vii) Encouraging the removal of existing culverting where practicable and appropriate.
- (viii) The development of the Leeds Flood Alleviation Scheme.