



Leeds Local Plan Update Consultation
Policy & Plans Group
Merrion House
9th Floor East
110 Merrion Centre
Leeds
LS2 8BB

11 December 2023

FAO Leeds Local Plan Update Team,

Re: Leeds Civic Trust response to pre-submission changes to Leeds Local Plan Update

Thanks for taking the time to consult with the city of Leeds during the period of 30 October to 11 December 2023 regarding the pre-submission changes to the Local Plan Update. Leeds Civic Trust in general supports the changes and congratulates the Council for producing excellent improvements to the Local Plan. Detailed below are specific comments under the five key areas.

- **Flood Risk:** This section is now easier to read and understand.
- **Carbon Reduction:** We welcome the emphasis on re-using existing buildings and this should be the primary consideration in any development. Thus, in Policy SP0, new item m) should be put above item d) in the policy. In Policy EN1, the phrase "the applicant must demonstrate why the proposed use is not suitable for the existing buildings on site" is too weak and should be rephrased as "the applicant must provide **robust justification** why the proposed use is not suitable for the existing buildings on-site".
- **Green/Blue Infrastructure:** We feel that there could be a confusion about the differences between Green and Blue Infrastructure and Strategic Green and Blue Infrastructure, and this should be addressed. There is also confusion sometimes about which map is being referred to: Policy Map in some instances and Map X in others. We welcome the increased protection for Ancient and Long-Established Woodlands, and trees generally, with a stronger recognition of their multiple roles in biodiversity, carbon storage, mental health, landscape and amenity value.
- **Place-making:** The method of calculating how "complete, compact and connected" existing places are, has been made more understandable. Design Policy is now much more comprehensive and we welcome the requirement that context must be considered prior to design commencing, though this may be difficult to establish in schemes for which there are no pre-application discussions.
- **Sustainable Infrastructure:** Consideration of the design of spaces under bridges is a sensible addition.

Please do not hesitate to contact us if you have any questions or would like to discuss these matters further.

Yours sincerely,

Martin Hamilton
Director of Leeds Civic Trust
Leeds Civic Trust cc: Leeds Civic Trust Planning Committee

Leeds Civic Trust 17-19 Wharf Street Leeds LS2 7EQ

T: (0113) 243 9594 F: (0113) 244 8355 E: office@leedscivictrust.org.uk W: www.leedscivictrust.org.uk