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## DEVELOPMENT PLAN PANEL

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Meeting to be held in Civic Hall, Leeds, LS1 1UR on  
Tuesday, 11th September, 2012  
at 1.30 pm

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### MEMBERSHIP

#### Councillors

M Coulson  
P Gruen  
R Harington  
J Lewis  
K Mitchell  
N Taggart (Chair)  
N Walshaw

C Campbell

B Anderson  
C Fox

T Leadley

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**Agenda compiled by:**  
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**Head of Forward Planning and**  
**Implementation:**  
**David Feeney**  
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# A G E N D A

Item No	Ward	Item Not Open		Page No
1			<p><b>APPEALS AGAINST REFUSAL OF INSPECTION OF DOCUMENTS</b></p> <p>To consider any appeals in accordance with Procedure Rule 25 of the Access to Information Rules (in the event of an Appeal the press and public will be excluded)</p> <p>(*In accordance with Procedure Rule 25, written notice of an appeal must be received by the Head of Governance Services at least 24 hours before the meeting)</p>	
2			<p><b>EXEMPT INFORMATION - POSSIBLE EXCLUSION OF THE PRESS AND PUBLIC</b></p> <p>1 To highlight reports or appendices which officers have identified as containing exempt information, and where officers consider that the public interest in maintaining the exemption outweighs the public interest in disclosing the information, for the reasons outlined in the report.</p> <p>2 To consider whether or not to accept the officers recommendation in respect of the above information.</p> <p>3 If so, to formally pass the following resolution:-</p> <p><b>RESOLVED</b> – That the press and public be excluded from the meeting during consideration of the following parts of the agenda designated as containing exempt information on the grounds that it is likely, in view of the nature of the business to be transacted or the nature of the proceedings, that if members of the press and public were present there would be disclosure to them of exempt information, as follows:</p> <p><b>No exempt items or information have been identified on this agenda.</b></p>	

Item No	Ward	Item Not Open		Page No
3			<p><b>LATE ITEMS</b></p> <p>To identify items which have been admitted to the agenda by the Chair for consideration.</p> <p>(The special circumstance shall be specified in the minutes).</p>	
4			<p><b>DECLARATION OF DISCLOSABLE PECUNIARY AND OTHER INTERESTS</b></p> <p>To disclose or draw attention to any disclosable pecuniary interests for the purposes of Section 31 of the Localism Act 2011 and paragraphs 13-18 of the Members' Code of Conduct. Also to declare any other significant interests which the Member wishes to declare in the public interest, in accordance with paragraphs 19-20 of the Members' Code of Conduct.</p>	
5			<p><b>APOLOGIES FOR ABSENCE</b></p> <p>To receive any apologies for absence.</p>	
6			<p><b>MINUTES - 7TH AUGUST 2012</b></p> <p>To approve as a correct record the minutes of the Development Plan Panel meeting held on 7<sup>th</sup> August 2012.</p>	1 - 6
7			<p><b>LEEDS COMMUNITY INFRASTRUCTURE LEVY - UPDATE ON PROGRESS AND THE COMMISSIONING OF THE LEEDS ECONOMIC VIABILITY STUDY</b></p> <p>To receive and consider a report from the Director of City Development providing a brief update on the progress made with the Leeds CIL, and the Economic Viability Study currently being undertaken by consultants GVA.</p>	7 - 12

Item No	Ward	Item Not Open		Page No
8			<p data-bbox="675 181 1410 434"><b>LDF CORE STRATEGY - PUBLICATION DRAFT, ANALYSIS OF CONSULTATION RESPONSES: SECTION 1 - 4: INTRODUCTION, PROFILE OF LEEDS METROPOLITAN DISTRICT, SPATIAL VISION &amp; OBJECTIVES, SPATIAL DEVELOPMENT STRATEGY (OVERVIEW) &amp; KEY DIAGRAM</b></p> <p data-bbox="675 477 1410 689">To receive and consider a report from the Director of City Development reviewing the consultation responses in relation to Section 1 - 4: Introduction, Profile of Leeds Metropolitan District, Spatial Vision &amp; Objectives, Spatial Development Strategy (Overview) &amp; Key Diagram.</p>	13 - 50
9			<p data-bbox="675 768 1410 869"><b>LDF CORE STRATEGY - PUBLICATION DRAFT, ANALYSIS OF CONSULTATION RESPONSES: PLACEMAKING - RETAIL AND CENTRES</b></p> <p data-bbox="675 911 1410 1124">To receive and consider a report from the Director of City Development reviewing the consultation responses in relation to the overall approach to retailing and centres including Strategic Policy SP2 and the Placemaking chapter Policies P1 to P9 (the City Centre is covered by a separate report).</p>	51 - 114
10			<p data-bbox="675 1193 1410 1294"><b>LDF CORE STRATEGY - PUBLICATION DRAFT, ANALYSIS OF CONSULTATION RESPONSES: CITY CENTRE</b></p> <p data-bbox="675 1337 1410 1482">To receive and consider a report from the Director of City Development reviewing the consultation responses in relation to the Placemaking chapter and the overall approach to retailing and centres.</p>	115 - 142
11			<p data-bbox="675 1552 1410 1697"><b>LDF CORE STRATEGY - PUBLICATION DRAFT, ANALYSIS OF CONSULTATION RESPONSES: THE HOUSING REQUIREMENT (SP6) AND DISTRIBUTION (SP7)</b></p> <p data-bbox="675 1740 1410 1886">To receive and consider a report from the Director of City Development reviewing the consultation responses in relation to the housing requirement (Policy SP6) and housing distribution (Policy SP7).</p>	143 - 184

Item No	Ward	Item Not Open		Page No
12			<p data-bbox="675 181 1406 398"><b>LDF CORE STRATEGY - PUBLICATION DRAFT, ANALYSIS OF CONSULTATION RESPONSES: HOUSING POLICIES H1 (PHASING), H2 (DEVELOPMENT ON NON-ALLOCATED SITES), H3 (DENSITY), H4 (MIX) AND H8 (INDEPENDENT LIVING)</b></p> <p data-bbox="675 443 1393 584">To receive and consider a report from the Director of City Development reviewing the consultation responses in relation to Policies H1, H2, H3, H4 and H8 of the housing chapter.</p>	185 - 224
13			<p data-bbox="675 656 1401 757"><b>LDF CORE STRATEGY - PUBLICATION DRAFT, ANALYSIS OF CONSULTATION RESPONSES: SPATIAL POLICY 10: GREEN BELT</b></p> <p data-bbox="675 801 1393 943">To receive and consider a report from the Director of City Development reviewing the consultation responses in relation to Spatial Policy 10: Green Belt.</p>	225 - 248
14			<p data-bbox="675 1014 1401 1193"><b>LDF CORE STRATEGY - PUBLICATION DRAFT, ANALYSIS OF CONSULTATION RESPONSES: POLICY SP12 'MANAGING THE GROWTH OF LEEDS BRADFORD INTERNATIONAL AIRPORT'</b></p> <p data-bbox="675 1238 1393 1379">To receive and consider a report from the Director of City Development reviewing the consultation responses in relation to SP12 'Managing the growth of Leeds Bradford International Airport'.</p>	249 - 260

Item No	Ward	Item Not Open		Page No
15			<p><b>LDF CORE STRATEGY CONSULTATION RESPONSES IN RELATION TO MISCELLANEOUS TOPICS (INCLUDING SOUNDNESS, NPPF COMPLIANCE, GENERAL ENVIRONMENT &amp; ECONOMY, CONSULTATION, HABITAT REGULATIONS ASSESSMENT, SUSTAINABILITY APPRAISAL, EQUALITY IMPACT ASSESSMENT AND HEALTH IMPACT ASSESSMENT).</b></p> <p>To receive and consider a report from the Director of City Development reviewing the consultation responses in relation to a number of Miscellaneous topics (including Soundness, NPPF compliance, General Environment &amp; Economy, Consultation, Habitat Regulations Assessment, Sustainability Appraisal, Equality Impact Assessment and Health Impact Assessment.)</p>	261 - 284
16			<p><b>DATE AND TIME OF NEXT MEETING</b></p> <p>Tuesday, 2<sup>nd</sup> October 2012 at 1.30pm.</p>	

# Agenda Item 6

## Development Plan Panel

Tuesday, 7th August, 2012

**PRESENT:** Councillor N Taggart in the Chair

Councillors B Anderson, C Campbell,  
M Coulson, C Fox, P Gruen, T Leadley,  
J Lewis and N Walshaw

### 18 Chair's Opening Remarks

The Chair welcomed all in attendance to the August meeting of Development Plan Panel.

### 19 Late Items

In accordance with his powers under Section 100B(4)(b) of the Local Government Act 1972, the Chair agreed to accept the following late information, which was not available at the time of agenda despatch:

- Leeds Site Allocations Development Plan Document – Proforma for site assessment prior to issues and options stage (Minute No. 12 refers)
- Response from the Environment Agency in relation to the Core Strategy, paragraph 5.5.51 and policy EN5. (Minute No. 27 refers)

### 20 Declaration of Disclosable Pecuniary and Other Interests

There were no disclosable pecuniary interests made at the meeting, however, a significant interest was declared by Councillor Taggart in relation to agenda item 10, LDF Core Strategy – Publication Draft, Analysis of Consultation Responses: Urban Design, Conservation, Landscape and Managing Environmental Resources, in his capacity as Chair of West Yorkshire Joint Services Committee (Minute No. 27 refers).

### 21 Apologies for Absence

Apologies for absence were submitted by Councillors Harington and Mitchell.

### 22 Minutes - 2nd July 2012

The following amendments were raised at the meeting:

- Inclusion of Councillor Gruen's apologies for absence
- The site assessment proforma be amended to not refer only to grade 1 agricultural land, of which there is very little in Leeds, but all agricultural land use classifications.

**RESOLVED** – That subject to the above amendments, the minutes of the meeting held on 2<sup>nd</sup> July 2012 be approved as a correct record.

Draft minutes to be approved at the meeting  
to be held on Tuesday, 11th September, 2012

## **23 Matters Arising from the Minutes**

Members were advised that a request had been made for the latest interim affordability limits. It was agreed to forward this information to Members in due course.

Members briefly discussed the impact of the scrutiny inquiry report in relation to affordable housing and the role of Members in supporting this area of work.

## **24 LDF Core Strategy - Publication Draft, Analysis of Consultation Responses: Policy H7 Accommodation for Gypsies, Travellers and Travelling Show People**

The Director of City Development submitted a report which outlined the consultation responses in relation to Policy H7, Accommodation for Gypsies Travellers and Travelling Show People.

A copy of proposed changes to the Core Strategy was appended to the report.

The following officers attended the meeting and responded to Members' questions and comments:

- David Feeney, Head of Forward Planning and Implementation
- Steve Speak, Deputy Chief Planning Officer
- Lois Pickering, Team Leader (Local Plans West).

The key points of discussion were:

- Acknowledgement of the different requirements of travellers and travelling show people.
- The benefits of producing a checklist so that travellers could identify their own sites.

**RESOLVED** – That the Development Plan Panel endorses the analysis of the issues raised and suggested Core Strategy text changes, subject to amendments, for presentation to Executive Board for approval.

## **25 LDF Core Strategy - Publication Draft, Analysis of Consultation Responses: Policy H6 - Houses in Multiple Occupation (HMOs), Student Accommodation and Flat Conversions**

The Director of City Development submitted a report which set out further changes to Policy H6 suggested by Councillor Walshaw for consideration by Development Plan Panel.

A copy of proposed changes to the Core Strategy was appended to the report.

The following officers attended the meeting and responded to Members' questions and comments:

Draft minutes to be approved at the meeting  
to be held on Tuesday, 11th September, 2012



- David Feeney, Head of Forward Planning and Implementation
- Steve Speak, Deputy Chief Planning Officer
- Gareth Read, Senior Planner.

The key areas of discussion were:

- Concern about grouping together 3 distinct areas, HMOs, student accommodation and flat conversions.
- Concern about the surplus of student accommodation. It was suggested that scope for adjustments be included as part of the review process.
- The impact of the reduction in student numbers.
- Concern about the number of empty properties.
- The need for clarification of 'appropriately located off and on street parking'.

**RESOLVED** – That the Development Plan Panel endorses the analysis of the issues raised and suggested Core Strategy text changes, subject to amendments, for presentation to Executive Board for approval.

**26 LDF Core Strategy - Publication Draft, Analysis of Consultation Responses: SP8, SP9, EC1- EC3 Employment**

The Director of City Development submitted a report which outlined the consultation responses in relation to Policies SP8, SP9, EC1- EC3, Employment.

A copy of proposed changes to the Core Strategy was appended to the report.

The following officers attended the meeting and responded to Members' questions and comments:

- David Feeney, Head of Forward Planning and Implementation
- Steve Speak, Deputy Chief Planning Officer
- Ann Stewart, Senior Planner.

The main areas of discussion were:

- Confirmation of the need to avoid reference to specific venues in ensuring that the policy did not favour named sites even before planning permission for enabling development had been sought.
- Clarification sought regarding the requirement for offices expressed as floorspace, the margin of space equalling 8,611 square metres of floorspace per annum. Members were advised that the figure was derived from the Employment Land Review. It was agreed to provide Members with a breakdown of the calculation.
- That reference be made to altering Policy EC3 following a representation submitted by Councillor Leadley.
- Minor typographical alterations suggested in relation to paragraphs 4.7.3 and 4.7.5

- Development of apprenticeships through city working and ensuring developers made provision for this as part of planning conditions.
- Concern about conversion of existing buildings in cases where the building was unsuitable for conversion. It was suggested that a further review of the NPFF may be required.

**RESOLVED** – That the Development Plan Panel endorses the analysis of the issues raised and suggested Core Strategy text changes for presentation to Executive Board for approval.

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

The Director of City Development submitted a report which outlined the consultation responses in relation to Urban Design, Conservation, Landscape and Policies contained within the Managing Environmental Resources theme.

A copy of proposed changes to the Core Strategy was appended to the report.

The following officers attended the meeting and responded to Members' questions and comments:

- David Feeney, Head of Forward Planning and Implementation
- Steve Speak, Deputy Chief Planning Officer
- Lois Pickering, Team Leader (Local Plans West)
- Jenny Fisher, Principal Design Officer
- George Munson, Energy and Climate Change Manager.

The main points of discussion were:

- Amendments to Policy GX – Cemeteries and Burial Space, as follows:
  - Removal of the word 'easy' in the first bullet point to read 'access by public transport, walking and cycling'
  - Removal of the word 'local' in the third bullet point to read 'the scale is appropriate to identified need'.
- Concerns about the challenges in meeting the requirements of Policy GX, particularly in terms of the frequency of public transport to and from cemeteries.
- In relation to Policy EN1: Climate Change – Carbon Dioxide Reduction, clarification was sought about the rationale of 10 dwellings or more. Members requested justification of the number of dwellings, particularly in terms of ensuring consistency.
- Amendment to Spatial Policy 13: Strategic Green Infrastructure, as follows:
  - (iv) The Wharfe Valley and Chevin Ridge.
- Amendment to Climate Change, paragraph, 5.5.33, last sentence, as follows:
  - 'Therefore, the policy imperative is to constrain emissions from all development as soon as possible'.

- Para. 5.5.37, should make cross reference to the policy areas covered in the 'Building Tomorrow for Today: Sustainable Design and Construction Supplementary Planning Document.
- Acknowledgement that clarification was required in relation to the additional text inserted under hydro power, paragraph 5.5.41.

**RESOLVED** – That the Development Plan Panel endorses the analysis of the issues raised and suggested Core Strategy text changes, subject to amendments, for presentation to Executive Board for approval.

## **28 LDF Core Strategy - Publication Draft, Analysis of Consultation Responses: Implementation and Delivery**

The Director of City Development submitted a report which outlined the consultation responses in relation to the Implementation and Delivery chapter.

A copy of proposed changes to the Core Strategy was appended to the report.

The following officers attended the meeting:

- David Feeney, Head of Forward Planning and Implementation
- Steve Speak, Deputy Chief Planning Officer
- Lora Hughes, Principal Planner

**RESOLVED** – That the Development Plan Panel endorses the analysis of the issues raised and suggested Core Strategy text changes for presentation to Executive Board for approval.

## **29 Date and Time of Next Meeting**

Tuesday, 11<sup>th</sup> September 2012 at 1.30pm.

Tuesday, 25<sup>th</sup> September, 2012 pm (to be confirmed) – workshop for Development Plans Panel Members and Chairs of Plans Panels on the Site Allocations DPD and process of site assessment.

Members agreed to re-arrange the meeting date scheduled to take place on Wednesday, 2<sup>nd</sup> January 2012. Confirmation of the re-arranged meeting date to be agreed at a later date.

(The meeting concluded at 3.30pm.)

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Report author: Lora Hughes  
50714

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## Report of the Director of City Development

Report to: Development Plan Panel

Date: 11<sup>th</sup> September 2012

**Subject: Leeds Community Infrastructure Levy – Update on progress and the commissioning of the Leeds Economic Viability Study**

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

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### Summary of Main Issues

1. Members have previously been given an overview of the Community Infrastructure Levy (CIL), and will be aware that in Leeds we are working towards a target of having an adopted CIL by April 2014 at the latest. Consultants GVA have been appointed to undertake the key piece of evidence to inform the CIL, an Economic Viability Study, which is needed in order to help set the CIL Charging Schedule. This is currently underway with the final report due by the beginning of October.

### Recommendations

Development Plan Panel is requested to:

- i) Note the information relating to the Community Infrastructure Levy for Leeds, especially the current work on the Economic Viability Study, and the future actions to develop the Leeds CIL.

## **1.0 Purpose of this Report**

- 1.1 This report gives a short update on the progress made with the Leeds CIL, and the Economic Viability Study currently being undertaken by consultants GVA.

## **2.0 Background Information**

- 2.1 The Community Infrastructure Levy Regulations (2010 and amended 2011, final Regulations expected early 2013) set out that a charging authority can choose to charge the CIL on new development in its area. The charges must be set out in a Charging Schedule, and must be based only on viability evidence. The CIL Regulations have also changed the use of S106 planning obligations. From April 2014 it will no longer be possible to secure S106s for District wide requirements such as greenspace, transport schemes and education facilities.
- 2.2 In December 2011 the Executive Board agreed to progress work on developing a CIL for Leeds.

## **3.0 Main Issues**

- 3.1 Consultants GVA have been appointed to undertake the key piece of evidence to inform the CIL, an Economic Viability Study. This is currently underway with the final report due by the beginning of October.
- 3.2 GVA have agreed with a range of Council officers the various assumptions and inputs to be used in the Study. They will test a range of uses across the District using a residual appraisals methodology. This will take into account the Council's current and potential future policy requirements, such as for affordable housing, greenspace, Code for Sustainable Homes, and other relevant assumptions. This includes the policy requirements for new development in the emerging Core Strategy.
- 3.3 A development industry workshop is scheduled for the 14<sup>th</sup> September, where interested parties will be able to comment on the assumptions in the Viability Study and on its initial findings. Where possible, the comments and opinions will be incorporated into GVA's analysis and final report, and where this is not possible or not deemed appropriate, justification will be given. This 'frontloading' therefore aims to understand developers' concerns at an early stage and aims to reduce subsequent objections.
- 3.4 Dale Robinson from GVA will be attending Development Plan Panel to answer any detailed questions on the viability work.
- 3.5 The final report will use the evidence to recommend a range of viable rates within which the CIL could be set for each of the different uses (and varied by location across the District as necessary). As a theoretical example, the report might set out that new development would still be generally viable if the CIL were set anywhere up to £150 per square meter for residential development in a certain zone. However, choices and options will then need to be balanced in setting the final rate to form the Council's Preliminary Draft Charging Schedule. This includes

considering aspects such as setting the £150 highest rate in order to gain the maximum funding for infrastructure, versus setting a rate £50 or £100 lower in order to encourage economic growth and housebuilding. The CIL Regulations state that the CIL rates must not put at serious risk the overall development of the area, and that an appropriate balance must be struck. The impact on affordable housing also needs to be considered, as once adopted the CIL will not be negotiable, whereas affordable housing will remain negotiable and therefore there will be pressure to reduce provision where schemes are not viable.

- 3.6 The final Economic Viability Study will be brought back to Development Plan Panel for Members to consider these options and recommend the final rates to be used, prior to taking a report to Executive Board. It is anticipated that the formal consultation period on the Preliminary Draft Charging Schedule will be in early 2013.

## **4.0 Corporate Considerations**

### **4.1 Consultation and Engagement**

- 4.1.1 As yet there has been no formal consultation stages of the CIL. The first formal consultation will be on the Preliminary Draft Charging Schedule, currently anticipated in early 2013. The current work on the Economic Viability Study as the key piece of evidence to inform the CIL includes informal consultation with the development industry by holding a stakeholder workshop in mid-September, and with neighbouring authorities through informal discussions. Executive Board agreed to implement a CIL for Leeds in December 2011, and Members have been kept aware of ongoing work since then. Following the completion of the Viability Study, Development Plan Panel will make recommendations to Executive Board on the final CIL rates to be set out in the Preliminary Draft Charging Schedule. The findings of the Viability Study are also to be presented to Scrutiny Board on 25<sup>th</sup> September.

### **4.2 Equality and Diversity / Cohesion and Integration**

- 4.2.1 An Equality Impact Assessment Screening was undertaken on the Executive Board report in December 2011. This concluded that equality, diversity, cohesion and integration issues were being considered as part of the preparation of the CIL although it was too early to be able to have any meaningful consideration of specific effects. Within this overall context, it will therefore be necessary to continue to have regard to equality and diversity issues as part of the ongoing process of developing a CIL for Leeds, including arranging appropriate consultation stages and proper consideration of representations. Another screening assessment will be required at the point of bringing forwards specific recommendations on the CIL rates and options.

### **4.3 Council Policies and City Priorities**

- 4.3.1 The CIL is already a process which local authorities can use, as supported by the CIL April 2010 and 2011 Regulations. The CIL will be a document within the Local Development Framework. The intention to develop the CIL broadly reflects Council

policies and city priorities in that it emphasises incentivising growth, both to the development industry and local communities.

#### **4.4 Resources and value for money**

4.4.1 Executive Board gave agreement in December 2011 to progress work on the CIL, including the release of the necessary funds. The Government recognises that costs will be incurred and so the Regulations allow set up and administration costs to be reclaimed from future CIL receipts. The implementation of the CIL in Leeds is expected to result in increased funding for strategic infrastructure across the District. The impetus to deliver the CIL as early as possible would therefore provide the most value for money.

#### **4.5 Legal Implications, Access to Information and Call In**

4.5.1 The Community Infrastructure Levy Regulations (2010 and amended 2011, final Regulations expected early 2013) set out that a charging authority can choose to charge the CIL on new development in its area. The charges must be set out in a Charging Schedule, and must be based only on viability evidence. The CIL Regulations have also changed the use of S106 planning obligations. From April 2014 it will no longer be possible to secure S106s for District wide requirements such as greenspace, transport schemes and education facilities

4.5.2 As this report is for information only, it is not subject to call-in, however future Key Decisions on the CIL will be subject to call-in.

#### **4.6 Risk Management**

4.6.1 If the Community Infrastructure Levy is not brought forward in Leeds, then the Council is at risk of losing out on monies which under the present system are gained through the S106 mechanism, as this system will no longer be available. In addition, the introduction of the CIL is intended to bring in a greater amount of infrastructure funding than at present, alongside wider benefits to incentivise development such as more certainty to developers, and more acceptance by local communities. In order to manage this risk it is recommended that Officers continue to work on the development of the CIL, including inputting into the current Economic Viability Study as outlined in this report. The preparation of the CIL is a challenging process within the context of ongoing national changes to the Regulations, limited precedents nationally, and in responding to local issues and priorities. Consequently, at the appropriate time advice is sought from a number of sources, including legal advice and that from the Planning Advisory Service, Planning Officers Society, and neighbouring authorities as a method to help manage risk and to keep the process moving forward.

#### **5. Conclusions**

5.1 This report aims to update Development Plan Panel on the progress made with the Leeds CIL, and in particular the Economic Viability Study. It has set out that the Study is currently underway, with consultants GVA undertaking a range of residual appraisals to inform their final report, which will give recommendations on the possible range of CIL rates which could be charged across the District. As part of



this, a developer workshop is programmed for 14<sup>th</sup> September which will allow 'frontloading' of the process with the development industry. The final Study will be presented to Members to recommend the final rates to go into the Preliminary Draft Charging Schedule, anticipated to go out for formal consultation in early 2013.

## **6. Recommendations**

6.1 Development Plan Panel is requested to:

i) Note the information relating to the CIL for Leeds, especially the current work on the Economic Viability Study, and the future actions to develop the Leeds CIL.

## **7. Background documents<sup>1</sup>**

7.1 Relevant background documents are the Executive Board report 14<sup>th</sup> December 2011, the Economic Viability Study Brief for Consultants, and the draft Infrastructure Delivery Plan (February 2012). These documents can be obtained from Lora Hughes on 0113 39 50714.

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<sup>1</sup> 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.

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Report authors: David Feeney  
2474539, Janet Howrie 2478200

## Report of the Director of City Development

Report to: Development Plan Panel

Date: 11 September 2012

**Subject: LDF Core Strategy – Publication Draft, Analysis of Consultation Responses: Section 1 - 4: Introduction, Profile of Leeds Metropolitan District, Spatial Vision & Objectives, Spatial Development Strategy (Overview) & Key Diagram**

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

- The key issues which have arisen in response to this part of the Core Strategy include comments on the plan period and the relationship to the Vision for Leeds, the need to reflect new arrangements regarding the Duty to Cooperate (following the introduction of the Localism Act), the need to use Office of National Statistics (ONS) population projections, a series of suggested wording changes to improve the clarity of the wording and a series of recommended changes to the Key Diagram to improve clarity and presentation.

### Recommendations

Development Plan Panel is requested to:

- note and comment on the contents of the report and the course of further action (as detailed in Appendix 1 to the report).

## **1.0 Purpose of this Report**

- 1.1 Within the context of the Core Strategy Initial Report of Consultation (6<sup>th</sup> June), the purpose of this report is to review consultation responses in relation to Section 1 - 4: Introduction, Profile of Leeds Metropolitan District, Spatial Vision & Objectives, Spatial Development Strategy (Overview) & Key Diagram. Appendix 1 attached, summarises the representors, key issues raised, the City Council's view and proposed action. The suggested changes to the Core Strategy text arising from this analysis has been included in Appendix 2.

## **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 28<sup>th</sup> February to 12<sup>th</sup> 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)

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 The main issues on these topics relate to comments on the plan period and the relationship to the Vision for Leeds, the need to reflect new arrangements regarding the Duty to Cooperate (following the introduction of the Localism Act), the need to use ONS population projections, a series of suggested wording changes to improve the clarity of the wording and a series of recommended changes to the Key Diagram to improve clarity and presentation

## **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 City 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, 10<sup>th</sup> 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 Section 1 - 4: Introduction, Profile of Leeds Metropolitan District, Spatial Vision & Objectives, Spatial Development Strategy (Overview) & Key Diagram. Following consideration of representations received, recommendations for a number of minor changes have been made and have been consolidated in Appendix 2, to this report.

## **6. Recommendations**

- 6.1 Development Plan Panel is requested to:
- i). note and comment on the contents of the report and the course of further action (as detailed in Appendix 1 to the report).

## **7. Background documents<sup>1</sup>**

- 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) web pages or by contacting David Feeney on 247 4539.

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<sup>1</sup> 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**

**Section 1: Introduction, Section 2: Profile of Leeds Metropolitan District, Section 3 Spatial Vision & Objectives, Section 4. Spatial Development Strategy (Overview) & Key Diagram**

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<b>1. Introduction</b>		
Templegate Developments, Hallum Land Mangement Ltd, Ashdale Land & Property Company Ltd, (via Barton Willmore Planning Partnership – Northern) (0057) Home Builders Federation (0092) Taylor Wimpy and Ashdale, Chatford, Keyland, Kebbell, Mirfield, Miller, Barratt Leeds, Barratt York, Warner, Redrow (via Dacre Son & Hartley) (0480) Redrow Homes (Yorkshire) Ltd (1938) Pegasus Planning Group (4388) Redrow Homes (Yorkshire) Ltd, Barratt David Wilson Homes Great Northern Development, Edmund Thornhill Thornhill	The Core Strategy Plan Period should be extended (to 2030 for consistency with the Vision for Leeds, or to 2031).	The plan period of 2012 – 2028, is consistent with NPPF advice, which states that plans should be drawn up over an appropriate time scale, ‘preferably a 15 year time horizon’. The 15 plan period specified in the Core Strategy is therefore sound in relation to this advice. Whilst the desire for alignment with the time scale of the Vision for Leeds is noted, the Core Strategy is consistent with the strategic objectives of the Vision for Leeds in aiming for Leeds to be the ‘Best City in the UK’. A change to the Core Strategy’s plan period at this stage in the process, would have major implications for the plan and spatial strategy as a whole, for example the overall scale of housing growth. As emphasised above, the plan is sound in relation to the plan period advocated by the NPPF and the supporting evidence base.	No Change

<p>Estates, House Builder Consortium, ELE Northern Quadrant Consortium, Wortlea Estates, Great North Developments c/o Evans Property, Robert Ogden Partnership Ltd (Via ID Planning) Barratt David Wilson Homes Yorkshire Homes (5895)</p> <p>The Ledston Estate, AR Briggs and Co, The Hatfield Estate, The Diocese of Ripon and Leeds, Lady Elizabeth Hastings Estate Charity, The Bramham Park Estate, Meadowside Holdings Ltd (via Carter Jonas) (5681)</p>			
Highways Agency (0060)	Concern regarding the scale of Growth and associated traffic impacts arising from the scale of housing and employment development proposals, when assessed using the Network Analysis Tool (NAT)	Through the preparation of the Core Strategy (and supporting material, including the draft Infrastructure Plan), the City Council recognises that planning for the scale of regeneration and growth envisaged in the plan, presents major opportunities and challenges. Within this context (and the objectives of the Local Transport Plan), the City Council is working actively with the Highways Agency and other City Region Partners, including neighbouring local authorities, to manage growth and to seek to mitigate against, any adverse impacts.	No change
English Heritage (0099)	Welcome consideration of environmental; quality in assessing development issues and the goal of respecting local character and distinctiveness.	Support welcomed.	No change.
Leeds Civic Trust (0062)	Need to provide a schedule of UDP Saved Policies	A schedule of UDP saved policies will be provided, together with a schedule of UDP policies which will be superseded as a	No change to Core Strategy text or specific policies



Leeds Local Access Forum (4572)		consequence of the Core Strategy.	regarding this matter but inclusion of information regarding superseded and retained saved policies at Submission.
Metro (1933)	Need to cross reference Local Transport Plan	As noted above, the Core Strategy has been developed, within the context of a range of strategic documents, including the Local Transport Plan. For clarity more explicit reference will be made, together with the role of Leeds within the City Region and 'duty to cooperate' arrangements.	<p>Minor change:</p> <p>Add the following text at the end of para. 1.15: <i>"Within this context also, the City Council has worked closely with Metro, through the West Yorkshire Local Transport Plan Partnership, in the preparation of the West Yorkshire Local Transport Plan (My Journey – Connecting people and Places) 2011 – 2026"</i>.</p> <p>Add the following text to para. 1.17 after 'interim Strategy Statement' <i>"(approved by the Leaders Board in April 2011)"</i>.</p> <p>Add a new para 1.19 as follows, <i>"Since the Localism Act received Royal Assent, the NPPF has been finalised and includes further policy in regard of strategic planning. In light of this the city region partnership has further developed its role in support of the Local Planning Authorities in exercising the Duty. This ranges from developing common approaches to documentation through to</i></p>

			<p><i>the commitment to develop a spatial investment plan in the City Deal. These actions will help local planning authorities to better understand and respond to activities that take place beyond their plan area and impact on their plan”.</i></p> <p>It is also proposed to prepare a Background paper detailing cross boundary working arrangements and issues.</p>
<p>Pegasus Planning Group, (4388) Morley Town Council (4825)</p>	<p>Need to clarify relationship to the Regional Spatial Strategy and what aspects of the RSS evidence base have been reflected.</p>	<p>Through changes to legislation, the RSS is in the process of being abolished. However, at the time of preparing the Publication draft Core Strategy, the RSS is still operational and the City Council is legally obliged to take this into account. This may change prior to submission. The Core Strategy has been developed within the context of the RSS but is supplemented by new evidence, prepared by and on behalf of the City Council (such as the Employment Land Review and Strategic Housing Market Assessment). This is in recognition of the major changes in economic circumstances and the housing market, post RSS adoption in 2008.</p>	<p>No change.</p>
<p>Redrow Homes (Yorkshire) Ltd, Barratt David Wilson Homes Great Northern Development, Edmund Thornhill Thornhill Estates, House Builder Consortium, ELE Northern Quadrant Consortium, Wortlea Estates, Great North Developments c/o Evans Property, Robert Ogden Partnership Ltd (Via ID Planning)</p>	<p>Consistency of Core Strategy to NPPF</p>	<p>In reviewing the compliance of the Core Strategy against the NPPF, the City Council has assessed the document using a PAS (Planning Advisory Service) check list. From this assessment, the City Council has concluded that the Core Strategy is broadly consistent with the NPPF. Where further clarification or minor amendments are required for consistency with the NPPF, the necessary changes have been made, in respect of particular policy topics.</p>	<p>No change.</p>

Barratt David Wilson Homes Yorkshire Homes (5895)			
Directions Planning (on Behalf of Otley Town Partnership & Mr & Mrs Haigh).(5121)	Need to recognise wider role of Leeds in Leeds City Region, to reflect new arrangements under the 'Duty to Co-operate'.	Paragraphs 1.16 – 1.18 of the Core Strategy Publication document, describe the Leeds City Region context. It is accepted that further to the Publication of the Core Strategy new City Region arrangements have been and are being introduced. Consequently, it is proposed that this section should be updated accordingly and further information on detailed arrangements and consideration of specific issues, detailed in a background paper.	<p>Minor change:</p> <p>Add the following text to para. 1.17 after 'interim Strategy Statement' “(approved by the Leaders Board in April 2011)”.</p> <p>Add a new para 1.19 as follows, “<i>Since the Localism Act received Royal Assent, the NPPF has been finalised and includes further policy in regard of strategic planning. In light of this the city region partnership has further developed its role in support of the Local Planning Authorities in exercising the Duty. This ranges from developing common approaches to documentation through to the commitment to develop a spatial investment plan in the City Deal. These actions will help local planning authorities to better understand and respond to activities that take place beyond their plan area and impact on their plan</i>”.</p> <p>It is also proposed to prepare a Background paper detailing cross boundary working arrangements and issues.</p>

	<b>2. Profile of Leeds Metropolitan District</b>		
	<b>i) Our City</b>		
Home Builders Federation (0092) Bradford Metropolitan District Council (0100) Directions Planning (5121) Bradford Council Highways (5941)	The plan is unsound as it does not reflect the provisions in legislation and national policy with regard to cooperating with other local authorities to plan strategically and to meet objectively assessed housing need. Need to fully reflect the role of Leeds within the City Region in Section 2. Need to recognise wide strategic priorities under the Duty to cooperate.	Paragraphs 1.16 – 1.18 of the Core Strategy Publication document, describe the Leeds City Region context. It is accepted that further to the Publication of the Core Strategy new City Region arrangements have been and are being introduced. Consequently, it is proposed that this section should be updated accordingly and further information on detailed arrangements and consideration of specific issues, detailed in a background paper.	Minor change: Add the following text to para. 1.17 after 'interim Strategy Statement' " <i>(approved by the Leaders Board in April 2011)</i> ".  Add a new para 1.19 as follows, " <i>Since the Localism Act received Royal Assent, the NPPF has been finalised and includes further policy in regard of strategic planning. In light of this the city region partnership has further developed its role in support of the Local Planning Authorities in exercising the Duty. This ranges from developing common approaches to documentation through to the commitment to develop a spatial investment plan in the City Deal. These actions will help local planning authorities to better understand and respond to activities that take place beyond their plan area and impact on their plan</i> ".  It is also proposed to prepare a Background paper detailing cross boundary working arrangements and issues.
Directions Planning	Specific employment policies are	The approach of the Core Strategy is to set out an overarching	No change

(on behalf of Otley Town Council Partnership and Mr & Mrs Haigh) (5121)	needed for Otley	spatial approach for development in the District to 2028. Within this context, Otley covered as part of settlement hierarchy and through related policies. The representation relates specifically to employment land allocation. Current employment allocations have been retained through saved UDP policies and will be subsequently reviewed as part of the Site Allocations DPD. It should be noted also that Otley has been selected as one of the 4 Neighbourhood planning pilot areas. Consequently, there will be an opportunity to consider local development issues, as part of this process.	
A R Briggs & Co, Lady Elizabeth Hastings Estate Charity, Bramham Park Estate, the Diocese of Ripon and Leeds, Meadowside Holdings Ltd (via Carter Jonas) (5681)	Broad Agreement with the key challenges.  Where will the Economic Growth come from, to support the plan.	Support welcomed.  It is acknowledge that within the UK and internationally, the economy is experiencing fundamental changes. Within this context, the future is uncertain. However, following previous economic downturns and restructuring, Leeds has demonstrated its resilience and propensity to foster a diverse and dynamic economy to support growth. The Leeds Growth Strategy (referenced in paras. 1.14 – 1.15 of the Publication draft Core Strategy), sets out longer term ambitions for the District's economy. The rate at which these ambitions can be realised, will to some extent be linked to wider economic conditions and interventions. Within this context, the Core Strategy is supported with an Employment Land Review (prepared within the context of the Regional Econometric Model – REM), which helps to identify requirements for Leeds. The Core Strategy is planning for a 15 year time frame, with regeneration and economic growth, as integral elements as part of a broader strategy. The plan will need to be monitored against its objectives (including economic) and reviewed as necessary.	No change.  No change
AR Briggs & Co, Lady Elizabeth Hastings Estate Charity, Bramham Park Estate, the Diocese of Ripon and Leeds, Meadowside Holdings Ltd (via Carter Jonas) (5681)	Need to Recognise the Needs of the Rural Population	A key theme of the Core Strategy is to plan for regeneration and growth, whilst maintaining local character and distinctiveness. Leeds MD is a large and diverse area and home to a diverse range of communities and settlement types and it is agreed that the text can be strengthened to reflect this. The importance of the rural economy is also acknowledged through strengthening the references within the 'Rural economy' section (Economic Development Priorities).	This point has been addressed through changes presented to Development Plan Panel on 7 <sup>th</sup> August 2012.
	<b>The Growth of Leeds</b>		

English Heritage (0099)	General support for this section but suggested minor change to clarify the historical origins of the City.	General support welcomed.  Agreed to amend para. 2.6 to add, “ <i>Leeds has a rich and diverse history. Within the City there are stone hut circles dating from the Bronze Age. The majority of the City Centre dates from 1207...</i> ”.	Minor change Add the following to para. 2.6: “ <del>Parts of Leeds have a long history dating</del> <i>Leeds has a rich and diverse history. Within the District there are stone hut circles dating from the Bronze Age. The majority of the City Centre dates from 1207...</i> ”.
West Yorkshire Archaeology Advisory Service (5051)	No enough attention given to the importance of the historic environment as expected by the NPPF.	A key theme of the Core Strategy is to plan for regeneration and growth, whilst maintaining local character and distinctiveness. Within this context, the historic environment has a key role to play in helping to maintain local identity, supporting regeneration and helping to shape future growth. This is subsequently reflected in detailed policies relating to Design and Conservation (P10 and P11).	No further changes, Policies P10 and P11 have been strengthened following consideration changes reported to the Development Plan Panel on 7 <sup>th</sup> August 2012.
<b>Housing</b>			
Templegate Developments, Hallam Land Management, Ashdale Land & Property Company Ltd (via Barton Willmore Planning Partnership–Northern) (0057)	Need to use ONS population forecasts	As part of the Core Strategy evidence base, the Leeds Strategic Housing Market Assessment (SHMA), addresses the issue of population growth in the District and concerns regarding the reliability of ONS forecasting. Consequently, based upon local evidence, a methodology for the Core Strategy for the Core Strategy has been developed which is considered to be more realistic at a local level than ONS projections.  ONS has now published the first results from the 2011 Census. The Census data shows the population for Leeds is 751,500, which is considerably lower than previous mid-year estimates. The population estimate is significantly lower than the indicative population estimate of 780,925 published by ONS in November 2011. As a planning authority, Leeds had concerns that the mid-year estimates may have been an over estimate of the population figures for Leeds therefore an important part of the Leeds Strategic Housing Market Assessment (SHMA) was the detailed scrutiny of official statistics to ensure that the demographic evidence on which the study is based was robust and reliable. To provide a revised population for Leeds, the SHMA rescaled the trajectory of change in	No change.

		<p>the mid-year population estimates to be consistent with complementary evidence from on local housing and GP registrations data. The SHMA employment-led forecast identified a growth in Leeds population of approximately 93,000 people between 2011 and 2026. The population of Leeds in 2011 was estimated at 756,060 people with a forecast for it to reach 860,618 by 2028. The changes to official statistics were deemed necessary to ensure that a robust demographic evidence base underpins the development of the SHMA. This approach has been justified by the subsequent release of the 2011 Census which shows a difference of just +0.6% between the SHMA estimate and official Census population published on 16 July 2012.</p>	
Pegasus Planning Group (4388)	<p>Paras. 2-13 – 2.16 need to acknowledge that a further factor contributing to the drop in completions has been the restriction on the type and location of sites available – given that greenfield sites have been held back until recently.</p>	<p>A key focus of the existing UDP and emerging Core Strategy, is to focus upon urban regeneration, whilst planning for longer term growth. Prior to the economic downturn, Leeds had been delivering unprecedented levels housing development on windfall sites within the urban area. As a consequence, the release of phase 2 and 3 sites was not warranted. In seeking to maintain housing land supply, phase 2 and 3 greenfield housing sites were released in June 2011. It is not accepted that the drop in completions is as a consequence of greenfield sites being 'held back'. The reduction in completions is as a consequence of a host of factors including mortgage availability, and the reduction in public sector finance to support housing development, rather than exclusively housing land supply.</p>	No change.
Morley Town Council (4825)	<p>Concerns regarding the scale of proposed housing growth and implications for Green Belt release. View that the main constraints on house building are related to housing finance rather than a lack of land availability or planning permissions.</p>	<p>These comments reflect comments raised in response to the housing policies SP6 and SP7, which are addressed in more detail as part as a separate topic paper. With regard to the points about the scope of a selective Green Belt review, this is allowed for within the context of the NPPF. Within the context of the Core Strategy, Spatial Policy 10, proposes a selective Green Belt review. However, consistent with a key theme of the plan to safeguard local character and distinctiveness, it should be emphasised that the majority of designated green belt is to be retained in tact, with the selective review, targeted to locations associated with the settlement hierarchy, through the Site Allocations DPD process (and informed through Neighbourhood planning). In order to clarify the approach, the longer term role of green belt – in maintaining the character and distinctiveness of Leeds should be reaffirmed as part of the long term vision for the district (para. 3.2), with further explanation to the overall policy approach in section 4.8.</p>	No change

NHS Leeds (5693)	Need to give greater prominence to the need for affordable housing and affordable warmth	The topic of Affordable Housing is covered in paras 5.2.11 – 5.3.17 and Policy H5 and affordable warmth is an aspect of Sustainable Design and Construction covered in paras. 5.5.35 – 5.5.37. However, it is agreed that reference to these topics within para 2.13, would help to acknowledge the importance of these issues in setting the strategic context.	Minor change, add the following sentence to para. 2.13, "...whilst protecting the quality of the environment and respecting community identity. <i>Within this overall context the need for affordable housing and affordable warmth are key issues.</i> It is clear that that house building....".
	<b>Employment</b>		
NHS Leeds (5693)	Need to reflect the desire of communities for accessibility of job opportunities close to where people live and the need to promote a range of employment opportunities for all groups.	An integral aspect of the Core Strategy is to deliver the principles of sustainable development, linked to strategic objectives and a range of policies. Access to employment opportunities is integral to this approach. The ability to live and work in the same place is inherently sustainable and the Core Strategy allows for this through the promotion of housing and employment growth within the context of the Settlement Hierarchy. However, it does need to be recognised that given the dynamics of a modern economy (at a City Region, national and international level), this is not always possible, nor are jobs for local people necessarily guaranteed, where they do exist – close to where people live. However, in reflecting the overall commitment to sustainability, Policies SP8 and EC3 seek to promote job retention and creation, training & skills and the desire to safeguard existing employment land and industrial areas.	No change.
NHS Leeds (5693)	Need to include programmes to tackle child poverty	The Core Strategy recognised that Deprivation and Health Inequalities are major challenges facing the City (paras. 2.30 – 2.32 and Map 2). In seeking to address these issues, the plan seeks to deliver the principles of sustainable development and to prioritise regeneration areas (Policy SP4). It need to be recognised also that the LDF is one of a series of strategic initiatives to tackle a range of social, economic and environmental opportunities and challenges across Leeds. It is important therefore that such initiatives in the round are complementary and through effective partnership working positive progress is made.	No change.
	<b>ii) Our People</b>		
Leeds Trinity University College (via White Young Green	<b>Support for the identification of LTUC as one of the three universities in the City (para. 2.33)</b>	Support welcomed.	No change.



Planning) (0420)			
<p>Hallam Land Management Ltd, Ashdale Land and Property Company Ltd, Templegate Developments (via Barton Willmore Planning Partnership-Northern) (0057) DPP (5543)</p> <p>Morley Town Council (4825)</p>	<p>In para. 2.28 need to replace figures with ONS derived projections. Use of GP registration data understates the real need. Figures for population growth are unrealistic.</p>	<p>The population figures used in this section are taken from the Strategic Housing Market Assessment, as part of the Core Strategy evidence base. As a planning authority, Leeds had concerns that the mid-year estimates may have been an over estimate of the population figures for Leeds therefore an important part of the Leeds Strategic Housing Market Assessment (SHMA) was the detailed scrutiny of official statistics to ensure that the demographic evidence on which the study is based was robust and reliable. To provide a revised population for Leeds, the SHMA rescaled the trajectory of change in the mid-year population estimates to be consistent with complementary evidence from on local housing and GP registrations data. The SHMA employment-led forecast identified a growth in Leeds population of approximately 93,000 people between 2011 and 2026. The population of Leeds in 2011 was estimated at 756,060 people with a forecast for it to reach 860,618 by 2028. The changes to official statistics were deemed necessary to ensure that a robust demographic evidence base underpins the development of the SHMA. This approach has been justified by the subsequent release of the 2011 Census which shows a difference of just +0.6% between the SHMA estimate and official Census population published on 16 July 2012.</p>	<p>No change</p>
<p>Mr Stuart Andrew MP (0165)</p>	<p>Need to have regard to 2011 Census results.</p>	<p>The population figures used in this section are taken from the Strategic Housing Market Assessment, as part of the Core Strategy evidence base. As a planning authority, Leeds had concerns that the mid-year estimates may have been an over estimate of the population figures for Leeds therefore an important part of the Leeds Strategic Housing Market Assessment (SHMA) was the detailed scrutiny of official statistics to ensure that the demographic evidence on which the study is based was robust and reliable. To provide a revised population for Leeds, the SHMA rescaled the trajectory of change in the mid-year population estimates to be consistent with complementary evidence from on local housing and GP registrations data. The SHMA employment-led forecast identified a growth in Leeds population of approximately 93,000 people between 2011 and 2026. The population of Leeds in 2011 was estimated at 756,060 people with a forecast for it to reach 860,618 by 2028. The changes to official statistics were deemed necessary to ensure that a robust demographic evidence base underpins the development of the SHMA. This approach has been justified by the subsequent release of the 2011 Census which</p>	<p>No change</p>

		shows a difference of just +0.6% between the SHMA estimate and official Census population published on 16 July 2012.	
Cllr John Illingworth (2703)	Like to see an overarching policy that commits the Council to 'narrow the gap', between the most favoured and least favoured communities in Leeds. Like to see the Council formally incorporate the most relevant guidance from the National Institute for Health & Clinical Excellence (NICE) into the Core Strategy.	The commitment to 'narrow the gap', was a strategic initiative incorporated as part of the Community Strategy – Vision for Leeds 2. This strategic initiative has now been reviewed and superseded by Vision for Leeds 3. As described in para. 1.2 of the Core Strategy, the key aim of the Vision for Leeds (2011 – 2030), is for Leeds to be the 'Best City in the UK', through being fair, sustainable and inclusive. In taking forward these strategic aims, the Core Strategy provides a strategic planning framework for the Vision. Issues of deprivation and the need for regeneration are therefore integral to the overall strategic objectives and policy approach of the plan. Map 2 illustrates the indices of multiple deprivation across Leeds and a number of policies including SP4 and SP8 and seeking to embed the policy interventions to tackle deprivation issues, where they can be addressed through the planning process. Because of this it is not felt that the introduction of an additional policy is necessary, as this would duplicate the policy approaches currently incorporates across the plan. In terms of health issues, a Health Impact Assessment has been undertaken as part of the Core Strategy evidence base, and the necessary adjustments made to the document. The significance of the NICE guidance is acknowledged but with regard to government advice on the preparation of Development Plan Documents, it is not the role of such documents to repeat national guidance	No change
	<b>iii) Our Green Environment</b>		
Sport England (1982)	Welcome references to the quality of the environment in providing opportunities for leisure.	Support welcomed.	No change.
Templegate Developments (via Barton Willmore Planning Partnership-Northern) (0057)	Opportunities to enhance the environment of the Aire Valley.	Comments in respect of the desire to enhance the environment of the Aire Valley (para. 2.40) are noted. This is a key objective of the Core Strategy, linked to a number of key Policies including SP5 (Aire Valley Urban Eco-Settlement) and SP13 (Strategic Green Infrastructure). More detailed aspects of this approach are also being progressed within the context of the preparation of the Aire Valley Leeds Area Action Plan.	No change
Mr Lee Davidson (2560)	Para. 2.38 needs to include references to the Public Rights of Way network in Leeds and 2.39 include a reference to the canals in	For completeness it is accepted that reference should be made to the scope and extent of the PROW network in Leeds. It is therefore proposed to reinstate the relevant extracts previously incorporate to PROW, incorporated as part of the Core Strategy Preferred	Minor change: 2.39 Add the following wording at the end of the

	Leeds.	Approach. For completeness it is also agreed to include references to the Leeds canals in para. 2.39.	<p>first sentence "...River Aire and canal corridors".</p> <p>Add after the final sentence of 2.39 <i>"In addition, the network of Public Rights of Way (PROW) represents the arteries that help people access the countryside and urban greenspaces, linking people with place and linking urban to rural. Within Leeds there are 819km of rights of way, 628kn of footpath, 180km of bridleway, together with a short network of byways and other routes with public access. Included within this total area are key strategic routes (such as the Leeds Country Way and local recreational routes (such as the Meanwood Valley Trail). Within this context also, the City Council has produced a Rights of Way Improvement Plan, in response to the Countryside Rights of Way Act (2000), setting out a 10n year improvement plan for the Rights of Way network."</i></p>
Mr Cedric Wilks (4783)	Need to include a district wide tree management scheme across the district	At a strategic level, the Core Strategy seeks to provide a framework to protect and enhance the environment. Within this overall context Policies are included for Green Infrastructure (SP13) and for the Creation of new tree cover (Policy G2). Although the need for tree management is integral to this overall approach, the preparation and implementation of a detailed tree management scheme for the district is beyond the scope of the Core Strategy and part of the day today responsibilities of the City Council's Parks and Countryside service and individual landowners.	No change.

West Yorkshire Archaeology Advisory Service (5051)	Need to incorporate a new strategic policy to safeguard and promote the diverse historic heritage across the district.	A key theme of the Core Strategy is to plan for regeneration and growth, whilst maintaining local character and distinctiveness. Integral to this approach is the desire to safeguard the diverse and historic heritage of the district. This is reflected in the general scope of Policy SP1 (iii) (Location of Development) and the focus of detailed Policies for Design and Conservation (P10 and P11). In addition to a range of detailed UDP saved policies. As a consequence, it is not considered necessary to introduce a new strategic policy to reflect this issue, this is especially the case given that both P10 and P11 have been strengthened (considered by Development Plan Panel, 7 <sup>th</sup> August 2012), in response to representations made.	No change.
WARD (Wharfedale & Airedale Review Development) (5852)	Need to clarify the meaning of sustainable development	It is accepted that the term and application of “Sustainable Development” is open to much interpretation. With regard to the Core Strategy, a definition has been included in the Glossary and within the context of national guidance, the NPPF provides an overall definition and the range of simultaneous considerations to be taken into account.	No change.
	<b>Key Challenges</b>		
Hallam Land Management (via Barton Willmore Planning Partnership - Northern) (0057)  Templegate Developments (via Barton Willmore Planning Partnership - Northern) (0057)	Support for Key Challenges listed.	Support welcome.	No change.
	<b>3. Spatial Vision</b>		
Ashdale land and Property Company Ltd (via Barton Willmore Planning Partnership-Northern), Hallam Land Management (via Barton Willmore Planning Partnership-Northern) (0057)	General Support for Spatial Vision	Support welcome.	No change.

Craven District Council (5888)	Support for spatial vision and role of city as a strategic hub, better connected by an accessible and integrated transport system which supports communities and economic competitiveness.	Support welcome	No change.
Caddick Developments, Leeds Trinity University College, D Westwood & son (via White Young Green Planning) (0420)	Support for spatial vision – in particular need to balance brownfield and greenfield land through promotion of development in sustainable locations in order to meet identified need.	Support welcome	No change.
White Young Green Planning (0420)	Support urgency to progress Core Strategy and need to work with businesses in a proactive way to deliver the Vision for Leeds by planning for jobs and homes in a sustainable way.	Support welcome.	No change.
Leeds Bradford International Airport (via White Young Green) (0420)	General support for overriding aim of the objective to increase the use of sustainable transport by delivering new infrastructure and improvement of the existing transport hubs and for Leeds district to have better connected, more accessible and integrated transport system in supporting communities and economic growth.	Support welcome.	No change.
Harrow Estates (via White Young Green Planning) (0402)	Support adoption of Core Strategy as soon as possible to facilitate economic growth and associated delivery of housing.	Support welcome	No change.
Templegate Developments (via Barton Willmore Planning Partnership-Northern) (0057)	Reference should be made in para. 3.2, 6 <sup>th</sup> bullet, to the need for a district/neighbourhood centre within Aire Valley Leeds to support growth	The precise details and configuration of the Aire Valley Urban Eco-Settlement will be addressed as part of the preparation of the Aire Valley Area Action Plan. At this stage it is not possible to specify what scale and form a new centre might take. Within this context Policy P7 of the Core Strategy provides criteria for the creation of new Centres. However, it is acknowledged that ‘community facilities’ and infrastructure will be necessary to achieve the vision	Minor change as follows: “Aire Valley will become an innovative new living and working community, <i>supported by the necessary community facilities and</i>

		for the Aire Valley and it is therefore proposed that the wording of the 6 <sup>th</sup> bullet point is amended accordingly.	<i>infrastructure, which is a national model for sustainable development...</i>
Leeds Civic Trust (0062)	The long term vision set out in para. 3.2 needs to be revised to be more visionary.	As set out in para. 1.5 of the Core Strategy, a key role of the document is to provide a spatial planning framework for the Vision for Leeds. It is important therefore that the high level objectives of the VFL are translated and implemented through the Core Strategy, into realistic and deliverable Policies. The proposed wording advocated by the Civic Trust is noted but largely restates what the Core Strategy's objectives and Policies are seeking to achieve. These objectives are in turn, set within the context of the NPPF and the overall commitments to sustainable development.	No change.
Oulton Civic Society (0065)	Consider the plan to be unsound as Oulton is not considered part of Rothwell within the Settlement Hierarchy.	It is accepted that locally Oulton and Rothwell are distinct places and it is a key objective of the Core Strategy to safeguard local character and distinctiveness, in planning for regeneration and growth. However, For the purposes of the Core Strategy, the focus of the Settlement Hierarchy (as illustrated on Map 3), is to categorise the settlement structure of the district, within this overall context Oulton form part of the wider urban area of Rothwell, which has been identified as a Major Settlement.	No change.
Wakefield Metropolitan District Council (0104)	Whilst it is accepted that that the document sets out an appropriate spatial vision and development strategy for Leeds, a number of concerns are raised regarding the soundness of the plan and legal compliance issues. These are the presentation of the Key Diagram, the need to demonstrate how 'Duty to Cooperate issues have been addressed, the justification for the scale of growth envisaged and the scope of the Green Belt review, the effectiveness of the plan in delivering housing growth and accordance with the NPPF (including the approach to meeting the housing requirement).	Issues concerning the presentation of the Key Diagram are set out below and as a result of the Publication draft consultation a number of changes are being proposed. In terms of the detailed points regarding the scale of housing and employment growth, the City Council's position has been informed by more recent evidence, which supersedes the adoption of the RSS in 2008. This includes the Strategic Housing Market Assessment and the Employment Land Review (which itself is informed by the Regional Econometric Model). The City Council considers this evidence to be sound as a basis to develop the Spatial Vision and underpinning specific policies. In terms of detailed comments in relation to SP6 (The Housing Requirement and Allocation of Housing Land), SP7 (Distribution of Housing Land and Allocations) and SP10 (Green Belt), these are addressed in the relevant topic analysis. With regard to the 'Duty to Co-operate', it is acknowledged that the references in the document can be strengthened and supplemented with a background topic paper, setting out the arrangements and approach to tackling cross boundary issues in further detail. Within this context, the City Council is committed to working closely with neighbouring authorities and relevant agencies, to discuss issues and where necessary, approaches to mitigation. In terms of	No change (see Key Diagram analysis below).  Minor change: Add the following text to para. 1.17 after 'interim Strategy Statement' " <i>(approved by the Leaders Board in April 2011)</i> ".  Add a new para 1.19 as follows, " <i>Since the Localism Act received Royal Assent, the NPPF has been finalised and includes further policy in regard of strategic planning. In light of this the city region partnership has further developed its role in support of the Local Planning Authorities in exercising the</i>

		infrastructure, in support of the Core Strategy a draft Infrastructure Delivery Plan has been prepared and the City Council is in the process of developing its approach to the Community Infrastructure Levy, in identifying detailed requirements and an appropriate charging schedule.	<p><i>Duty. This ranges from developing common approaches to documentation through to the commitment to develop a spatial investment plan in the City Deal. These actions will help local planning authorities to better understand and respond to activities that take place beyond their plan area and impact on their plan”.</i></p> <p>It is also proposed to prepare a Background paper detailing cross boundary working arrangements and issues.</p>
Leeds Bradford International Airport (via WYG) (0420)	Whilst generally supporting the Spatial Vision, it is considered that stronger references to the role of Leeds Bradford International Airport (LBIA) need to be made	In response to these comments, revisions are propose to the supporting text for SP12 (Managing the Growth of Leeds Bradford International Airport), which is the subject of a separate topic report.	See changes proposed under SP12 topic report.
<p>Kebbell, Keyland, Chatford, Taylor Wimpey and Ashdale, Barratt Leeds, Mirfield, Miller, Barratt York, Warner, Redrow (via Dacre Son and Hartley) (0480)</p> <p>Redrow Homes (Yorkshire) Ltd (1938) Banks Development (5036) Pegasus Planning Group (4388) Linton Land Owners (via Ian Bath Planning)</p>	Concern that Objective 8 of the Core Strategy is not sound/consistent with the NPPF and should be reworded	The City Council considers that it’s approach to the phased release of sites is consistent with the NPPF and the evidence base for the Core Strategy. Whilst prioritising PDL, the Core Strategy is ensuring that housing land can be brought forward in sufficient quantities, to meet the housing requirement. Detailed consideration of comments in relation to SP6, SP7 and Policy H1 (Managed Release of Sites), is covered in a separate topic paper.	No change

<p>(5883) Barratt David Wilson Homes (5895)</p> <p>Wortlea Estates, Redrow Homes, Robert Ogden Partnership Ltd, Housebuilder Consortium, Great North Development, Edmund Thornhill, Thornhill Estates, ELE Northern Quadrant Consortium, Great North Developments c/o Evans Property Group (via ID Planning) (5671)</p>			
<p>Pegasus Planning Group (4388)</p>	<p>Whilst there is general support to the recognition of the role of both brownfield and greenfield land in suitable locations, as a sustainable way of meeting identified needs, it is suggested that that the 3<sup>rd</sup> para. of 3.2 is reworded to make reference to demonstrate that the plan has been positively prepared.</p>	<p>In reflecting this point, a number of minor wording changes are proposed to improve the clarity and intent of the wording.</p>	<p>Minor change to para. 3.2 3<sup>rd</sup> bullet as follows:</p> <p>“The spatial <del>management</del> <i>distribution</i> of growth will be planned <i>and delivered</i> to balance the use of brownfield and greenfield land in a sustainable way...”.</p>
<p>Morley Town Council (4825)</p>	<p>Concern is expressed that the Core Strategy does not reflect the requirements of the NPPF/’Duty to Co-operate’, with regard to cross boundary planning issues with Bradford, Kirklees and Wakefield. Concern also that flood risk issues need to be taken seriously.</p>	<p>Paragraphs 1.16 – 1.18 of the Core Strategy Publication document, describe the Leeds City Region context. It is accepted that further to the Publication of the Core Strategy new City Region arrangements have been and are being introduced. Consequently, it is proposed that this section should be updated accordingly and further information on detailed arrangements and consideration of specific issues, detailed in a background paper.</p>	<p>Minor change; Add the following text to para. 1.17 after ‘interim Strategy Statement’ “(approved by the Leaders Board in April 2011)”.</p> <p>Add a new para 1.19 as follows, “Since the Localism Act received Royal Assent, the NPPF has been finalised and includes further policy in</p>



			<p><i>regard of strategic planning. In light of this the city region partnership has further developed its role in support of the Local Planning Authorities in exercising the Duty. This ranges from developing common approaches to documentation through to the commitment to develop a spatial investment plan in the City Deal. These actions will help local planning authorities to better understand and respond to activities that take place beyond their plan area and impact on their plan”.</i></p> <p>It is also proposed to prepare a Background paper detailing cross boundary working arrangements and issues.</p>
Banks Development (5036) Linton land Owners (via Ian Bath Planning) (5883)	Consider that the plan period should be extended to 2030, to reflect the timeframe of the Vision for Leeds	The plan period of 2012 – 2028, is consistent with NPPF advice, which states that plans should be drawn up over an appropriate time scale, ‘preferably a 15 year time horizon’. The 15 plan period specified in the Core Strategy is therefore sound in relation to this advice. Whilst the desire for alignment with the time scale of the Vision for Leeds is noted, the Core Strategy is consistent with the strategic objectives of the Vision for Leeds in aiming for Leeds to be the ‘Best City in the UK’. A change to the Core Strategy’s plan period at this stage in the process, would have major implications for the plan and spatial strategy as a whole, for example the overall scale of housing growth. As emphasised above, the plan is sound in relation to the plan period advocated by the NPPF and the supporting evidence base.	No change.
Directions Planning (on Behalf of the Otley Town Partnership and	Express concern that the strategic objectives are inward looking and do not recognise the wider role of	The role of Leeds within the context of the City Region, is covered as part of the first bullet point in para. 3.2.	No change

Mr & Mrs Haigh).(5121)	Leeds within the City Region.		
	The vision needs to be referred to throughout the document	Point noted and opportunities will be taken to improve cross references where necessary and do not result in repetition.	Change: Consider minor cross references where necessary through editing.
	<b>Objectives</b>		
Hallam Land Management Ltd, Ashdale Land & Property Company Ltd, Templegate Developments (via Barton Willmore Planning Partnership-Northern) (0057)	Support for Core Strategy Objectives	Support welcome	No change.
	<b>(i) City Centre</b>		
Highways Agency (0060)	Objective 2 re. development in southern part of city centre and the South Bank, should be dependent on firm City Council proposals for a revised route to extend the loop road and upon the agreement of a management strategy for the M621 and its junctions with the local primary road network.	These issues are subject to ongoing consideration and technical work between the City Council and the Highways Agency and the scope for revisions will need to be considered within the light of the outputs of this work	No change
WYG (0420), Renew (5105)	WYG support the 4 City Centre objectives but consider but consider that they need to be expressed in greater detail elsewhere, together with an assessment of the approach to the southern half of the City Centre Renew consider that reference could be made for mixed use housing development in Holbeck Urban Village.	The purpose of the objective for these areas, is to identify the locations positively as strategic opportunities as part of the Core Strategy. Further work will be necessary outside of the Core Strategy process to work up more detailed proposals.	No change
	<b>(ii) Managing the needs of a Successful District</b>		
Craven District Council (5888)	Support for Objective6 and (ii)		

ASDA Stores Limited (via Osborne Clarke) (5889)			
<p>Kebbell, Keyland, Chatford, Taylor Wimpey and Ashdale, Barratt Leeds, Mirfield, Miller, Barratt York, Warner, Redrow (via Dacre Son and Hartley) (0480)</p> <p>Redrow Homes (Yorkshire) Ltd (1938) Wortlea Estates, Redrow Homes, Robert Ogden Partnership Ltd, Housebuilder Consortium (via ID Planning) (5671)</p> <p>Barratt David Wilson Homes Yorkshire Homes (5895)</p> <p>T G M F Emsley (via ID Planning) (1186)</p>	Concern that Objective 8 of the Core Strategy is not sound within the context of the NPPF.	The City Council considers that it's approach to the phased release of sites is consistent with the NPPF and the evidence base for the Core Strategy. Detailed consideration of comments in relation to SP6, SP7 and Policy H1 (Managed Release of Sites), is covered in a separate topic paper.	No change.
Harrow Estates (via WYG) (0420)	Consider that Objective 8 should be expanded to make reference to opportunities outside the main settlement hierarchy as set out in para. 4.6.17	A key spatial approach of the Core Strategy is to deliver regeneration of growth in sustainable locations as part of the identified Settlement Hierarchy. Whilst para. 4.6.17 recognises that there may be circumstances, where opportunities exist outside the hierarchy, this is not the overall focus of the plan and on that basis it is not considered that Objective 8 should be amended.	No change
	<b>(iii) Place Making</b>		
English Heritage (0099)	Support for (iii)	Support welcomed	No change.
Templegate Developments (via Barton Willmore	There is no reference to the need for new town and local centres which will be required as a result of the	This is a detailed point, covered by the scope of Policy P7 (The Creation of New Centres), rather than a strategic matter to be covered under the objectives.	No change.

Planning Partnership – Northern) (0057)	growth aspirations of Leeds. The objective should be amended accordingly		
Leeds Civic Trust (0062)	Objective 12 needs to be reworded to make reference to the need to “enhance” existing areas. Objective 13 needs to be amended to make reference to the “refurbishment and/or re-use of buildings”.	The focus of Objective 12, is to enhance design and positive use of the historic environment. The refurbishment/reuse of buildings is a component of the wider regeneration of areas.	No change.
The Victorian Society (3059)	General support for objective 12 but suggest amendment to make reference to need to ‘create and maintain’.	The need for maintenance is an important issue as a consequence, the need to “maintain” areas is supported for inclusion as a change.	Minor change Objective 12 add the following wording “...historic environment to create <i>and maintain</i> , distinctive...”
Inner NW Area Committee Planning Sub Group (5696)	Support for Objective 14 but suggest amended wording to add “...and workforce <i>and support the creation of more equal communities which narrow the gap between rich and poor</i> ”.	The comments are noted but the Core Strategy as a whole has been set to help deliver the priorities of Vision for Leeds 3. The need to support equal communities and economic prosperity for all is integral to this approach.	No change.
	<b>(iv) Well Connected District</b>		
(5942) North Yorkshire County Council	General support	Support welcome	No change.
Templegate Developments (via Barton Willmore Planning Partnership-Northern)	General support for Objective 16	Support welcome	No change.
Highways Agency (0060)	Need to promote development in locations that are accessible and sustainable	This point is accepted and central to the Core Strategy’s approach to the delivery of regeneration and growth through the settlement hierarchy, in locations considered to be accessible and sustainable. Detailed consideration of these in relation to individual sites, will be considered as part the preparation of the Site Allocations DPD.	No change.
Leeds Civic Trust (0062)	Suggest additional objective, “Promote the improvement and reconfiguring of existing neighbourhoods and centres and other places and routes to make them easier and more attractive for walking/cycling”.	These principles are covered within the context of the current Objectives.	No change.

Mr Lee Davidson (250)	Objective is vague on how new opportunities for cycling and walking might be achieved.	The purpose of the Objectives is to help provide a strategic focus and overall direction. Detailed implementation issues, will need to be considered as part of the Infrastructure Delivery Plan, related programmes and within the context of individual development proposals.	No change.
	<b>(v) Managing Environmental Resources</b>		
Environment Agency (0046)	Amend Objective 18 to include the following principle: "Wherever possible there should be the principle that in order to achieve sustainable forms of development, development should be located in low flood risk areas and only when it is demonstrated that this is not possible through the appropriate tests, measures to mitigate the risks should be implemented".	This comment is noted but is dealt with as part of Policy EN5.	No change.
Meadowside Holdings Ltd, The Hatfield Estate, The Ledstone Estate, The Diocese of Ripon and Leeds, AR Brigg and Co, The Bramham Park Estate, Lady Elizabeth Hastings Estate Charity (via Carter Jonas) (5681)	Objectives for Place making and Managing Environmental Resources give emphasis to Green Infrastructure, Landscape, Natural Habitats, rather than to built or cultural heritage.	Objective 11 makes reference to 'cultural facilities' and Objective 12 makes reference to the 'positive use of the historic environment'. On balance it is considered that the objectives give sufficient emphasis to both the 'green' and 'built' heritage.	No change
	<b>(vi) Implementation &amp; Delivery</b>		
Highways Agency (0060)	Need to take into account transport/accessibility issues	Through the preparation of the Core Strategy (and supporting material, including the draft Infrastructure Plan), the City Council recognises that planning for the scale of regeneration and growth envisaged in the plan, presents major opportunities and challenges. Within this context (and the objectives of the Local Transport Plan), the City Council is working actively with the Highways Agency and other City Region Partners, including neighbouring local authorities, to manage growth and to seek to mitigate against, any adverse impacts.	No change.
	<b>4. Spatial Development Strategy</b>		

	<b>Overview &amp; Location of Development</b>		
Directions Planning (On Behalf of Otley Town Partnership & Mr & Mrs Haigh) (5121)	Welcome classification of Morley and Otley as major settlements.	Support welcome.	No change.
Boston Spa Parish Council (0112)	Discrepancies in Settlement Hierarchy roles and definitions/ Discrepancies on Town & Local Centre roles	In support of the Core Strategy, the City Council has completed background work in the development of the Settlement Hierarchy and it is considered that the approach to the role of settlements and centres is consistent with this evidence.	Incorporate material as part of a Background Paper.
Collingham with Linton Parish Council (0115)	The criteria for identifying a small settlement in para 4.1.10 are unsound	In support of the Core Strategy, the City Council has completed background work in the development of the Settlement Hierarchy and it is considered that the approach to the role of settlements and centres is consistent with this evidence.	No change.
Mr Stuart Andrew MP (0165)	The final sentence of para. 4.1.4 needs to be strengthened and clarified and redrafted to reflect the desire of the NPPF to preserve the Green Belt.	The reference to 'exceptional circumstances' referred to in para. 4.1.4 is consistent with the NPPF.	No change.
Savills (0466)	The Council has failed to produce a robust evidence base for the identification of the smaller settlements in the District, listed in Table 1., need to amend the table to include Thorner in the list of small settlements.	In support of the Core Strategy, the City Council has completed background work in the development of the Settlement Hierarchy and it is considered that the approach to the role of settlements and centres is consistent with this evidence. Small Settlements are defined on the basis of a population of at least 1500, with supporting facilities (a primary school, shop or pub). Thorner has a population of 1284 and is therefore below the threshold for Small Settlements.	No change.
Chatford, Warner,, Miller, Redrow, Kebbell, Taylor Wimpey, Barratt Leeds, Taylor Wimpey and Ashdale, Barratt York, Keyland, Mirfield (via Dacre Son & Hartley) (0480)  Redrow Homes (Yorkshire) Ltd, Housbuilder	Para. 4.1.4 should be amended to read, "... the majority of growth should be focused within <i>and adjoining</i> the Main Urban Area <i>and Major Settlements</i> ...".	The focus of the Core Strategy approach is to deliver major regeneration and growth, within the context of the settlement hierarchy. The introduction of the proposed wording would dilute this focus. Opportunities for development adjacent to settlements, will be considered as part of the Site Allocations DPD process.	No change.

Consortium, Wortlea Estates, Robert Ogden Partnership Ltd (via ID Planning) (5671)			
Directions Planning (on Behalf of the Otley Town Partnership and Mr & Mrs Haigh) (8121)	Support for the identification of Otley as a major settlement but concern that the settlement needs employment opportunities as well as housing.	Support for Otley as Major Settlement welcomed. The point regarding the need for employment opportunities is noted and is covered as part of SP8 and EC3 within the Core Strategy and as part of the Site Allocations DPD process.	No change.
AR Briggs and Co, The Bramham Park Estate, The Diocese of Ripon and Leeds, Meadowside Holdings, Lady Elizabeth Hstings Estate Charity, the Hatfield Estate (via Carter Jonas) (5681)	The document is not clear where and when evidence and appraisal of the District's settlements was undertaken/in undesignated villages, development proposals should be considered on their merits/support for a number of settlements within the hierarchy: Swillington Collingham, Boston Spa and Thorp Arch	The City Council has undertaken technical work, which will be made available as a Background paper.	No change.
	<b>KEY DIAGRAM</b>		
	<b>Settlement Hierarchy</b>		
The Bramham Park Estate; AR Briggs and Co; Meadowside Holdings Ltd; Lady Elizabeth Estate Charity; The Hatfield Estate; The Diocese of Ripon & Leeds (Carter Jonas)	Clifford and Thorp Arch should be indicated in pink (i.e. as a small settlement).	Clifford and Thorp Arch do not fall within the definition of a smaller settlement (at least 1,500 population, primary school and shop or pub).	No change.
	<b>Location for New Housing</b>		
Ashdale Land & Property Company Ltd (Barton Willmore Planning Partnership – Northern)	Support identification of Micklefield and Kippax for 500-1,000 new homes and Allerton Bywater for 1-2,000 new homes. Housing should be provided at the top end of the range, if not in excess.	Comment noted	No change.
Boston Spa Parish Council	Boston Spa expected to carry 500-1,000 new homes, representing an	Boston Spa (smaller settlement) is promoted for new housing consistent with the Spatial Strategy, the availability of sites and	No change.

	increase in housing stock of between 28% and 55%. As a 'smaller settlement', it should only carry a smaller proportion of new homes in the NE quadrant. The designation of Boston Spa on the Key Diagram should be removed. Clifford is not shown as carrying any new homes, but the SHLAA identifies 616 houses, of which 327 are on boundary with Boston Spa.	access to services.  Clifford is a village not a smaller settlement. Promoting further significant new housing at Clifford is not consistent with the spatial strategy/settlement hierarchy. The inclusion of sites in the SHLAA does not necessarily mean they are acceptable or will be allocated for housing.	
Harrow Estates (White Young Green)	5-10,000 homes in the City Centre is reliant on apartment schemes and does not match market delivery in recent times. SP3 talks about family housing, but there is a lack of sites to meet this aspiration in the required quantities.	The SHLAA (2011) identified capacity for 16,000 units in the City Centre. The Core Strategy sets out a figure 10, 200 dwellings for the City Centre, which is considered to be realistic.	No change.
D Westwood & Son (White Young Green)	Support Lofthouse and East Ardsley as key locations for new housing growth. 1,000 and 2,000 respectively.	Comment noted.	No change.
DPP	Wetherby should accommodate significantly more than 500 to 1,000 new homes. It can accommodate at least 1-2,000 new homes. Support Collingham, Barwick-in-Elmet and Bardsey as smaller settlements wherein 8,000 new homes are to be built.	The figures given are a broad indication of housing numbers for each settlement. If more housing came forward in Wetherby above the numbers shown in the Core Strategy, they would be considered having regard to Policy SP1 and SP7.	No change.
Redrow Homes (Yorkshire) Ltd (ID Planning)	Land east of Rawdon should be identified as strategic location for housing growth. There should be a specific policy linkage between strategic housing growth and delivery of the A65 Leeds/Bradford Airport link.	The symbol for new housing in the Key Diagram (KD) is not site specific. The symbol shown covers the Guiseley / Yeadon / Rawdon area. The Core Strategy does not identify strategic housing sites. No evidence has been presented to justify the link between strategic housing growth and the Airport link road.	No change.
Edmund Thornhill, Thornhill Estates (ID Planning)	New strategic locations for housing growth:	Farsley lies within the Main Urban Area (MUA). Given the geographical size of the MUA a symbol is not used. The Farsley area will contribute towards the 33,300 total for the MUA. The Core	No change.



	<p>Calverley -Sites at Foxholes Crescent (1.15ha), Upper Carr Lane (0.6ha), East of Calverley Cutting (2.5ha) and West of Calverley Cutting (4.9ha)</p> <p>Farsley - Site at Kirklees Knowl, Farsley (45 acres).</p>	Strategy does not identify strategic housing sites.	
Great North Developments Ltd c/o Evans Property Group (ID Planning)	<p>New strategic location for housing growth:</p> <p>Micklefield – north and south of Church Lane (350 acres)</p>	The symbol for new housing is not site specific. The symbol shown covers the Micklefield area. The Core Strategy does not identify strategic housing sites.	No change.
Wortlea Estates (ID Planning )	<p>New Strategic location for housing growth:</p> <p>Whitehall Road, New Farnley</p>	New Farnley lies within the Main Urban Area (MUA). Given the geographical size of the MUA a symbol is not used. The New Farnley area will contribute towards the 33,300 total for the MUA. The Core Strategy does not identify strategic housing sites.	No change.
The Ledston Estate (Carter Jonas)	Allerton Bywater should be identified as a location for growth	A symbol for new housing is already shown for Allerton Bywater.	No change.
	<b>Strategic Locations for Job Growth</b>		
Aberford Parish Council	The KD shows a strategic location for job growth in the wrong location. The industrial site is to the west of the Garforth-Aberford road.	The symbol for strategic locations for job growth are not site specific. The symbol shown covers the Garforth area.	Minor change: Reposition the symbol for the strategic location for job growth for the Garforth area on the Key Diagram.
British Library (via Drivers Jonas Deloitte)	British Library at Boston Spa covers 17 ha is required to be retained for employment related uses for the duration of the plan period in line with the library's Property Strategy 2002. Identify the British Library on the KD and in supporting text, as a Key Employment Location for the promotion and growth of digitisation and archiving services in particular	The Core Strategy is not the appropriate means for considering individual site specific proposals, notwithstanding this, Policy SP8 of the Core Strategy does support existing economic priorities and existing businesses. If the British Library wishes to promote its future development proposals, it is recommended to do this through the Site Allocations DPD process.	No change.
	<b>PAS</b>		
Gaunts Ltd (Peacock	KD shows land west of Calverley	The CS cannot show specific sites to be allocated. This is the role	Minor change;

& Smith)	lane B6165 and south of the Ring Road A6120 (Farsley) as green belt and green infrastructure. It is PAS land. Policy should identify land allocated as PAS both currently in UDP and new sites to be allocated through Site Allocations.	of the Site Allocations DPD.  It is noted that the Key Diagram inadvertently shows the PAS site areas as Green Belt, this will be addressed in the revisions to the Key Diagram. The PAS site areas will now be excluded from the Green Belt designation	Revise the Key Diagram to remove the areas occupied by PAS sites from the Green Belt.
Robert Ogden Partnership (ID Planning)	The Tingley PAS site should be identified as a strategic location for housing growth	The future use of the Tingley PAS site will be considered by the Site Allocations DPD. The Core Strategy does not identify strategic housing sites.	No change.
	<b>Transport</b>		
The Bramham Park Estate; AR Briggs and Co; Meadowside Holdings Ltd; Lady Elizabeth Estate Charity; The Hatfield Estate; The Diocese of Ripon & Leeds (Carter Jonas)	Following improvements to the A1 from Bramham to Wetherby this is now a motorway. This should be shown on the KD and the correct route of the carriageway.	The KD shows the A1 correctly, referenced as A1(M).	No change.
Gareth Brown	Missing link in the masterplan for the Outer Ring Road to match the East Leeds Orbital. Access between J26/27 of the M62 and Dawson's Corner (Junction A647/A62120) is very poor and a missing link in the orbital route around Leeds that is A62120/M1/M62. Previous plans for a dual carriageway around the ORR get no mention.	The KD shows the proposals in the Leeds Transport Strategy.  Improvements to the ORR are covered under SP11 (iii) 'Targeted highway schemes to alleviate congestion and assist improved connectivity for local and strategic orbital movements.'  There are no proposals for a new link between M62 Jn 26 and Dawson's Corner.	No change.
Highways Agency	Proposals on the KD expected to have significant traffic impact on the Strategic Road Network: <ul style="list-style-type: none"> <li>• City Centre and the Aire Valley – east, south and west of Leeds</li> <li>• Morley - M621 between Outer Ring Road and Stourton and less adverse impact on J27 Gildersome M62</li> <li>• Allerton Bywater, East Ardsley</li> </ul>	Leeds City Council are currently working with the Highways Agency and their consultants to assess the impact of the Core Strategy on the Strategic Road Network. This work will provide a more detailed examination of the impacts than has been possible to date. The intention is to reach an agreed position on the impacts and agree appropriate mitigation where necessary.	No change.

	<p>and Rothwell - impact between Five Towns of Wakefield district, Aire Valley and the City Centre</p> <ul style="list-style-type: none"> <li>• Boston Spa. Scholes and Wetherby – commuting to Leeds and York, impact on M1 junctions</li> <li>• Employment locations in City Centre, Aire Valley, Leeds Valley Park, Tingley, Gildersome, Cross Gates and East Garforth – need for developer-funded enhancements to capacity of Strategic Road Network</li> <li>• Park and Ride sites – see SP11</li> </ul> <p>Lack of evidence of traffic modelling of impact of the Core Strategy</p>		
	<b>Opportunity for Regeneration &amp; BF land/ residential development</b>		
White Young Green	Support for KD recognising opportunity for regeneration and brownfield land/residential development in locality of Thorp Arch	Comment noted.	No change.
Samuel Smith Old Brewery (Tadcaster) (Cunnane Town Planning)	Re. Thorp Arch, no further explanation provided either within the CS or the KD. The CS fails to provide a clear and unambiguous policy framework to guide development of the area. Notation is not based on evidence of need, suitability, availability or viability of the sites development potential and should not be relied upon as 'deliverable' during the plan period. The notation should be deleted from the KD.	Paragraph 4.6.17 refers to the context of identifying Thorp Arch. Proposals are advancing through the pre-application process and form part of the background evidence to the Core Strategy.	No change.
Montpellier Estates	A similar opportunity for a 'brown triangle' in the South Bank area.	The site falls within the Leeds City Centre – Southern Area shown on the Key Diagram and is covered by Policy CC2 which identifies the development opportunities including suitable land uses.	No change.
	<b>Green Infrastructure</b>		

Land Securities & Evans Property Group (Quod)	Area of land between White Rose Shopping Centre and the railway line to the west is shown as GI on the KD. It is not clear what this relates to, given the proximity to the centre's perimeter road and car parking to the railway corridor. Request clarification from the Council.	The Key Diagram should reflect the location of GI as shown on Map 14 (Strategic Green Infrastructure). The land between White Rose Shopping Centre and the railway line is not GI or Green Belt as currently shown in the Key Diagram. The Key Diagram should be corrected to reflect this.	Minor change; Amend the Key Diagram to remove the Green Infrastructure and Green Belt from the area between White Rose Shopping Centre and the railway line and extend the area shaded in grey (Main Urban Area).
Mr C and Mr A Haigh (Directions Planning)	Object to inclusion of land to the west of Dewsbury Road and east of Morley as Green Infrastructure. It does not perform several of the functions as stated is a requirement of GI under para. 4.10.5.	The Key Diagram is indicative only and should not be used to show site specific designations. A full response is provided by the Council in relation to Policy SP13 (Strategic Green Infrastructure).	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.
	<b>Regeneration Priority Areas</b>		
Land Securities & Evans Property Group (Quod)	The South Leeds Priority Regeneration Area is identified on the KD with its boundaries reflecting the MUA and Major Settlements in the vicinity. This boundary is different to that set out in the Investment Strategy and excludes all existing open space. It is not clear why the open spaces are excluded but given the need for the image of the area to be enhanced and the recognition in the Investment Strategy of the need for landscape enhancements, the boundary should be amended to better reflect the Investment Strategy.	The areas of existing open space lie within the GB. The Regeneration Priority Areas boundary has been drawn to exclude the GB areas of the South Leeds Investment Strategy as decisions on Green Belt release are a matter for the Site Allocations DPD.	No change.
	<b>Adjoining Authorities</b>		
Wakefield MDC	Wakefield Core Strategy Key Diagram shows key issues and links to adjoining authorities. In the	The Key Diagram already indicates the links between Leeds and the adjoining authorities. More detailed consideration of cross-boundary issues is being considered in the context of the Leeds	No change.

	<p>Wakefield Site Specific Proposals document sections 3, 6, 7 and 15 are where key links and the interrelationship with Leeds are refined. Highlight relationship with Leeds and provide context for the Leeds Core Strategy and the role of larger places in Leeds City Region and transport links.</p>	<p>City Region and the Duty to Cooperate. It is not considered appropriate to provide more detailed references in the Key Diagram. Specific cross boundary issues will be addressed via the identification of issues and appropriate mitigation, through the Duty to Cooperate arrangements and as necessary via the Infrastructure Delivery Plan.</p>	

## APPENDIX 2 - CHANGES TO CORE STRATEGY TEXT

### 1. INTRODUCTION

- 1.15 In progressing the Vision for Leeds there are a range of partnership arrangements and mechanisms in place, focusing on priorities for action, which will be subject to regular review. As part of this framework, a City Priority Plan (2011-2015) has been developed, along with the City Council's own Business Plan (2011-2015). The Council has also agreed areas for priority housing investment with the Homes and Communities Agency and set these out in a shared Local Investment Plan (2011-15). Leeds is also an active partner in the Leeds City Region grouping of local authorities, acting through the Local Enterprise Partnership, as a focus to tackle strategic issues across the City Region. *Within this context also, the City Council has worked closely with Metro, through the West Yorkshire Local Transport Plan Partnership, in the preparation of the West Yorkshire Local Transport Plan (My Journey – Connecting people and Places) 2011 – 2026.*

#### The Regional Context

- 1.16 The Regional Spatial Strategy (RSS) for Yorkshire and the Humber provides the regional level planning framework. The RSS was developed over a number of years and was adopted in 2008, and the Core Strategy work is therefore firmly based on its policies and overall vision. Subsequently, the Government has announced its intention to abolish all RSSs, although this is not anticipated to be confirmed until later 2012.
- 1.17 The Leeds City Region partnership has therefore developed its own 'Interim Strategy Statement' *(approved by the Leaders Board in April 2011)* to provide a strategic context for both plan making and major development proposals. This is to reflect the context of the wider strategy setting work of the Leeds City Region, the uncertainty over RSS, and the duty to co-operate with neighbouring authorities as set out in the Localism Act (Nov 2011). The Heads of Planning and Chief Executives believe that such a statement was urgently needed to provide a framework for the continuing preparation of development plans.
- 1.18 The strategy statement includes some of the exact policies in the RSS in order to ensure that it has broad support in the City Region, as agreed through the extensive stakeholder consultation during the RSS process. All Leeds City region authorities have recognised that these key policies in the former RSS are those which articulate the urban transformation ambition, safeguard environmental assets, and identify the key spatial investment priorities.
- 1.19 *Since the Localism Act received Royal Assent, the NPPF has been finalised and includes further policy in regard of strategic planning. In light of this the city region partnership has further developed its role in support of the Local Planning Authorities in exercising the Duty. This ranges from developing common approaches to documentation through to the commitment to develop a spatial investment plan in the City Deal. These actions will help local planning authorities*

*to better understand and respond to activities that take place beyond their plan area and impact on their plan.*

## **2. PROFILE OF LEEDS METROPOLITAN DISTRICT**

### **The Growth of Leeds**

- 2.6 ~~Parts of Leeds have a long history, dating~~ *Leeds has a rich and diverse history. Within the District there are stone hut circles dating from the Bronze Age. The majority of the City Centre dates from 1207 when the Lord of the Manor founded a new town with a new road called Briggate leading up to a river crossing. The rest of the City Centre layout has medieval origins, still evident in its street patterns and covered arcades, and the relocation in 1684 of the cloth market onto Briggate created the core of the modern city of Leeds. The City Centre was extended in the mid 1700s on the west side resulting in the numerous squares, which survive today. The population grew to 30,000 at the end of the 18<sup>th</sup> Century and Leeds became one of the busiest and most prosperous urban centres in the north of England.*

### **Housing**

- 2.13 One of the biggest challenges Leeds faces is to provide enough quality and accessible homes to meet the city's growing population, whilst protecting the quality of the environment and respecting community identity. *Within this overall context the need for affordable housing and affordable warmth are key issues.* It is clear that house building in Leeds needs to significantly increase. Housing starts decreased sharply in July 2008 and since then the rate of new starts has averaged just 80 units a month, compared to a monthly average of 330 in the four previous years. The impacts of the recession are clearly seen in that the completion of new dwellings fell to their lowest level in years during 2010/11.

### **iii) Our Green Environment**

- 2.39 The environment in Leeds is continually improving, including air quality and the cleanliness and attractiveness of the waterways for wildlife, particularly the River Aire and canal corridors. However, the City Centre does have a relatively small amount of greenspace, and so the Council's ambition is to develop a major new City Centre park just south of the River Aire, with strong pedestrian links across the river into the heart of the shopping and commercial area. The upgrading of other City Centre public spaces is also important. *In addition, the network of Public Rights of Way (PROW) represents the arteries that help people access the countryside and urban greenspaces, linking people with place and linking urban to rural. Within Leeds there are 819km of rights of way, 628kn of footpath, 180km of bridleway, together with a short network of byways and other routes with public access. Included within this total area are key strategic routes (such as the Leeds Country Way and local recreational routes (such as the Meanwood Valley Trail). Within this context also, the City Council has produced a Rights of Way Improvement Plan, in response to the Countryside Rights of Way Act (2000), setting out a 10n year improvement plan for the Rights of Way network.*

### 3. SPATIAL VISION

#### Spatial Vision and Objectives

Para. 3.2 6<sup>th</sup> Bullet Point

- Aire Valley will become an innovative new living and working community, *supported by the necessary community facilities and infrastructure*, which is a national model for sustainable development, accommodating up to 9,000 new homes and 35,000 new jobs within a distinctive green environment. An integral part of the urban eco-settlement will be the establishment of low carbon solutions, and energy requirements in established communities will have been significantly reduced by retrofitting,

#### Objectives

12.	Support high quality design and the positive use of the historic environment to create <i>and maintain</i> distinctive and cohesive places that include measures to improve community safety.
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Report author: Lora Hughes  
50714

**Report of the Director of City Development**

**Report to: Development Plan Panel**

**Date: 11<sup>th</sup> September 2012**

**Subject: LDF Core Strategy – Publication Draft, Analysis of Consultation Responses: Placemaking - Retail and Centres**

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 6 weeks public consultation during February – April 2012. Section 3 of this report summarises the issues raised and the Table in Appendix 1 suggests how the City Council should respond. Appendix 2 illustrates how the text of the Core Strategy would need to be altered.
  
2. A number of representations gave general support to this Chapter and the Council’s ‘centres first’ approach, and all the policies had representations in support. Many comments received have helped improve and clarify specific policies. The majority of comments warrant no changes, and a few issues warrant only minor changes to the supporting text in order to add clarity. There are a couple of issues which are significant enough to justify major changes to the relevant policies, and the analysis and suggested changes in this regard are set out in Appendices 1 and 2.

**Recommendations**

Development Plan Panel is requested to:

- i) Note and comment on the contents of the report and the course of further action (as detailed in Appendix 1 to the report).

## **1.0 Purpose of this Report**

- 1.1 The purpose of this report is to review consultation responses in relation to the overall approach to retailing and centres including Strategic Policy SP2 and the Placemaking chapter Policies P1 to P9 (the City Centre is covered by a separate report). Appendix 1 attached summarises the representations, key issues raised, the City Council's view and proposed action.

## **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 28<sup>th</sup> February to 12<sup>th</sup> 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 (and 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)

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, the Leeds City Centre, Town and Local Centres Study, Housing Growth in Leeds, the Strategic Housing Land Availability Assessment, the Strategic Housing Market Assessment and the Leeds Open Space, Sport and Recreation Assessment).

## **3.0 Main Issues**

### Floorspace projections

- 3.1 Some developers had concerns over the Core Strategy taking a cautious approach to the comparison shopping floorspace projections in the Leeds Centres Study (2010).
- It is considered that sufficient justification for this approach is set out in the Core Strategy. This includes the key issue that within the first five years priority needs to be given to Trinity and the Eastgate Quarter to ensure their success, and also to give time for the rest of the City Centre to adjust to any resulting trading effects. Additionally, growth forecasts have decreased since the Study was published and projecting future retail trading is currently at its most uncertain. An updated retail study in a few years is proposed as the appropriate mechanism to identify further floorspace requirements.

### Out of town shopping centres

3.2 A range of conflicting opinions were expressed, including general support for the policy approach, concern that more weight should be given to the regeneration and economic benefits of the White Rose Centre, and also the contrary opinion that too much weight is given to potential for expansion of out of town shopping centres.

- The CS does recognise the importance of the White Rose Centre and other out of centre retail parks. However, national policy is clear on how in general terms such out of town centres should be addressed and it would be inappropriate for the CS to depart from this centres first approach without a significantly greater amount of evidence. The Centres Study identified capacity in the sector of the City containing the White Rose Centre, but made it clear that the market share approach should not support its extension in isolation from other policy considerations. No changes are proposed to the CS in this regard as consider that it is in conformity with the NPPF and is sufficiently clear in its approach.

### Spatial Policy 2 – Hierarchy of Centres and Spatial Approach to Retailing, Offices, Intensive Leisure, and Culture

3.3 General support was given to SP2, and there were no particular comments which required any changes making. A number of the more detailed comments were considered better addressed under the Placemaking policies. Respondents raised similar points on floorspace projections as have already been discussed above.

### Policy 1 – Town and Local Centre Designations

3.4 Need more clarity as to new centres proposed in the Aire Valley.

- The Aire Valley Area Action Plan is to identify which centres are necessary.

3.5 More clarity is needed as to why certain centres are designated within their level of the hierarchy.

- As a result of emerging survey data undertaken to inform the Site Allocations DPD, it has now been possible to further clarify and address some anomalies in the ranking of some centres within the overall hierarchy. When the data is sorted by gross retail floor space (A1), some centres appear to be anomalies:

<b>Centre</b>	<b>Anomaly</b>	<b>Proposal</b>
Holt Park	Small for a town centre	No change
Middleton	Small for a town centre	No change
Dewsbury Road	Small for a town centre	No change
Farsley	Small for a town centre	No change
Street Lane	Large for a lower order local centre	Change to higher order local centre
Chapelton Road	Large for a lower order local centre	Change to higher order local centre
Lower Wortley	Large for a lower order local centre	No change
Chapelton, Pudsey	Small for a higher order local centre	Change to lower order local centre

- It is considered that Farsley, Dewsbury Road, Middleton and Holt Park all continue to be valid as town centres due to a combination of their community facilities, scope for additional retail provision and further expansion, recent planning permissions, and regeneration projects. Street Lane and Chapelton

Road are proposed to become higher order due to their overall volume of retail floorspace and the presence of larger format convenience provision through the Co-op (Street Lane) and the Continental Supermarket (Chapelton Road). Lower Wortley is an anomaly due to the presence of Matalan which makes up 63% of the total gross floor space in the centre (with another 13% being residential). Its designation as lower order is therefore justified due to its limited range of retail and community facilities. Chapelton Pudsey is relatively small with overall retail provision relatively limited. The largest building is occupied by Rhodes and Scholes for manufacture of office furniture, and the largest unit for food shopping is a very small Sainsbury's which only provides a neighbourhood 'top-up' shopping role. Therefore there appears no justification for this centre to remain as a higher order local centre, and propose it should be changed to lower order.

- 1,500 sqm total gross A1 retail is therefore proposed as a basic threshold to differentiate between higher and lower order local centres (notwithstanding the Lower Wortley anomaly and any other site specific issues which may arise in individual centres).
- There are also a number of centres which are now considered too small for inclusion as lower order local centres as they are no larger than any other neighbourhood parade across the District. This has been assessed using a threshold of a lower order local centre needing to have more than 500 sqm retail (A1) and at least an additional 500 sqm across all other uses:
  - Galloway Lane
  - Coldcotes Circus
  - Ireland Wood
  - Woodlesford
  - Adel
- Weetwood Far Headingley also comes below this threshold for at least 500 sqm retail, but due to its configuration, range of uses, and having a total floorspace far exceeding a number of other centres, it is clearly larger in size and function than a neighbourhood parade and is proposed to remain as a lower order local centre.

Policy P2 – Acceptable Uses in and on the Edge of Town Centres

Policy P3 – Acceptable Uses in and on the Edge of Local Centres

3.6 Use of upper floors for residential should be encouraged not just acceptable. Policies are overly prescriptive.

- Agree that NPPF encourages residential on appropriate sites within centres. The policies provide clarity and a locally distinctive interpretation of national policy. The acceptable threshold size for a supermarket in higher order local centres is stated as only for guidance and subject to local circumstances. Having a threshold and list of acceptable uses gives more clarity in advance, is more transparent, and allows consistency of decisions. However, based on emerging survey data undertaken to inform the Site Allocations DPD and the range of sizes of stores in the different levels of the hierarchy, it is proposed to reduce this threshold slightly to 1,500 sqm. This also aligns better with Policy P8 requiring sequential and impact tests.

## Policy P4 – Shopping Parades and Small Stand Alone Foodstores Serving Local Neighbourhoods and Communities

- 3.7 Inappropriate for the policy to be too precise regarding scale of small scale food stores allowed. Also the threshold should be more flexible to allow larger stores in Regeneration Priority Areas.
- P4 provides clarity and a locally distinctive interpretation of national policy, and setting no threshold would mean that a sequential test would be required for even the smallest sized proposals for a main town centre use. It is set in order to support local communities and promote local provision. Having this threshold also gives more clarity in advance, is more transparent, and allows consistency of decisions. It is important in Regeneration Areas to promote their existing centres and Policy P8 addresses proposals for larger stores through the centres first approach.
- 3.8 Differing views were offered, in that promoting retail uses above those such as property management/letting offices does not take account of changing demands and would stop opportunity for local employment and keep units empty. Alternatively, it was suggested that a % figure should be specified to retain an amount of retailing within parades.
- P4 aims to maintain the retail function of local parades to provide at the very local level. Aspects such as length of vacancy would be material considerations at planning application stage. P4 does consider cumulative impact but there is no evidence to impose a % figure, and the range of parades across the District is too varied to do this in the Core Strategy.
- 3.9 Considerations of change of use from retail to non-retail (including hot food takeaways) are equally applicable to other defined centres and not just neighbourhood parades.
- It is agreed that this is the case. As town centres and higher order local centres are/will be covered by shopping frontage policies, it is proposed to add the last paragraph and related criteria of P4 also into P3 to relate to lower order local centres.

## P5 – Approach to Accommodating New Foodstores Across Leeds

- 3.10 Some respondents considered that in the centres listed as those where the Council is promoting further foodstore provision, there is no evidence to show availability of sites. Respondents from Headingley also queried why other town centres were not included on the list, and that the character and amenity of Headingley would be harmed by a new major foodstore as it is already a successful centre serving a unique local community.
- Improved provision does not necessarily require a new site or an extension, and also by supporting these centres in principle over the timescale of the Core Strategy, sites may be encouraged to come forwards. The centres listed were identified through the Centres Study based on health checks, capacity/need figures, recent commitments, and the distance to other town centres. Other CS policies would still apply regarding scale, impact, and amenity. The Site Allocations DPD will also provide the opportunity to take into account such detailed issues.

## P6 – Approach to Accommodating New Comparison Shopping in Town and Local Centres

3.11 No special issues were raised.

## P7 – The Creation of New Centres

3.12 The need for the policy was queried, and that the location of new centres should be specified further and with a limit on the amount of main town centre use floorspace within them.

- The intention of the policy is to support the Site Allocations DPD and reflect that over the timescale of the CS a blanket rejection of new centres would be inappropriate. It would be too onerous to set floorspace limits in advance.

## P8 – Sequential and Impact Assessments for Town Centre Uses

3.13 Policy P8 was the most contentious of all the centres policies, primarily because of its very detailed nature allowing for a range of specific comments to be made. Overall, representors felt that it was unduly complicated, too long, too prescriptive including setting catchment areas, and confusing.

- If thresholds were not set then the Council would have to apply a sequential test against every town centre use proposal, whereas P8 reduces the severity of the test. This is therefore both pragmatic, and proactive to growth, especially at the local level to support communities' needs. Having detailed criteria allows for clarity in advance, consistency, and transparency.
- However, in response to the detailed comments a number of changes have been made to Policy P8, which in their entirety have greatly increased its clarity, and reduced its complexity and length. This is primarily to make more clear which main town centre uses apply and to which criteria, and remove duplication. Overall this is considered to be a major change to Policy P8.

3.14 Another key comment was querying the reduction from the NPPF threshold of 2,500 sqm for impact tests, to 1,500 sqm.

- Again, the underlying reason is that a local interpretation of centres policy is required, and the NPPF allows for a local threshold to be set. It was based on recommendations in the Centres Study and on the general size banding of different types/formats of stores.

3.15 There were queries over Criteria A and that the NPPF does not require an impact test within an existing centre.

- The aim of Criteria A was to allow the Council to address potential disproportionate impacts even where a new store was sited in centre. However, it is agreed that it is difficult to set an appropriate size threshold for the test, especially based on recent survey work undertaken for the Site Allocations DPD. Considered alongside the overall CS approach to directing growth into centres, propose to remove reference to requiring impact tests within existing centres.

## P9 – Community Facilities and Other Services

3.16 One school provider and the Conservative Group considered that Core Strategy could give more emphasis on the need for school provision in relation to new development. Sport England requested that 'sport and recreation' should be added to the list of community facilities.

- It is considered that school provision is adequately covered in P9, because due to the Council's statutory obligations for providing school places, repeating this

in the CS would not give the requirement any further weight. There has been (and is ongoing) close working with Education colleagues to ensure that there will be sufficient school infrastructure to support growth. The Site Allocations DPD and the Infrastructure Delivery Plan will in addition identify school requirements relating to specific locations. It is agreed that sport and recreation should be added.

#### **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 City 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, 10<sup>th</sup> 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 about the Centres policies SP2 and P1 – P9. The issue of needing further clarity to Policy P8 is considered significant enough to justify a major change and the policy has been substantially altered in response. Recent survey work undertaken to support the emerging Site Allocations DPD has also identified more appropriate thresholds for classification between the different levels of the centres hierarchy, and allowed rectification of anomalies in the classifications of a few specific centres within Policy P1. The remaining issues warrant only minor changes or no changes at all, and the reasons for not making the changes suggested by respondents have been set out in detail.

## **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 documents<sup>1</sup>**

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) web pages or by contacting David Feeney on 247 4539.

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<sup>1</sup> 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

#### Placemaking Chapter – Centres and Retail: SP2, P1 – P9

Representor/ Agent	Representor Comments	LCC Response	Action:
<b>TOWN AND LOCAL CENTRES – GENERAL (Qu 32)</b>			
ASDA Stores (via Osborne Clarke 5889)	The proposed retail strategy (other than Policy P3) is broadly supported.	Support welcomed.	No change
CAMRA (0085)	Support identification of importance of city centre, suburban centres and outlying town centres. Is important in these centres to retain amenities to produce a vibrant community and environment.	Support welcomed.	No change
CAMRA (0085)	Although A4 uses are mentioned as local centre amenities, should be distinction between the traditional pub and other types of bars as the former is the type under threat and therefore needs more recognition of importance and more specific weighting to help retain these institutions.	A public house is regarded as a town centre use within the NPPF therefore its role is supported within the CS through its approach to town and local centres. It is not possible within the use class system to distinguish between the range of uses covered by the A4 classification. But Policy P9 gives protection to pubs where they act as community facilities and services, and P11 gives protection where the building is of merit. In addition, the NPPF identifies pubs as community facilities and resists their unnecessary loss; recent appeals have been won on this basis. It is therefore considered that repeating NPPF would be unnecessary.	No change
Aviva Life & Pensions UK and the Crown Estate (via Indigo Planning 0806)	Identify Crown Point Retail Park as a complementary and preferable retail destination to alternatives outside of the PSQ.	See full response to this point in City Centre Chapter.	No change
Otley Town Partnership (via Directions Planning 5121)	Otley is an important town centre within the district and fulfils a market town function serving a wider rural area. The town centre strategy should include guidance/ support in relation to regeneration and renewal.	Policy SP4 on regeneration priority areas includes reference to supporting additional Council led regeneration initiatives that can demonstrate a positive impact.	No change
Scarborough Development Group (5719)	Could acknowledge that large development proposals, i.e. Thorpe Park, are also opportunities for placemaking.	Already addressed by design policies and Vision.	No change

Leeds Civic Trust (0062)	Need to reference importance of historic character of town and local centres and the importance and quality of the public realm. State that there is an intention to carry out character assessments. Development should enhance character of public realm.	Importance of historic character referred to in Policy P11, and Policy P10 refers to new development that respects and enhances streets, spaces etc according to local distinctiveness and the wider setting of the place, contributing towards placemaking, quality of life and being accessible to all. Additionally, strengthened wording to P10 and P11 has already been agreed at the previous Development Plan Panel. Amend para 5.3.4 to include reference to historic character and public realm.	Minor change - Amend para 5.3.4
Land Securities and Evans Property Group (via Quod 1091)	As a result of cautious approach, the CS only positively plans for 31,000 sqm of net additional comparison retail space, which is only 24% of the overall need (low growth scenario) at 2016, 19% of the need at 2021, and 18% of the need at 2026, after taking account of existing commitments. Since the evidence base was prepared, revised expenditure growth rates and special forms of trading rates have been published in the form of Experian Retail Planner Briefing Note 9, which do not dramatically alter the identified need for comparison retail floorspace across the District. Therefore, for NPPF consistency, need to positively plan for the full retail needs of the District. The evidence base demonstrates that this (new) requirement has not been met.	<p>The 31,000 sqm figure only applies to the City Centre. We are positively planning for comparison retail in the City Centre, as explained at Para 5.1.7. It is a market driven approach, taking into account local conditions, and Paras 4.2.3 and 4.2.4 also clearly set out the reasons why we have taken this approach.</p> <p>The NPPF sets out that plans should be justified: “the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.” Whilst the Leeds Centres Study shows there is wider need for comparison space in the White Rose area and identifies a level of overtrading, it also suggests that the evidence be treated with caution and that particularly in the first 5 years there needs to be the opportunity for Trinity and Eastgate (and Trinity Wakefield) to be successful and for the City Centre to readjust to this floorspace. This is therefore consistent with all the NPPF principles. As with all major schemes, they will cause internal trading effects and there will be readjustments, as has occurred over the past few decades. Additionally the Eastgate and the Harewood Quarter is a major commitment, and its delivery must be a priority due to its significant physical and economic regeneration benefits. This could bring forward other redevelopment opportunities within or closely related to the Prime Shopping Area. A further retail study will be necessary before any further addition to the floorspace.</p> <p>Experian assumptions and other data sources since the Study was published have decreased growth forecasts, and increased forecasts for online shopping. Retail trading is probably at its most uncertain in the modern era. Future</p>	No change

	<p>Also attached Land Securities letter originally sent 3rd August 2011 regarding concerns over the Centres Study:</p> <ul style="list-style-type: none"> <li>- Assertions about the future of the White Rose Centre fail to have regard to the wider context, including benefits to the local and regional economy, work undertaken through the Investment Partnership, the Investment Strategy for South Leeds, and the views of the public. No weight given to issues of regeneration.</li> <li>- No evidence or analysis on the impacts of development at White Rose on the City Centre. That Land Securities is investing in both the City Centre through Trinity and at White Rose is hard evidence that they can both add to the economy.</li> </ul>	<p>'capacity' based on trend projections can only be subject to similar uncertainty. Alongside the ongoing recession this means that it is necessary to take a cautionary approach to providing the full level of floorspace identified in the Study. An updated study once the impact of Trinity and Eastgate has been established is the appropriate mechanism to identify how much further floorspace would be required in the longer term. The Site Allocations DPD will also consider opportunities within and on the edge of centres including opportunities to change boundaries. As the main City Centre commitments are delivered and begin to trade, medium and longer term prospects will become clearer. Major schemes are being brought forward and the context established to address longer term needs, therefore it is considered that the approach is justified and in broad terms provides significant flexibility for the LDF to bring forward development of an appropriate scale and location as evidence becomes more certain. It is concluded the approach is sound in the context of NPPF para 182 when read in its entirety.</p> <p>The White Rose Centre has clearly developed into a successful shopping destination, drawing trade from a significant catchment area, both within and beyond Leeds District. The CS does recognise the importance of the WRC including its economic benefits, for instance at 5.3.9. However, whilst the site owners may well progress proposals to broaden its character, at present it can only be described as a freestanding sub-regional shopping centre. National policy context is quite clear as to how policy in general terms should address such developments.</p> <p>For example, the representation makes reference to the employment benefits of the WRC for the Morley area, but it is believed that there has been no assessment of how it may have already diverted investment from defined town and city centres within and beyond the Leeds District, nor relocated development. Such concerns are key to the national policy approach and have not been addressed. The impact of overtrading on centres outside the Leeds District needs to be considered in our duty to co-operate. Essentially, the representation is very specific focusing that the CS should</p>	
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		generally be amended to facilitate proposals to expand and alter development at the WRC. Any such proposals and the case and evidence behind them should be developed in far more detail than has been provided at this stage, within the context of relevant national and local policies. It would be inappropriate for the CS to depart from the centres first approach, and so specific expansion opportunities starting from this centres first approach will be identified through the Site Allocations DPD.	
Hammerson UK Properties Ltd (via Barton Willmore 4816)	<p>Majority of previous representations to the CS Preferred Approach and to the Colliers Centres Study are outstanding and still relevant [only retail related ones shown below]:</p> <ul style="list-style-type: none"> <li>- Out-of-town retail parks should not be considered as town centres, further out-of-centre development should be resisted.</li> </ul> <p>- Specific reference should be made to support the delivery of the Eastgate &amp; Harewood scheme, given its importance to the City Centre. Support the economic role of the City Centre. EHQ will provide a leading role in delivering the primary objective of Policy EC2.</p>	<p>For clarity, the Hammerson representation to the Preferred Approach, and LCC responses at that time are set out in summary:</p> <ul style="list-style-type: none"> <li>- Support that out of town retail parks should not be considered as town centres and further out of centre developments to be resisted. Such sites should not have policy or be a regeneration priority. Need additional policy that the expansion of retail floor space at existing out of centre retail parks will be resisted.</li> <li>*Support welcomed. Proposals to extend out of town centre locations would be judged against PPS4 and therefore an additional CS Policy is not required; the existing CS policies also control development in such locations.</li> <li>- LCC support for large hypermarkets and out of town shopping is bad for the sustainability of local community and therefore bad for the environment, so Vision for Leeds is contradicted.</li> <li>*LCC does not support out of centre shopping. Promoting shopping choice through large supermarkets is in line with PPS4.</li> <li>- Support that development of out of centre retail parks must be linked with development of public transport to encourage modal shift.</li> <li>*Support welcomed, although it is not the intention to develop out of centre retail parks.</li> <li>- Given the scale of the Eastgate and Harewood Quarter scheme and its importance to the future vitality and viability of the City Centre, it is of strategic importance and so the CS should make explicit reference to supporting its delivery, as it should not be undermined by ambiguous policies.</li> <li>*LCC agrees, and will also be addressed further through the</li> </ul>	No change

	<p>- Flexibility should be allowed to enable sustainability merits of a scheme to be negotiated on an individual basis, which would otherwise affect viability.</p> <p>The concerns raised regarding the Centres Study were focused on:</p> <ul style="list-style-type: none"> <li>- The robustness of the household survey;</li> <li>- The level of capacity identified for additional floorspace at White Rose;</li> <li>- How the EHQ commitment had been taken into account; and</li> <li>- The use of benchmark sales densities to inform the assessment.</li> </ul> <p>Also attached their letter originally sent 6<sup>th</sup> October 2011 regarding concerns over the Centres Study:</p> <ul style="list-style-type: none"> <li>- Maximum levels of retail floorspace permitted for EHQ and Trinity should be included as a commitment in the retail capacity assessment. Clarification of the turnover figure.</li> <li>- Priority should be given to the delivery of the EHQ and Trinity schemes and the resulting consolidation of the City centre before additional floorspace is planned.</li> <li>- Household survey questionnaire – only split comparison into non-bulky and bulky goods, rather than more specific categories. This overestimates the market shares of larger centres and retail destinations, showing particularly high levels of ‘need’ in Zone 4 City Centre and Zone 9 White Rose Centre. Unrealistic capacity shown at White Rose, although welcome that there is no planning case to encourage its further development.</li> </ul>	<p>Town Centre Study.</p> <ul style="list-style-type: none"> <li>- Policy CC1 as rigidly worded could have a significant adverse impact on the viability of current pipeline schemes. Flexibility should be introduced here to allow for the sustainability merits of a scheme to be negotiated on an individual basis having regard to site specific constraints and development costs.</li> </ul> <p>*Viability can be assessed on every application and considered alongside other policies on affordable housing and other contributions. This will mean more work at planning application stage but they will achieve the standards for some schemes, whereas without the policy no schemes would achieve them. Also, the CS is a long term document and over time the costs will come down.</p> <p>The committed retail floorspace for Eastgate and Harewood Quarter was included as a commitment in the Centres Study, which was clear in prioritising the committed schemes before looking to further extensions.</p> <p>Capacity was not identified for the White Rose Centre, but rather ‘capacity’ within that sector of the City. The Study made it clear that the market share approach should not be taken to demonstrate a particular need for that quantum of development within any particular sector nor to support any proposals for extension of non town centre developments in isolation from other policy development.</p> <p>In relation to the household survey, while it may be of interest to have a more detailed breakdown of comparison shopping habits, the purpose of the study was to provide information to assist policymaking. Planning policy can differentiate between major goods types, but it is not possible to influence provision of detailed sectors. Consequently, this would have been more for academic interest than of value in policy generation.</p> <p>The calculation of spend in all regards took into account primary and second choices and Colliers International standard methodology apportioned these to create the overall spending figures, an approach which has been</p>	
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	- Believe sales densities are lower which therefore overstates the levels of overtrading. Densities are Colliers estimate rather than being sourced from particular data providers, and therefore need clarification.	applied consistently and is generally supported.	
Carter Jonas (5681) on behalf of Lady Elizabeth Hastings Estate Charity. The Hatfeild Estate, AR Briggs and Co, The Bramham Park Estate, The Ledston Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds	Policies are too prescriptive and overly detailed with a high level of repetition. Could slim down and remove repetition.	Repetition of policies has been reviewed, and is addressed through specific comments on each policy below.	No change
St James Securities Ventures (Leeds) Ltd (via Indigo Planning 3010)	No criteria based policy for the sequential and impact assessment of town centre uses outside centres.	Policy P8 addresses proposals for out of centre retail proposals.	No change
<b>Out of centre retail parks - general</b>			
Hammerson UK Properties Ltd (via Barton Wilmore 4816), Morley Town Council (4825), Cllr Thomas Leadley (2956)	Object to CS in suggesting even limited expansion of out-of-centre retailing, which would cause harm to traditional town centres in Leeds and in neighbouring districts. This could impact on the delivery of Eastgate and should not be encouraged. The wording in para 5.3.9 is contrary to NPPF and contradicts the aims and objectives of spatial policies 1,2,3 and 8. The White Rose Centre is a major generator of employment and an asset to Leeds, but out of centre shopping must be contained.	The CS has to recognise the existence of out of town retail parks, and they do provide an important contribution to the economy. 5.3.9 does state that any out of centre retail development must be in line with and not compromise the centres first approach, and also confirms the Council's commitment to delivering the city centre major retail proposals of Trinity and Eastgate. It is therefore not considered that it is inconsistent with the NPPF.	No change
Scarborough Development Group (via RED Property Services 5719)	5.3.9 - support general thrust but consider that the text could also refer to 'and other areas of major growth' after the words 'established retail park locations.'	Support welcomed. The Core Strategy supports a centres first approach and therefore new centres will be considered against Policy P7.	No change
Land Securities & Evans Property	Para 5.3 7 5.39 - fully endorse the recognition of the role of out of centre retail facilities. Additional development	Support welcomed. Any additional development at White Rose will be subject to the appropriate sequential and impact	No change

Group (via Quod 1091)	and diversification at White Rose Shopping Centre (if demonstrate no detrimental impact on the city centre or other centres) can build on the existing linkages with the local community by leveraging further direct economic benefits, as well as indirect opportunities i.e. public transport enhancements, which together can deliver regeneration to South Leeds.	assessments and would need to align within a clear regeneration framework.	
St James Securities Ventures (Leeds) Ltd (via Indigo Planning 3010)	Should be a policy allowing new out of centre retail development where it is demonstrated that there are no sequentially preferable sites within existing centres and that the proposal does not result in significant adverse impact in accordance with the retail tests of the NPPF.	Consider that this is covered in Policy P7 and P8. Also, as stated in Policy P5 improved provision doesn't necessarily require new floorspace but could be improvements to existing provision within the existing boundaries.	No change

**SPATIAL POLICY 2 – HIERARCHY OF CENTRES AND SPATIAL APPROACH TO RETAILING, OFFICES, INTENSIVE LEISURE AND CULTURE (Qu 6)**

**General support**

<p>S.W Fraser - Cannon Hall Estate (via Smiths Gore 5017), Tesco, Yelcon (via DPP 5543)</p>	<p>Support the content of Spatial Policy 2.</p>	<p>Support welcomed.</p>	<p>No change</p>
<p>Templegate Developments (via Barton Willmore Planning Partnership-Northern 0057), Land Securities and Evans Property Group (via Quod 1091), Hammerson UK Properties Ltd (via Barton Willmore 4816), Morley Town Council (4825), ASDA Stores (via Osborne Clarke 5889)</p>	<p>Support the hierarchy of centres and policy's overall commitment to the 'centres first approach' as being consistent with the NPPF.</p> <p>Support given to the promotion of the delivery of the EHQ scheme (Hammerson).</p> <p>Supports the definition and location of designated centres shown on Map 4 (Hammerson).</p> <p>Agree with 4.2.5 and the need to not having a detrimental impact on regional/sub-regional shopping hierarchy (Morley Town Council)</p> <p>Welcome that the City Centre will be the focus for growth (Asda).</p>	<p>Support welcomed.</p>	<p>No change</p>
<p>The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon</p>	<p>Welcome that policy seeks to maintain the local distinctiveness of the District's Centres.</p> <p>Welcome variously a number of specific centres: Boston Spa and Collingham, Horsforth Town Street, Wetherby, Boston Spa (with Thorp Arch).</p>	<p>Support welcomed.</p>	<p>No change</p>



and Leeds (via Carter Jonas 5681)			
<b>Out of centre</b>			
Hammerson UK Properties Ltd (via Barton Willmore 4816)	4.2.5 - for clarity and to avoid any confusion in a section of the CS entitled 'City and Town Centres', the references to the White Rose Centre should be prefixed with the word 'out-of-centre'.	Agree would improve clarity.	Minor change – add wording 'out-of-centre'
Land Securities and Evans Property Group (via Quod 1091)	SP2 states that proposals which undermine the town centres first approach will not be supported. However, this is not consistent with NPPF (which recognises the potential for edge and out of centre development subject to tests) or Policy P8 which sets out the manner in which proposals in out of centre locations will be assessed. Should change to: "Proposals which would undermine that approach, following an assessment under Policy P8, will not be supported."	It is not considered that SP2 is inconsistent with the NPPF. Such detailed wording is not appropriate for this overarching Spatial Policy. Sequential tests and impact assessments are dealt with and clarified by the Placemaking policies.  It would not be appropriate for all applications for main town centre uses across the District to be directed to the City Centre with no other centres allowed to accommodate major developments. The hierarchy of centres allows and encourages town centres to perform their own important roles, particularly relevant in Leeds where there is such a wide range of types of town and local centres. There is the need to maintain the vitality of all centres. In any case, due to the nature of the hierarchy it is considered that any proposals of city wide or regional significance will be most likely to come forwards in the City Centre. If proposals were to come forward at other centres to an extent that would affect the place of that centre in the hierarchy, then that would be a matter for separate consideration, and is addressed through e.g. Policy P8.	No change
Hammerson UK Properties Ltd (via Barton Willmore 4816)	Detailed wording should be redrafted so that it is consistent with the NPPF (paras 23 – 27) particularly in relation to the wording relevant to the sequential test and impact assessment. It should also be explicit that applications for major town centre uses should be directed to the City Centre in the first instance.		
<b>New centres and Regeneration Priority Areas</b>			
West Properties Ltd (1998)	The Kirkstall Road Renaissance Area should be recognised within SP2 and supporting text, as a focus for new development which maximises existing brownfield regeneration opportunities in a highly accessible location.	Notwithstanding the range of current retail and leisure uses in the Kirkstall Road area, new town centre uses would still have to comply with the sequential approach.	No change
ASDA Stores (via Osborne Clarke 5889)	It should be recognised that the designation of new centres may be required to support housing growth. The hierarchy should be reviewed throughout the plan period to reflect any changes as a result of growth areas with Leeds.	This is recognised and addressed by Policy P7.	No change
Airebank Developments	Should recognise that those sites within Regeneration Priority Areas should have a more flexible approach that will enable	All the CS policies need to be read in conjunction. The criteria for smaller scale developments proposed in P8	No change

(via WYG Planning and Design 0420), Land Securities and Evans Property Group (via Quod 1091)	convenience retail opportunities to come forward (as paragraphs 4.4.6 and 4.4.7 note that a lack of retail facilities is one indicator of a poorly performing area). In PRAs if such uses are appropriately scaled and justified, they would contribute to reversing the social and economic decline of local communities, without detrimentally impacting on the vitality and viability of existing centres. Aims and objectives of SP2 need to be consistent with SP4. Should add to policy: "...unless directed to other locations in accordance with other policies in this Core Strategy."	will help to address regeneration needs. Regeneration areas contain centres so it is even more important to promote their vitality and viability through the detailed approach in the Placemaking Chapter.	
<b>New Centres</b>			
Templegate Developments (via Barton Willmore Planning Partnership-Northern 0057)	No reference to the potential for new centres that will be required as a result of the overall level of growth planned within the District over the next 15 – 20 years.	Not necessary as addressed by Policy P7 and due to need for caution in forecasting and as result of Site Allocations DPD identifying specific areas of growth.	No change
Templegate Developments (via Barton Willmore Planning Partnership-Northern 0057)	Unclear why the 2011 Centres Study does not build on the detailed evidence in the 2009 EASEL/Aire Valley Town and Local Centre Assessment, which sets out clear recommendations for a town centre on either area 6 or 11 of the AVL. This requires clarification, and the CS maps should show a town centre located at Skelton Grange. Nevertheless it is clear that the principle of retail development is accepted at Skelton Grange. (Representor provides further detailed comments in support of a town centre at Skelton Gate, based on criteria in P7.)	The evidence of retail need in the AVL in the 2009 EASEL/AVL Study remains of some relevance, but was based on assumptions of development set out the AAP Preferred Options (Oct 2007). Subsequent further detailed financial modelling and other assessment work has shown that Area 6 (Temple Green, Skelton Grange) is not a suitable or deliverable housing site. The assumptions on the overall number of new homes to be provided in the eastern part of the AVL have therefore been substantially reduced to around 2,250 on the Skelton Gate site (Area 11). This amount of development is unlikely to sustain retail development of the scale associated with a town centre, e.g. a major foodstore, plus the site is not close to other established communities to meet other deficiencies. It would not be sustainable for the site to become a destination in itself attracting shoppers from a much wider area. The city-wide Centres Study took the AVL Study into account but was based on more up to date evidence and was able to take into account the effects of the economic downturn.  There is however clearly a need for some retail and other uses within the AVL, likely to be at the scale of a	No change

		local centre. Policy P7 allows for the creation of new centres, and this will be addressed through the Aire Valley AAP. In the western part of the extended AVL area there is evidence to support a new town centre based on the need to address a deficiency in existing convenience provision, derived from the Centres Study and proposals for new residential development in the area.	
<b>NPPF consistency</b>			
ASDA Stores (via Osborne Clarke 5889)	There is no requirement for the sentence, "Proposals which would undermine that approach will not be supported", which would be unduly inflexible.	This would not be unduly flexible, as it is the aim of the CS not to support out of centre development. The specific criteria for out of centre development are set out in P2.	No change
Scarborough Development Group (via RED Property Services 5719)  Aviva Life & Pensions UK, and The Crown Estate (via Indigo Planning 0806)	Para 4.2.3 - Focusing on first 5 year period does not satisfy the soundness test set out under NPPF paras 23 and 192: 'It is important that needs for retail, leisure, office and other main town centre uses are met in full'. The retail study highlighted need for additional comparison retailing, these should be properly planned for.  Para 4.2.3 - Only referring to projections made for the first 5 years does not represent a sound approach to plan-making, object on the basis of consequent uncertainty it delivers. The York Inspector summarised (explanatory meeting 23rd April) that "the CS is the place to make key discussions about distribution of development and to set out clear guidance for the allocation of sites in future plans. The strategy for the amount and distribution of development needs to be clear and based on a robust justification." Paragraph 4.2.3 clearly contradicts this approach which has implications for the retail policies of the draft DPD, and the Crown Point Retail Park.	See previous responses above under 'Town and local centres – general' in relation to Hammerson UK (via Barton Willmore 4816) and Land Securities and Evans Property Group (via Quod 1091), as the issues of taking a cautious approach and focusing on the first five years are addressed comprehensively there.  The Core Strategy discusses the City Centre south of the river with the objective of securing better integration with areas to the north. The CS policies give scope to consider the relationship between the Crown Point Retail Park and the South Bank in the relatively short term, and specific proposals to address this are to be developed in subsequent DPDs. This is also relevant in the context of the cautious approach being promoted in relation to projection based expenditure estimates. The Site Allocations DPD will identify opportunities within centres including the consideration of boundary definitions.  The situation in Leeds (and specifically the City Centre) is different to that at York. Major schemes are being brought forward and the context established to address longer term needs. The approach in broad terms provides significant flexibility for the LDF to bring forward development of an appropriate scale and location as evidence becomes more certain.	No change

		Much of these representations appear more relevant to the Site Allocations DPD. It is considered that the strategic approach in the CS would not inevitably rule out the approach being promoted.	
The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)	NPPF recognises that in rural areas it may be appropriate to consider that certain villages act as clusters and share facilities. It would be appropriate for the policy therefore to recognise the creation of new centres and local shopping parades particularly where these reduce the need to travel.  One such circumstance could be the cluster of Bardsey with East Rigton and East Keswick (The Bramham Park Estate).	The NPPF rural focus is more aimed at rural areas which are not located near to major urban areas and therefore which need to be more self sustaining. Although the rural economy is important in Leeds, the District's rural areas are all in relatively close proximity to identified centres in the main urban area and major towns; the settlement hierarchy and centres hierarchy has been developed to reflect that and the linkages between the urban and rural areas in Leeds. The identification of new centres would need to be in line with P7.	No change
<b>Miscellaneous</b>			
Scarborough Development Group (via RED Property Services 5719)	CS section 4.2 should be amended so that it does not focus too narrowly on City Centre in terms of planning for future comparison retailing, and be more strategic in the long term.	The City Centre is the key location for comparison provision, therefore it is appropriate to focus on this. SP2 does state that development will be directed to the appropriate level of centre based on its scale and catchment.	No change
The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)	Rather than just 'promoting' vitality and viability suggest should be more positive and seek to enhance the vitality and viability of such centres. This would accord with the wording of SP3.	SP3 also uses the word 'promote'. Consider would be make no material difference to the policy if this change were made and therefore not necessary.	No change

**POLICY P1 - TOWN AND LOCAL CENTRE DESIGNATIONS (Qu 33)**

<p>Templegate Developments (via Barton Wilmore Planning 0057)</p>	<p>Not clear whether the new centre at Richmond Hill will act as the main centre for the Aire Valley or whether the existing Hunslet centre would act as the centre. The Retail Study refers to a potential town centre at AVL6 (Temple Green) or AVL11 (Skelton Gate). Suggest Skelton Grange is added to the town and local centre designation listed in P1.</p>	<p>Policy P7 supports the creation of new centres that may be required as a result of housing growth. The Aire Valley AAP will identify further centres if considered necessary.</p>	<p>No change.</p>
<p>Metro (1933)</p>	<p>Clarification required on higher and lower order centres. Needs to be better cross referenced with SP2.</p>	<p>Para 5.3.7 states that due to the significant differences in scale and function of local centres across Leeds a two tier approach to local centres has been introduced to recognise this. Para 4.2.9 (relating to SP2) also addresses this issue. The Leeds Centres Study was prepared by retail planning experts Colliers International, and included site visits and centre health checks. The Study recommended a sub-division of local centres into higher and lower order, partly to do with size but also to do with function.</p> <p>Further survey work as part of the Site Allocations DPD has allowed detailed analysis of the types of floorspace across the centres. 1,500 sqm total gross A1 retail is therefore proposed as the basic threshold to differentiate between higher and lower order local centres (notwithstanding any site specific issues which may arise in individual centres).</p> <p>There are also a number of centres which are now considered too small for inclusion as lower order local centres as they are no larger than any other neighbourhood parade across the District. This has been assessed using a threshold of a lower order local centre needing to have more than 500 sqm retail and at least an additional 500 sqm across all other uses.</p>	<p>Major change – upgrade Chapeltown Road and Street Lane to higher order local centres, downgrade Chapeltown Pudsey to a lower order local centre, and remove Galloway Lane, Coldcotes Circus, Ireland Wood, Woodlesford, and Adel from the list (i.e. they become neighbourhood parades).</p>

Boston Spa Parish Council (0112)	Boston Spa has been classed as a higher order local centre yet has fewer facilities than some of the lower order centres.	Boston Spa is categorised as a higher order local centre because it acts as the main centre for the wider rural area and therefore has an important function even though it has fewer facilities than some of the lower order local centres. This approach is further justified through the recent survey work undertaken for the Site Allocations DPD. With the proposed upgrading of Chapeltown Road and Street Lane to higher order local centres, Boston Spa has more overall floorspace and more A1 floorspace than any lower order local centre. It has more A3 and A4 combined floorspace than all but two lower order centres, more B1a offices than all but one, and more D1 than all but two.	
Wm Morrison Supermarkets Plc (via Peacock and Smith 1027)	Object to the town centre proposed at Richmond Hill as insufficient evidence has been provided. The Retail Study states that a town centre at RH merits further investigation. Further evidence therefore needs to be provided for the requirement of a centre in this location. Site is adjacent to a busy dual carriageway and a railway which both act as barriers.	The EASEL and Aire Valley Centres Study identified a need for a foodstore in this area, which was maintained by the Centres Study (2011). This location would allow for linked trips to the range of existing adjacent complementary uses and provide wider benefits than a stand alone foodstore. Further evidence would be required at planning application stage in line with policy, where any proposal would be judged on its merits. Initial work done by the developer identified that the physical barriers could be overcome through design solutions.	No change
Hammersons UK Properties Ltd (via Barton Wilmore 4816)	For avoidance of doubt should include City Centre as part of the hierarchy and amend title to 'Hierarchy of Centres' in accordance with NPPF para 23 and to ensure consistency with SP1, 2, 3, 8, 9.	The Leeds hierarchy is already identified in SP2, including reference to the City Centre in SP2, SP3, and CC1. This policy is specifically about identifying the other centres.	No change
Arcadia Group (via Montagu Evans LLP 5723)	Harehills Lane serves an area of east Leeds that is poorly served by shopping facilities and Arcadia consider that there is an opportunity to enhance retail provision in this area.	Harehills Lane is identified as a town centre in part to reflect the new Morrisons store, and Harehills Corner is a higher order local centre. Town centre uses will be directed to these centres. There is the opportunity to identify further appropriate sites through the Site Allocations DPD.	No change
ASDA Stores (via Osborne Clarke 5889)	ASDA have a number of existing stores within the identified locations in Policy P1. These stores should fall within the boundary of the designated town and local centres, and be defined through the site allocations process.	Centre boundaries will be reviewed as part of the Site Allocations DPD as referred to in para 5.3.8.	No change

<p>ASDA Stores (via Osborne Clarke 5889)</p>	<p>Policy P1 should take account of new housing growth areas within the plan period in relation to potential changes between the hierarchy of centres. Should provide flexibility for further expansion of centres to support growth and catchment needs, especially when defining centre boundaries. Policy P1 should makes reference to Policy P7 (and vice versa) in relation to the creation of new centres, to ensure there is adequate flexibility for changes in centre sizes for development growth.</p>	<p>Para 5.3.8 states that scope to change centres' designation and proposals to extend or include new centres to reflect retail need as a result of housing growth proposals will be considered in the interim. Not considered necessary to cross reference P1 and P7.</p>	<p>No change</p>
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<b>POLICY P2 – ACCEPTABLE USES IN AND ON THE EDGE OF TOWN CENTRES (Qu 34)</b>			
Mr C & Mr A Haigh, Otley Town Partnership (via Directions Planning 5121)	The UDP considered housing to play a positive role in sustaining the viability of town centres, so is surprising to see that CS suggests housing is considered to compromise the function of the town centre. Object to this change in strategy, particularly as no justification. Suggest that the wording should be amended to reflect the strategy previously set out in the UDP and which supported residential development within centres.	The UDP does not support residential over the need to maintain the vitality and viability of shop frontages. However, agree that as wording of NPPF Para 23 states that residential within centres should be encouraged on appropriate sites, should change CS text in the housing bullet point from 'Housing would be acceptable...' to 'Housing is encouraged...'	Minor change – change 'acceptable' to 'encouraged'.
Leeds Civic Trust (0062)	Use of upper floors for residential should be encouraged not just acceptable.		
ASDA Stores (via Osborne Clarke 5889)	P2 should also take account of regeneration policies within the Core Strategy and potential growth areas.	Policy P2 supports a centre first approach. Regeneration areas are referred to in Policy SP2. Policy P7 refers to the creation of new centres as a consequence of housing growth.	No change
The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)	This policy contains a prescriptive list of uses which could be simplified.	The policy provides clarity regarding what uses are considered acceptable. The Council needs a local interpretation of town centres policy. P2 refines the NPPF (and PPS4 before it) to make it locally distinctive.	No change



<b>POLICY P3 – ACCEPTABLE USES IN AND ON THE EDGE OF LOCAL CENTRES (Qu 35)</b>			
ASDA Stores (via Osborne Clarke 5889)	Support the flexibility within the Policy and the acknowledgement to take account of local circumstances is in relation to identify the size of a food store.	Support welcomed	No change
GVA Grimley (2996)	Accept approach of reviewing boundaries through Site Allocations DPD as referenced within para 4.2.9.	Support welcomed	No change
Boston Spa Parish Council (0112)	Reference to small supermarkets ignores the size of local population and ability of the area to absorb a facility. Amend policy to exclude small supermarkets where existing convenience or food shopping provision is adequate for the local populations needs.	P3 references acceptable uses and therefore needs to be somewhat general. P8 is more specific in relation to size and levels of existing provision.	No change
GVA Grimley (2996)	Supporting text to Policy P3 should reference Paragraph 4.2.9 recognising the acceptability of potential changes to the classification of a local centre within the settlement hierarchy.	Not necessary as P3 refers to uses within a local centre, not the classification of a local centre within the overall hierarchy.	No change
Mr C & Mr A Haigh, Otley Town Partnership (via Directions Planning 5121), Leeds Civic Trust (0062)	Use of upper floors for residential should be encouraged not just acceptable, in line with UDP approach.	The UDP does not support residential over the need to maintain the vitality and viability of shop frontages. However, agree that as wording of NPPF Para 23 states that residential within centres should be encouraged on appropriate sites, should change CS text in the housing bullet point from 'Housing would be acceptable...' to 'Housing is encouraged...'	Minor change – change 'acceptable' to 'encouraged'
The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)	Provisions repeat P2, the two policies could be merged.	The separation of town and local centres into P2 and P3 is for clarity and to reflect their difference in scale, and was based on advice from Colliers who conducted the Centres Study. The policies need to be locally distinctive, plus a merged policy would be too complex.	No change

<b>Overly prescriptive</b>			
ASDA Stores (via Osborne Clarke 5889)	Approach in relation to identified uses in and on the edge of local centres is too descriptive to be sound. The Policy should set a framework to allow for an assessment of the scale of development appropriate to the size of the centre rather than restricting development.	The Council needs a local interpretation of town centres policy. Policy P3 does state that the threshold is given as guidance and would be subject to local circumstances. It is therefore accepted that because of the range of different centres, there may be different scales of foodstore that might be considered acceptable in some centres. However, it is considered appropriate to provide some guidance at this level. The suggested amendment to P3 is not appropriate as it suggests a departure from the hierarchy may be acceptable without full justification and simply on the basis of sequential assessment, rather than sequential and impact assessments. P8 assesses scale. The ASDA suggestion is considered to be met in the wording of the policy. The threshold and acceptable uses in local centres provides more clarity in advance rather than waiting for discussions to be held at planning application stage, and allows consistency of decisions and transparency.  However, based on emerging survey data undertaken to inform the Site Allocations DPD and the range of sizes of foodstores stores in the different levels of the hierarchy, it is proposed to reduce this threshold slightly to 1,500 sqm. This also aligns better with Policy P8.	Major change – change threshold size for supermarkets in higher order local centres to 1,500 sqm.
GVA Grimley (2996)	The maximum size threshold of 1,858 sqm for the provision of a small supermarket within higher order local centres is unsubstantiated with no reference to evidence that this represents a reasonable or appropriate level beyond which a supermarket would be unacceptable. Specific reference to size thresholds within the policy is overly prescriptive, unjustified and renders the policy ineffective, it should be removed. The reference to consideration of appropriateness of proposals based on local circumstance, also guidance within policy P1 and P2 regarding a sequential preference for consideration of town centres first, is considered to be sufficient to support the aspirations of the CS retail approach. Policy P3 should be amended to read: “Within higher and lower order local centres food stores that are compatible with the size of the centre would be acceptable. The acceptability of proposals will be subject to consideration of local circumstance. A larger scale store may be appropriate if identified need cannot be met within a nearby town centre.”		
The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)	Policy is overly prescriptive.		

**POLICY P4 – SHOPPING PARADES AND SMALL STAND ALONE FOOD STORES SERVING LOCAL NEIGHBOURHOODS AND COMMUNITIES (Qu 36)**

<p>The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)</p>	<p>It is important that local shopping parades are supported and that new retail facilities are provided to cater for day to day needs of local communities. NPPF supports the provision of local shopping and other facilities where these can serve a cluster of villages.</p> <p>Have submitted a site at Bardsey through just off the Wetherby Road close to an existing parade which could be considered suitable for a small scale stand alone store.</p>	<p>Support welcomed.</p> <p>Sites submitted through the 'call for sites' will be assessed as part of the Site Allocations DPD.</p>	<p>No change</p>
<p>Montpellier Estate (via WYG Planning &amp; Design 0420)</p>	<p>Inappropriate for the policy to be too precise regarding scale. If can demonstrate that proposed convenience store has no significant adverse impact upon in centre facilities and there are no suitable sequential sites, P4 should support and recognise delivering a qualitative and potentially quantitative need in the local area as a mechanism to deliver local facility and support residential neighbourhoods.</p>	<p>The Council needs a local interpretation of town centres policy. If thresholds were not set then we would potentially have to apply a sequential test against every town centre use proposal. P4 reduces the severity of the tests for developments of a smaller scale in order to support local communities and to specifically allow for local provision while maintaining a centres first approach, as expanded upon in P8.</p> <p>The threshold also provides more clarity in advance rather than waiting for discussions to be held at planning application stage, it allows consistency of decisions and transparency. Also the policies were drawn up through looking at a range of real applications where it became apparent that one size fits all approach would not work in Leeds, especially for the smaller scale uses.</p>	<p>No change</p>

Airebank Developments (via WYG Planning & Design 0420)	Where local retailing above the threshold can positively contribute to the success of Regeneration Priority Areas, flexibility should be afforded. The lack of local retail facilities can be a contributing factor to neighbourhood's performing poorly. In order to achieve the strategic aims of SP1 (v) and SP4. Policy P4 should be amended to be flexible in those areas identified as Regeneration Priority Areas so as to enable successful regeneration.	All the CS policies need to be read in conjunction. The criteria for smaller scale developments proposed in P8 will help to address regeneration needs, and also addresses proposals for larger scale stores, supporting a centre first approach. Policy P4 is specifically to cater for small scale local need across all areas. Regeneration areas contain centres so it is even more important to promote their vitality and viability through the detailed approach in the Placemaking Chapter.	No change
Leeds Residential Property Forum (via Bury & Walker Solicitors 2527)	Object in relation to changes of use of existing retail units to non retail uses, including within Use Class A2. This is particularly relevant to private rented sector landlords who may wish to use such units for the purpose of letting/ managing properties. Promoting retail uses over and above non retail uses of this kind fails to take account of changing needs and demands. More and more retail activity is moving towards supermarkets and away from local shops. It is vital that shops are kept in use rather than standing empty, and with greater emphasis given to local employment opportunities that could be provided.	The purpose of P4 is to maintain the retail function of neighbourhood parades to provide at the very local level. There is no objection in principle to non retail uses on parades providing that they do not undermine their vitality and viability. If a shop unit were left vacant for a length of time even with marketing, this would be regarded as a material planning consideration at planning applications stage.	No change.
The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)	Considerations of vitality and viability, availability of transport and residential amenity are equally applicable to other defined centres, although they appear not to be relevant to Policies P2 and P3.	Agree that issues of transport and residential amenity are applicable to other centres. Town centres and higher order local centres are/will be covered by shopping frontage policies which include similar considerations. It is therefore appropriate to also include the last paragraph of P4 and the related criteria within P3 relating to lower order local centres.	Major change – add the 3 <sup>rd</sup> para and three criteria in P4, also into P3 relating to lower order local centres.

The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)	Policies P2-P4 could be merged and simplified.	The separation of the different types of centres into P2 to P4 is for clarity and to reflect their difference in scale, and was based on advice from Colliers who conducted the Centres Study. The policies need to be locally distinctive, plus a merged policy would be too complex.	No change
Friends of Allerton Grange Fields (5857)	Policy P4 fails to protect and enhance neighbourhood shopping parades for A1 uses. The proliferation of hot food takeaways and drinking establishments can have a detrimental impact on residential amenity due to noise, litter and car parking problems. Should be more explicit that over 50% of the units on neighbourhood shopping parades must remain in A1 use. A stronger policy protecting neighbourhood shopping parades for A1 uses will also prevent the proliferation of hot food takeaways on parades in close proximity to schools and therefore have positive health and well being outcomes.	The aim of Policy P4 is to protect neighbourhood parades for retail uses and looks at the cumulative impacts of their changes of use. It cannot impose a % policy as the range of neighbourhood parades across the whole District is so varied that this would be too prescriptive, and there is also insufficient evidence to support this.	No change
ASDA Stores (via Osborne Clarke 5889)	Welcome the locations listed within P4, but should provide the flexibility to take account of other new potential opportunities within the plan period. This includes listing existing commitments.	P4 does not preclude provision across the City. Listing existing commitments would not add anything to the policy, and would become out of date.	No change

**POLICY P5 – APPROACH TO ACCOMMODATING NEW FOOD STORES ACROSS LEEDS (Qu 37)**

<b>Support</b>			
Highways Agency (0060)	It is stated that as part of the Aire Valley developments, a new town centre is proposed at Richmond Hill that would support a new food store. This would serve the housing development in inner parts of the Aire Valley leaving only housing on the site to the east of M1 Junction 45 reliant to an extent on facilities at Colton.	Support welcomed for a potential town centre at Richmond Hill.	No change
ASDA Stores (via Osborne Clarke 5889)	Support in relation to the approach to accommodate new food stores across Leeds. Welcome the locations listed.	Support welcomed	No change
<b>Aire Valley centres</b>			
Templegate Developments (via Barton Willmore Planning Partnership-Northern 0057)	The wording is a little ambiguous, as it is not clear whether the reference to the new town centre at Richmond Hill would be the main centre for the Aire Valley, or whether the existing Hunslet centre would be at as its centre.	Consider wording is sufficiently clear. Further detail on the existing and new centres in relation to the Aire Valley will be provided in the AVL AAP.	No change
Templegate Developments (via Barton Willmore Planning Partnership-Northern 0057)	The Leeds City Centre, Town and Local Centres Study includes references to Richmond Hill, but paragraph 10.59 only states that “inner east Leeds has long been identified as an area of deficiency and our latest qualitative assessment confirms capacity. Consequently it is considered that this opportunity merits further investigation.” It is also noted that the Centres Study refers to the CS Preferred Approach, which proposes a potential town centre at AVL6 (Temple Green) or AVL11 (Skelton Gate). Therefore the evidence of a new town centre in this locality is unequivocal. Include Skelton Grange as an additional town centre for which a food store would be directed towards.	See detailed response to Templegate on this point under SP2 ‘new centres’ above. In summary, the assumptions on the overall number of new homes to be provided in the eastern part of the AVL have been substantially reduced, and the associated need for retail development downsized accordingly. New local centres will be addressed through the Aire Valley AAP.  In the western part of the extended AVL area there is evidence to support a new town centre based on the need to address a deficiency in existing convenience provision, derived from the Centres Study and proposals for new residential development in the area.	No change

Airebank Developments (via WYG Planning & Design 0420)	Richmond Hill would not necessarily be the best location for a new town centre for the purposes of serving Hunslet. Cross Green Estate and the Ring Road present major obstacles between large areas of Hunslet and Richmond Hill and is likely to detract potential customers from travelling between Hunslet and Richmond Hill to undertake their shopping needs. It is acknowledged that the Council wish to protect the function of Hunslet's existing town centre; however the centre is separated from large areas of Hunslet by major roads. In light of SP5 which promotes an Urban Eco-Settlement within the Aire Valley, there is no reason why a number of local and district centres could not be promoted throughout the Aire Valley to ensure that local residents and those employed within the Aire Valley have appropriate provision of retail facilities and other community services in one location.	Policy P7 supports the creation of new centres that may be required as a result of housing growth. The Aire Valley AAP will identify further centres if considered necessary.	No change
<b>Out of centre / new centres</b>			
Scarborough Development Group (via RED Property Services 5719)	NPPF Para 23 - does not place moratorium of development in out of centre locations, it recognises that out of centre will be inevitable to meet some retail development needs. Policy P8 requires a sequential test, and para 5.3.22 recognises that where insufficient sequentially preferable sites exist, accessible out of centre locations can be considered. However, this is not reflected in policies P5 or P6, which should therefore be amended to better reflect the NPPF.	The suite of policies have to be read as a whole, and P5, P6, and P7 do not contradict one another. P8 provides the detailed sequential approach for all uses, P5 expands on this for food provision.	No change
ASDA Stores (via Osborne Clarke 5889)	P5 should provide the flexibility to take account of other new potential opportunities within the plan period that are not listed at present. It should recognise that there are existing commitments in certain areas of the city which are yet to be implemented	Listing existing commitments would not add anything to the policy, and would become out of date. The Centres Study used the list of commitments provided by LCC in its preparation, as would an update to the Centres Study in a few years time.	No change
<b>Miscellaneous</b>			

<p>Aviva Life &amp; Pensions UK, and The Crown Estate (via Indigo Planning 0806), St James Securities Ventures (Leeds) Ltd (via Indigo Planning 3010)</p>	<p>No evidence to show availability of sites in the centres listed in P5. A number of these centres are so constrained that they clearly could not support new major food stores. NPPF Para 23 highlights that it is important that the needs for retail, leisure, office and other main town uses are met in full and are not compromised by limited site availability. P5 should recognise that when no sites are available, suitable or viable within the existing centres, proposals for sites outside the centres should be supported where they will not have a significant adverse impact. Unsound due to deliverability, with the consequence being that otherwise appropriate locations to meet food shopping needs may be overlooked.</p> <p>Crown Point Retail Park could serve the general area around Holbeck, particularly in conjunction with some of the enhanced linkages suggested in the South Bank proposals and the growing residential population in the immediate area, and could therefore represent an appropriate location to accommodate identified needs. This would represent a more deliverable option than many of the locations specified in P5 (Aviva Life &amp; Pensions UK, and The Crown Estate).</p>	<p>The locations specified are existing centres. Improved provision doesn't necessarily require a new foodstore but could be improvements to existing provision within the existing boundaries. Alternatively, although some centres may not currently have room for additional provision, by supporting new foodstore development in principle may help to bring sites forwards within the timescale of the CS. This will also be addressed further through the Site Allocations DPD. Priorities were based on the health checks, the capacity/ need figures, and the distance to other town centres.</p> <p>CPRP is not a recognised centre, albeit it is within the wider city centre. Any proposal for a foodstore at CPRP would go through the tests in P8.</p>	<p>No change.</p>
<p>Hammerson UK Properties Ltd (via Barton Willmore 4816)</p>	<p>Concerned that the Policy does not make explicit reference to the City Centre, wherein new foodstores should be supported and are acceptable in principle in accordance with the NPPF and Spatial Policies 1, 2, 3 and 8. Policy P5 should therefore be amended to include specific reference to the City Centre in addition to the Town and Local Centres.</p>	<p>The City Centre is addressed within the City Centre chapter and it is not considered necessary to cross-reference it in P5.</p>	<p>No change</p>
<p>The Diocese of Ripon and Leeds, The Hatfeild Estate, The Bramham Park Estate, Lady Elizabeth Hastings Estate Charity, The Ledston Estate, AR Briggs and Co, Meadowside Holdings Ltd (via Carter Jonas 5681)</p>	<p>This policy is overly detailed and repeats the provisions of Policy P1. No indication is given to the scale of such new foodstores. Could be merged with P2 and deleted.</p>	<p>P5 provides a local geographical element to the centres approach and the specific needs of foodstore provision. Scale is addressed in P8. For clarity it was felt necessary for P5 to cross-reference P1.</p>	<p>No change</p>



<p>Inner NW Area Committee Planning Sub Group (5696)</p>	<p>Although point (iii) doesn't state that a new major food store would be the only option to expand the retail offer or function of Headingley, the group has concerns that this is one of a number of options encouraged in this policy. Headingley is one of ten town centres identified in the Leeds City Centre, Town and Local Centres Study (July 2011) which lacks a major anchor foodstore. However, three of the other town centres identified in the report (Garforth, Halton and Harehills) have not subsequently been included in the list of town centres included in Policy P5. Inadequate justification for this.</p> <p>The Leeds City Centre, Town and Local Centres Study states: there is little opportunity for the creation of a major food store in Headingley; the centre currently functions well in its existing form acting as a 'strong local community base'; the centre performs successfully in a situation where it serves a large number of individuals whose shopping habits will be rather different to the majority of shoppers in other parts of Leeds; and there is adequate provision to meet weekly shopping provisions at the centre in combination with nearby major food stores. NPPF requires to "take account of the different roles and character of different areas, promoting the vitality of our main urban areas" but this aspect of policy P5 fails to sufficiently take into account the unique role and character of Headingley Centre, which serves a relatively unique local community successfully in its current form. Headingley has a character and amenity value resulting from a diverse range of small retailers and non-retailers, in combination with medium sized units provided by major supermarket chains (with a new store set to be opened at the Former Lounge Cinema site shortly), which successfully serve the unique local community. This character and amenity would be significantly harmed by the introduction of a major food store in the centre or on the edge of the centre.</p>	<p>Although Headingley may not currently have room for expansion, supporting this in principle may help to bring sites forward both within or on the edge of the centre within the timescale of the CS. and This will also be addressed further through the Site Allocations DPD. Priorities identified through the Study were based on the health checks, the capacity/need figures, recent commitments, and the distance to other town centres. The moving of the Sainsbury's Local to the former Lounge Cinema may help to address this depending on the whether its former store stays in convenience use. Other CS policies will still apply regarding scale, impact, and amenity issues.</p> <p>The Site Allocations DPD will also provide the opportunity to consider further sites and boundary changes and take into account any such detailed issues.</p> <p>Harehills is very constrained, is in close proximity to Oakwood town centre (with its commitment for a very large store) and has recently benefited from new foodstore provision. As Garforth is a stand alone settlement, development in the area would automatically be directed to Garforth through the centres first approach. Growth there would also be better addressed once the extent of adjacent housing growth is identified. Halton has also benefited from recent food store provision. Encouragement of food stores in all the centres across Leeds will be supported, but P5 is necessary to identify the priorities.</p>	<p>No change</p>
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<b>POLICY P6 – APPROACH TO ACCOMMODATING NEW COMPARISON SHOPPING IN TOWN AND LOCAL CENTRES (Qu 38)</b>			
Hammerson UK Properties Ltd (via Barton Willmore 4816)	Support the general aim of Policy P6.	Support welcomed.	No change
Hammerson UK Properties Ltd (via Barton Willmore 4816)	In accordance with the NPPF and Spatial Policies 1, 2, 3 and 8, Policy P6 should clarify that major new comparison goods floorspace should be directed to the City Centre in the first instance, followed by the town and local centres subject to being of an appropriate scale commensurate with the role of the Centre in the hierarchy (identified in Policy P1) and compliance with Policy P8. Policy P6 should therefore be amended to prioritise the City Centre as a location for major new comparison goods development.	The key issue relates to provision being at the appropriate scale in the hierarchy, and agree that this would be the key consideration for major comparison goods proposals within any town or local centres. However, criteria (i) states “in addition to the PSQ of the City Centre...” plus Policy SP2, SP3, and CC1 provide the retail hierarchy. Therefore do not consider P6 needs additional emphasis on the City Centre.	No change
The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)	Again this policy could be merged with a revised P3 as it adds nothing to the documents and is therefore unnecessary.	Although similar to P3, the Policy was included to attempt to highlight the differences between comparison and convenience shopping, and to show equal importance.	No change

<b>POLICY P7 – THE CREATION OF NEW CENTRES (Qu 39)</b>			
ASDA Stores (via Osborne Clarke 5889)	Support in relation to the creation of new centres.	Support welcomed.	No change
Pegasus Planning Group (4388)	Support Policy P7 and consider that this is consistent with the overall approach of the Core Strategy and the role of sustainable urban extensions in meeting growth.	Support welcomed.	No change
ASDA Stores (via Osborne Clarke 5889)	Policy P7 should make reference to Policy P1 (and vice versa) in relation to town and local centre designations, to ensure there is adequate flexibility for changes in centre sizes for development growth.	New centres under P7 would be in addition to those listed in P1 therefore do not see the need to cross reference further.	No change
L Ward (via LDP Planning 5867)	Policy should be expanded to provide clear support for the expansion of existing town centres and local centres where possibilities arise, to meet needs of growing populations to protect viability of existing centres and promote use of existing public transport links for sustainable access. New centres require new public transport links, rail stations are unlikely to be an option, and difficult to discourage use of private motor vehicles.	This policy does not encourage new centres, and in conjunction with the other policies is clear that the CS supports a centres first approach as being most sustainable. However, P7 is necessary to reflect and direct change that will inevitably occur over the CS time period, and be resilient to anticipated future economic changes as required by NPPF (para 23).	No change
The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)	Unless P7 infers additional centres over and above those identified in P1 it should be deleted and the general considerations included within an overarching retail and town/local centres policy.	The intention of P7 is to potentially allow for additional centres to those in P1, reflecting future significant housing growth.	No change

Templegate Developments (via Barton Willmore Planning Partnership-Northern 0057)	The evidence from EASEL and AVL Centres Study for a new town centre at Skelton Grange is unequivocal. A new town centre meets all those tests listed in parts i) – iv), and should be included on the maps and in the CS.	See detailed response to Templegate on this point under SP2 'new centres' above. In summary, the assumptions on the overall number of new homes to be provided in the eastern part of the AVL have been substantially reduced, and the associated need for retail development downsized accordingly. New local centres will be addressed through the Aire Valley AAP.	No change
Hammerson UK Properties Ltd (via Barton Willmore 4816)	<p>Concerned that P7 will allow the creation of new centres in a development management application scenario, as it should be a strategic planning decision set out in the CS and based on a credible evidence base.</p> <p>P7 should also place a limit on the level of acceptable floorspace.</p> <p>Neither Policy P7 (nor the Centres Study 2011) identifies a need for new centres as required by NPPF (para 23).</p> <p>In the absence of an identified need, any new centres or the expansion of existing centres will require a sequential and impact assessment in accordance with Policy P8.</p> <p>The Policy should also clarify that new / expanded centres should be of an appropriate scale commensurate with their role in the hierarchy (identified in Policy P1).</p>	<p>P7 clearly sets out that new centres are required where convenience provision is needed to support housing growth or specific new centres identified within housing sites. Therefore any other major growth areas which might justify supporting facilities will be promoted through the Site Allocations DPD.</p> <p>Proposals for new centres would have to show a need for the floorspace, and therefore while placing limits in advance is relevant for other policies in relating to existing centres, setting this for potential centres for the full extent of the CS period would be too onerous.</p> <p>In the full timescale of the CS, it would be unsustainable to have a policy blanket rejection of supporting facilities relating to significant residential proposals. Consider that P7 is fully in line with NPPF para 23.</p> <p>Criteria (i) incorporates requirements of P8.</p> <p>The criteria in P7 are to ensure that any new centre would be of an appropriate scale.</p>	No change

<b>POLICY P8 – SEQUENTIAL AND IMPACT ASSESSMENTS FOR TOWN CENTRE USES (Qu 40)</b>			
<b>Support</b>			
Land Securities and Evans Property Group (via Quod 1091)	Fully support paragraph 5.3.23	Support welcomed	No change
Hammerson UK Properties Ltd (via Barton Willmore 4816), ASDA Stores (via Osborne Clarke 5889)	Support the general aim of the Policy	Support welcomed	No change
<b>Contrary to NPPF – Scale and floorspace thresholds</b>			
Aviva Life & Pensions UK, The Crown Estate (via Indigo Planning 0806), Wm Morrison Supermarkets Plc (via Peacock and Smith 1027), Tesco, Yelcon (via DPP 5543), The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681), ASDA Stores (via Osborne Clarke 5889), Hammerson UK Properties Ltd (via Barton Willmore 4816), NewRiver Retail (via GL Hearn 5856)	<p>Unduly complicated and prescriptive with a series of thresholds applied to different uses with no apparent justification.</p> <p>As in PPS4, NPPF does not state that scale is a factor to be taken into consideration.</p> <p>The different thresholds are confusing and unnecessary.</p> <p>Setting floorspace thresholds in relation to sequential assessments is not in line with NPPF para 24 (which states should apply a sequential test to planning applications for main town centre uses not in an existing centre and not in accordance with up to date development plan).</p>	<p>LCC needs a more local interpretation of town centres policy now that PPS4 is superseded by NPPF. P8 refines the NPPF to make it locally distinctive. Silence on a topic area by the NPPF does not mean that local policies on such aspects are not in conformity.</p> <p>If thresholds were not set then LCC would potentially have to apply a sequential test (and possibly an impact test) against every town centre use proposal. P8 reduces the severity of the tests for developments of a smaller scale. LCC has therefore been both proactive to growth and regeneration, and pragmatic in this regard.</p> <p>The policy criteria also provide more clarity in advance rather than waiting for discussions to be held at planning application stage, it allows consistency of decisions and transparency. Also the criteria were drawn up through looking at a range of real applications where it became apparent that one size fits all approach would not work in Leeds, especially for the smaller scale uses.</p> <p>However, LCC does agree that the above justification for P8 is not set out sufficiently in its supporting text, therefore propose to include this to make the reasons and justification for P8 more clear. P8 has also been</p>	<p>Major change - See revised Policy P8 at the end of this table. P8 has been made more concise and clear. (Detail on individual changes in relation to specific comments provided below).</p> <p>Also paragraph added to supporting text further clarify the need for P8.</p>

		consolidated to make it more concise and give better clarity. The detail of the specific changes is outlined in relation to the specific representations below.	
NewRiver Retail (via GL Hearn 5856)	Part H - there is no national policy justification for in centre extensions of above 200 sqm to conduct sequential and impact assessments. If the intention of this part of the policy is to set the “proportionate, locally set threshold” as required by the NPPF, then it should be made clear that this only applies to retail proposals outside of centres.	Agree needs clarity that is intended to only apply to retail proposals outside of town centres.	Minor change – alter ‘existing units’ to ‘existing out of centre units’
<b>Contrary to NPPF - Impact assessments</b>			
L Ward (via LDP Planning 5867)	NPPF sets threshold requiring submission of impact assessments where development exceeds 2,500 sqm but CS decreases this to 1,500 sqm without any justification.	The threshold was set in the context that the Centres Study suggested that LCC should consider adopting a more positive approach to the development of small to medium size supermarkets in areas of deficiency either within or associated with local as well as town centres. However, also needed to ensure that such proposals would be tested appropriately in terms of any potential impacts on centres. The 1,500 sqm threshold means that the formats generally being promoted by the major operators including the discounters would need to demonstrate that they could address deficiencies without impacting unacceptably on existing centres and their functions.  Proposals for stores under 1,500 sqm would have a sales area of approximately 1,200 sqm and would be almost exclusively convenience based. In practice there are few current proposals for stores between 500 sqm to 1,500 sqm. This also takes account of advice in previous versions of national policy guidance relating to the reliability of statistical analysis, and because at this smaller scale of stores, the statistical assessments and the assumptions upon which they are based become inevitably more imprecise.  It is considered that the threshold would ‘catch’ all proposed developments of the scale that might be brought forward that might impact on centres, while proposals below could not be shown as having such impacts. In any case those below the 1,500 sqm threshold would generally consist of much smaller	No change
Hammerson UK Properties Ltd (via Barton Willmore 4816)	Concerned that edge or out-of-centre schemes below the identified thresholds could have the potential to impact upon the vitality and viability of existing centres. Policy should require an impact assessment for schemes below the identified thresholds where there is the potential to impact upon existing centres.		

		stores, where development should be encouraged as meeting a highly local need and reducing the need to travel. It is also important to note that this approach will be monitored and, should the threshold be found inappropriate in practice, then it could be modified.	
Wm Morrison Supermarkets Plc (via Peacock and Smith 1027), Scarborough Development Group (via RED Property Services 5791), ASDA Stores (via Osborne Clarke 5889), NewRiver Retail (via GL Hearn 5856), Tesco, Yelcon (via DPP 5543)	<p>Criteria A - NPPF para 26 states need impact assessment if development outside of town centres is over a proportionate locally set floorspace threshold, if no locally set threshold then default is 2,500 sqm. Therefore is clear that there is no requirement to submit impact assessments for town centre uses within existing centres, it is not necessary or appropriate.</p> <p>Difficult to calculate 10% or more of the total gross retail floor space, and is unreliable for future assessments. Should be revised to enable flexibility for growth and avoid unduly preventing development through prescriptive policies. The policy would require impact assessments for what could be small proposals in a town centre.</p> <p>Cannot apply blanket presumption as contradicts various other policies of the plan, primarily P5 which identifies centres where growth and new convenience retailing is to be encouraged and where a facility of more than 10% may be appropriate to achieve the objectives which have been identified for those centres.</p>	<p>Silence on a topic area by the NPPF does not mean that local policies on such aspects are not in conformity. The Council needs a more local interpretation of town centres policy now that PPS4 is superseded by NPPF, and P8 refines the NPPF to make it locally distinctive.</p> <p>However, although the aim of criteria A is to allow LCC to address potential disproportionate impacts of a development on that centre or other centres, it is agreed that it is difficult to set an appropriate size at which impact assessments would be required. Surveys have now been undertaken of local centres, and 10% is too onerous as it could be less than one unit within the smallest centres. It is therefore too low a figure to be applied against all centres. There is limited evidence which would support setting a higher percentage. Considering the need to cross-reference with P5, the overall CS approach to directing growth into centres, and the other requirements of P8, agree that there should be no reference to requiring impact assessments for in-centre proposals for main town centre uses.</p>	Major change – Remove criteria (A) from P8 so that there is no reference to in-centre impact assessments.
Tesco, Yelcon (via DPP 5543)	<p>Criteria D and E - no requirement in national guidance for such uses to be assessed in either sequential or impact terms. Should be deleted.</p> <p>Criteria D and E query the reference to bulky goods within Use Classes A2-A5 as these are not retail.</p>	<p>Consider this is incorrect, Use Classes A2-A5 are main town centre uses under NPPF and therefore generally require a sequential test. However, agree that need more clarity on which uses are encompassed under which criteria in P8. Will be undertaken in conjunction with updated Glossary.</p> <p>Bulky goods to be removed from D/E along with reference to City Centre catchment. B/C now to split into convenience/comparison above 1,500 sqm, which incorporates bulky goods (see below for further explanation).</p>	Major change: a) Make clearer which uses are relevant for each criteria. b) Remove bulky goods from D/E.
<b>Difference within or outside of residential areas</b>			

Wm Morrison Supermarkets Plc (via Peacock and Smith 1027), Tesco, Yelcon (via DPP 5543)	No justification or definition with regards to the difference in requirements for proposals within or outside residential areas.	This is based on general experience of planning applications in Leeds. Reflects local catchments and intention of provision for 'walk in' versus 'drive time', as proposals in non-residential areas would be intended/necessary to have larger catchment areas as no local population, whereas within residential areas there is an immediate catchment population.	No change
<b>Catchment areas</b>			
Wm Morrison Supermarkets Plc (via Peacock and Smith 1027), Tesco, Yelcon (via DPP 5543)	Specifying drive times based on size of proposal is overly prescriptive. Totally inappropriate to define catchment areas for individual store proposals within a DPD. Catchment areas will be largely driven by its local context and population it's likely to serve. It is simply not possible to state that all stores of a certain size have a drive time of 5 minutes and stores of a larger size should have a drive time of 10 minutes as this depends on location, existence of competing facilities, and peoples' existing shopping patterns. Should be a matter for discussion with the Council at the pre-application stage of proposals. The policy needs to allow for flexibility based on local circumstances.	The policy criteria provide more clarity in advance and allows consistency of decisions and transparency, rather than waiting for discussions to be held at planning application stage. Even if catchments of all proposals were solely negotiated through pre-application agreement, the Council would still need to rely on standard catchment areas in order to form the basis of such discussions. Acknowledge that drive times are a proxy but there are limited other methods available. The Council uses software called Strat-e-gis as an accurate tool to determine isochrone creation (thematic bands of equal time) to support accessibility analysis and determine drivetimes. It takes into account speed, distance, congestion, and the hierarchy of the road network. It provides real travel times for different times of the day as opposed to theoretical default speeds determined by road classification. Other material considerations will always apply.	No change
Land Securities and Evans Property Group (via Quod 1091)	Defining the size of catchment areas for various scales and types of proposals is presumably in the context of the impact assessments, however, the policy would benefit from clarification.	Further clarification/justification of P8 will be added to supporting text.	Minor change - Insert paragraph to clarify the need for P8.
Land Securities and Evans Property Group (via Quod 1091)	May be acceptable to apply a 10 minute drive time to a convenience store proposal above 1,500 sqm on the basis that this represents the likely catchment area of the proposal, but a similar sized comparison proposal associated with an existing out of centre retail facility will draw custom from a larger area and hence necessitate a larger catchment area.	Agree there is a difference in catchments between comparison and convenience for larger A1 stores. This also addresses removal of bulky goods from D/E. Propose to split convenience and comparison into separate rows. For comparison also include in catchment area the City Centre and main centres of neighbouring authorities as appropriate.	Major change – split into convenience and comparison. Add city centre boundary (and edge of) and neighbouring authorities' main centres to



			catchment area for comparison.
Tesco, Yelcon (via DPP 5543)	Criterion (I) - does contain a far more sensible statement regarding the definition of catchment areas, which could be used to apply to all retail developments.	Criterion (I) is necessary because it is specific to proposals for a mix of uses where no other single criteria applies. Even if catchments of all town centre use proposals were solely negotiated through pre-application agreement, the Council would still need to have standard catchment areas in order to form the basis of such discussions. Having this clearly set out in the CS ensures consistency and transparency.	No change
<b>Contrary to NPPF – General / Miscellaneous</b>			
Tesco, Yelcon (via DPP 5543)	Sheer length of P8 contrary to the Government's approach to simplify matters and to encourage development.	A detailed policy is necessary in order for clarity and to reflect NPPF through local circumstances. However, P8 has been made more concise in relation to specific comments below.	Minor change – length of P8 reduced
Hammerson UK Properties Ltd (via Barton Willmore 4816)	Reference should be made to offices in criterion F and G (as in NPPF Annex 2).	See full LCC comments in relation to EC2 representations. In summary, EC2 was drafted in the context of the draft NPPF which did not include offices as a main town centre use. Now they are included and therefore P8 does also need to include offices, worked up in conjunction with changes to EC2 to include a sequential test.	Major change - offices are now incorporated within the 'main town centre uses' in P8.
Tesco, Yelcon (via DPP 5543), Hammerson UK Properties Ltd (via Barton Willmore 4816)	Criteria F and G – no clarity as to what the phrases 'intensive' and 'culture' mean, and do not accord with the simplified guidance contained within the NPPF. Reference should be made to other 'main town centre uses' in criterion F and G (as in NPPF Annex 2).	<p>The phrases are included in the Glossary (and were taken originally from PPS4 and updated from Draft NPPF). However, in light of NPPF and to increase clarity, agree need to refine this further as to which criteria the different uses are related to, aligned with changes to glossary.</p> <p>Changes proposed to P8 in relation to this issue:</p> <ol style="list-style-type: none"> <li>1) Remove G.</li> <li>2) Remove E, and add additional column to D to show catchment distinguished between within or outside residential area.</li> <li>3) Remove F, and add additional rows to D to incorporate and clarify additional uses – through NPPF terminology aligned with use classes.</li> <li>4) Include reference to offices in D and cross reference to EC2.</li> </ol>	Major change – make changes as outlined to a number of the criteria

		<p>5) Bulky goods to be removed from D along with reference to City Centre catchment (as B/C now to split into convenience/comparison above 1,500 sqm which incorporates bulky goods)</p> <p>6) Update Glossary for 'main town centre uses' to reflect NPPF and include as asterisk to D.</p> <p>See updated version of Policy P8 at the end of this table to illustrate all the changes proposed.</p>	
Scarborough Development Group (via RED Property Services 5791)	Para 3.2.25 agree that these criteria are important, but the text could be updated to better reflect the NPPF rather than PPS4.	Not necessary as criteria are still valid considerations.	No change
<b>Miscellaneous</b>			
Tesco, Yelcon (via DPP 5543)	Criterion B – unnecessary as duplicates P4.	P4 expands on detail of B, especially for small scale proposals, and also B only refers to within residential areas. It is useful to have all the thresholds identified in one place.	No change
Tesco, Yelcon (via DPP 5543)	Criterion C - Object to the use of the phrase off-peak. This is not defined and is open to interpretation. The fact that this only refers to in bound is also completely irrelevant in terms of how people actually undertake shopping trips. Rather than adding clarity, this criterion merely causes confusion.	'Off-peak' is defined underneath P8 as between 10 am and 2pm. This ensures the maximum realistic driving distance can be captured. The Council uses software called Strat-e-gis as an accurate tool to determine isochrone creation (thematic bands of equal time) to support accessibility analysis and determine drivetimes. It takes into account speed, distance, congestion, and the hierarchy of the road network. It provides real travel times for different times of the day as opposed to theoretical default speeds determined by road classification.	No change
ASDA Stores (via Osborne Clarke 5889)	Policy should also take account of regeneration policies within the Core Strategy and potential growth areas.	<p>New town centre uses would still have to comply with the sequential approach within regeneration areas. the CS policies need to be read in conjunction with each other. The criteria for smaller scale developments proposed in P8 will help to address regeneration needs. Regeneration areas contain centres so it is even more important to promote their vitality and viability through the detailed approach in the Placemaking Chapter.</p> <p>See further comments on these points in the separate document relating to the Regeneration Policy SP4.</p>	No change

<b>POLICY P9 – COMMUNITY FACILITIES AND OTHER SERVICES (Qu 41)</b>			
Brownberrie Farm, Horsforth Gospel Hall Trust (via J & J Design 5666)	Support Para 5.3.31 especially the recognition of increasing and significant pressures for education facilities, including free schools.	Support welcomed.	No change
Brownberrie Farm (via J & J Design 5666)	Para 5.3.34 – needs additions to address existing deficiencies as well as complementing new housing growth, and to acknowledge communities of interest as well as geographical communities.	Agree could include the word ‘particularly’ before phrase ‘as a result of new housing growth’.	Minor change – Para 5.3.34 add ‘particularly’ before ‘as a result of new housing growth’
Brownberrie Farm, Horsforth Gospel Hall Trust (via J & J Design 5666)	Need policy to direct spatial planning for new school provision otherwise question effectiveness in meeting the Vision of being fair, open and welcoming to all Leeds communities. Must not hide behind the Council’s statutory educational provision duties (as implied by the response to the Trust’s previous representations) as seeking to address need through the Site Allocations or IDP in association with Education Leeds gives appearance that private education providers are likely to be overlooked or ignored. The absence of a clear unequivocal support for such facilities is inconsistent with national policy. Suggest add new policy ‘Education Provision’: “The Council recognises the importance of ensuring that a sufficient choice of school places is available in Leeds and the surrounding settlements to meet the needs of existing and new communities. The Council will take a proactive, positive and collaborative approach to meet this requirement and to widen choice in education. The Council will give great weight to the need to create, expand and alter schools and cooperate with school promoters to identify and resolve key planning issues before applications are submitted. Detailed proposals will have regard to the level of need within the community and its proposed location within the settlement hierarchy, together with accessibility by foot, cycling and public transport in the interests of sustainability and of health and wellbeing.”	Consider that provision for new school provision is adequately covered in P9, along with other important community facilities and services. The statutory provision requirements are not being ‘hidden behind’, but as they do require the Council to provide the sufficient choice of school places and widen choice in education, it is considered that stating this in a CS policy would not give it any further weight. Identifying and resolving key planning issues at pre-application stage is also important to all types of proposal, not just schools. (The last sentence of Brownberrie/Gospel Hall Trust proposed new policy is the same wording as that at present.)  LCC comments made in response to Preferred Approach representations are still relevant. The policy has changed from the PA to recognise that education facilities will not always be appropriate to be located within centres. The Site Allocations DPD and the IDP will in addition identify school requirements.	No change

Conservative Group (2950)	Given the housing numbers there will be a key need to deliver additional schools in order for the Council to meet its statutory requirements around provision of school places. Paragraphs 5.1.17 and 5.3.32 reference this issue but there could be more emphasis placed on school places and the need for more schools to service new development.	There has been close working with Education colleagues to ensure that there will be sufficient school infrastructure. This is further expanded in the IDP.	No change
The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)	Could be subsumed into a general town and local centre policy.	Some of these facilities and services should where possible be located within centres, but are not required to be located there. Therefore it is appropriate to have a specific policy to support and encourage such uses.	No change
Sport England (1982)	The Core Strategy should contain policies that protect and enhance both indoor and outdoor sport facilities. Add 'sport and recreation' to the list of community facilities.	Agree is important to protect and enhance indoor and outdoor sport facilities.	Minor change - add sport and recreation to the list, and refer in supporting paragraphs.

**Other LCC comments not in relation to specific representations:**

Need to include copy of Use Class Order as an Appendix both to support Centres policies (especially P8) and in case Use Classes changes in future to have a record of what was meant at the time of CS publication.

Clarify that all measures/thresholds are Gross Internal Areas

## APPENDIX 2 – RELEVANT TEXT CHANGES TO CORE STRATEGY

### 4.2 City and Town Centres

- 4.2.1 Town and local centres within the district have generally become established as a consequence of historical growth of the main urban area and outlying towns. They are at the heart of their communities and contribute much to local character and distinctiveness. *Alongside Spatial Policy 2 below, the Placemaking Chapter contains a number of policies setting out the detailed approach towards proposals for main town centre uses, including shopping.*
- 4.2.2 The Leeds City Centre, Town and Local Centres Study 2011 (Centres Study) was commissioned by the Council in order to review existing centres within the district and consider future demand for town centre uses in accordance with national policy guidance. As part of the study, a health check of existing centres was undertaken, the centres' hierarchy was reviewed and options put forward to meet identified requirements. The approach was based on the policy context formed by the UDP, the RSS and national policy guidance.
- 4.2.3 The Centres Study was carried out during a time of great economic uncertainty. Nonetheless, the Study inevitably not only adopted the population projections upon which the Core Strategy is founded but also trend projections of consumer spending. The Study consequently cautioned against reliance on higher projections, advised that a cautious approach be adopted for the short term with a need to review the position at an early stage. Since the study was written, consumer expenditure has continued to fall and the rate of on-line shopping has increased, both of which will have a negative effect on retail floor space need projections. Nationally, new retail development has slowed significantly. The Centres Study states that only 230,000 sq m of new shopping centre floor space opened in 2010, whilst the longer term pipeline has slipped back from 5 million square metres in 2008 to 3.2 million square metres in 2010, but of this only 11% is under construction, so the majority may be subject to delay or cancellation, reducing the pipeline even more. Whilst the Centres Study makes retail projections for Leeds up to 2028, to cover the lifetime of the Core Strategy, the current economic climate is still very unstable. Consequently the Core Strategy ~~will refer only to the projections made for the first 5 years and even then~~ takes a cautious approach given the continuing uncertainty relating to *the economic* climate and the importance of delivering particular major schemes.
- 4.2.4 Leeds has slid down the national retail league table in its retail offer. However, with the Trinity development projected to be completed in 2013 and the first phase of the Eastgate development to follow, Leeds' retail offer will be improved significantly, which will boost its position nationally as well as regionally. The Centres Study and the Core Strategy give full support to the completion of these two developments, which is vital during an uncertain economic climate. It is also important that time be allowed for the city centre to readjust to the development of a significant quantum of new retail floor space, particularly that which will be delivered at Eastgate which will inevitably cause readjustment of retail provision and shopping patterns in the city centre as did comparable new developments in the past.

- 4.2.5 Moreover, it is necessary to have regard to the regional/sub-regional shopping hierarchy and the need not to have a detrimental impact on this generally or on other important centres outside the district. Since the Centres Study was completed in 2010, Trinity Walk in Wakefield has opened adding 44,000 sq m (471,000 square feet) of new retail floor space to the centre. It is reasonable to assume, given the findings of the surveys which underpinned the Centres Study, that this will inevitably lead to 'claw back' in retail expenditure by Wakefield residents from Leeds city centre and in particular, *the out of centre* White Rose *Centre*. In addition to this, Bradford city centre's planned retail scheme Westfield, totalling over 55,000 square metres (nearly 600,000 square feet) is now progressing. This is likely to result in Bradford residents choosing to shop locally in Bradford rather than in Leeds or at the *out of centre* White Rose *Centre*. The delivery of this centre is crucial to Bradford and to the maintenance of a sustainable hierarchy of shopping centres within the City Region. The completion of such retail development schemes need to be taken account of when assessing how the trend based projections set out in the Centres Study should be used for policy development.
- 4.2.6 The Core Strategy approach, in line with the Centres Study and national guidance, is to achieve growth within centres, with a "centres first" approach, protecting the vitality and viability of centres. This requires a sequential assessment and where appropriate, impact assessment to be conducted to direct town centre uses to the appropriate level within the centres hierarchy. Further details regarding this approach are in Policy P8.
- 4.2.7 The City Centre performs the role of a regional city and the Core Strategy aims to maintain the primacy of the City Centre for comparison shopping and recognises its role as a major employment centre.
- 4.2.8 Beneath the City Centre, town centres and local centres perform an important role in:
- providing for weekly and day-to-day shopping requirements, employment, community facilities and leisure opportunities in easily accessible locations,
  - helping to minimise the need to travel, by providing the opportunity for 'linked trips' to shopping, employment and other services,
  - performing an important role in place making through contributing towards the character and identity of an area.
- 4.2.9 Higher order local centres are distinguished from lower order centres on the basis of a number of considerations. These can include most notably the range of shops in particular, and so the service they provide to the local community, but also other facilities that are offered and the consequent role the centre can play in meeting wider local needs. This is generally supported by assessment of vitality and viability of each centre at the time of survey. Other relevant considerations are the presence of a supermarket of some scale and also the potential scope for expansion or redevelopment. It is expected that centres may move from one category to the other".

## **SPATIAL POLICY 2: HIERARCHY OF CENTRES & SPATIAL APPROACH TO RETAILING, OFFICES, INTENSIVE LEISURE & CULTURE**

The Council supports a centres first approach supported by sequential and impact assessments. The Council will direct retailing, offices, intensive leisure and culture, and community development to the city centre and designated town and local centres in order to promote their vitality and viability as the focus for shopping, employment, leisure, culture, and community services.

Proposals which would undermine that approach will not be supported.

The following hierarchy of centres is to be maintained to ensure that development is directed to the appropriate level of centre based on its scale and catchment.

1. The City Centre
2. Town Centres
3. Local Centres

The Leeds district currently contains a great variety of centres with different characteristics and history, and the need to maintain this local distinctiveness remains an overarching consideration.

4.2.10 Map 4 shows the location of centres within Leeds which are designated under Spatial Policy 2 and Policy P1.

### **5.3 PLACE MAKING**

#### **TOWN AND LOCAL CENTRES**

- 5.3.1 Leeds City Centre is the major centre in the Leeds district and the Leeds City Region as outlined in Spatial Policy 2. The City Centre chapter sets out the importance of its shopping, employment, leisure and cultural offer. Leeds is, however, a large district with many other established centres providing facilities within communities. The Core Strategy seeks to maintain and enhance this sustainable pattern of development across the district, ensuring that town and local centres remain the focus for shopping, intensive/built leisure, employment and services.
- 5.3.2 The UDP established a centres hierarchy which included shopping frontages for the City Centre, 28 town centres and 11 other local centres. The function and performance of these centres has been reviewed in the Leeds City Centre, Town and Local Centres Study, (July 2011). In addition to the City Centre, the Core Strategy now identifies 29 town centres and 38 local centres. A network of neighbourhood parades and shops within smaller settlements also make a contribution towards meeting basic day to day shopping and service requirements.
- 5.3.3 The aim of the policies within this section is to support the vitality and viability of these centres for weekly shopping requirements, leisure, local employment provision, and a range of services and community facilities and to promote sustainable and linked trips.

- 5.3.4 ~~Town centres are at the heart of communities within Leeds and contribute towards the character and identity of communities. They provide for weekly and day-to-day shopping and service needs close to where people live and work. A town centre has a range of uses including the A1 (Shops) to A4 (Drinking Establishments), D1 (non residential institutions), D2 (assembly and leisure), C1 (hotels) and C2 (Residential uses and in some cases B1. Typically, the range could include a supermarket/superstore, financial services, a Council presence either in the form of a library or council offices, healthcare presence and community facilities, for example, a community hall. A town centre has a good range of retail of both convenience and comparison, including the presence of local independent traders. Apart from the purpose built town centres built during the 1950s and 1960s (e.g. Bramley and Crossgates), town centres have evolved over time and are surrounded by residential development, without major barriers to hinder their accessibility from these communities (e.g. major road or rail network). The range of uses and the presence of independent traders are important characteristic of a town centre.~~
- 5.3.5 ~~The defined primary shopping frontage in town centres is predominantly A1 uses. Saved UDP Policy SF7 seeks to maintain this core focus for town centres with a 70/30 split between A1 and other uses. Greater flexibility is given to the mix of uses within the secondary frontage with applications being determined on their merits with the purpose to safeguard the overall retailing character of shopping centres. This approach to primary and secondary shopping frontages is taken forward within the Core Strategy as part of the definition of town centres.~~
- 5.3.6 ~~Local centres cater for daily shopping needs, and often provide shopping provision to complement weekly shopping. They consist largely of a mix of A1-A4, and may have D1 and D2 present. The range of uses and the scale of units is much less than what a town centre can offer and depending on the size of the local centre, there is often no Council, health or community facility. Higher Order Local Centres may have a small supermarket (see Policy P23 for scale), and some service and community facilities whereas lower order local centres may only have a small local convenience store of a size that trades outside of Sunday licensing restrictions and a mix of shops, including a post office, and a public house.~~
- 5.3.7 ~~Policy P1 sets out the town and local centre designations. Richmond Hill All (area) is the location of a new town centre, to support Hunslet town centre in the Aire Valley Eco Settlement. Kippax has been redefined as a local centre as the facilities there do not reflect those of a town centre and are more akin to a higher order local centre. The term district centre has been removed and all those centres that were previously district centres within the UDP are now classed as town centres. 'Local centre' is a new designation to replace Policy S4 centres within the UDP and the number of designated local centres has increased to recognise their importance in providing day-to-day local service needs. Due to the significant differences in scale and function of local centres across Leeds a two-tier approach to local centres is established in the Core Strategy, recognising that there can be significant differences in the scale and function of local centres.~~

*Town centres are at the heart of communities within Leeds and contribute towards the character and identity of communities. They provide for weekly and day-to-day shopping and service needs close to where people live and work. The range of uses and the presence of independent traders are important characteristics of a town centre, as are their historic characters and provision of public realm. Apart from the purpose built town centres constructed during the 1950s and 1960s (e.g. Bramley and Cross Gates), town centres have evolved over time, and in some cases have a long history with many historic features remaining. They are embedded in the communities which they serve, with the*



*town centres of stand alone settlements particularly having an important role in serving their local catchments.*

*The main element of town centres is the 'A' use classes (e.g. shops, financial services, restaurants, public houses and bars). In Leeds town centres have a good range of convenience and comparison retail, including the presence of local independent traders, and the great majority contain a medium sized supermarket (around 1,000 sqm trading floorspace), or a superstore (larger than 2,500 trading floorspace). They also contain financial services such as banks, estate agents, and employment offices, and restaurants or cafes. The town centres in Leeds also contain either a library or Council offices, some form of health provision, and community facilities such as a community hall or place of worship (D1 use). The large majority also include office employment (Class B1a) and leisure uses (Class D2) such as gyms or indoor sports facilities.*

*The defined primary shopping frontages in town centres are those with predominantly A1 uses. Saved UDP Policy SF7 seeks to maintain this core focus for town centres with a 70:30 split between A1 and other uses. Greater flexibility is given to the mix of uses within secondary frontages, with applications being determined on their merits with the purpose to safeguard the overall retailing character of shopping streets and maintain vitality of town centres as a whole. This approach to primary and secondary shopping frontages is taken forward in principle within the Core Strategy with the detail to be established in the Site Allocations DPD.*

*'Local centre' is a new designation to replace the UDP 'Policy S4 centres' and the number of designated local centres has increased to recognise their importance in providing day-to-day local shopping and service needs. Local centres cater for daily shopping needs, and provide shopping provision to complement weekly shopping, known as 'top up' shopping. The range of uses and the scale of units is less than that offered by town centres and there may be no Council, health or community facility, although they provide financial services such as banks and estate agents and a third contain office uses.*

*Due to the significant differences in scale and function of local centres across Leeds the Core Strategy establishes a two-tier approach to split them into higher and lower order. 1,500 sqm of total gross retail floorspace is the general threshold above which a local centre is higher order (notwithstanding any site specific issues which give rise to individual anomalies). Higher order centres also generally have a small supermarket up to 1,500 sqm, and some service and community facilities. They normally have more health centre and library type uses than lower order local centres.*

*Lower order centres only have a small convenience store which allows trade outside of Sunday licence restrictions (up to 280 sqm trading floorspace), fewer restaurants and cafes, and less of a mix of other shops and small scale community facilities. They ordinarily have to contain at least 500 sqm of A1 retail, and at least an additional 500 sqm across all other uses, otherwise they are simply neighbourhood parades.*

*Policy P1 sets out the town and local centre designations. The term 'district centre' no longer applies and all those centres that were previously district centres within the UDP are now classed as town centres. Kippax has been redefined from its UDP town centre classification, to be a higher order local centre as its facilities do not reflect those of a town centre. The Richmond Hill All Saints area is proposed as the location of a new town centre (subject to further evidence and assessment), to complement Hunslet town centre in the Aire Valley Eco Settlement.*

## **POLICY P1: TOWN AND LOCAL CENTRE DESIGNATIONS**

Town and local centres are designated in the following locations:

<b>Town Centres</b>	<b>Higher Order Local Centres</b>	<b>Lower Order Local Centres</b>
Armley	Beeston	Adel
Bramley	Boston Spa	Alwoodley, King Lane
Chapel Allerton	Harehills Corner	Beeston Hill
Cross Gates	Kippax	Burley Lodge
Dewsbury Road	Moortown Corner	Butcher Hill
Farsley	<i>Chapelton Road</i> ←	<del>Chapelton Road</del>
Garforth	Montreal, Harrogate Road	<del>Coldcotes Circus*</del>
Guiseley	<del>Chapelton, Pudsey</del> →	<i>Chapelton, Pudsey</i>
Halton	Hollins Park	Collingham Village Centre
Harehills Lane	Horsforth, New Road Side	Drighlington
Headingley	Kirkstall Road	East Ardsley
Holt Park	Middleton Park Circus	<del>Galloway Lane, Pudsey</del>
Horsforth Town Street		Guiseley, Oxford Road
Hunslet		Hawksworth Estates Centre
Kirkstall		Holbeck
Meanwood		Horsforth, Station Road
Middleton		Hyde Park Corner
Moor Allerton		<del>Ireland Wood</del>
Morley		Lincoln Green
Oakwood		Lower Wortley
Otley		Rawdon, Leeds Road
Pudsey		Royal Parks
Richmond Hill, area*		Slaid Hill
Rothwell		Stanningley Bottom
Seacroft	<i>Street Lane, Roundhay</i> ←	<del>Street Lane, Roundhay</del>
Wetherby		Tommy Wass
Yeadon		Weetwood, Far Headingley
		Woodlesford

\* Newly identified centres in the City Centre, Town and Local Centres Study

- 5.3.8 Boundaries of all centres, and their shopping frontages, will be reassessed through the Site Allocations DPD (and future LDF allocations documents as appropriate), and the scope to change their designation and proposals to extend or include new centres to reflect retail need as a result of housing growth proposals will be considered in the interim. Centre boundaries shown in the Centres Study will be a material consideration in the determination of planning proposals until boundaries are reconfirmed in LDF allocations documents.
- 5.3.9 Out of centre shopping retail parks do not perform the role of a city, town or local centre, as they lack the broad range of facilities and services which should be available within such centres. Nevertheless major out-of-centre retailing is a feature of most regional economies, usually associated with the regional city. Such retail parks provide a valuable part of the wider retail offer and make a significant contribution to the local economy and as a source of employment. It is not in the interest of the local economy that such centres should be allowed to decline. In recognition of the important role of such retail parks it is considered that some element of the retail capacity identified in the Core Strategy could be acceptable in established retail park locations where this is clearly demonstrated not to compromise the centres first approach, including consideration of the impact on centres beyond the Leeds boundary. Such proposals should be considered within the context of the delivery of major retail proposals in the City Centre (Trinity and Eastgate).
- 5.3.10 To support the centres first approach, town centre uses should be focused in the identified centres to help to maintain the vitality and viability of centres. Where this is not possible edge of centre locations are appropriate (see Policy P8 and its supporting text for further guidance). This in turn ensures that facilities are available where they can be readily accessed by sustainable modes of transport and provides the opportunity for linked visits to other services. Policy T2 sets out accessibility standards. The full range of uses considered appropriate within town and local centres are listed in Policy P2.
- 5.3.11 The Policy for office development is explained in more detail in Spatial Policy 3 and Policies CC1 and EC2. This indicates that while the City Centre and locations on the edge of the City Centre will be the major focus for new office development, town centres and edge of town centres will also be promoted as locations for office development, with a target of 23,000 sq m set for locations in or on the edge of town centres.
- 5.3.12 While respecting the centres hierarchy, it is also important that the role of Leeds within the wider Leeds City Region is recognised. In particular, nearby centres such as Bradford, Harrogate, Wakefield and Castleford provide important services for Leeds' residents living near the district boundary, just as residents outside Leeds travel into the district to access employment and services. Improving sustainable transport links within the Leeds City Region is therefore of key importance.

## **POLICY P2: ACCEPTABLE USES IN AND ON THE EDGE OF TOWN CENTRES**

Town centres offer shopping and services intended to meet weekly and day-to-day requirements. The uses set out below are acceptable in principle in and, subject to a sequential assessment edge of centre, and will be directed towards the centres listed in Policy P1.

- Shops, supermarkets and superstores
- Non-retail services
- Restaurants and cafes, drinking establishments and hot food takeaways,
- Intensive leisure and cultural uses including theatres, museums, concert halls, cinemas, leisure centres, gyms and hotels
- Health care services
- Civic functions and community facilities
- Offices
- Housing ~~would be acceptable~~ *is encouraged* in centres above ground floor in the primary and secondary shopping frontages or outside the shopping frontages, providing it did not compromise the function of the town centre.

### **POLICY P3: ACCEPTABLE USES IN AND ON THE EDGE OF LOCAL CENTRES**

Local Centres offer shopping and services that meet day-to-day requirements. The uses set out below are acceptable in principle in and, subject to a sequential assessment, edge of centre, and will be directed towards the centres listed in Policy P1:

- Within higher order local centres small supermarkets would be acceptable in principle up to around **1,500 sqm** ~~1,858 square metres gross (20,000 square feet)~~. Within lower order local centres small food stores that are compatible with the size of the centre would be acceptable. These size thresholds are given as guidance and would be subject to local circumstances. A larger store may be appropriate if identified need cannot be met within a nearby town centre.
- A basic range of facilities including shops, banks, health care facilities, public-facing Council services and community facilities that serve a local catchment area
- Restaurants, cafes and hot food takeaways
- Offices
- Housing is **encouraged** acceptable within local centres above ground floor or outside of the shopping frontages providing it maintains the vitality and viability of the retail area.

*Within lower order local centres, proposals for the change of use of existing retail units to non retail units (including restaurants, cafes and take-away hot food shops) will be resisted where the vitality and viability of the centre to meet day to day local needs will be undermined and increase the need to travel, or where the proposal will lead to a concentration of non retail uses in a locality which will detrimentally impact on the community. Proposals for such uses will be considered against the following criteria:*

- The cumulative impact of such development, particularly upon the amenity of the area and traffic generation, especially where concentrations of such uses already exist,*
- Where a proposal involves evening opening, account will be taken of the proposal in relation to the proximity of the premises (and associated parking requirements), to nearby residential accommodation, the nature and character of the neighbourhood parade and existing noise levels;*
- The availability of public transport, convenient on/off street car and cycle parking provision and impact on highway safety. Where there is insufficient car parking or where traffic movements are such as to create a traffic hazard, planning consent is likely to be refused.*

#### **Neighbourhood Shopping**

5.3.13 Neighbourhood shopping parades offer a retail and service function providing a basic range of facilities for day-to-day shopping requirements for people living in local communities. They are particularly important for those without access to a car or with limited mobility, but they are not seen as the main focus of local provision or intended growth.

5.3.14 Small scale stand alone food stores can help to meet a local deficiency where there is no nearby food provision on neighbourhood parades or in centres. It is important that new small stand alone food stores or groups of shops are not in close proximity

to existing parades or centres as they could undermine the vitality and viability of existing parades and centres.

5.3.15 It is important that the function of neighbourhood shopping parades, is not compromised through the loss of retail uses to non retail uses which could create inactive frontages during the day, or a proliferation of A3, A4 and A5 uses (restaurants and cafes, drinking establishments, and hot food takeaways) which could lead to the loss of the shopping function of the centre or parade in a local area.

5.3.16 Whilst A4 and A5 uses can be appropriate uses for parades of shops, their cumulative impact give rise to amenity concerns for nearby residents, including noise, disturbance, litter and car parking, which can occur when a number of such uses are located in close proximity to each other. In addition to this, health issues are now a material planning consideration. As such, sensitive control of the number of A3, A4 and A5 uses in a parade/ local area should be exercised to prevent a loss of the retail function of the parade /local area will be assessed. Where concentrations of such uses exist that are already causing such problems, planning consent may be refused if the additional use would cause further demonstrable harm.

**POLICY P4: SHOPPING PARADES AND SMALL SCALE STAND ALONE FOOD STORES SERVING LOCAL NEIGHBOURHOODS AND COMMUNITIES**

Local service facilities, including extensions to existing retail uses to improve their viability, will be supported within shopping parades in residential areas, providing that they are of a size compatible with the scale and function of the shopping parade, do not compromise the main retail function of the parade to service day-to-day shopping requirements, and other relevant planning policies.

Proposals for stand alone for small scale food stores up to 372 sqm (~~4,000 square foot~~) gross within residential areas, will be acceptable in principle where there is no local centre or shopping parade within a 500 metre radius that is capable of accommodating the proposal within or adjacent to it. Consideration will also be taken of the number of existing small stores in the vicinity to avoid cumulative impact on parades and centres.

Proposals for the change of use of existing retail units to non retail units (including restaurants, cafes and take-away hot food shops) will be resisted where the vitality and viability of the range of shops to meet day to day local needs will be undermined and increase the need to travel, or where the proposal will lead to a concentration of non retail uses in a locality which will detrimentally impact on the community. Proposals for such uses will be considered against the following criteria:

- (i) The cumulative impact of such development, particularly upon the amenity of the area and traffic generation, especially where concentrations of such uses already exist,
- (ii) Where a proposal involves evening opening, account will be taken of the proposal in relation to the proximity of the premises (and associated parking requirements), to nearby residential accommodation, the nature and character of the neighbourhood parade and existing noise levels;
- (iii) The availability of public transport, convenient on/off street car and cycle parking provision and impact on highway safety. Where there is insufficient car parking or where traffic movements are such as to create a traffic hazard, planning consent is likely to be refused.

**Meeting the need for food stores and other retail uses within Leeds**

5.3.17 The Core Strategy supports new retail provision in a sustainable manner, directing it towards town and local centres where there is a known deficiency rather than following a market share approach. A market share approach would undermine the vitality and viability of centres that have known deficiencies and only give support to locations that are successful contrary to the 'centres first' approach that the Core Strategy advocates. Whilst the Core Strategy will continue to support successful centres, the focus of new provision will be directed towards centres in areas of known deficiency to enable people to shop locally and with good access to sustainable transport.

5.3.18 The Leeds City Centre, Town and Local Centres Study will be reviewed periodically to ensure its is kept up to date. The following policies set out the Council's approach to the provision of new floor space for convenience and comparison goods, and support the centres first approach.

**POLICY P5: APPROACH TO ACCOMMODATING NEW FOOD STORES  
ACROSS LEEDS**

- (i) Food stores will be directed towards the town and local centres identified in Policy P1.
- (ii) Sites on the edge of town and local centres will be considered where there are no available, viable or suitable sites within centres.
- (iii) A number of town centres could perform more successfully as major locations for weekly shopping needs if they included a major food store or redevelopment of existing facilities to expand their retail offer or expand their function. Appropriate provision within centre or on the edge of centre ~~subject to policy P8 (A)~~ will be encouraged, and will be supported where sites can be identified in the following locations:
  - Armley
  - Chapel Allerton
  - Cross Gates
  - Dewsbury Road
  - Farsley
  - Headingley
  - Holt Park
  - Horsforth Town Street
  - A new town centre is proposed in the Richmond Hill area, to support the provision at Hunslet, which is the main centre for the Aire Valley Eco-Settlement. The new centre will meet the local deficiency in convenience goods shopping and improve the provision of non-retail services and local facilities that cannot be met by Hunslet town centre. Delivery of this centre is subject to Policy P7.
  - A site for convenience retailing will be sought in the Holbeck area to meet an existing deficiency and complement wider regeneration initiatives.

**POLICY P6: APPROACH TO ACCOMMODATING NEW COMPARISON SHOPPING  
IN TOWN AND LOCAL CENTRES**

- (i) In addition to the Primary Shopping Quarter of the City Centre, the town and local centres identified in Policy P1 are acceptable locations for comparison goods providing that they are of a scale compatible with the size of the centre ~~subject to Policy P8 (A)~~.
- (ii) Sites on the edge of town and local centres will be acceptable in principle where there are no suitable sites within centres. ~~subject to Policy P8 (A)~~

**Creation of New Centres**

5.3.19 Centres that have the potential for extension and the scope to meet particular geographical retail need will be explored in subsequent LDF allocations documents.

5.3.20 The commitment to housing growth as set out in Spatial Policy 6, may lead to a requirement for new centres if existing centres do not have capacity, expansion potential or where the volume of housing proposed justifies a centre on its own merit. A new centre would need to be the focal point of a residential community, have a mix of shops, including independent retailers, services and facilities and be



accessible by foot, cycle and public transport for it to be considered a centre. It should not undermine the vitality and viability of nearby centres.

### **POLICY P7: THE CREATION OF NEW CENTRES**

New centres may be required where there is need for additional convenience and local service facilities as a consequence of significant housing growth if existing centres are not capable of expansion to support the level of development proposed. The following criteria should all be met:

- (i) The proposed centre should not undermine the vitality and viability of the City Centre or any town or local centre, or any committed or planned investment within or on the edge of these centres;
- (ii) The proposed centre should have good pedestrian and cycle access, and good public transport links to the community it is intended to serve;
- (iii) The proposed centre should be of good design quality, in helping to maintain and enhance local distinctiveness;
- (iv) Based on the scale of the centre, the centre should have a mix in type and scale of facilities, services and shops, to reflect a range of uses as outlined in Policy P2 in order to ensure sustainable provision within the proposed centre.

### **Sequential and Impact Assessments for *main* town centre uses and intensive leisure.**

XX.X *Now that the previous national guidance is superseded by the NPPF, the Council needs a more local interpretation of town centres policy in order to make it locally distinctive to Leeds. Therefore Policy P8 refines the NPPF and sets out local thresholds for sequential and impact tests, including catchment areas. If thresholds were not set then the Council would potentially have to apply a sequential test (and possibly an impact test) against every main town centre use proposal, whereas P8 reduces the severity of the tests for developments of a smaller scale and is therefore proactive towards growth and regeneration. Setting these policy criteria also provide more clarity in advance rather than waiting for discussions to be held at planning application stage, it allows consistency of decisions and transparency.*

5.3.21 In assessing proposals for *main* town centre uses the Council will require development proposals to follow a sequential approach to site selection. This requires development proposals for town centre uses to assess sites for their availability, viability, and suitability within existing centres of their catchment area in the first instance. Where no in-centre sites exist, preference will be given to 'edge of centre' locations which are well connected to the centre by means of easy pedestrian access. Edge of centre is defined as up to 300 metres from the primary shopping area for retail uses. For non retail uses edge of centre is defined as up to 300 metres from the town centre boundary. For local centres where there is no defined primary shopping area, edge of centre is defined as up to 300 metres from identified shopping frontages. Sites on the edge of centres should be well connected to the centre and not be constrained by major roads, railway lines or waterways.

5.3.22 If there are no sites available, viable or suitable in or edge of centre, out of centre locations that are well served by a choice of transport modes and that are close to the centre with the potential of forming linkages with the centre in the future will be favoured before other less sustainable sites. Developers must demonstrate flexibility in their business model in terms of the scale, format, car parking provision and scope for disaggregating specific parts of the development to enable them to locate within the centre before considering less central sites.

5.3.23 The Council has recognised the role of existing major out of centre retail locations in terms of the wider retail offer of the district and in providing significant employment opportunities. The need for limited expansion to allow such centres to continue to fulfil this role is recognised and will be taken into account when considering the sequential approach.

5.3.24 The sequential approach will be carried out in accordance with the thresholds set out in Policy P8, which also indicates the scale of development at which an impact assessment will be required for town centre uses. Impact assessments will be required to consider the following criteria:

- The impact of the development on existing, committed and planned investment in centres located within an agreed catchment area,
- The impact of the development on town centre vitality and viability, including consumer choice and range,
- The impact of the development on allocated sites outside of town centres being developed in accordance with future LDF allocations documents.
- The impact of the development on in-centre trade/turnover in the wider area, taking account of current and future consumer expenditure capacity in the catchment area up to 10 years from the time the application is made.
- If located in or on the edge of a centre, whether the proposal is of an appropriate scale (in terms of gross floor space) in relation to the size of the centre and its role in the hierarchy of centres as set out in Spatial Policy 2.
- The impact of the development of proposal on local independent traders. They add essential variety and individuality to centres which contributes to place making and overall character and any detrimental impact to them through any likely disproportionate effect on the centre should be avoided. Impact assessments should be proportionate to the level of development proposed.

5.3.25 All proposals for town centre uses should consider the following:

- Plan over the lifetime of the development to limit carbon dioxide emissions and be resilient to climate change.
- The accessibility of the proposal to be considered against choice of transport including walking, cycling, public transport and the car. The effect on local traffic levels and congestion after public transport and traffic management measures have been secured.
- High quality and inclusive design – improve character and quality of the area and the way it functions.
- Impact on economic and physical regeneration in the area.
- Impact on local employment.

## **POLICY P8: SEQUENTIAL AND IMPACT ASSESSMENTS FOR MAIN TOWN CENTRE USES\***

Leeds City Council has adopted a centres first approach to main town centre uses\* as set out in Policy SP2. Proposals must accord with the following sequential and impact assessment requirements:

A) Proposals for up to 200 sqm extensions to existing units or up to 200 sqm change of use will not require sequential or impact assessments. This will not apply where the Council considers that a combination of conversions / extensions / new build is being used to attempt to avoid the below thresholds. Proposals for extensions or change of use to existing edge or out of centre units above 200 sqm will be required to conduct assessments based on the gross floorspace of the resulting unit in accordance with the thresholds set out below.

B) Proposals for edge of centre or out of centre A1 within residential areas:

<b>Total gross size of built development</b>	<b>Sequential Assessment</b>	<b>Impact Assessment</b>	<b>Catchment Area (radius)</b>
Below 200 sqm	NO	NO	N/A
200 – 372 sqm	YES	NO	500 metre walking
373 – 1,499 sqm	YES	NO	5 minute inbound off peak drive time
1,500+ sqm: Convenience	YES	YES	10 minute inbound off peak drive time
1,500+ sqm: Comparison	YES	YES	10 minute inbound off peak drive time, and in addition the City Centre (and edge of), and the main centres of neighbouring authorities as appropriate depending on distance and the scale of the proposal

C) Proposals for edge of centre or out of centre A1 outside residential areas:

<b>Total gross size of built development</b>	<b>Sequential Assessment</b>	<b>Impact Assessment</b>	<b>Catchment Area (radius) inbound off peak drive time</b>
0 - 1,499 sqm	YES	NO	5 minute
1,500+ sqm: Convenience	YES	YES	10 minute
1,500+ sqm: Comparison	YES	YES	10 minute inbound off peak drive time, and in addition the City Centre (and edge of), and the main centres of neighbouring authorities as appropriate depending on distance and the scale of the proposal

D) Proposals for all other edge of centre or out of centre main town centre uses\*

<b>Total gross size of built development</b>	<b>Sequential Assessment</b>	<b>Impact Assessment</b>	<b>Within residential area: Catchment Area (radius) inbound off peak drive time</b>	<b>Outside residential area: Catchment Area (radius) inbound off peak drive time</b>
A2, A3, A4, A5 0 - 1,499 sqm	YES	NO	5 minute	10 minute and City Centre (including edge of)
A2, A3, A4, A5 1,500+ sqm	YES	YES	10 minute and City Centre	15 minute and City Centre (including edge of)
Main town centre uses except Class A 0 - 1,499 sqm	YES	NO	10 minute and City Centre (including edge of)	
Main town centre uses except Class A 1,500+ sqm	YES	YES	15 minute and City Centre (including edge of)	

E) Proposals for more than one unit will generally be required to carry out assessments based on their total gross floor area, unless disaggregation is more relevant for the sequential test. Pre-application discussions with Council officers will be required to agree a catchment search area for proposals for a mix of A1 convenience and comparison units.

F) All proposals will be required to accord with Policy T2 on accessibility standards.

*\* NPPF glossary identifies main town centre uses as retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities, and the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).*

*N.B. offices are also subject to Policy EC2.*

*Use Classes Order: Class A1 - shops, A2 – financial and professional services, A3 – restaurants and cafes, A4 – drinking establishments, A5 – hot food takeaways.*

*All measures/thresholds in Policy P8 are Gross Internal Areas.* The total gross size of built development is based on a 65/35 split of net sales area to storage/back office area. Proposals for development with a greater split will be required to submit justification for why their operations needs require this and will be judged on the merits of the application. 500 metres easy walking distance equates to a 10 minute walk time, which takes into account gradient and barriers such as road, rail and waterways. The catchment area includes all centres located within it, including the City Centre if it falls within the catchment area. Off peak is between 10am and 2pm.

**[SUPERSEDED POLICY P8:]**

## **POLICY P8: SEQUENTIAL AND IMPACT ASSESSMENTS FOR TOWN CENTRE USES**

Leeds Council has adopted a centre first approach to town centre uses as set out in Policy P2. Proposals for town centre uses must accord with the following sequential and impact assessment requirements where appropriate:

A) Any new proposals for town centre uses within a defined centre of a gross floor space of 10% or more of the total gross retail floor space in the centre will be subject to an impact assessment to ensure that the proposal would not undermine the vitality and viability of the centre in which it is located, or any centres within the catchment area, as a whole.

B) Proposals for edge of centre or out of centre A1 uses / stores within residential areas:

<b>Total gross size of built development</b>	<b>Sequential Assessment</b>	<b>Impact Assessment</b>	<b>Catchment Area (radius) inbound off peak drive time</b>
Below 200 square metres	NO	NO	N/A
200 – 372 square metres	YES	NO	500 metre walking
373 – 1,499 square metres	YES	NO*	5 minute inbound off peak drive time
1,500 square metres and above	YES	YES	10 minute inbound off peak drive time

\* unless the gross floor space of the proposal is more than 10% of the total floor space of each of the centres within the catchment area, then a local impact assessment is required.

C) Proposals for edge of centre or out of centre A1 uses / shopping, outside residential areas:

<b>Total gross size of built development</b>	<b>Sequential Assessment</b>	<b>Impact Assessment</b>	<b>Catchment Area (radius) inbound off peak drive time</b>
0 - 1,499 square metres	YES	NO*	5 minute inbound off peak drive time
1,500 square metres and above	YES	YES	10 minute inbound off peak drive time

\* unless the gross floor space of the proposal is more than 10% of the total floor space of each of the centres within the catchment area, then a local impact assessment is required.

D) Proposals for edge of centre or out of centre A2 – A5 (including bulky goods) and non-retail services within residential areas:

<b>Total gross size of built development*</b>	<b>Sequential Assessment</b>	<b>Impact Assessment</b>	<b>Catchment Area (radius) inbound off peak drive time</b>
0 -1,499 square metres	YES	NO*	5 minutes
1,500 square metres and above	YES	YES	10 minutes and City Centre

\* unless the gross floor space of the proposal is more than 10% of the total floor space of each of the centres within the catchment area, then a local impact assessment is required.

E) Proposals for edge of centre or out of centre A2 – A5 (including bulky goods), and non retail services outside residential areas:

<b>Total gross size of built development*</b>	<b>Sequential Assessment</b>	<b>Impact Assessment</b>	<b>Catchment Area (radius) inbound off peak drive time</b>
0-1,499 square metres	YES	NO*	10 minutes and City Centre (including edge of)
1,500 square metres and above	YES	YES	15 minutes and City Centre (including edge of)

\* unless the gross floor space of the proposal is more than 10% of the total floor space of each of the centres within the catchment area, then a local impact assessment is required.

**N.B. POLICY CONTINUES ON NEXT PAGE**

**SUPERSEDED POLICY P8 - CONTINUED FROM PREVIOUS PAGE**

F) Proposals for edge of centre or out of centre intensive leisure and culture within residential areas

Total gross size of built development*	Sequential Assessment	Impact Assessment	Catchment Area (radius) inbound off peak drive time
0-1,499 square metres	YES	NO*	10 minutes and City Centre (including edge of)
1,500 square metres and above	YES	YES	15 minutes and City Centre (including edge of)

\* unless the gross floor space of the proposal is more than 10% of the total floor space of each of the centres within the catchment area, then a local impact assessment is required.

G) Proposals for edge of centre or out of centre intensive leisure or culture outside of residential areas

Total gross size of built development*	Sequential Assessment	Impact Assessment	Catchment Area (radius) inbound off peak drive time
0-1,499 square metres	YES	NO*	10 minutes and City Centre (including edge of)
1,500 square metres and above	YES	YES	15 minutes and City Centre (including edge of)

\* unless the proposal is more than 10% of the total floor space of each of the centres within the catchment area, then a local impact assessment is required.

H) Proposals for extensions of up to 200 square metres to existing units will not require sequential or impact assessments. Proposals for extensions to existing units above 200 square metres will be required to conduct sequential and impact assessments based on the gross floor space of the resulting unit in accordance with the thresholds set out above.

I) Proposals for more than one unit will be required to carry out assessments based on their total gross floor area. Pre application discussions with Council officers will be required to agree a catchment search area for proposals for a mix of convenience and comparison units.

J) All proposals will be required to accord with Policy T2 on accessibility standards.

~~For clarification, in Policy P8 the total gross size of built development is based on a 65/35 split of net sales area to storage/back office area. Proposals for development with a greater split will be required to submit justification for why their operations needs require this and will be judged on the merits of the application. 500 metres easy walking distance equates to a 10 minute walk time, which takes into account gradient and barriers such as road, rail and waterways. The catchment area includes all centres located within it, including the City Centre if it falls within the catchment area. Off peak is between 10am and 2pm.~~

**Shopping frontages and their mix of uses**

5.3.26 Primary and secondary shopping frontages were identified in the UDP in order to maintain and enhance the viability of shopping centres and ensure a concentration of facilities. These primary and secondary shopping frontage policies are saved in UDP Appendix A12 until revised in LDF documents. Primary shopping areas will be identified within the City Centre and town centres. These will consist of primary frontages and any contiguous secondary frontages, large retail units and adjoining areas with potential for expansion of the primary shopping area. To maintain the

vitality and viability of Town and Local Centres (as set out in Spatial Policy 2), primary frontages and where appropriate secondary frontages will be identified in LDF documents.

- 5.3.27 As emphasised in the above section on Neighbourhood Shopping and Policy P4, the need to maintain retail uses as the predominant use in primary and secondary frontages in centres and in neighbourhood parades is a key issue. This is necessary to prevent inactive frontages during the day, or a proliferation of A3-A5 uses (restaurants and cafes, drinking establishments, and hot food takeaways), which could lead to the loss of the function of the centre or parade which is first and foremost for shopping. Whilst A4 and A5 uses are acknowledged as town centre uses, employment contributors, and can contribute to the tourism of an area, they can cause amenity issues to nearby residents. In addition to this, health issues are now a material planning consideration. As such, sensitive control of the number of A4 and A5 uses in a centre or parade should be exercised to prevent a loss of the retail function of the centre or parade and overexposure to such uses, which could contribute to poor health in the community. Therefore, the proportion of retail to non retail uses in primary and secondary frontages will be reviewed in future LDF documents with the aim to maintain retail uses as the predominant use.

### **Community Facilities and Other Services**

- 5.3.28 In addition to local shopping and built leisure facilities, local communities have a need for good access to health, education, training and community facilities and a range of high quality green space provision, which in turn is thought to have a positive impact on the health and wellbeing of a community. The projected increase in households across Leeds will lead to an increase in the demand for these facilities. Policies G3-G6 outline the delivery of new green space and enhancement of existing facilities. A Policy relating to other community infrastructure and services is outlined below.

### **Health**

- 5.3.29 Local health facilities need to be accessible to all, therefore it is important that they are provided in sustainable locations. Town and local centres are considered to be sustainable locations as they have sustainable transport access and are the focus for other community facilities which in turn can encourage services to co-locate to enable linked trips.
- 5.3.30 This supports the decentralised approach of providing health and social care services closer to where people live and away from central hospital locations, unless that is appropriate. Wherever possible, health and social care services will be integrated, to give individuals more choice and control over the services they need to stay healthy or return to independent lives following recovery from illness.

### **Education and Training**

- 5.3.31 An increasing school age population means that Leeds is facing significant pressure to ensure that basic need is met for statutory education. Educational provision is experiencing significant change with the introduction of academies and free schools. However the duty to ensure all children and young people have a school place remains the responsibility of the Council.
- 5.3.32 New educational facilities will be required to meet increased demand either through extensions to existing establishments or through the building of new schools in

areas of housing growth or adjacent to them. Developers will be required to reserve land for education facilities where this need is identified in LDF allocations documents and contributions will be sought through Section 106 agreements and/or the Community Infrastructure Levy to deliver these facilities. Similar consideration will also be given to community needs for sufficient early years, childcare, and appropriate youth provision.

5.3.33 The Council is committed to ensuring young people are in education, employment or training beyond the age of 16 and Government preparations are being made for the raising of the participation age in formal learning to 18 by 2015. The LDF will support provision of facilities required in appropriate locations.

### **Social and Community Facilities**

5.3.34 The provision of existing and new social and community facilities is integral to creating sustainable communities. One of the aspirations within the Vision for Leeds is for all communities to be successful. To be successful local services need to be easily accessible and meet people's needs therefore the Council needs to support the provision of new community facilities *particularly* as a result of new housing growth. The delivery of such facilities should be through effective community engagement and be of high design quality to help maintain local character and distinctiveness.

5.3.35 The provision of greenspace within communities has an important role to play in creating sustainable communities and there is often a link between social and community facilities and the provision of leisure and open space facilities. The Managing Environmental Resources and Green Infrastructure sections sets out the Council's requirements for greenspace across Leeds.

## **POLICY P9: COMMUNITY FACILITIES AND OTHER SERVICES**

Access to local community facilities and services, such as education, training, places of worship, health, and community centres, is important to the health and wellbeing of a neighbourhood. New community facilities and services should be accessible by foot, cycling, or by public transport in the interests of sustainability and health and wellbeing. Facilities and services should not adversely impact on residential amenity and should where possible, and appropriate, be located in centres with other community uses.

The scale of the facility or service should be considered in conjunction with the level of need within the community and its proposed location within the settlement hierarchy.

Where proposals for development would result in the loss of an existing facility or service, satisfactory alternative provision should be made elsewhere within the community if a sufficient level of need is identified.





Report author: Robin Coghlan  
78131

**Report of the Director of City Development**

**Report to: Development Plan Panel**

**Date: 11<sup>th</sup> September 2012**

**Subject: LDF Core Strategy – Publication Draft, Analysis of Consultation**

**Responses: City Centre**

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 6 weeks public consultation during February – April 2012. Section 3 of this report summarises the issues raised and the Table in Appendix 1 suggests how the City Council should respond. Appendix 2 illustrates how the text of the Core Strategy would need to be altered.
2. It is not considered that there are any issues significant enough to justify major changes. 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 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 (6<sup>th</sup> June), the purpose of this report is to review consultation responses in relation to the Placemaking chapter and the overall approach to retailing and centres. Appendix 1 attached, summarises the representors, key issues raised, the City Council's view and proposed action.

## **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 28<sup>th</sup> February to 12<sup>th</sup> 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)

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 Strategic Policy SP3 sets out the role of the city centre in ten points. These cover a wide range of matters including use, character, transport, spaces, flooding etc. Consequently, the public comments received raise a wide range of issues. The main points raised include flood risk, impact of development on the motorway network, re-use of buildings, encouragement of residential use, making the city centre more family friendly, protecting the character and cultural offer of the city centre and acknowledging the potential of Holbeck Urban Village.
- 3.2 Policy CC1 deals with the quantity of development to be planned for in the City Centre and management of the development of town centre uses. The main points raised include:
- Questioning the quantity of retail growth planned for in the city centre

- The prescription of the criteria for applying NPPF sequential and impact tests for different sizes of development inside the city centre but outside of designated retail areas
- Centre designations and boundaries
- Allowances for bulky goods retailing
- Conservation, heritage and the public realm

3.3 Policy CC2 deals with the southern half of the city centre. Public responses have queried the role of Crown Point Retail Park, boundaries and the level of detail of proposals for the area.

3.4 Policy CC3 seeks enhancement to connections both within the city centre and to adjoining neighbourhoods for pedestrians and cyclists. Comments relate to the level of detail provided and to the appropriateness of certain transport strategy ideas set out on Map 11.

#### **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 City 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, 10<sup>th</sup> 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 about Strategic Policy SP3 and Policies CC1, CC2 and CC3 concerning the planning of Leeds City Centre. None of the issues are considered significant enough to justify any major changes. The remaining issues warrant only minor changes or no changes at all.

### **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 documents<sup>1</sup>**

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) web pages or by contacting David Feeney on 247 4539.

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<sup>1</sup> 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: City Centre

### Core Strategy Publication Draft - Analysis of Consultation Responses

#### Policy SP3: Role of the City Centre

<b>Representors</b>	<b>Issue and Suggested Changes</b>	<b>LCC Opinion</b>	<b>LCC Action</b>
Environment Agency (0046)	Flood risk i) Criterion vi should require a sequential test for flood risk in line with the NPPF. A link with an amended Spatial Policy 1 should address this issue. ii) Criterion (vii) creating open spaces should be viewed as a form of flood mitigation measure, with areas such as the proposed City Centre Park (South Bank) acting as a green-blue open space area that is allowed to flood before the onset of flooding of built up areas.	The testing of development proposals for flood risk in line with the NPPF is required for all development under Core Strategy Policy EN5. This policy also commits the Council to manage and mitigate flood risk by making space for flood water in high flood risk areas. This would apply equally to high flood risk areas in the city centre, including the south bank park, as areas outside of the city centre. There is no need for Policy SP3 to duplicate the role of Policy EN5	No change
Highways Agency (0060)	Whilst office growth in the city centre is supported in principle, insufficient mitigation is proposed to deal with the effects of traffic on the motorway network. Mitigation needs to be considered in the context of local road and other transport infrastructure initiatives.	The city centre is the most accessible part of Leeds MD by public transport and is therefore very sustainable for office development.  Leeds City Council is currently working with the Highways Agency and its consultants to assess the impact of the Core Strategy on the Strategic Road Network. This work will provide a more detailed examination of the impacts than has been possible to date. The intention is to reach an agreed position on the impacts and agree appropriate mitigation where necessary.	No change
Leeds Civic Trust (0062)	Buildings can contribute to the vitality of the city centre. Criterion iv) should also plan for the re-use of buildings, with encouragement for the positive use of vacant upper floors	Agree.	Minor change. Insert "and buildings" after "sites" in criterion iv of Policy SP3.
Leeds Civic Trust (0062)	In clause vii), places and spaces should also aim to be family friendly, and the needs of pedestrians should be put before those of vehicles	Agree that "family friendly" should be added. Priority over vehicles depends on individual site circumstance	Add ", family friendly" after "attractive" in criterion vii of Policy SP3
Leeds Civic Trust (0062)	Existing routes within the city also need attention, as well as connections to adjoining neighbourhoods. Traffic dominates some parts of the centre. Re-write criterion viii): "improving	Covered in more detail by Policy CC3	No change

	connections (particularly pedestrian and cycling connections) within the City Centre (including city centre south) and between the City Centre and adjoining neighbourhoods.”		
English Heritage (0099)	The distinct identity of Leeds City centre is a key contributory factor in its attractiveness and all other actions set out in this Policy need to be balanced against it. Insert an additional criterion: "Safeguarding and reinforcing those elements which contribute towards the distinct identity of the City Centre”	Use of Policies P10 and P11 in combination with the recognition of the distinct character set out in paras 5.1.11 – 13 as well as Character Area and Conservation Area statements should be sufficient to safeguard and reinforce the identity of the city centre. Policies P10 and P11 are proposed to be strengthened in the first Proposed Changes.	No change
WYG (0420)	The supporting text in paragraphs 4.3 and Policy SP3 fail to give enough emphasis to the role of the city centre in delivering 10,200 dwellings during the plan period	Objective i) of the Spatial Vision clarifies that there is a place for residential development. Policy SP7 sets the housing distribution including 10,200 dwellings for the city centre. No need to duplicate in Policy SP3	No change
WYG (0420)	Para 4.3.3 should mention the development potential of Holbeck Urban Village	Agree	Minor change. Insert text to para 4.3.3 after "...City Centre park." To state: "Holbeck Urban Village in the south west of the City Centre offers opportunity for significant development of a scale compatible with its historic street pattern and buildings."
WYG (0420)	Policy SP3 is not aspirational enough. The policy should recognise the need for the City to attract inward investment and deliver infrastructure to support the Vision for Leeds to be the 'Best City in the UK by 2030	The supporting text explains that Leeds is aspirational about the city centre.	No change
(0420) WYG	Make the retail offer more robust. Consideration should be given to comparison goods retailing being introduced into mixed use regeneration schemes in order to introduce vitality and distinctiveness.	Dealt with under Policy CC2	No change
Harrow Estates via WYG (0420), Taylor Woodrow, Mirfield, Keyland, Chatford, Taylor Wimpey, Kebbell, Warner, Redrow, Miller, Barrett Leeds,	Criterion (x) to broaden the housing offer with more family housing will be frustrated by a lack of sites to meet this aspiration in the required quantities and lack of clarity on how necessary supporting infrastructure will be delivered. Policy cannot be effective, therefore unsound.	A large number of deliverable and developable sites are available for housing development as demonstrated by Leeds' Strategic Housing Land Availability Assessment. Paragraph 5.1.17 of the Core Strategy Publication Draft explains the means for delivering the range of supporting services.	No change

Barrett York via Dacre Son & Hartley (0480). T Emsley via ID Planning (1186) E Thornhill, R Ogden, Consortia of house-builders, ELE NQ Consortia, Barrett DWH GND, GND Ltd and Evans, Redrow Homes and Wortlea Estates via ID Planning (5671) Redrow Homes Yorkshire (1938), Barratt Homes and DWH (5895)			
The Theatres Trust (2029)	<p>Whilst the plan promotes the cultural offer of the city centre, Spatial Policy 3 (i) and Policy CC1 c) provide insufficient protection of existing facilities to maintain this vibrancy.</p> <p>Amend criterion iii, adding a sentence EXISTING FACILITIES WILL BE PROTECTED AND ENHANCED AND THEIR LOSS RESISTED UNLESS DEMAND CAN BE MET FROM ALTERNATIVE PROVISION IN THE CITY CENTRE OR EDGE OF, OR THERE IS NO DEMAND FOR SUCH FACILITIES AND NO OTHER COMMUNITY OR CULTURAL SERVICE CAN MAKE USE OF SUCH FACILITIES.</p>	<p>Policy CC1 criterion c) says "...cultural facilities to be retained in the city centre". The last sentences of para 5.1.16 explain that because cultural facilities generate large footfall and trips they should be retained in the city centre; other new development must therefore be planned to sustain rather than undermine major cultural facilities; exceptions may be made to help retain historic buildings or where floorspace will be replaced.</p> <p>This is as strong as the text suggested for retaining existing cultural facilities.</p>	No change
Mr Cedric Wilks (4783)	The modern shopping centres of the city centre should be replaced with Victorian frontages, as far as financial resources allow	Victorian frontages will not always be appropriate in individual street contexts	No change
Mr Cedric Wilks (4783)	More and cheaper parking and "park and ride" should be made available to attract visits to the city centre	This is dealt with adequately in Policy T1	No change
Mr Cedric Wilks (4783)	The city centre should be kept cleaner to help attract visits to the city centre	Beyond the scope of the Core Strategy	No change

Hammersons via Barton Willmore (4816)	SP3 should make specific reference to the Eastgate and Harewood Quarter redevelopment as it is a key part of the vision for enhancing the city centre.	Not necessary to be so site specific in this strategic policy. The Eastgate proposal is mentioned already in the Profile of Leeds (para 2.11), Spatial Vision (para 3.2), City and Town Centres (4.2.4), Shopping in the City Centre (5.1.6-7), Policy CC1 and Policy CC2	No change
ASDA via Osborne Clark (5889)	The city centre's role for major retail should not preclude the development of retail development outside of the City Centre where facilities can cater for specific needs and meet the requirements of the NPPF	SP3 does not preclude this	No change



## Core Strategy Publication Draft - Analysis of Consultation Responses

### Policies CC1, CC2 and CC3: City Centre

Representors	Issue and Suggested Changes	LCC Opinion	LCC Action
<b>Policy CC1: City Centre Development</b>			
	<b>Retail Growth in the City Centre</b>		
RED Property Services (5719) for Scarborough Development Group	<p>Retail Study concluded there was a need for a large amount of additional retail comparison floorspace across district. CS does not specify district wide needs, instead only suggesting 31k additional for City Centre. Therefore, does not satisfy NPPF para 23 which says 'It is important that needs for retail, leisure, office and other main town centre uses are met in full'.</p> <p>CS should seek to plan for the retail needs that have been identified for the Leeds district as a whole rather than focus too narrowly on the City Centre.</p>	<p>The NPPF sets out that plans should be justified: "the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence." The Leeds Centres Study shows there is wider need for comparison space, particularly in the White Rose area as result of overtrading, but particularly in the first 5 years there needs to be the opportunity for Trinity and Eastgate (and Trinity Wakefield) to be successful and for the City Centre to readjust to this floorspace. This is therefore consistent with all the NPPF principles. As with all major schemes, they will cause internal trading effects and there will be readjustments, as has occurred over the past few decades. Additionally the Eastgate and the Harewood Quarter is a major commitment, and its delivery must be a priority due to its significant physical and economic regeneration benefits. This could bring forward other redevelopment opportunities within or closely related to the Prime Shopping Area. A further retail study will be necessary before any further addition to the floorspace.</p> <p>Experian assumptions and other data sources since the Study was published have decreased growth forecasts, and increased forecasts for online shopping. Retail trading is probably at its most uncertain in the modern era. Future 'capacity' based on trend projections can only be subject to similar uncertainty. Alongside the ongoing recession this</p>	<p>Minor change. Replace "all" with "the vast majority" in line 4 of para 5.1.7</p>
ASDA via Osborne Clark (5889)	<p>The city centre's role for major retail should not preclude the development of retail development outside of the City Centre where facilities can cater for specific needs and meet the requirements of the NPPF</p>		

		<p>means that it is necessary to take a cautionary approach to providing the full level of floorspace identified in the Study. An updated study once the impact of Trinity and Eastgate has been established is the appropriate mechanism to identify how much further floorspace would be required in the longer term. The Site Allocations DPD will also consider opportunities within and on the edge of centres including opportunities to change boundaries. As the main City Centre commitments are delivered and begin to trade, medium and longer term prospects will become clearer. Major schemes are being brought forward and the context established to address longer term needs, therefore it is considered that the approach is justified and in broad terms provides significant flexibility for the LDF to bring forward development of an appropriate scale and location as evidence becomes more certain. It is concluded the approach is sound in the context of NPPF para 182 when read in its entirety.</p> <p>As stated in para 5.1.7, the plan is to expect the city centre to accommodate major shopping provision to meet Leeds' needs for additional comparison shopping provision. The use of the word "all" is considered too absolute when Town Centre schemes may be possible.</p>	
Aviva Life & Pensions (UK), and The Crown Estate via Indigo Planning (0806)	The plan creates uncertainty on how comparison retail floorspace growth will be accommodated. By planning for 31,000sqm of growth as a long term matter, creates uncertainty for the short and medium periods. This will hamper Crown Point Retail Park's (CPRP) ability to attract occupiers and compete with unrestricted out-of-centre retail parks. The Core Strategy needs to identify locations to accommodate strategic development needs now. Given the recognition of the CPRP's current complementary role, this should be formally recognised now in conjunction with the proper planning of the wider South Bank Area. Without properly outlining what will be delivered and where, the plan will not be "effective" and not be "sound".	<p>The Centres study (Colliers 2011) concludes that it is not necessary – at this stage – to consider any further growth of the city centre shopping area (para 10.10). The Trinity and Eastgate Schemes will suffice for the short-medium term, save for some re-modelling of existing city centre shopping centres.</p> <p>The CS policies give scope to consider in a relatively short term the relationship between CPRP and the southern half of the city centre.</p> <p>However, if the CS called for subsequent DPDs to identify locations and sites to accommodate trend projected growth over the entire plan period it is a</p>	No change.
Morley Town Council	We support the aim of preserving the primacy of the city		

(4825)	centre. One of the attractions of the city centre is its compactness; it would be a mistake to expand it beyond reasonable walkability.	significant risk that owner/developer aspirations could result in significant “planning blight”. It is concluded that the CS approach to planning for retail growth in the city centre is sound in the context of NPPF paragraph 182 when read in its entirety.	
Osborne Clarke (5889) for ASDA	Policy CC1 ASDA support the approach to the location of development in the City Centre. The focus of development within the City Centre will increase investment and help to maintain the City as a regional focus for development.	Detailed matters of what will be delivered and where would be best handled in a site allocations document rather than the CS.	
Montagu Evans (5723) for Threadneedle	Part (ii) of the policy implies that 31,000 sq m of net additional retail space (comparison) will be allowed following completion of the Trinity and Eastgate schemes.  If development is within the PSQ, no need to reassess need.  Replace words 'FOLLOWING COMPLETION OF' with 'TO'.	Does not make sense to replace “following completion of” with “to”. The need for 31,000sqm already takes into account the additional floorspace being provided by Trinity and Eastgate	No change
Aviva Life & Pensions (UK), and The Crown Estate via Indigo Planning (0806)	Para 5.1.7 sets a policy approach that would preclude any development beyond the PSQ until all vacant floorspace has been absorbed. This is contrary to the NPPF. It has been a longstanding principle that vacant floorspace is an accepted and expected component of the make-up of any town or city centre arising from natural ‘churn’ of retailers and providing scope. Therefore, each proposal needs to be assessed having regard to its individual merits.	In the context of para 5.1.7 the type of vacancy referred to is that which is caused as a consequence of the opening of major new schemes such as the Trinity and Eastgate shopping centres. This would be vacancy above that expected from natural “churn”. As such, it would provide sequentially preferable alternatives to be considered in edge/out of centre retail proposals	No change
The Victorian Society (3059)	5.1.7 states “...Once the Trinity and Eastgate retail developments have [been] completed it is probable that some retail operators will vacate floorspace elsewhere in the PSQ...” This is of great concern, and we urge the inclusion of specific measures to protect the existing and historic parts of the PSQ from damaging vacancy and neglect.	The intention of the planned approach set out in para 5.1.7 is to avoid premature approval of further major retail developments that could exacerbate or prolong higher than normal vacancy rates in the city centre.	No change
WYG (0420)	Policy CC1 point iv is not clear at what supporting services actually means.	It is explained in para 5.1.17	No change
	<b>Criteria d), e) and f) of Policy CC1</b>		
Aviva Life & Pensions (UK), and The Crown Estate via Indigo Planning (0806)	The principle of locally set thresholds for sequentially testing such proposals is seen as a reasonable approach, although the thresholds themselves are (i) arbitrary, (ii) unnecessarily complex, and (iii) more onerous than those applied outside of the City Centre which is illogical. Each proposal will have	Complexity does not make policy unsound. The thresholds are designed to remove certain sizes of development from the sequential and impact tests. This is positive planning.	No change

	different implications, depending on the particular characteristics of the scheme, and it is not effective to apply such a prescriptive set of standard thresholds in the manner currently drafted – the approach needs to be simplified.	1500sqm is a reasonable threshold for impact assessment. The NPPF makes it clear that there can be locally set thresholds. This threshold relates to current and continuing Leeds development management experience of supermarket and superstore proposals.	
WYG (0420)	Policy CC1e is overly prescriptive as is and may not enable successful regeneration and successful residential schemes.		
DPP (5543)	<p>Parts e) ii, iii, iv of Policy CC1 are unduly prescriptive and detailed. Paragraph 24 of the NPPF is quite clear in the application of the sequential approach and this has not fundamentally changed from that contained within PPS4, i.e. in centre, followed by edge, followed by out of centre sites which are accessible and well related to the centre. There is no justification for complicating the sequential approach in the way that Policy CC1 seeks to. It's prescription and inflexibility are contrary to para 182 of the NPPF.</p> <p>A far simpler approach would be for criterion e) of the Policy to be more akin to criterion d) which deals with comparison retailing. Within the City Centre the sequential test for convenience retailing should include the Primary Shopping Quarter.</p>		
DPP (5543)	Object to convenience retailing that is above 1500 sq m gross requiring an impact assessment and consider that this threshold is not locationally proportionate and should be reduced.		
Montagu Evans (5723) for Threadneedle	<p>CC1: Clauses (i) (ii) and (e)(iv) should be clarified as to which floorspace measure is used (i.e. gross external area/gross internal area/net sales) as '(gross)' is referred to in (e)( i) - (iii).</p> <p>In (e) (i) - (iii) there should be clarification whether this is a GEA or GIA figure</p>	Agree. Clarification will help prevent misunderstanding. Clarify that all measures in CC1 are Gross Internal Areas	<p>Minor Change. In criterion e) delete "(gross)" from i), ii) and iii). After f) add "Nb All thresholds are for Gross Internal Area"</p> <p>For further clarity, revise overlapping thresholds in part e) to "201-372" and "373 – 1,499"</p> <p>For further clarity, define "convenience facilities"</p>

			in the Glossary
DPP (5543)	Support clause e) i) allowing convenience retailing below 200 sqm gross anywhere in the city centre. Small scale local shopping provision performs an important role for residential and business communities and accords with both the economic and social roles of sustainable development.	Support welcomed	
DPP (5543)	We have a particular concern in relation to the requirement for the sequential search to incorporate a '5 minute inbound off peak drive time'. This is simply unrealistic and unworkable.	It is necessary to provide a general benchmark for the distance from the proposed development to search for sequentially preferable sites and buildings. A 5 minute drive time is considered appropriate for development of 372sqm or more in the city centre	No change
Aviva Life & Pensions (UK), and The Crown Estate via Indigo Planning (0806)	The final paragraph of Policy CC1 part e) says proposals will be resisted where convenience proposals would be "harmful". Paragraph 27 of the NPPF states that that proposals should only be refused on 'impact' grounds where there will be a 'significant adverse impact'. The Policy should be revised to reflect the NPPF definition.	Agree	Replace "harmful" with "significantly adverse" in part e) of Policy CC1
Barton Willmore (4816) for Hammerson UK Properties Ltd	Hammerson is concerned that criteria d. and e. could support future edge and out-of-centre retail development which could impact upon the delivery of the EHQ scheme. Such support is premature given that Policy CC1 acknowledges the need for a further retail study to assess future need. As currently worded Policy CC1 does not comply with the aims of the NPPF (para 23) or Policies SP1, 2, 3, 8 and 9 which direct development to the City Centre in the first instance.  CC1 should be amended to explicitly support the 'City Centre first' approach and the requirement for sequential and impact assessments for edge and out-of-centre schemes, in accordance with the NPPF (paras 24 – 27) and the thresholds identified in Policy P8.	Criterion d) provides a strong preference for comparison floorspace to be located in the PSQ. To remove any doubt, add text about compliance with NPPF tests. The national threshold of 2,500sqm would apply for impact testing of comparison floorspace in the City Centre as this is the highest level of the centres hierarchy.  Criteria under e) are designed to loosen the restrictions of the NPPF sequential test for small scale convenience shops and services within the city centre. This is necessary to allow provision of corner shops to serve new development and to help promote the vitality of existing parades (to be renamed "local centres"). It is not considered that limited acceptance of additional small scale convenience provision – outside of the NPPF sequential test – would impact upon the delivery of the Eastgate scheme.	At the end of criterion d) of Policy CC1 add "This will be according to NPPF sequential testing, and, in the case of proposals of 2,500sqm or more according to NPPF impact testing."
Jenny Fisher Chamber of Commerce Sub-Group	Part iv) add "...and improvements to the public realm	Agreed at Development Plans Panel as a consequence of changes to Policy P10	Part iv) add "...and improvements to the public realm"
		The City Council considers a minor change necessary to offer greater scope for A2 – A5 uses to be supported in principle in city centre locations where	Add to the end of e) ii) "...or if the proposal is not complementary to

		these uses can be complementary to particular functions of the city centre, such as office areas or leisure and entertainment areas along the riverside.	the function of office areas or entertainment or cultural destinations, including the waterfront”
	<b>Centre Designations and Boundaries</b>		
DPP (5543)	The Policy is based around references to the Prime Shopping Quarter and designated parades and yet there is no clear definition of either. The Colliers CI Retail Study, at paragraph 4.11, defines the area but we can see no such reference within the Core Strategy and for purposes of clarity the area should be defined in diagrammatic form.	The PSQ is defined in the UDP. The Site Allocations DPD will review the PSQ boundary.	No change
DPP (5543)	‘Designated’ parades are also only referred to in text form at paragraph 5.1.10 of the Core Strategy. Notwithstanding this we consider, in any event, that a sequential test to include neighbourhood parades is incorrect and inconsistent with the NPPF Annex 2 of which defines town centres as applying to ‘city centres, town centres, district centres and local centres but excludes small parades of shops of purely neighbourhood significance’.	The term parade is intended to mean local centre.  The need for convenience facilities in the southern half of the city centre to support the growth of residential and working populations was recognised in the City Centre Area Action Plan Preferred Options. It is recognised in para 5.1.10 which also accepts the need for new shopping parades.	Revise para 5.1.10 to replace “shopping parades” with “Local Convenience Centres” and list the named locations as bullet points with an additional bullet point to state “Further Local Convenience Centres may be identified in response to new evidence or new development” Revise Policy CC1 e) ii), iii), iv) and final paragraph to replace “designated parades” with “Local Convenience Centres”. Add “(New Dock)” after Clarence Dock. Update Map 10 to illustrate the centres.
WYG (0420)	Whilst the need to deliver convenience goods retailing outside the PSQ to support a growing residential population is reflected in CC1, there is need for a further major convenience good store in the south of the city centre. This should well linked to the public transport network and pedestrian links and in a location which will encourage regeneration. As such, para 5.1.10 should enable more flexibility for more extensive convenience good retailing subject to normal retail tests.		
Montagu Evans (5723) for Threadneedle	5.1.7 and 5.1.8 Support the updating of retail frontages as a matter of priority because it affects the Core Shopping Centre	Support Welcomed	No change
Montagu Evans (5723) for Threadneedle	In terms of part (f), relies on up to date definition of primary and secondary shopping frontages. The frontage plan relating to The Core shopping centre on The Headrow is out of date showing the layout of the now redeveloped Headrow Shopping Centre. In light of this discrepancy there need to	This matter will be addressed in the Site Allocations DPD.  Policy CC1 Part “f” does not need to refer to the prospect of change in designation of frontages.	No change

	be: a) an explicit exception for The Core; or b) supplementary wording of 'unless the Primary Frontages and Secondary Frontages have been superseded'.	Whatever frontages are added, withdrawn or modified, policy will apply accordingly	
	<b>Bulky Goods Retail Area Designations</b>		
Aviva Life & Pensions (UK), and The Crown Estate via Indigo Planning (0806)	Lack of clarity regarding what areas are designated for bulky goods retailing.	The UDP designates two areas of the City Centre for retail warehousing which were designed for bulky goods retail operators. The Site Allocations DPD will examine whether and where new areas might be designated. The Core Strategy acknowledges that the CPRP function has changed away from bulky goods (5.1.7); it will be the role of the Site Allocations DPD to re-designate it.	No change
Aviva Life & Pensions (UK), and The Crown Estate via Indigo Planning (0806)	The designation of the CPRP as a 'bulky goods' retail warehouse park location does not reflect the prevailing planning status of the majority of units at the CPRP with only 3 of 20 subject to such controls, the remainder being able to sell an unfettered range of non-food (plus an allowance of food) goods. Treating CPRP as a bulky goods location that should only accommodate bulky goods retailers is objectionable.		
	<b>Residential Use</b>		
Leeds Civic Trust (0062)	We support the statement in para 5.1.14 that a wider variety of house sizes and types should be created to accommodate families wishing to live in the city centre. We support the criteria in the policy for mixed use with residential use of upper floors. CC1 Criteria b) should include the promotion of residential use of existing as well as proposed upper floors.	Support for residential development in the city centre is welcomed.  Agree that residential development in the city centre should be encouraged in line with bullet point 9 of paragraph 23 of the NPPF, and should be encouraged in both new development and changes of use, subject to considerations of residential amenity and the need to avoid prejudicing the prime function of the city centre to host town centre uses.	Replace criterion b) with the following: "Encourage residential development including new buildings and changes of use of existing providing that it does not prejudice the town centre functions of the city centre and that it provides a reasonable level of amenity for occupiers"
Leeds Civic Trust (0062)	There is a large amount of vacant space on existing upper floors, much of it in historic buildings where residential use should also be encouraged.		
WYG (0420)	No detailed assessment as to the ability to deliver 10,200 dwellings.	The SHLAA provides evidence of ability to deliver 10,200 dwellings	No change
WYG (0420)	We support the recognition of the need to support the growing residential community in terms of services such as Gps, nurseries, etc as at para 5.1.3	Support welcomed	No change
Barton Willmore (0057) on behalf of Templegate	Paragraph 5.1.15 states that there should be higher standards of sustainability in dwellings within the Aire Valley Eco Settlement. This aspiration needs to be considered within the overall viability of this project, including	LCC maintains an aspiration that the standards of sustainability in dwellings within the Aire Valley Eco Settlement should be higher than normal, and this should certainly be achievable in the vicinity of the	Minor change. Add the following text to the end of para 5.1.15, "...providing that

	contributions towards public transport infrastructure and affordable housing. Also much of the AV land suffers from significant abnormal costs Paragraph 5.1.15 should be deleted.	planned combined heat and power unit. But LCC acknowledges that the cost of achieving higher standards on the viability of development must be taken into account.	development remains viable”.
	<b>Conservation, Heritage and the Public Realm</b>		
Leeds Civic Trust (0062) English Heritage (0099)	We support the recognition in para 5.1.13 that a character appraisal of the city centre needs to be carried out to review Conservation Area boundaries.	Support welcomed	No change
Leeds Civic Trust (0062)	The policy itself makes no mention of the importance of heritage in the city centre. A statement on proposals for Conservation Area Appraisals is required in policy CC1	The importance is recognised in paragraphs 5.1.11-13. Policy control is provided through policies P10 and P11	No change
Leeds Civic Trust (0062)	There is no mention of the role of development in improving the public realm in the city centre. Although Policy P10 may be the place to expand on this, the importance of the city centre warrants its inclusion in this policy. The public realm is the most visible and most used part of the city and this policy should spell out clearly that the aim of achieving the soubriquet of “best city in the UK” requires a public realm which is second-to-none in its quality of design, its distinctiveness, its sense of place and its attractiveness to users.  Include In the policy that any development taking place in the city centre must not only maintain and enhance of the quality of the public realm around it but must also be expected to make a contribution to its enhancement.	Improvement to the city centre public realm is dealt with by Policy CC3, as well as Policy P10.	No change
The Victorian Society (3059)	5.1.1 We strongly support the reference to “...the distinctive historic core...” It is on this that so much of Leeds’s distinctive and successful character depends.	Support welcomed	No change
	<b>Miscellaneous</b>		
Montagu Evans (5723) for Threadneedle	5.1.6 The “Core Shopping Centre” should be mentioned as one of the enhanced schemes	Mention of the recent refurbishment of the Core Shopping Centre is not of strategic significance	No change
<b>Policy CC2: City Centre South</b>			
Leeds Civic Trust (0062)	COMMENT Support identification of city centre south as an area of substantial development opportunity. The policy could go further in encouraging a mixed community in the area which would include family housing and the provision of facilities which would enable such a community to be sustained..	The proposed text would duplicate policy commitment already provided in Policy SP3 (x) for a broader housing mix (including family housing) and in Policy CC1 (iv) for supporting services and open spaces	No change



	<p><b>SUGGESTED CHANGE</b> Amend the phrase "...substantial opportunity for residential development." to "...substantial opportunity for development which would result in a mixed neighbourhood which would include family housing and the provision of facilities which would enable the resulting community to be sustained."</p>		
Leeds Civic Trust (0062)	<p><b>COMMENT</b> The city centre boundary has no logical boundary along Leathley Road and by the river it follows no topographical feature. Development on both sides of the existing boundary are of a similar type and extending the boundary will allow a more comprehensive approach to the future of City Centre South.</p> <p><b>SUGGESTED CHANGE</b> The boundary of the city centre should be extended to the recently completed ring road.</p>	The Site Allocations DPD will be the place to examine any boundary changes needed to create a more logical fit.	No change
WYG Planning (0420)	The policy for the southern half of the CC needs to be assessed in greater detail. Concern that this policy and reference to City Centre connectivity in CC3 and Diagram 6 are insufficient to provide a robust and deliverable strategy for the CC and that the need for quality of delivery required for schemes in the CC is not defined clearly.	The Core Strategy is not the place for detailed locational strategy.	No change
Indigo Planning (0806) for Aviva Life & Pensions (UK), and The Crown Estate	<p>Support the recognition of the potential future role that CPRP could play within the City Centre, but object to the uncertainty around how and when this will be applied. A simple, NPPF compliant approach to assessing proposals outside of the PSQ (on their respective merits against the sequential and impact tests) would be more appropriate, with areas such as the PSQ and CPRP confirmed as having sequential preference to other locations.</p> <p>To place an effective moratorium on any retail development within the City Centre until completion of the Eastgate development runs contrary to national policy and is unsound on this basis. NPPF only developments exceeding 2,500 sqm should be subject to testing against their implications for implementation of the Eastgate development, and even then there would have to be a 'significant adverse impact' on the investment to justify refusal – this will clearly not apply to many proposals that could come forward within the City Centre, and certainly not at the CPRP.</p>	The retail study concludes that it is not necessary – at this stage – to consider any further growth of the city centre shopping area (para 10.10). The Trinity and Eastgate Schemes will suffice for the short-medium term, save for some re-modelling of existing city centre shopping centres.	No change

West Properties Ltd	<p>The Kirkstall Road Renaissance Area is defined in a document published by Leeds City Council. The area is characterised by a mix of retail, hotel, commercial and sui generis uses together with a number of brownfield regeneration opportunities which should be identified for redevelopment. The area shares similar characteristics of use and physical form to Leeds City Centre.</p> <p>The area benefits from good public transport accessibility enhanced by the Quality Bus Initiative for this part of the A65 Kirkstall Road</p> <p><b>SUGGESTED CHANGES</b> Include the area within the boundary of Leeds City Centre highlighting the brownfield redevelopment potential of the area in a highly accessible location.</p>	The boundary of the City Centre is provided through the UDP Proposals Map. This may be modified by the Site Allocations DPD but not by the Core Strategy. In any case, there is no evidence that the city centre boundary needs to be extended to accommodate town centre uses. City centre south provides significant opportunity for city centre growth and, with its central location, is sequentially preferable. Nevertheless, Policy EC2 is flexible in allowing office development in edge of centre locations.	No change
WYG Planning (0420) on behalf of Muse Developments	Yes (support?)	Support welcomed	No change
<b>Policy CC3: Improving Connectivity between the city centre and neighbouring communities</b>			
WYG (0420)	City Centre connectivity in CC3 and Diagram 6 require greater detail to provide a robust and deliverable strategy for the CC.	Not appropriate for the Core Strategy to provide greater detail.	No change
WYG (0420)	Proposals for secondary access route across the southern part of the city along whitehall road and jack lane/nineveh road as shown on map 11 are supported as mechanisms to reduce traffic through Holbeck Urban Village.	Support Noted	No change
WYG (0420) for Muse	Support	Support Noted	No change
Montpellier Estates (1780)	Support the Proposed Secondary Access Routes across the southern part of the city along Jack Lane/Nineveh Road and Water Lane to Whitehall Road. In addition we would like to see a similar Secondary Access Route proposed around the back of Pottery Field as marked up on the annotated Map 11 [see map in representation folder]. This would have the benefit of bringing Crown Point retail park 'into the city' for pedestrians by reducing traffic on Hunslet Lane. Also this could pave the way for a reduction of traffic along Crown Point Road bringing development at Yorkshire Chemicals and Tetleys 'into the city'. Better access around the back of Crown Point retail park would provide additional	<p>The city centre transport strategy is work in progress. A new Map 11 to illustrate the latest thinking on the emerging city centre transport strategy was agreed by Development Plan Panel 2/7/12. It provides a 'representative illustration of emerging city centre transport strategy' including a proposed enhanced route around the south of Crown Point Retail Park</p> <p>No detailed work has been done on the line of circulation routes, so there is no guarantee that the proposal as shown will be adopted.</p>	No change

	opportunities for regeneration and development in this part of the city centre over the longer term. This reflects emerging work from Leeds City Council Highways where the 'Southern Loop System' is illustrated on the Leeds City Council slide, "City Centre – Transport Strategy Phase B" (attached)..		
Metro	Map 11 has recently been updated. The updated map needs to be included in the document.	An updated Map 11 was agreed by Development Plan Panel 2/7/12. This set out the latest transport route and infrastructure priorities agreed with Metro and other partners. It is in a schematic form and is labelled as "emerging".	No change
Montpellier Estates (1780)	The proposed River Aire crossing between Criterion Place and the proposed City Park should be marked on Map 11. This is to acknowledge the proposals in the South Bank Planning Statement and Criterion Place Development Brief	Too detailed for the Core Strategy	No change
Gareth Brown (3410)	Vicar Lane outside of the market should be pedestrianized to create a new public square emulating the success of previous pedestrianisation schemes. It would reconnect the Markets to the City Centre, increase footfall and bring Clarence Dock closer to the pedestrianised core.	Too detailed for the Core Strategy. This could be addressed through future non-statutory plans and strategies for the City Centre. Within such context Policy CC3 could be used to help ensure that new development makes appropriate contributions to improve routes, such as pedestrianisation	No change
Gareth Brown (3410)	The proposed new Public Transport Box will still run in front of the market, I feel this is a mistake	An amended version of Map 11, which illustrates the emerging city centre transport strategy, was agreed by Development Plan Panel 2/7/12. The map still shows the Public Transport Box running along Vicar Lane in front of Kirkgate Market, but the map is in a schematic form and is labelled as "emerging". This means that the Core Strategy, whilst embodying the concept of the Public Transport Box, offers flexibility for the emerging City Transport Strategy itself or other more detailed plans and strategies to vary the exact designation on the ground.	No change
North Yorkshire County Council (5942)	Support Policy CC3,	Support Noted	No change

## Appendix 2

### 4.3 Leeds City Centre

- 4.3.1 Leeds City Centre is at the top of the Centres Hierarchy and is the major financial and commercial centre and 'shop window' for the rest of the city and region. As such, one of the objectives of the Core Strategy is for the City Centre to remain a 'successful regional facility'. As the centre of the City Region and district's public transport network, the City Centre is a sustainable employment, shopping, leisure and cultural location, which can promote development that is less reliant on people travelling by car.
- 4.3.2 The City Centre's environmental quality is vital to its economic success and making it a better place to live in, work in and visit. Every opportunity will be taken to enhance streets and spaces in the City Centre, including provision of a major new park. The City Centre will also need to be able to adapt to effects of climate change. One important measure in this respect will be the Leeds Flood Alleviation Scheme, which will help to protect areas at risk of flooding particularly in the south of the City Centre.
- 4.3.3 Whilst the City Centre has seen substantial new development over the last decade, there remain significant parcels of vacant and underused brownfield land available, particularly to the south of the river (The South Bank - linked to the development of a potential urban eco settlement, connecting to Aire Valley Leeds), to the east of Marsh Lane and along the Wellington Street and Whitehall Road corridors to the west. These areas have great potential to accommodate large scale commercial and mixed use development over the plan period along with a City Centre park. *Holbeck Urban Village in the south west of the City Centre offers opportunity for significant development of a scale compatible with its historic street pattern and buildings.* Improving transport links between the City Centre, its surrounding communities, the rest of the City Region and beyond is vital if the economy of the City Centre is to flourish.

#### **SPATIAL POLICY 3: ROLE OF LEEDS CITY CENTRE**

The importance of the City Centre as an economic driver for the District and City Region will be maintained and enhanced by:

- (i) Promoting the City Centre's role as the regional capital for major new retail, leisure, hotel, culture and office development;
- (ii) Making the City Centre the main focus for office development in the District (focussed upon the West End, South Bank & Holbeck Urban Village);
- (iii) Valuing the contributions to the life, vitality and economy of the City Centre made by the Universities, Leeds General Infirmary, Major Museums and Arena
- (iv) Comprehensively planning the redevelopment and re-use of vacant and under-used sites *and buildings* for mixed use development and new areas of public space (including a major City Centre Park in the South Bank Area);
- (v) Improving public transport links between the City Centre and the rest of the District, including Leeds Bradford International Airport;

- (vi) Managing flood risk issues comprehensively through supporting the construction of the Leeds Flood Alleviation Scheme and use of other flood mitigation measures;
- (vii) Enhancing streets and creating a network of open and green spaces to make the City Centre more attractive, *family friendly* and easier for people to use and in consolidating and enhancing sense of place;
- (viii) Improving connections between the City Centre and adjoining neighbourhoods;
- (ix) Support the role of Leeds City Station, enhancing Leeds' role as a regional transport hub and supporting the potential for the integration of high speed rail;
- (x) Expanding city living with a broader housing mix (including family housing).

## **5.1 CITY CENTRE**

5.1.1 Leeds City Centre performs a key economic, strategic and cultural role at the heart of the Metropolitan District and the City Region. The City Centre is the focus for major employment and job growth, a hub for major transport infrastructure, a premier destination for retail development and a range of commercial activity (including a portfolio of major office locations) and the prestigious location for major cultural facilities (including Europe's first purpose built, super theatre arena). A key strength of the City Centre also is the distinctive historic core, high quality public realm and the delivery of iconic architecture and urban design solutions. These factors combine to present the City Centre as a major opportunity for longer term growth and enhancement.

5.1.2 In reflecting the aspiration for Leeds to be the 'best city in the UK', as set out in the Vision for Leeds (including special recognition of the City Centre), the Core Strategy sets out an overall vision, strategy and policy approach. As a basis to facilitate the longer term vitality and viability of the City Centre, this provides the context for longer term growth and economic development, whilst seeking to maintain and enhance its unique and distinctive character. The south eastern quadrant of the City Centre falls within the boundary of the Aire Valley Area Action Plan, for which specific policies are being concurrently brought forward.

5.1.3 In addition to its economic and commercial role, the City Centre is also home to an established and developing residential population. This serves to diversify and enhance its role and reduce the need to travel to work, without prejudicing the primary role for town centre uses. It is recognised that the City Centre environment will need to be planned to support the needs of a growing residential community in terms of open spaces suitable for recreation and supporting services such as GPs, convenience shops, nurseries etc

### **Offices**

5.1.4 In reflecting the status and role of the City Centre for job growth and economic development and the need to maintain longer term competitiveness, the Core Strategy supports the provision of a first class portfolio of opportunities to serve the office market. These include the West End, South Bank (as reflected in the South Bank Planning Framework) and Quarry Hill.

5.1.5 Whilst current forecasts anticipate a need for over 1 million sq m of office floorspace district wide 2010-28, it is considered that most of this space will be accommodated in the City Centre for the following reasons:

- i) To achieve a sustainable pattern of development in Leeds with better potential for employees to reach work by public transport or on foot,
- ii) To enhance the health and viability of the City Centre by positioning the spending power of employees and businesses in close proximity to shops, restaurants, hotels, cultural, leisure and entertainment facilities,
- iii) To offer a flexible portfolio of sites within the City Centre,
- iv) To make use of sites that already have planning permission in the City Centre,
- v) To anticipate that not all out-of-centre permissions will be implemented
- vi) vi. to make optimum use of the extensive areas of development opportunity south of Leeds City Station.

### **Shopping**

5.1.6 Retailing is integral to the City Centre and its primary status within the retail planning hierarchy. In challenging economic circumstances interest in City Centre retailing remains strong with the Trinity development due for completion in 2013 and the Eastgate development moving through the planning process. Together, these schemes will provide 130,000 sq m of net additional retail floorspace. It is also important to recognise the valuable role placed by independent retailers and Kirkgate Market. A number of enhancement schemes are planned including the Merrion Centre and Kirkgate Market.

5.1.7 Beyond the provision anticipated through the Trinity and Eastgate schemes, the City, Town and Local Centres Study 2011 identifies a need for 31,000 sqm of comparison retail space in the city centre, although it will be expected that Leeds City Centre will be the first preference for major shopping provision to meet all the vast majority of Leeds' needs for comparison shopping. The Prime Shopping Quarter (PSQ) is of a sufficient size to accommodate anticipated growth in comparison shopping for at least the short to medium period of the plan. Once the Trinity and Eastgate retail developments have completed it is probable that some retail operators will vacate floorspace elsewhere in the PSQ to take up new opportunities in these schemes. It is only after consequent vacancy has been absorbed or dealt with through modernisation or re-designation of frontages that extension of the PSQ be considered, subject to need being confirmed in a further retail study. The Council may identify locations for possible long term growth in comparison retailing which could be extensions of the PSQ or may be sited in the southern half of the City Centre, possibly associated with the Crown Point Retail Park. Over the years Crown Point has transformed into high street shopping although the retail park layout with free car parking remains. Also, with the redevelopment of the former Tetley Brewery, the physical barrier between Crown Point and the historical core of the city will be removed. As such the Core Strategy longer term vision is to assume that Crown Point Retail Park already functions as an integral part of the City Centre rather than a retail warehouse destination.

### **Shopping Frontages**

5.1.8 A review of the extent of the primary and secondary shopping frontages will be undertaken as necessary, for example on completion of the Trinity and Eastgate shopping centres.

### **Retail Warehousing**

- 5.1.9 Retail warehousing (also known as bulky goods retailing) across the wider district is discussed in section 4 above and section 5.3 below). The first preference is for retail warehousing to be accommodated within the City Centre boundary in order to offer good accessibility for non-car users. Large enough sites are not available in core areas adjacent to the Prime Shopping Quarter, but City Centre locations around Mabgate will be appropriate for accommodating new retail warehousing.

### **Convenience Shopping and Local Centres – Within the City Centre**

- 5.1.10 Given the expected growth in residential and working populations in the City Centre over the plan period a need for further limited provision of convenience stores outside of the PSQ is recognised. This will be particularly true of the southern half where most growth of housing and offices is planned. In accordance with district wide retail policy, development will be controlled to channel this provision into existing and new shopping parades *Local Convenience Centres* within the City Centre along with complementary convenience facilities (e.g. dry cleaners, off-licenses, banking facilities, medical facilities, cafés, and pubs). Existing shopping parades *Local Convenience Centres* include:

- Clarence Dock,
- Great George St,
- Woodhouse Lane (University), and
- Wellington Street.

*Further Local Convenience Centres may be identified in response to new evidence or new development*

### **Conservation**

- 5.1.11 The City Centre has Anglo-Saxon origins and a medieval layout in part, but it is its Victorian buildings which mark it out. John Betjeman said that “No city in the North of England has so fine a swagger...”. There are hundreds of listed buildings in the City Centre, many highly graded such as the Town Hall and the Corn Exchange (both designed by Cuthbert Broderick).
- 5.1.12 The historic environment is the backdrop for many of the economic and cultural activities that make Leeds City Centre successful, which is a testament to a flexible policy of adaptation. The re-use of historic buildings and spaces has been combined with innovative design which has made for the stimulating townscape combining the best of the old with the best of the new.
- 5.1.13 Most of the City Centre is within a conservation area which has evolved by amalgamation and extension since the 1970s. As the shape and pattern of economic development of the City Centre changes and the appreciation of heritage expands, the boundary of the conservation area needs to adapt. The existing conservation area boundary needs to be reviewed following an appraisal of the character and appearance of the conservation area and management policies adopted which reflect on conservation practice over the last twenty years.

### **A Growing Residential Community**

- 5.1.14 With significant house building between 1995 and 2010 a substantial residential population exists in the City Centre. Despite the recession and pause in construction activity, city living remains extremely popular with little vacancy. Considerable land opportunities exist in the City Centre to boost the residential

population further. It is important that efforts are made to make best use of this opportunity in order to make efficient use of land and provide a wide housing offer for Leeds as a whole, as delivery of housing in the City Centre is key to the overall delivery of the Core Strategy. However, with some of the first residents putting down roots and wanting to continue to live in the City Centre it is important that a wider variety of sizes and types of housing are made available than have previously been built. In line with Policy H4 Housing Mix, major housing developments across the City Centre will be expected to contribute to a wider mix of dwelling sizes. Potential for creation of family friendly environments exist on the fringes of the City Centre where densities can be lower, and more green space and supporting services can be delivered, including medical and education services. The City Centre remains a good location for purpose built student housing, but excessive concentrations in one area should be avoided in line with Policy H6.

- 5.1.15 There should be higher standards of sustainability in dwellings within the Aire Valley Eco Settlement which overlaps the south eastern quadrant of the City Centre, *providing that development remains viable.*

### **Hospital, Universities and Culture**

- 5.1.16 The City Centre contains the major teaching hospital, the Leeds General Infirmary which contributes greatly to the vitality and economy of the City Centre through the use of shops and services by thousands of staff, patients and visitors. The same type of contribution comes from Leeds University and Leeds Metropolitan University which have most of their teaching accommodation and a number of halls of residence in the City Centre and from a number of higher education colleges including music and dance which are located in or on the edge of the City Centre. There is also a wider attraction of Leeds as a centre of medical and academic excellence. Major museums exist in the City Centre at the Royal Armouries and City Museum (Millennium Sq) and major theatres at West Yorkshire Playhouse, the Grand Theatre, Royal Varieties and the Carriageworks. These facilities will be complemented by the opening of the Arena in 2013 and all contribute to the vitality, culture and economy of the City Centre. The hospital, universities and cultural venues generate large amounts of footfall and journeys which make it appropriate that their presence is largely retained in the City Centre where public transport accessibility is extremely good. Future growth in office space, shops and dwellings should be planned to sustain rather than undermine the hospital, universities and major cultural facilities. Exceptions may be made to help retain historic buildings or where floorspace will be replaced elsewhere in the City Centre.

### **Supporting Services**

- 5.1.17 The means for delivering the range of supporting services and open spaces will include policy requirements, Section 106 Agreements and/or the Community Infrastructure Levy (CIL), and the natural incentives of the market. Policy G5 sets out the requirements for provision of sufficient civic and green spaces. The Council will support the delivery of other facilities including nurseries, schools, health facilities, convenience shops, hair dressers, laundrettes, dry cleaners, banks, restaurants, cafes, bars, and private gyms, although planning policy control will be exercised to ensure these are suitably located giving first preference to locations in centres.

<b><u>POLICY CC1: CITY CENTRE DEVELOPMENT</u></b>
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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*.

This will be achieved through implementation of outstanding permissions, decision making on planning applications, master-planning, and identification of appropriate sites and mixed use allocations through LDF allocations documents, according to the following criteria:

- a) Favouring locations with the best public transport accessibility for large scale offices,
- b) ~~Mixed office/residential schemes to site residential on upper floors and away from major roads~~ *Encouraging residential development including new buildings and changes of use of existing providing that it does not prejudice the town centre functions of the city centre and that it provides a reasonable level of amenity for occupiers*
- c) Hospital, university, college, and cultural facilities to be retained in the City Centre.
- d) Comparison retail space will only be permitted outside of the Prime Shopping Quarter when it cannot be accommodated within the Prime Shopping Quarter, or in the case of bulky goods retailing space cannot be accommodated also in areas designated for bulky goods retailing. *This will be according to NPPF sequential testing, and, in the case of proposals of 2,500sqm or more according to NPPF impact testing.*
- e) Considering proposals for convenience retailing and convenience facilities (such as dry cleaners, off-licenses, small branch banks, cafés, and pubs) as follows:
  - i) ~~below~~ *up to* 200 sqm acceptable anywhere within the city centre,
  - ii) ~~2001 – 372 sqm sequential test to include the Prime Shopping Quarter and any designated parades~~ *Local Convenience Centres* if they fall within 300m walking distance, *or if the proposal is not complementary to the function of office areas or entertainment or cultural destinations, including the waterfront*
  - iii) ~~3723 – 1,499 sqm sequential test to include the Prime Shopping Quarter, all designated parades~~ *Local Convenience Centres* and those centres identified in Policy P1 that fall within a 5 minute inbound off-peak drive time,
  - iv) 1,500 sqm and above sequential test as per iii) above plus an impact assessment on the Prime Shopping Quarter and ~~parades~~ *Local Convenience Centres* and centres identified in iii) above,
  - v) aggregating floorspace together for the purposes of the above thresholds if more than one unit is proposed,  
  
such that where a realistic alternative opportunity exists in-centre in the first instance, or edge of centre in the second, or where the impact on the viability and vitality of the Prime Shopping Quarter, a centre or ~~designated-parade~~ *Local Convenience Centres* would be ~~harmful~~ *significantly adverse*, proposals will be resisted.
- f) A concentration of shops with ground floor frontages should be maintained in the Prime Shopping Quarter for reasons of vitality. Proposals for non-retail use should not result in the proportion of retail frontage length falling below 80% in Primary Frontages or below 50% in Secondary Frontages. Proposals for uses outside of the “A” class will not be permitted within designated ground floor frontages.

*Nb All thresholds are for Gross Internal Area*

## **City Centre South**

5.1.18 The southern half of Leeds City Centre (all of the area south of the river – see Diagram 6) offers huge potential for development of offices, leisure uses, parkland, and housing, and possibly in the longer term further high street shopping. In reflecting this ambition a South Bank Planning Framework has been developed, setting out opportunities for major redevelopment including the provision of a major new City Centre park, at the heart of the City Centre to the south of the River Aire and improved pedestrian connections to the City Centre and lower Aire Valley. It is an aspiration that this development should be achieved in a street pattern, form and scale which helps unite ‘city south’ with the northern area and confirm its role as an integral part of the City Centre as a whole. It should also provide for connectivity with the existing residential neighbourhoods to the south. In particular, the anticipated opening of the southern entrance to Leeds City Station will help to reinforce the centrality of the southern half of Leeds City Centre.

### **POLICY CC2: CITY CENTRE SOUTH**

The north and south halves of Leeds City Centre are to be more effectively integrated and better connected.

The areas of development opportunity south of the river will be prioritised for town centre uses (see list in Policy P2), particularly large scale office development, delivery of a new park, residential, cultural and leisure uses, and a strong pedestrian corridor to connect Crown Point Retail Park with the Prime Shopping Quarter and east/west links to Clarence Dock and the remainder of the lower Aire Valley. Within this priority, there is substantial opportunity for residential development. Large scale edge of centre development which would prejudice the achievement of this priority will be resisted. The suitability of this area for provision of comparison retail floorspace to be released for development will be considered (subject to the need being confirmed in a further retail study) only after the Eastgate retail development has completed and any subsequent excess retail vacancy in the remaining Prime Shopping Quarter has been taken up.

### **Connections**

5.1.19 To address the physical and social disconnectivity between the City Centre and the inner-city (the Rim), the Council will advance and promote schemes to improve pedestrian linkages. Particular attention will be given to overcoming obstacles to movement such as Armley Gyratory, Sheepscar Junction and the Southern Inner Ring Road/M621. The West Leeds Gateway Supplementary Planning Document provides more information about Armley Gyratory. In line with Policy CC3, new development will need to be laid out and designed to improve connectivity, for example large redevelopment sites might be laid out with new traversing roads or pathways to improve connectivity; smaller developments might enhance an existing route by providing lighting or installing windows overlooking the route to improve natural surveillance.

### **Open Space and Permeability**

5.1.20 Existing public open space will be protected and new space sought in association with new development in line with the green space policies (G3 and G5). Maximum

pedestrian permeability and public accessibility should be promoted in new development.

**POLICY CC3: IMPROVING CONNECTIVITY BETWEEN THE CITY CENTRE & NEIGHBOURING COMMUNITIES**

Development at appropriate locations is required to help provide and improve routes connecting the City Centre with adjoining neighbourhoods and improve connections within the City Centre in order to make walking and cycling easier, safer and more attractive.

# MAP 10. Leeds City Centre





## Report of the Director of City Development

**Report to: Development Plan Panel**

**Date: 11<sup>th</sup> September 2012**

**Subject: LDF Core Strategy – Publication Draft, Analysis of Consultation Responses: The Housing Requirement (SP6) and Distribution (SP7)**

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 6 weeks public consultation during February – April 2012. Section 3 of this report summarises the issues raised and the Tables in Appendices 1a (Policy SP6) and 2a (Policy SP7) suggest how the City Council should respond. Appendix 1b illustrates how the text of Policy SP6 would need to be altered in response to comments on the housing requirement. There are no suggested changes to Policy SP7.
  
2. It is not considered that there are any issues significant enough to justify major changes.

### Recommendations

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 1a, 1b and 2a 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 (6<sup>th</sup> June), the purpose of this report is to review consultation responses in relation to the housing requirement (Policy SP6) and housing distribution (Policy SP7). The appendices attached, summarise the representations, key issues raised, the City Council's view and proposed action.

## **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 28<sup>th</sup> February to 12<sup>th</sup> 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)

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 Strategic Policy SP6 sets out the housing requirement for Leeds including how much land needs to be identified and what criteria are to be used to help identify the land. The housing requirement used to be set by the Regional Spatial Strategy, but it is now incumbent upon Local Authorities to set, based on robust evidence. The following issues were raised:

- i) the scale and justification of the windfall allowance
- ii) accounting for under-provision of housing before the start of the plan period
- iii) planning for an extra "buffer" to the 5 year supply of +5% or +20%
- iv) weaknesses in the underlying evidence
- v) the role of the 20,000 dwellings with outstanding planning permission
- vi) allowance for non-implementation of permissions
- vii) justification for a lower requirement figure during 2012 to 2017
- viii) cross-boundary needs

ix) the merits of the housing land identification criteria

3.2 In support of the overall vision and strategy of the Plan, Policy SP7 provides a steer on the quantity of housing to be planned for at different tiers of the settlement hierarchy and in different geographical areas of Leeds. The main points raised include:

- i) flaws in the geographical boundaries of the Housing Market Characteristic Areas
- ii) lack of evidence to inform the choices of distribution
- iii) sufficiency of housing apportioned to Smaller Settlements and Other Rural areas
- iv) the methodology for distribution
- v) the role of the city centre
- vi) whether “Strategic Sites” should be identified in the Core Strategy
- vii) location specific comments

#### **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 City 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, 10<sup>th</sup> 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 about Strategic Policies SP6 and SP7 concerning Leeds' housing requirement and distribution. None of the issues are considered significant enough to justify any major changes. The remaining issues warrant only minor changes or no changes at all.

### **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 1a, 1b and 2 to the report) for presentation to Executive Board for approval.

### **7. Background documents<sup>1</sup>**

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) web pages or by contacting David Feeney on 247 4539.

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<sup>1</sup> 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 1a**

**Core Strategy Publication Draft - Analysis of Consultation Responses**

**Policy SP6: The Housing Requirement and Allocation of Housing Land**

Representor/Agent	Representor Comments	LCC Initial Response	Action
<b>Windfall Allowance</b>			
<p>Page 147</p> <p>Templegate, Hallam Land, Ashdale via Barton Willmore Planning (0057), Home Builders Federation (0092), Caddick Developments, Comforth and Sons, Airebank Developments, Harrow Estates, via White Young Green (0420), Chatford, Taylor Wimpey, Ashdale, Keyland, Warner, Kebbell, Redrow, Miller, Barratt Leeds, Barratt York, Mirfield via Dacre Son and Hartley (0480), Gaunts Ltd via Peacock and Smith (1027), Quod (1091), , TGMF Emsley via ID Planning (1186), Taylor Wimpey via Turley Associates (1743), Redrow Homes (Yorkshire) Ltd (1938), Miller Strategic Land via Spawforths (2663), Spawforths (2663), Evans Homes No2 Ltd via Drivers Jonas Deloitte (5034), Directions Planning (5121), Walton &amp; Co (5510), DPP (5543), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern</p>	<p>- not allowed by NPPF, which says windfall only allowable for 5 year supplies not local plans                      - 8,000 dwelling allowance not justified by evidence                      - not positive planning</p> <p>Delete windfall references. Add an acknowledgement that a robustly justified windfall allowance may be considered as part of 5 year supply calculations.</p> <p>500 pa not justified particularly during 1<sup>st</sup> 5 years (5867)</p>	<p><b>Allowed by the NPPF?</b>                      The final NPPF says, “Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends...”</p> <p>The five year supply calculation is integral to the local plan calculation about quantity of housing land that needs to be identified. According to the NPPF (Glossary) “windfall” is land not identified as available in the local plan. Therefore, whatever windfall allowance is concluded as appropriate for a 5 year supply has direct effect on the amount of land that needs to be identified in the local plan. As such the Core Strategy housing supply calculations need to plan for a windfall allowance in order to advise on how much land needs to be identified, and avoid taking land out of the Green Belt that is not required</p> <p>Also, including a windfall allowance in the Core Strategy brings greater transparency and consistency to the process. It provides opportunity for a greater number of local housing interests to be heard. Otherwise, if the windfall allowance was subject to discussion on each planning application there would be far greater change of inconsistency and only partial involvement of different housing interests.</p> <p><b>Evidence?</b>                      LCC does have compelling evidence of consistent delivery of</p>	<p>No change.</p>

<p>Quadrant Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), The Diocese of Ripon and Leeds, AR Briggs &amp; Co, Ledston Estate, Meadowside Holdings, Bramham Park Estate, Lady Elizabeth Hastings Charity Estate, Hatfield Estate via Carter Jonas (5681), C/o Hileys Solicitors via LDP Planning (5867), Linton Land Owners via Ian Bath Planning (5883), Barratt David Wilson Homes Yorkshire Homes (5895)</p>		<p>windfall sites smaller than the size threshold for inclusion in the SHLAA to justify an allowance of 500 units per annum. This applies just as much during the 2012-17 period.</p> <p>There is also a historic trend of larger windfall sites being delivered in Leeds. However, because that trend was established during a period when policy restricted release of allocated sites, it will not provide reliable evidence to extrapolate a future trend.</p> <p><b>Positive Planning?</b> Leeds is planning for huge housing growth in all geographies of the city and on different types of land. The quantity of housing planned for is far in excess of actual trends of delivery. The windfall allowance is realistically set based on evidence.</p>	
<p>Banks Development (5036)</p>	<p>The housing provision includes a substantial windfall allowance of 8,000 dwellings. This is described as being conservative but if it is based upon historic levels this should be seen in the context of the prevailing UDP which mainly allocated housing on peripheral sites and left significant opportunities, during a booming market, for proposals to come forward in urban areas. The best opportunities have been taken up or at least permitted and the market has since deteriorated. In these circumstances the windfall allowance is optimistic and should be revised downwards unless the Core Strategy includes the use of PAS sites (see below). Policy H2 would stifle new windfall sites by posing a number of hurdles including accessibility, visual impact, and provision of local services. A more flexible approach to windfall would justify the inclusion of significant numbers in the CS.</p>	<p>The Housing Background Paper examines past trends of windfall development in Leeds and illustrates that the windfall allowance of 500 dwellings per annum is based upon windfall delivery in 2010/11 of 497 dwellings on sites smaller than the size threshold of Leeds' SHLAA. This is a robust conclusion because it ignores much higher levels of windfall development achieved in earlier years and leaves out any allowance for larger sites that the SHLAA is unable to anticipate and identify.</p> <p>The evidence is based on trends of completions rather than permissions so there is no need for a "leakage" or non-delivery allowance.</p> <p>The Inspector at New Forest reached conclusions based on PPS3 national guidance rather than the NPPF which has provision for local authorities to make windfall allowances.</p>	<p>No change</p>
<p>Conservative Group (2950)</p>	<p>Why use a conservative estimate of windfall delivery which seems contrary to past evidence of windfall numbers? The NPPF does not cap the figure allowed to count towards housing numbers.</p>		
<p>Cllr T Ledley (2956), Morley</p>	<p>Doesn't take full account of the scope for counting</p>		

Town Council (4825)	<p>windfall set out in NPPF para 48. Means that calculation of land-take for new housing in CS is unsound.</p> <p>Leeds' windfall target must be revised sharply upwards to reflect what it achieved every year since 1990, particularly since 2000. Following planning permissions granted from 2001-02 onwards, a windfall allowance of 3,000 units a year, or 48,000 over the LDF period, would not be over large and a vast improvement on the 8,000 suggested in CS. To achieve better understanding and reliability of forecasting, there would have to be research into the rates at which permissions on various types of land have been turned into completed units; however, that would be a refinement (4825).</p>		
MFS Land Ltd via Mosaic Town Planning (5672)	<p>Council has not provided 'compelling evidence' to support its windfall allowance of 500 dwellings per annum, as required by the NPPF. In terms of historic performance, the Housing Monitoring Report (September 2011) only includes previous permissions rather than completions and paragraph 4.9 acknowledges that, as windfall schemes are not guaranteed to proceed to development, the rate of actual development has not increased by nearly as much as the stock of permissions. Windfall leakage rates have generally increased since 1994 due to the economic climate. While specific figures are not given for recent years, the report states that there is an average leakage of 11.6% between 1994 and 2008. However, the Core Strategy does not specify any discount on the basis of leakage. In addition, it is now possible to allocate sites for housing based on the SHLAA and employment land review and therefore there will be fewer unidentified sites emerging as windfalls.</p> <p>In other local authorities, Inspectors have found relying on past performance not to be a reliable indicator. Insufficient evidence was presented to the New Forest LDF Core Strategy to justify the inclusion of windfall sites.</p>	<p>The evidence is based on trends of completions rather than permissions so there is no need for a "leakage" or non-delivery allowance.</p> <p>The Inspector at New Forest reached conclusions based on PPS3 national guidance rather than the NPPF which has provision for local authorities to make windfall allowances.</p>	No change

**Under-provision before start of CS Plan Period not accounted for**

<p>Templegate, Hallam Land, Ashdale via Barton Willmore Planning (0057), Home Builders Federation (0092) Harrow Estates and Airebank Developments via White Young Green Planning (0420), Savills (0466), Chatford, Taylor Wimpey, Ashdale, Keyland, Warner, Kebbell, Redrow, Miller, Barratt Leeds, Barratt York, Mirfield via Dacre Son and Hartley (0480), Quod (1091), TGMF Emsley via ID Planning (1186), Taylor Wimpey via Turley Associates (1743), Redrow Homes, (Yorkshire) Ltd (1938), Pegasus Planning Group (4388), Evans Homes No2 Ltd via Drivers Jonas Deloitte (5034), Walton &amp; Co (5510), DPP (5543), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), MFS Land Ltd via Mosaic Town Planning (5672), The Diocese of Ripon and Leeds, AR Briggs &amp; Co, Ledston Estate, Meadowside</p>	<p>The Core Strategy housing requirement should account for years of over/under deliver of housing against the Yorkshire and Humber Plan (RSS) housing requirement in the years preceding introduction of the Core Strategy.  Add at least 1,000 dwellings (1743)  Add 4,600 dwellings (0057)  Add 3,816 or 7,748 if no ceiling (ie no carry-over of 2004-08 surplus) (5543)  Add 3,500 dwellings (0092, 1186, 1938, 5671)  Add 1,216 dwellings (5672)</p> <p>Undersupply in previous years would need to be factored in to total requirement whether the plan date starts April 2012 or April 2013 (0480)</p>	<p>The under-delivery of 3585 dwellings (2004/05 – 2011/12) against RSS requirements is compensated for by i) rounding up the housing requirement of 70,000 dwellings from the SHMA net housing requirement of 68,286 (Table 6.9) and ii) the over-ambitiousness of the RSS requirements.</p>	<p>No change</p>
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Holdings, Bramham Park Estate, Lady Elizabeth Hastings Charity Estate, Hatfield Estate via Carter Jonas (5681), Barratt David Wilson Homes Yorkshire Homes (5895)			
<b>Leeds should plan to meet an extra 20% of its housing requirement</b>			
Caddick Developments via White Young Green (0420), Savills (0466), Quod (1091), Great North Developments Ltd c/o Evans Property Gr via ID Planning (5671), Linton land Owners via Ian Bath Planning (5883)	As a local authority that has not addressed the housing shortfall in recent years, the housing requirement should have a 20% buffer in line with the NPPF  This is likely to be necessary for the period to 2014 (5671)	The additions of +5% of +20% apply to the five year supply calculations expected as part of NPPF paragraph 47. It is not appropriate to build these additions into the housing requirement. Rather, they will need to be added to the 5 year supply requirement throughout the plan period  Whether Leeds is a +5% or +20% authority is not a matter for the Core Strategy. It may vary during the plan period depending upon Leeds' housing supply delivery performance	No change
<b>Evidence of population and household growth – weaknesses leading to over-estimation and under-estimation of the housing requirement</b>			
Arcadia Group via Montagu Evans LLP (5723)	Support the requirement of 70,000 dwellings	Support welcomed	No change
Templegate, Hallam Land, Ashdale via Barton Willmore Planning (0057), Home Builders Federation (0092), Quod (1027), TGMF Emsley via ID Planning (1186), Redrow Homes (Yorkshire) Ltd (1938), Miller Strategic Land via Spawforths (2663), Spawforths (2663), Pegasus Planning Group (4388), Directions Planning (5121), Walton & Co (5510), DPP (5543), Beterspot Limited via Robert Halstead Chartered Surevior (5649), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes,	<ul style="list-style-type: none"> <li>- Experian Autumn 2011 employment growth forecast indicates higher need for housing (0057)</li> <li>- Overall SHMA conclusions are sound, but it is not appropriate to use the fixed headship sensitivity (0092, 1186, 1938, 5671)</li> <li>- Constrained household formation (young people at home) not a reason for reducing the housing requirement – instead, housing supply needs to be expanded</li> <li>- No account of Government's "NewBuy" mortgage scheme</li> <li>- Viability should never be a constraint to delivery – instead policy requirements that make development unviable should be scaled back</li> <li>- Suppression of headship rates, even though the trajectory is for there to be smaller and smaller households.</li> <li>- The SHMA itself (para 6.57) recognises that this type</li> </ul>	<p>The housing requirement of Policy SP6 draws upon the SHMA 2011 for its evidence. The SHMA 2011 was produced according to the national practice guidance in partnership with local housing interests who did not disagree with the overall methodology or main conclusions.</p> <p>Informed by Dr Peter Boden – a nationally recognised expert on population and demographics - the SHMA was able to correct errors in the 2008 based ONS population forecasts for Leeds. These corrections have been vindicated by the most recent 2010 based ONS population forecasts for Leeds released in 2012; the SHMA adjusted forecasts (migration led) are very close to the 2010 based ONS forecasts. This makes the migration led forecasts of the SHMA a robust and reliable starting point for the further scenario and sensitivity refinements set out in the SHMA. In other words, there is no need to</p>	No change

<p>Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), MFS Land Ltd via Mosaic Town Planning (5672), C/o Hileys Solicitors via LDP Planning (5867), Brownberrie Education Trust via Steven Abbott Associates (5878), Linton land Owners via Ian Bath Planning (5883), Barratt David Wilson Homes Yorkshire Homes (5895), Banks Development (5036)</p>	<p>of testing is "difficult to predict with accuracy" and as such, the 2010-2015 sensitivity should not be carried forward into the SHMA conclusions.</p> <p>Doubt about city centre delivery not a reason to reduce the housing requirement – instead, the Core Strategy should apportion more dwellings to outer areas where market demand is stronger.</p> <p>The SHMA scenarios use the 2008 based population projections rather than the most up-to-date ones (ONS 2010-based Sub-National Population Projections). Also, the robustness of a series of constraints used to reduce the number of dwellings required is questionable. There is a risk (which the SHMA acknowledges) that there will be under-provision that would either suppress household formation (leading to larger household sizes) or force other Local Authority Districts to meet Leeds's housing need. This would be in contravention of the NPPF (1027)</p> <p>Under-provision of housing in Leeds will exacerbate affordability problems for people trying to access housing (5543)</p> <p>Comparison with the RSS is unsound (para 4.6.3). The RSS was based on 2004 projections and is therefore out of date. The most recent population projections should be used (4388, 5543).</p> <p>The SHMA only assesses up to 2026; therefore, the Core Strategy housing requirement lacks evidence for the last two years 2026 – 28 of the plan period. This could seriously underestimate the housing requirement by 9,000 dwellings (5878).</p> <p>Raise the requirement to a single annual figure throughout the plan period: 6000pa (0057) 4680pa + 3% vacancy adjustment (0092) 4539 net, 4925 gross (2663)</p>	<p>re-run the SHMA using ONS 2010 based data.</p> <p>The headship sensitivity accurately reflects the reality of Leeds' stabilisation in the long term trend of smaller households. It is not a policy manufactured constraint; it is a reflection of a real population trend evident in Leeds.</p> <p>Overall it is considered that planning for 70,000 dwellings (net) is appropriate for Leeds. Whilst it is at the lower end of the SHMA forecasts, there is robust evidence to underpin the figure. And it sits within a context of well founded scepticism about the ability of housebuilding rates to step up from low annual delivery rates now to delivery rates higher than have ever been achieved in Leeds.</p> <p>Leeds' SHMA is a technical evidence based document rather than a policy making document. As such, public consultation would be inappropriate for its preparation. Nevertheless, the final SHMA was made available as part of the public consultation on the Core Strategy Publication Draft. It has enabled respondents to see the source of evidence for housing policy and comment not only on the policy but on the evidence too if they so wished.</p>	
<p>A Watson (0043), Oulton Civic Society (0065),</p>	<ul style="list-style-type: none"> <li>- SHMA not subject to public consultation (0043, 4681)</li> <li>- dwelling requirement too ambitious – predicated on</li> </ul>		

<p>Boston Spa PC (0112), Drighlington PC (0136), J Allison (4681), Alexandra Hannant (4688), Mr John Buck (4697) Mr David Klemm (4776), Morley Town Council (4825), SEORA (5053), Mr Paul Evans (5873), Claire Donkin (5893), WARD (Wharfedale &amp; Airedale Review Development) (5852), Michael Green (5863), Paul Evans (5873), Claire Donkin (5893), Zoe Main (5900), Alec Main (5901), Sharron Smith (5902), Nicola McNally (5903), Brendan McNally (5904), Shelagh Connor (5907), Joe &amp; Karen Bentley (5909), Wanda Phillips (5910), Alison Watson (5912), Graham George (5914), Michael Littlewood (5917), Yvonne Smith (5918), Peter Smith (5919), Raymond Georgeson (5922), Peter Knighton (5926) Mark Seghetti (5932), Stephen Seddon (5935), Brian Biss (5938), Lisa Jackson (5885), John Powell (5921), David Ginn (5928), Maria Crosby (5933), Sheila Collins (5934)</p>	<p>continuation of high population growth. Doubtful because:</p> <ul style="list-style-type: none"> <li>- economic uncertainty</li> <li>- low historic delivery rates (only 2,000 dpa since 2000, 2,000 since 2009) – as such, extant planning permissions (20,000) will last until 2022.</li> <li>- requirement inflated by over-conservative windfall and demolition allowances</li> </ul> <p>Use up to date measures such as the Census (0112, 5852)</p> <p>Suggested Changes:</p> <ul style="list-style-type: none"> <li>- Review the requirement every 5 years</li> <li>- Control developer land-banking</li> </ul>		
<p>Mr Anthony L Silson (0942)</p>	<p>Release of greenfield and Green Belt land is unsound because fewer dwellings are needed than forecast.</p>		
<p>Conservative Group (2950)</p>	<p>The ONS Sub-National Population Projections 2010-2035 published in February 2012 suggest that Leeds has been basing its housing projections on population estimates that are in fact too high (previously just over 1 million by 2033, now 928,000). Are the housing numbers sound? The housing figures should be revised in accordance with the</p>		

	downwardly revised population projection for Leeds.		
Cllr T Ledley (2956)	CS housing land supply strategy unsound based on inflated estimates of population growth and housing targets derived ultimately from RSS. Means that calculation of land-take for new housing in CS is unsound.		
Taylor Wimpey via Turley Associates (1743)	The support for growth of Leeds Bradford Airport means that more housing land will be needed in locations with easy public transport access to the airport, in accordance with CS Objective 7.	The housing requirement is based on growth anticipated by the Regional Econometric Model. It is not considered that there are any anticipated local economic investments which are of such significance to justify further positive additions to the housing requirement.	No change.
Miller Strategic Land via Spawforths (2663), Spawforths (2663), Pegasus Planning Group (4388)	The housing requirement should be set as a minimum in line with the need to plan for positive growth.	The housing requirement is not set as a ceiling. This is apparent from the inclusion of Policy H2 which allows for housing development – subject to criteria – on unallocated land. Providing the criteria can be met, the housing requirement can be exceeded.	No change.
Pegasus Planning Group (4388)	In terms of the phasing of the housing target, there should be flexibility to allow for improvement of the housing market. Clarifying that the housing requirement is a minimum will help.		
Renew (5105)	It is questionable whether the housing growth targets identified will be achievable. There is some disjunction between the continuing 'preference for brownfield and regeneration sites', the current capacity of the housing market to deliver brownfield development especially to meet the 2012 – 2016 timescale, and the household preference data quoted at 4.6.14 from the SHMA. Will there be a need to review this as the shape of likely future housing market change becomes clearer?	The competing objectives can be married through the phased approach proposed in the CS. Where early phases of land release – which best meet the criteria of Policy H1 – are insufficient to meet needs, further phases can be brought forward to ensure there is always enough housing land. Likewise, the use of the settlement hierarchy and the housing market characteristic areas in Policy SP7 should ensure that all sustainable geographies of Leeds help to provide a varied distribution of new housing to meet the full range of needs and aspirations.	No change
Michael Green (5863)	Lack of evidence that the housing requirement is deliverable in accordance with Core Strategy policy. Lack of means to resolve conflicts.	Deliverability of the housing requirement has been tested using agreed SHLAA delivery forecasts for sites and consideration of other policy objectives and constraints such as need for employment land, flood risk, Green Belt objectives etc. More detail of this testing will be made available for the Core Strategy examination.	No change
<b>Factoring in 20,000 dwellings in outstanding planning permissions (paragraph 4.6.13)</b>			
Oulton Civic Soc (0065) Aberford PC (0106) Boston Spa PC (0112)	Reliance on extant planning permissions in 4.6.13 – not clear how the 20,000 are factored into the requirement or the windfall allowance. Clarify	The reference to 20,000 dwellings in extant planning permissions in paragraph 4.6.13 is relaying a fact: in 2012 Leeds had this number of dwellings in extant planning permissions. These 20,000 dwellings do not form part of the calculation of the housing requirement or the windfall	Add a footnote to explain that the SHLAA is used to determine
Morley Town Council (4825)	Outstanding planning permissions for 20,000 dwellings need to be re-assessed; some might prove unlikely to be		



	implemented, but, if discounted might notionally "free up" land for other development and so could be added back in.	allowance. Neither does the remaining capacity of the UDP allocated sites.	deliverability of extant planning permissions.
Home Builders Federation (0092), Chatford, Taylor Wimpey, Ashdale, Keyland, Warner, Kebbell, Redrow, Miller, Barratt Leeds, Barratt York, Mirfield via Dacre Son and Hartley (0480), TGMF Emsley via ID Planning (1186), Taylor Wimpey via Turley Associates (1743), Redrow Homes (Yorkshire) Ltd (1938), Pegasus Planning Group (4388), Pegasus Planning Group (4388), Walton & Co (5510), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), C/o Hileys Solicitors via LDP Planning (5867), Linton land Owners via Ian Bath Planning (5883), Barratt David Wilson Homes Yorkshire Homes (5895)	<p>Reliance on 20,000 dwellings in extant planning permissions in 4.6.13 unsound because deliverability not tested. This is expected according to the NPPF paragraph 47.</p> <p>Also unclear how remaining UDP housing allocations (7,500 dwellings) have been factored in. (4388)</p> <p>Use SHLAA as source of supply.</p> <p>Clarify in the text that the Site Allocations DPDs will need to use robust evidence of site deliverability (4388).</p>	<p>The SHLAA is used because it assesses the deliverability of housing as required by the NPPF. Nevertheless, it will be expected that most of the sites to which the 20,000 and 7,500 dwellings relate will be developed during the plan period, although not necessarily during the first 5 years.</p> <p>The CS does not have to offer wording to clarify what national policy expects of future site allocations DPDs.</p>	
<b>Lack of a delivery allowance in the housing requirement of SP6</b>			
MFS Land Ltd via Mosaic Town Planning (5672)	There is no evidence that the housing requirement in SP6 takes into account any discounting such as through a non-implementation allowance for those extant permissions and undelivered allocations. Even where sites are judged to be deliverable, it is unlikely that 100% of the envisaged	The housing requirement should not be increased to take account of any sort of non-implementation allowance. The housing requirement is simply what amount of housing is needed and should not be confused with allowances for supply. There will be scope to factor in	No change

	<p>completions from any source will be achieved, particularly within the five year period.</p>	<p>appropriate supply allowances in the LDF housing supply quantification. For example, the SHLAA should set realistic delivery periods for sites; dwellings forecast for delivery beyond the plan period should not count towards meeting the housing requirement. Delivery constraints also need to be fully accounted for in the Site Allocations DPD.</p>	
<p><b>Lower annual target for 2012-17 not justified</b></p>			
<p>Templegate, Hallam Land, Ashdale via Barton Willmore Planning (0057), Home Builders Federation (0092), Savills (0466), Chatford, Taylor Wimpey, Ashdale, Keyland, Warner, Kebbell, Redrow, Miller, Barratt Leeds, Barratt York, Mirfield via Dacre Son and Hartley (0480), TGMF Emsley via ID Planning (1186), Redrow Homes (Yorkshire) Ltd (1938), Miller Strategic Land via Spawforths (2663), Spawforths (2663), Signet Planning (5039), Directions Planning (5121), DPP (5543), Betterspot Limited via Robert Halstead Chartered Surveyor (5649), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), The Diocese of Ripon</p>	<p>Have a single annual requirement throughout the plan period: 5,943pa net (0057)</p> <p>4,680pa (5681) add 3% vacancy adjustment (0092)</p> <p>The findings of a sound SHMA have been inappropriately transposed to Policy SP6. There is insufficient justification to use the Fixed Headship Rate Sensitivity for the first 5 years, and the SHMA conclusions do not recommend its use. The following requirement should be used, from the SHMA's employment led scenario: 4,539 net add 3% vacancy = 4,675pa net add 250 demolition allowance to 4,925 gross ie 88,650 gross over a plan period of 18 years to 2030 (2663, 0480, 1186, 1938, 5671, 5883)</p> <p>4,700 (5649)</p> <p>Change the requirement figure for the first 5 years to 4,392 (0466)</p> <p>Higher housing delivery rates should be targeted in the first half of the plan period. Even if these are not quite achieved, there will still be the opportunity to catch up in the second half of the plan period (5039).</p> <p>The time period of the sensitivity in the SHMA (2010-15) does not correspond with the period used in the Core Strategy (2013-18)</p>	<p>The Fixed Headship Rate Sensitivity of the SHMA is robust evidence. It is not simply reducing the requirement for the first 5 years because of concerns about mortgage availability and reduced demand. It relies on actual evidence that the long-term trend of smaller household size has stabilised in Leeds. This is suggested to be a result of the housing market choosing not to build smaller flats.</p> <p>Although the SHMA period for the fixed headship sensitivity is 2010-15, relevant circumstances have not changed since the SHMA was prepared. As such, there is no reason why the lower annual target should not be applied from the start of 2012/13 to the end of 2016/17</p>	<p>No change</p>

<p>and Leeds, AR Briggs &amp; Co, Ledston Estate, Meadowside Holdings, Bramham Park Estate, Lady Elizabeth Hastings Charity Estate, Hatfield Estate via Carter Jonas (5681), C/o Hileys Solicitors via LDP Planning (5867), Brownberrie Education Trust via Steven Abbott Associates (5878), Linton land Owners via Ian Bath Planning (5883), Barratt David Wilson Homes Yorkshire Homes (5895), Banks Development (5036)</p>			
<p>Morley Town Council (4825)</p>	<p>A lower target for the first 5 years is not helpful. An LDF requirement for 74,000 dwellings gross from 2012-13 to 2027-28 inclusive means an average of 4625 completions a year for 16 years. Setting a lower target for the early years and a higher for the latter is not helpful, especially if not achieved; it merely makes the maths more confusing. If an average 3000 dwellings a year were completed in the first eight years of the LDF, which seems optimistic, a snowballed deficit would require an annual average of 6250 completions in the second half of the LDF.</p>	<p>Under performance is quite likely in the early years and it is the case that shortfalls will roll-over into later years. Nevertheless it is important that the housing requirement – whilst based on robust evidence of housing need – is set to be as realistic as possible about economic realities. The Core Strategy's use of the SHMA's Headship Sensitivity makes the housing requirement both robust and realistic, and should mean that shortfall roll-overs are minimised.</p>	<p>No change</p>
<p>Renew (5105)</p>	<p>A question arises as to what happens if housing targets for 2012 to 2016 are not met? What level of provision will then be needed from 2017/18? Will there be a need to review this as the shape of likely future housing market change becomes clearer?</p>		
<p>Home Builders Federation (0092)</p>	<p>Lack of a housing trajectory with component supply sources (e.g. from strategic sites, allocations, PAS, green belt etc). Include a housing trajectory with supply sources</p>	<p>The NPPF expects local authorities to illustrate the expected rate of housing delivery through a housing trajectory for the plan period. Leeds has provided a housing trajectory in its Annual Monitoring Reports (AMR) and will continue to do so. The City Council considers that providing a trajectory in the AMR satisfies the expectations of the NPPF. There are good reasons why it is better to set out the housing trajectory in the AMR rather than in the Core Strategy. The biggest problem with inclusion in the Core Strategy is that it will remain</p>	<p>No change.</p>

		fixed at a point in time. In the case of Leeds, it is almost certain that the adoption of the Site Allocations DPD 1-2 years after adoption of the Core Strategy will provide a great deal more certainty about which sites are expected to come forward when and this will undoubtedly change the forward trajectory. It is better that this can be reflected in an annually updated trajectory in the AMR	
<b>Cross boundary needs</b>			
Home Builders Federation (0092)	Under delivery expected in Bradford, Selby, York, Harrogate, (0092)	Adjoining authorities are planning to meet their needs based on local evidence. Because their strategies will be subject to public examination, LCC is not expecting to have to meet extra housing from neighbouring authorities. However, LCC is in regular dialogue with its neighbours to understand likely eventualities in case more/less housing does have to be planned for.  Regarding housing apportionment in the sub-region, Leeds is planning for housing growth that is aligned with economic growth. The SHMA forecasts are based on the Regional Econometric Model's (REM) forecasts for employment growth which anticipate Leeds' continuing role as the main employment centre in the City Region.	No change
C/o Hileys Solicitors via LDP Planning (5867)	Under delivery expected in Bradford, Selby, York and Kirklees		
Walton & Co (5510)	Lack of provision to meet needs of neighbouring authorities means that Leeds has failed in its Duty to Cooperate		
Quod (1027)	Under-provision in Leeds caused by the SHMA underestimating housing need will force adjoining authorities to meet Leeds' need.		
North Yorkshire County Council (2613)	<p>The proposals for housing growth fail to make appropriate housing provision in Leeds, both in terms of the scale the type and location of development. This will place increased pressure on adjoining authorities to release land and unsustainable commuting patterns with limited opportunities for the use of public transport and re-use of brownfield land. It will require significant investment in infrastructure and have adverse effects on the character and setting of rural communities.</p> <p>This issue was fully addressed in the former RSS which focused growth and regeneration on the main urban areas such as Leeds, while restraining the dispersal of development in the rural areas. The County Council is concerned that the Core Strategy could reverse this previously agreed regional approach to development. The principles in para 4.6.2 need to reflect the strategic/ sub-regional aspects of housing need in setting Leeds' housing requirement. The link needs to be strengthened between Economic/employment growth and residential development and the scale and distribution of housing growth proposed in the Core Strategy must be able to meet future demands arising from long term economic</p>		

	growth in Leeds without placing the onus on adjoining authorities to accommodate development in less sustainable locations.		
Craven District Council (5888)	In relation to the spatial policies in the document, CDC Officers support Spatial Policy 6 in planning to accommodate new (net) housing to meet needs arising in the conurbation and therefore address outward migration and commuting pressures.		
<b>Land identification criteria</b>			
Directions Planning (5121)	We generally support the guiding principles for the allocation of land, but they should not be applied sequentially.	The criteria are all important. The plan does not say they are to be applied sequentially. It is intuitive to expect sites to be identified against all of the criteria	No change
Arcadia Group via Montagu Evans LLP (5723)	Support the criteria of Policy SP6	Support welcomed	No change
Chatford, Taylor Wimpey, Ashdale, Keyland, Warner, Kebbell, Redrow, Miller, Barratt Leeds, Barratt York, Mirfield via Dacre Son and Hartley (0480), TGMF Emsley via ID Planning (1186), Redrow Homes (Yorkshire) Ltd (1938), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), Barratt David Wilson Homes Yorkshire Homes (5895)	NPPF does not support giving <i>preference</i> to brownfield and regeneration sites.  Suggest splitting criterion ii) into two separate criteria which would give <i>encouragement</i> rather than <i>preference</i> : ii) Encouraging the effective use of brownfield land by reusing land that has been previously developed, iii) Encouraging and supporting Regeneration Priority and Growth Areas,	LCC has a preference for using making best use of PDL and regeneration areas in planning for housing growth. There is no conflict with the NPPF in Leeds seeking to identify housing land with such a preference. This is one way in which the “encouragement” referred to in the NPPF can be put into practice. Such a preference should not be confused with any intention to constrain release of deliverable sites below what is necessary to meet the housing requirement, which would be contrary to the NPPF.  It should also be noted that the NPPF para 17 bullet 5 seeks to promote “...the vitality of our main urban areas...” and bullet 7 advises that “allocations of land for development should prefer land of lesser environmental value...”. Policy SP6’s preference for PDL and regeneration areas will help to support the vitality of the main urban area of Leeds and is likely to result in use of land of a lesser environmental value being used in the first instance.	No change
Directions Planning (5121)	There should be no preference to brownfield and regeneration sites. Instead, a holistic approach should make use of sites in all sustainable locations that are suitable, available and achievable.	The NPPF is clear in para 22 that employment sites should not be protected where there is no reasonable prospect of demand for that use. The Core Strategy takes a balanced approach to the needs of both housing	No change

	<p>The preference for brownfield land will have two consequences that need to be considered. Firstly, employment sites will be lost, to the detriment of areas like the Leeds Road (A660) corridor in Otley. Such losses need to be properly considered in the SHLAA and Employment Land Review.</p> <p>Secondly, a preference to brownfield in the Core Strategy would mean that Neighbourhood Plans would be forced to follow suit to ensure conformity.</p>	<p>and employment, with a recognition in Policy EC3 that some areas identified in the ELR – including Otley in the Outer North West – need greater protection of employment land.</p> <p>It is considered appropriate that the Core Strategy's vision and most of its strategic principles, objectives and policies, having been tested through examination, will be “sound” and helpful for the long term planning of Leeds, and that it will be sensible for Neighbourhood Plans to adhere to them. Neighbourhood Plans are required to conform to the adopted plans of their respective local authorities. If Policy SP6's preference for PDL and regeneration areas are adopted it is right that the same preference should form the context for Neighbourhood Plans in Leeds.</p>	
Yorkshire Wildlife Trust (2391)	The NPPF (para 17) qualifies its encouragement for brownfield land with the proviso “...that it is not of high environmental value”. This proviso should be added to criterion ii).	The criteria of Policy SP6 are not set out in sequential priority; they all apply equally. This means that criterion vi concerning impacts on environmental features would also need to be considered for all sites, brownfield and greenfield. Hence, there is no need to add a proviso to criterion ii).	No change
Leeds Civic Trust (0062) Aberford PC (0106) Boston Spa PC (0112) Drighlington PC (0136), Gareth Brown (3410), Miss Joanne Coultas (3995), Mark Seghetti (5932)	Weak preference in SP6 for brownfield development  Strengthen SP6  Brownfield sites should be used before green sites rather than 1st preference (3410, 3995)	The stance toward brownfield sites in Policy SP6 is as strong as it can be in the context of the NPPF. A sequential preference for brownfield land (ie not allowing any greenfield development whilst any deliverable brownfield sites are available) would be contrary to the NPPF because it would restrict supply from meeting needs.	No change
MFS Land Ltd via Mosaic Town Planning (5672), Linton land Owners via Ian Bath Planning (5883)	Policy SP6 criteria should acknowledge the role of PAS land as one of the prime sources for housing allocations. PAS land can better meet the need for family housing than infill and urban sites. PAS land is acknowledged by the NPPF to have a role in supplying long term housing needs. PAS land should be given priority over Green Belt releases. The last sentence of paragraph 4.6.9 is misleading in suggesting that Green Belt land release is the only alternative to windfall.  PAS sites have already been sustainability assessed through the UDP Review (5883)	Agree that the last sentence of paragraph 4.6.9 is misleading.	Minor change. Add “Once PAS land and UDPR allocations have been accounted for...” to the beginning of the last sentence of Paragraph 4.6.9

Caddick Developments and D Westwood & Son via White Young Green (0420)	SP6 iii should recognize that some GB sites can perform well in their sustainability credentials and, as part of a review of the green belt, can add to the delivery of new homes.	Other policies of the Core Strategy including SP1 and SP10 set out criteria for assessing sustainability and appropriateness of Green Belt land for housing.	No change
Evans Homes No2 Ltd via Drivers Jonas Deloitte (5034)	Full review of the GB is essential part of the evidence based to establish the parameters for the allocation of sites in sustainable locations through the forthcoming Site allocations DPD.	Selective Green Belt Review will be undertaken related to the Settlement Hierarchy to inform the Site Allocations DPD	No change
Mr Anthony L Silson (0942)	Release of greenfield and Green Belt land is unsound because developers will prefer to build on the green sites first negating the policy of prioritising brownfield sites. Keep all Green Belt and Greenfield sites, including the green infrastructure	The Core Strategy aims to make the best use of urban, brownfield and regeneration sites so that the use of countryside, including Green Belt land, is minimised. Nevertheless, the housing need in Leeds is so great that some Green Belt land will be needed. This means that, based on assessment, some land will be taken out of the Green Belt through the plan making process to allow for development. This is consistent with NPPF paras 83-85. The NPPF continues to protect land that is Green Belt from inappropriate development, which may account for national government statements to this effect.	No change
Mr Anthony L Silson (0942)	Release of greenfield and Green Belt land is unsound because priority to development of green sites near settlements is contradictory as the very places where Green Belt/fields are essential are close to settlements. Also, it is contradictory to identify Green Belt land as protected but then release some for development. CHANGES Keep all Green Belt and Greenfield sites, including the green infrastructure		
Lisa Fox (5880)	The strategy to use Green Belt land for housing is at odds with national government and local MP statements to protect it.		
Environment Agency (0046)	Criterion vii of SP6 does not state clearly that a flood risk sequential test is necessary for sites in high flood zones  Link to Policy SP1 regarding flood risk	Policy EN5 will ensure that all proposed housing development will be subject to flood risk sequential testing in accordance with national guidance. There is no need for the provisions of Policy EN5 to be repeated in Policy SP6.	No change
Signet Planning (5039)	There is a need to adopt a sequential approach to determining the most suitable locations for housing development to ensure housing is directed to areas at the lowest risk of flooding.	A sequential approach is required for all sites by Policy EN5	No change
Leeds Civic Trust (0062)	Weak preference in SP6 for protecting green infrastructure and natural habitats  Strengthen SP6	Criterion vi) will ensure that site selection avoids the choice of sites with valued environmental characteristics when alternatives are available	No change
English Heritage (0099)	Policy SP6 (iv): to safeguard those elements which contribute to the distinct identity of the District, this criterion should not only seek to "enhance" the identity of	Agree	Minor change. Amend to read:- "Opportunities to

	<p>existing neighbourhoods but also to “reinforce” those elements which contribute to their distinctive character.</p> <p>Policy SP6 (iv) amend to read:- “Opportunities to reinforce or enhance the distinctiveness..”</p>		reinforce or enhance the distinctiveness..”
Micklefield PC (0118)	<p>Criterion i) of SP6 includes three criteria. This means that a location with good public transport accessibility but totally lacking of local facilities – like Micklefield – might be favoured. Both parts need to apply in order to ensure that the concept of sustainable settlements, and the realistic distance for which people will walk to local facilities and key services within those settlements, is embedded in Spatial Policy 6. Divide criterion i) into three:</p> <p>(i) preference for sustainable locations within 1200m of an existing core of local facilities and key services,</p> <p>(ii) where a smaller settlement does not have an existing core of local facilities and key services, any new housing allocations proposed as extensions to that settlement will only be promoted in the site allocations DPD if a core of local facilities and key services is created as an integral component of the housing development,</p> <p>(iii) adequate standards of public transport accessibility - see the well connected city chapter, sub clause (ii)</p>	The elements of criterion i) are consistent. As written, the criterion will expect both public transport accessibility and access to local facilities and services. If the latter do not exist, they can be provided by the housing development.	No change
TGMF Emsley via ID Planning (1186), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671)	The Core Strategy should confirm that the remaining undeveloped UDP allocated housing sites should be carried forward into the LDF and not be subject to phasing	Paragraph 5.2.3 makes clear that outstanding UDP housing allocations will not be subject to phasing under Policy H1	No change
Yvonne Smith (5918), John Powell (5921), David Ginn (5928), Maria Crosby (5933), Sheila Collins (5934)	The remaining UDP allocated housing sites should be subject to sustainability assessment to ensure that only those in sustainable locations are carried forward.	The UDP allocated housing sites are too far advanced through the planning process to be reviewed now, and have already been subject to thorough assessment through the UDP Review Examination process.	No change



Gaunts Ltd via Peacock and Smith (1027)	Should also include a policy to identify land allocated as PAS.	Policy SP10 deals with provision of new PAS. Actual land designation will be made through Site Allocations DPDs	No Change
Stuart Andrew (0165)	Areas that have shouldered considerable housing growth in the past – like Guiseley, Yeadon, Rawdon, Farsley and Pudsey – should not have to accommodate so much. Reduce the housing requirement	Past provision of housing is not a reliable indicator of whether geographical areas are suited or are capable of hosting further growth. An evidence based holistic assessment of a range of factors is necessary to make those judgements.	No change
PPL via Scott Wilson (0414)	Clarity on the process for the adoption Neighbourhood Plans and timescales for this to happen	Timescales for neighbourhood plan preparation are set out in LCC's guidance note available on LCC website. It is not necessary for this to be set out in the Core Strategy	No change.
Mark Seghetti	The priority must be to build affordable homes on brownfield sites.	In line with Policy H5, affordable housing will be sought on all sites based on need and consideration of viability	No change

The following respondents have all raised matters under the heading of Policy SP6 which have not been addressed here because they better relate to issues addressed under Policy SP7:

Home Builders Federation (0092), PPL via Scott Wilson (0414), Airebank Developments, D Westwood & Son, Rockspring Hanover Property Unit Trust and Harrow Estates via WYG (0420), C/o Hileys Solicitors via LDP Planning (5867), Caddick Developments, Cornforth via White Young Green (0420), Quod (1091), Comforth and Sons and MFS Land Ltd via Mosaic Town Planning (5672), Chatford, Taylor Wimpey, Ashdale, Keyland, Warner, Kebbell, Redrow, Miller, Barratt Leeds, Barratt York, Mirfield via Dacre Son and Hartley (0480), Redrow Homes (Yorkshire) Ltd (1938), Barratt David Wilson Homes Yorkshire Homes (5895), Linton land Owners via Ian Bath Planning (5883), Morley Town Council (4825), Miller Strategic Land via Spawforths (2663), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), Michael Green (5863), The Diocese of Ripon and Leeds, AR Briggs & Co, Ledston Estate, Meadowside Holdings, Bramham Park Estate, Lady Elizabeth Hastings Charity Estate, Hatfield Estate via Carter Jonas (5681), Betterspot Limited via Robert Halstead Chartered Surevior (5649), A Watson (0043), J Allison (4681), Miss Alexandra Hannant (4688), Mr John Buck (4697), Mr David Klemm (4776), SEORA (5053), Mr Paul Evans (5873), Claire Donkin (5893), Michael Green (5863), Signet Planning (5039), McGregor Brothers Ltd via West Waddy ADP (5884), Pegasus Planning Group (4388), Mr M Dunstall (4743), Mrs Lisa Jackson (5885), P & K Cook (5899), Andrew Hepworth (5864), Taylor Wimpey via Turley Associates (1743), Mr Cedric Wilks (4783), WARD (Wharfedale & Airedale Review Development) (5852), Martin Gostling (5872), Susan Kelly (5870), Flora Pearson (5931), Oulton Civic Society (0065), Micklefield Parish Council (0122), A Watson (0043), J Allison (4681), Miss Alexandra Hannant (4688), Mr John Buck (4697), Mr David Klemm (4776), SEORA (5053 and 5940), Mr Paul Evans (5873), Claire Donkin (5893), Zoe Main (5900), Alec Main (5901), Sharron Smith (5902), Nicola McNally (5903), Brendan McNally (5904), Shelagh Connor (5907), Joe & Karen Bentley (5909), Wanda Phillips (5910), Alison Watson (5912), Yvonne Smith (5918), John Powell (5921), David Ginn (5928), Maria Crosby (5933), Sheila Collins (5934), Sandra Biss (5936), Karl Prime (5937), Mrs Deborah Biss (5939), Lisa Fox (5880)

## **APPENDIX 1B: CHANGES TO POLICY SP6**

### **4.6 Housing Development**

4.6.1 As highlighted in Section 2 (Profile of Leeds district), it is anticipated that the population of Leeds will rise from 755,136 in 2010 to 860, 618 in 2028. This raises major challenges for Leeds in seeking to meet the complex demographic needs of the existing population, together with the implications of an aging and growing population over the Plan period. It is important that planning for such growth forms part of an overall strategy, which gives emphasis not only to a sufficient housing land supply in appropriate locations but also the quality, type and affordability of homes in meeting local needs. This needs to be achieved within an overall framework, which gives priority to delivering sustainable development, promoting regeneration and job growth, whilst maintaining local character, distinctiveness and environmental quality. As a basis to help plan for this growth, the following key principles have been shaped and agreed through consultation (informal consultation into housing growth summer 2011) with key stakeholders, including communities and the development industry.

#### **Housing growth principles**

- 4.6.2 Within this context, the following Housing growth principles have been established.
- i) Ensure housing growth is linked to the creation of sustainable neighbourhoods throughout the city (see Spatial Policy 1)
  - ii) Set a realistic and phased target for the delivery of new homes (see Spatial Policy 6)
  - iii) Ensure housing growth targets reflect local housing needs, now and in the future, in terms of tenure, type and size, (see Spatial Policy 6 and Policy H4)
  - iv) Enhance the distinctiveness of existing neighbourhoods and quality of life of local communities through the design and standard of new homes (see Policies P10 & EN2),
  - v) Facilitate the development of brownfield and regeneration sites, (see Spatial Policies 1, 3 and 6)
  - vi) Agree a range of mechanisms to deliver additional affordable homes, (see Policy H5)
  - vii) Work in partnership to find ways to facilitate housing growth (see Section 6 Implementation & Delivery).
- 4.6.3 Within the context of evidence derived from the Strategic Housing Market Assessment (2011) and informed by the above considerations, a housing requirement of 70,000 new homes net has been set, as a basis to meet the housing demands and job growth aspirations of the City. This figure is broadly consistent with the Regional Spatial Strategy. A demolition allowance of 250 units/annum has been applied, which is higher than the average rate of demolition since 2004 (228 units). To account for demolitions, the gross housing requirement is 74,000 units. In the delivery of the above housing growth principles and within the context of current economic uncertainties and the fragile nature of the housing market, the delivery these requirements as part of an overall strategy, will need to be closely monitored.
- 4.6.4 Within this context, the Plan does allow for a number of contingencies. As set out below, based on historic performance and anticipated future potential, the role of

windfall development is recognised as an important component of supply. A windfall allowance is therefore set (see below). The figures presented are however conservative estimates and it is therefore highly likely that future windfall delivery will be in excess of the proposed figure. As part of an overall strategy, through Spatial Policy 1, emphasis is placed upon the role of the Main Urban Area and Settlement Hierarchy as a focus for delivery in sustainable locations. Linked to this, Spatial Policy 6, sets out an overall housing requirement (derived from the SHMA). Based on local evidence, this overall scale is considered to be realistic and appropriate to circumstances within Leeds. Within this context, Spatial Policy 7, identifies an indicative scale and distribution of growth, informed by the (SHMA and SHLAA), to provide a framework for more detailed site identification through the preparation of the Site Allocations DPD (and Are Valley Area Action Plan). In planning for longer term growth, Spatial Policy 10 provides the basis for a selective Green Belt review.

- 4.6.5 Current economic and housing market conditions are such, that the Core Strategy needs to have sufficient range and flexibility in its approach, to deliver the intended Objectives (as already set out in Section 3). In conjunction with the Core Strategy, the preparation of allocations DPDs (see above) is underway and a monitoring framework (see Background paper) is being developed to track progress and will be used as a basis to identify any which may result from unforeseen circumstances.
- 4.6.6 The commencement date for the housing requirement is 2012/13 to tie-in with the likely adoption date of the plan. Given the depressed state of the housing market over recent years, no calculation has been made of over or under-supply against targets in the Regional Spatial Strategy. The start of the housing requirement at 2012/13 marks a clean break from the past.
- 4.6.7 The housing figure is to be provided in stages, as part of a phased approach, increasing over the life time of the Plan. The Council has taken this course of action because the current economic climate has impacted on a range of factors, which have in turn frustrated recent housing delivery. These factors include:
- The current fragility of the housing market and the dramatic reduction in completion rates when compared to the 10 year average of 3,000 dwellings per year from 2000 – 2010 (and 2,000 from 2009 – 2011),
  - The availability and affordability of mortgage finance,
  - The affordability of new housing stock in meeting local needs,
  - Rates of household formation,
  - Uncertainties regarding the rate of economic recovery and growth and the impact of this upon, job retention and creation,
  - The availability of funding to deliver infrastructure requirements associated with new development.
- 4.6.8 As a large post industrial city which has experienced continual urban regeneration and renaissance, Leeds has continued to evolve in terms of its economic diversity and formats for housing delivery. A major aspect of this process has been the recycling of brownfield (previously developed land – PDL), for windfall housing and other uses. Leeds has a long and well recorded history of windfall housing being delivered as a source of land for development. This has been continuously monitored by the City Council since the 1980s.

- 4.6.9 In terms of housing land monitoring and the analysis of housing land availability, the City Council regularly updates the position as part of the Strategic Housing Land Availability (SHLAA) Partnership. Within this context, windfall is still recognised as a key component of housing land supply. Based upon past performance and the continued needs for urban renewal and regeneration of Leeds, windfall will continue to play an important role in housing delivery. This is due in part to the scale of the district in respect of the extent of the Main Urban Area of Leeds and large collection of settlements across the district (including Major and Small Settlements identified as part of the Settlement Hierarchy – see Table 1: Identification of Settlement Types). Consequently, the role of windfall and the identification of a windfall allowance, is integral to the overall housing strategy set out in this Plan. This is a factor recognised in RSS. Windfall predominantly occurs in urban locations and is therefore consistent with the objectives of the Core Strategy. *Once PAS land and UDPR allocations have been accounted for* the only alternative to windfall is further Green Belt release .
- 4.6.10 The windfall allowance for Leeds is based upon two components of windfall. First of all, it enables sites not assessed by the SHLAA partnership (due to their size or the timing of their delivery) to be considered as part of overall housing delivery. The allowance also takes into account the fact that not all sites which will deliver housing over the Plan period have been identified at the start of the period.
- 4.6.11 In order to reflect the future contribution that windfall will make based on historical performance and as a basis to harness the expected future potential of PDL windfall development, the Core Strategy incorporates an allowance of 500 units/annum for windfall. Such delivery has a critical role to play in contributing to housing need and in meeting development aspirations in sustainable locations. As demonstrated by monitoring evidence, this figure is considered to be an extremely conservative estimate and is therefore an appropriate figure when it comes to a contribution to overall supply. Therefore the Core Strategy anticipates that 8000 units of the 74,000 gross units required will be delivered via windfall. This means that 66,000 units will need to be identified to ensure delivery of the Core Strategy.
- 4.6.12 Evidence from the SHMA (2011) suggests that the long term trend toward smaller households will continue to level off beyond 2011. Therefore, Leeds considers it is sensible to plan for a static rate of household formation change during the first 5 years of the Core Strategy, returning to the SHMA's employment led forecast thereafter. Consequently, Spatial Policy 6, is subdivided into two time periods (2012 – 2017/18 and 2017/18 – 2028) to reflect the implications of this evidence. Taking into account changing levels of provision, demolitions, and the role of windfall, Leeds will seek to identify 66,000 units for housing delivery over the lifetime of the Core Strategy.
- 4.6.13 The 66,000 units that will be identified will be composed of current, undelivered allocations (7500 units), extant planning permissions (20,000 units)<sup>2</sup> and other sites which are deemed to be appropriate for housing delivery, as per the guidelines in Spatial Policy 6 (Figures as at 31 March 2011).

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<sup>2</sup> the SHLAA is used to determine deliverability of all extant planning permissions.

## **SPATIAL POLICY 6: THE HOUSING REQUIREMENT AND ALLOCATION OF HOUSING LAND**

70,000 (net) new dwellings net between 2012 and 2028 will be accommodated at a rate of:

- 3,660 per annum from 2012/13 to the end of 2016/17 (18,300)
- 4,700 per annum from 2017/18 (51,700)

Delivery of 500 dwellings per annum (8,000 over the plan period) is anticipated on small and unidentified sites.

Guided by the Settlement Hierarchy, the Council will identify 66,000 dwellings gross (62,000 net) to achieve the distribution in tables H2 and H3 in Spatial Policy 7 using the following considerations:

- i) Sustainable locations (which meet standards of public transport accessibility -see the Well Connected City chapter), supported by existing or access to new local facilities and services,
- ii) Preference for brownfield and regeneration sites,
- iii) The least impact on Green Belt purposes,
- iv) Opportunities to *reinforce or* enhance the distinctiveness of existing neighbourhoods and quality of life of local communities through the design and standard of new homes,
- v) The need for realistic lead-in-times and build-out-rates for housing construction,
- vi) The least negative and most positive impacts on green infrastructure, green corridors, greenspace and nature conservation,
- vii) Generally avoiding or mitigating areas of flood risk.

## APPENDIX 2A

### Core Strategy Publication Draft - Analysis of Consultation Responses

#### Policy SP7: Distribution of Housing Land and Allocations

Representor/Agent	Representor Comments	LCC Initial Response	Action
<b>Apportionment to Housing Market Characteristic Areas – General Comments</b>			
<b>Geography of Housing Market Characteristic Areas</b>			
Morley Town Council (4825)	Not at all clear how "Outer South West", which includes the former Borough of Morley, also includes Middleton, but, not Belle Isle, and takes in a small part of Farnley, but, not all of it. A more coherent HMCA would be made up of the former Borough of Morley and the former Rothwell Urban District, most of which is now in HMCA "Outer South". Contrived HMCAs cannot be helpful to understanding, and must be unsound.	The geography of Housing Market Characteristic Areas (HMCA) are derived from the SHMA 2011. Estate Agents provided a set of areas which reflect where people looking to buy houses tend to focus their searches. The boundaries were refined to reflect boundaries of affordable housing policy zones and to accord with census output areas. As such there is a sound evidence base to support the HMCA geographies.	No change
Linton land Owners via Ian Bath Planning (5883)	Linton should be included as a Small Settlement either independently or with Collingham, and its proximity to the principal/major settlement of Wetherby should be acknowledged.	The smaller settlements were identified on the basis of having at least a population of 1,500, a primary school and a convenience store or pub. With a population of half 1,500 (2001) and neither a school or a convenience store, Linton was not considered sufficiently sustainable. It is a separate settlement from Collingham and it would be artificial to combine them for the purposes of the Settlement Hierarchy.	No change
Rockspring Hanover Property Unit Trust, Harrow Estates via White Young Green (0420)	Map 8 - Distribution of new housing by HMCA % does not specifically reflect Table 3 of the written text in that the key to the diagram identifies the percentages with a + (eg 5%+). The table is however specific in % given. The Map should be specific for each of the characteristic area in order to avoid confusion of interpretation. There are also needs to be greater clarity in the key to Map 8 between the colouring for the 3- 5% bands.	The map is indicative of the relative quantities of housing that the different areas are expected to accommodate. It is acceptable for percentage quantities to be banded in order to provide a simple impression of the relative quantum.	No change
Oulton Civic Society (0065), Mickfield Parish Council (122)	Key Diagram symbols and tables 2 and 3 do not give sufficient local specificity	The Key Diagram and Tables 2 and 3 give an appropriate level of specificity to deliver a sustainable and balanced pattern of growth for the Leeds District. The Site Allocations DPD will offer further choices for the pattern of individual sites within each Housing Market Characteristic Area.	No change

<b>Lack of Assessment/Evidence to Inform the Housing Distribution Tables</b>			
Harrow Estates via White Young Green (0420)	Concerned SP7 is reliant on urban extensions without having carried out or informed by the review of the GB required by SP10.	Some Green Belt land take will be necessary to meet housing needs, but the Core Strategy does not need to be specific about the location of urban extensions; these choices will be made by the Site Allocations DPD informed by a GB Review	No change
Environment Agency (0046)	Lack of evidence that flood risk sequential test has been applied to the distribution of housing land and allocations. We understand that this work is being undertaken by the Council and welcome the opportunity to comment on this prior to formal submission of the DPD. This will work will also need to apply to provisions for all development types where broad locations for development are referred to within the DPD.	Drawing from evidence of the SHLAA, the City Council is satisfied that a palette of housing sites are deliverable which meet the housing requirement without relying upon land in high flood risk zones, unless there are insufficient sequentially preferable alternatives in the locality	No change
Highways Agency (0060)	<p>The scale of development in a number of areas of the District is of concern to the Agency because of the potential traffic impact on the Strategic Road Network:</p> <ul style="list-style-type: none"> <li>•Leeds city centre 10,200 new homes.</li> <li>•East Leeds – 11,400 homes.</li> <li>•Inner Leeds– 10,000 homes.</li> <li>•Outer South West area 7,200 homes.</li> <li>•Outer North East area 5,000 homes.</li> <li>•Outer West area 4,700 homes.</li> <li>•Outer South East area 4,600 homes.</li> </ul> <p>The number of new homes quoted in the Policy for the rural Outer North East Area seems high – we would welcome clarification of the development areas that are included.</p> <p>It will be necessary for the Agency to assess the output of current work on updating its traffic models and analysing the findings in order to form a clear view on the likely traffic impact on the Strategic Road Network in future years of these development proposals. Those outputs are expected to become available during Summer 2012 and will enable the Agency to determine if and where physical mitigation measures might be needed to provide additional capacity on the Strategic Road Network or whether there are any situations where it is not possible to provide the additional capacity. The output from this exercise will also provide inputs to the Infrastructure Schedule in the Infrastructure Delivery Plan. There is evidence already available from the Agency in</p>	Leeds City Council is currently working with the Highways Agency and its consultants to assess the impact of the Core Strategy on the Strategic Road Network. This work will provide a more detailed examination of the impacts than has been possible to date. The intention is to reach an agreed position on the impacts and agree appropriate mitigation where necessary.	No change

	<p>the form of forecast future year traffic flows on the Strategic Road Network in West Yorkshire derived from the existing Network Analysis Tool (NAT). The Agency has used this to model proposed housing and employment growth with the outcome that excessive demands will be placed on certain parts of the motorway network during the plan period.</p> <p>The Agency finds this part of the Plan unsound but we will work with Leeds Council with the objective of resolving outstanding matters and thereby enabling the Agency to declare the Core Strategy sound in this particular respect. The Agency's overall position needs to be reserved at least until the results of current traffic modelling work becomes available until June 2012 after which it will be possible to determine where and if physical capacity enhancement is available on the Strategic Road Network at a cost that is affordable and where and if there are any locations where there is no solution.</p>		
<p><b>Housing Development in "other" and smaller settlements</b></p>			
<p>PPL via Scott Wilson (0414)</p>	<p>The Core Strategy lacks clarity on how it treats housing development in locations outside of the settlement hierarchy. In setting out the spatial development strategy, para 4.1.15 restricts development to that that functionally requires a rural location. However, para 4.6.1 supporting Policy SP6 appears to offer encouragement for development opportunities outside of the settlement hierarchy. Also, part of Policy SP10 (Green Belt) says that sites may be considered in relation to other settlements where they are in sustainable locations with access to local services and where sites are more appropriate in meeting spatial objectives than sites in higher order settlements.</p> <p>The CS should set out clearer criteria for housing development in "other settlements"</p>	<p>Para 4.6.1 actually emphasises that quality, maintenance of local character and distinctiveness have to be achieved as well as delivering the housing requirement to an overall sustainable spatial strategy.</p> <p>Policy SP10 states that use of other settlements (ie outside of the settlement hierarchy) should only be considered exceptionally.</p> <p>Policy H2 would also cover proposals on non-allocated sites in "other settlements" and sets appropriate criteria for the size of development relative to local infrastructure and transport accessibility</p> <p>It is considered that the plan provides sufficient criteria both for Green Belt Land (which would be considered through the plan making process) in Policy SP10 and for non-Green Belt and non-allocated land through Policy H2</p>	<p>No change.</p>
<p>D Westwood &amp; Son via White Young Green (0420)</p>	<p>Only 600 dwellings apportioned to "other" settlements. Where sites are available in sustainable locations outside the Major and Smaller settlements in the Settlement Hierarchy, such sites should be considered favourably to assist in the delivery of housing. The pressure for housing development in Outer</p>	<p>The 600 dwellings or 1% of the total in "other" settlements is a guide figure and is not prescriptive</p>	



	South West should justify more development there outside of the settlement hierarchy.		
Linton land Owners via Ian Bath Planning (5883)	Apportionment of only 1% to the Other Rural category is too low, particularly in the Outer North East		
Rockspring Hanover Property Unit Trust, Harrow Estates via White Young Green (0420)	Table 2 should quantify supply from outside the settlement hierarchy which can be in sustainable locations, particularly as the City Council is making a significant windfall allowance.  Thorp Arch is an example of a sustainable location – an existing employment hub - outside of the settlement hierarchy	The “Other rural” category of Table 2 sets an expectation for 600 dwellings outside of the settlement hierarchy. Tables 2 and 3 exclude delivery through windfall development.  Paragraph 4.6.18 notes that other exceptional sustainable locations, such as Thorp Arch, can be considered. Thorp Arch is also shown on the Key Diagram as an opportunity for brownfield residential development	No change
Linton land Owners via Ian Bath Planning (5883)	Apportionment of only 8% to the Smaller Settlements is too low, particularly in the Outer North East area. Smaller settlements are sustainable enough to warrant a higher proportion.	The 8% to the Smaller Settlements applies city wide; it is not necessary for each HMCA to achieve 8%.	No change
<b>Dwelling Distribution Methodology Principles</b>			
Ashdale Land and Property Company Ltd via Barton Willmore Planning Partnership-Northern (0057), Miller Strategic Land via Spawforths (2663)	Broadly support the distribution which focuses development toward higher order settlements. Expect any increase in the housing requirement to be shared to Policy SP7 proportions.	The City Council does not believe that the housing requirement needs to be increased, but if it is concluded to be necessary the percentage proportions of Policy SP7 would need reconsideration.	No change
TGMF Emsley via ID Planning (1186), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant Consortium, Housebuilder Consortium, Robert	The apportionment in Table 2 of Policy SP7 is too prescriptive, particularly in terms of the split between Infill and Extension. The expectation for 70% of housing to be infill is unrealistic given that the majority of housing land identified in the SHLAA 2011 Update is in the form of extensions to either the MUA, Major Settlements or Smaller Settlements. The apportionment percentages in Table 2 could easily lead to a situation of restraint whereby the housing market is constrained by the insufficiency of infill sites and the quantity of settlement extension sites allowable under Policy SP7.  To promote sustainable patterns of development it would remain helpful for Policy SP7 to apportion housing growth to appropriate settlement types, but not to apportion between	The City Council believes that the apportionment of Infill v. Extension and to the different tiers of settlement type is possible based on the SHLAA 2011 conclusions. This is to identify land for 66,000 dwellings. More detailed evidence drawing upon SHLAA data can be provided to illustrate the realism of the apportionment.  It should also be noted that some land that forms part of the “infill” component will comprise of UDP allocated housing sites, including the East Leeds Extension.	No change

Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), Linton land Owners via Ian Bath Planning (5883), Barratt David Wilson Homes Yorkshire Homes (5895),	<p>infill and extension. Without fundamentally altering the settlement distribution proposed in the Publication Draft, the following apportionment is recommended:</p> <p>Main Urban Area (including City Centre)60-70% Major Settlements 20-25% Small Settlements 10-15% Other Rural 1-5%'</p> <p>The targets in Policy SP7 should be made more flexible (5883)</p>																																										
Templegate Developments via Barton Willmore Planning Partnership-Northern (0057)	<p>Further to our recommendations under Policy SP6 for uplifting the overall housing requirement from 66,000 (net) to at least 94,500 (net) over a 15 year period, the requisite housing distribution by settlement should be amended. Having not seen LCC's assessment of SHLAA sites that sits behind the distributions in Policy SP7 we have doubts about the deliverability of sites within specific areas, especially the City Centre. LCC should make this information available and we reserve the right to make further comments at a later stage. Until then the following distribution is recommended:</p> <table border="1" data-bbox="367 831 1115 1074"> <thead> <tr> <th></th> <th colspan="2">Number</th> <th colspan="2">Percentage</th> </tr> <tr> <th></th> <th>Infill</th> <th>Extn</th> <th>Infill</th> <th>Extn</th> </tr> </thead> <tbody> <tr> <td>CC</td> <td>10,200</td> <td>N/A</td> <td>11%</td> <td>N/A</td> </tr> <tr> <td>MUA</td> <td>30,000</td> <td>7,400</td> <td>33%</td> <td>8%</td> </tr> <tr> <td>MS</td> <td>4,000</td> <td>23,000</td> <td>4%</td> <td>25%</td> </tr> <tr> <td>SS</td> <td>2,300</td> <td>11,600</td> <td>3%</td> <td>13%</td> </tr> <tr> <td>OR</td> <td>100</td> <td>1,400</td> <td>0%</td> <td>2%</td> </tr> <tr> <td>Total</td> <td>46,600</td> <td>47,900</td> <td>52%</td> <td>48%</td> </tr> </tbody> </table>		Number		Percentage			Infill	Extn	Infill	Extn	CC	10,200	N/A	11%	N/A	MUA	30,000	7,400	33%	8%	MS	4,000	23,000	4%	25%	SS	2,300	11,600	3%	13%	OR	100	1,400	0%	2%	Total	46,600	47,900	52%	48%	The City Council does not believe that the housing requirement needs to be increased, so the recommended distribution will not be appropriate	No change
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	Infill	Extn	Infill	Extn																																							
CC	10,200	N/A	11%	N/A																																							
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TGMF Emsley via ID Planning (1186), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant	<p>The apportionment in Table 3 of Policy SP7 is too prescriptive, lacks justification and should be deleted entirely.</p> <p>Figure 3.12 of the SHMA lists housing supply estimates for the different housing market characteristic areas during 2010-26 and these do not accord with the distribution of Table 2 of Policy SP7. The SHMA goes on to conclude that it is not possible to generate a reliable need based distribution for the housing market characteristic areas.</p> <p>The apportionment in Table 3 is premature in pre-supposing</p>	The City Council agrees with the SHMA conclusion that there is no reliable methodology for identifying general housing need for the housing market characteristic areas. However, it believes that for the effective planning of Leeds, including infrastructure and the distribution of other land uses, it is essential to provide an indication of the quantity of housing that needs to be planned for in different smaller geographies. One reliable way to do this is to start with site deliverability conclusions from the SHLAA, and using the locational strategy criteria set out in Policies SP1 and SP6, assess what available sites best fit the criteria. From this, a palate of sites can be identified from which the	No change																																								

<p>Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), Barratt David Wilson Homes Yorkshire Homes (5895)</p>	<p>what areas will have appropriate housing sites ahead of preparation of the Site Allocations DPD</p>	<p>apportionment of dwelling numbers to housing market characteristic areas can be made.</p> <p>Officers have prepared and maintained a palate of sites that are considered to meet the locational criteria of the Core Strategy. This palate is not suggested to be a definitive set of sites to be advanced in the Site Allocations DPD; that would be misleading and premature. However, the palate is considered to be an evidence based way of providing an indication of the appropriate geographical distribution of housing growth in Leeds. The palate has been revised over time to reflect new circumstances, which explains the differences between Figure 3.12 of the SHMA and Table 3 of Policy SP7.</p>	
<p>Michael Green (5863)</p>	<p>There is no evidence to demonstrate that the general development targets are achievable in a manner consistent with other policies of the plan; the plan contains no mechanism for resolving any conflicts at allocation stage.</p>	<p>The palate has not been released into the public domain because people would treat it as a definitive list of supported sites rather than an indicator of broad geographical potential.</p>	
<p>The Diocese of Ripon and Leeds, AR Briggs &amp; Co, Ledston Estate, Meadowside Holdings, Bramham Park Estate, Lady Elizabeth Hastings Charity Estate, Hatfield Estate via Carter Jonas (5681)</p>	<p>To avoid rigidity, the target figures in Tables 2 and 3 should be regarded as minima</p>	<p>Regarding the targets as minima would not be appropriate, particularly in Table 2, which is designed to achieve a sustainable pattern of housing growth concentrating on the urban areas. If the target figures for the Smaller Settlements or Other Rural localities were significantly exceeded, this would produce an unsustainable pattern of growth in Leeds. The supporting text of paragraph 4.6.18 offers potential for some flexibility but on the basis that the targets may be marginally over or under shot, thereby maintaining the overall planned pattern of growth.</p> <p>Also, Policy SP7 provides guidance for the plan making process to ensure that housing allocations support the strategy of the plan. Policy H2 provides for more flexibility by allowing sustainable windfall development over and above the distribution expected by Policy SP7.</p>	<p>No change</p>
<p>Betterspot Limited via Robert Halstead Chartered Surevyor (5649)</p>	<p>The percentage figures for each area should be driven by the availability of sites, ie the capacity of each Housing Market Characteristic Area to accommodate development by reference to such factors as suitability, availability, transport connects and sustainability.</p>	<p>The figures for each area have been based on the availability of sites in the SHLAA chosen according to the criteria of the Plan, including public transport accessibility, flood risk etc.</p>	<p>No change</p>
<p>Betterspot Limited via Robert Halstead Chartered Surevyor (5649)</p>	<p>The percentage targets are not sound. For example, the Outer south west has capacity to accommodate more than 11% of Leeds' housing development without recourse to Green Belt land. Increasing its percentage could avoid</p>	<p>Evidence is not provided to demonstrate how the requirement for the Outer South West can be delivered without reliance on Green Belt land.</p>	<p>No change</p>

	<p>unnecessary use of GB land in other areas. The percentages in Table 3 might, as a consequence, result in unnecessary changes to the Green Belt simply to fall within the guideline percentages. This approach is not sound, having regard to the NPPF objectives. Green belt releases should only be applied as a 'last resort'.</p> <p>Land currently falling within the 'open land' designation ( UDP Policy N11) is capable of accommodating some housing development in the Outer South West geographic area.</p>	If possible it would need to rely instead on development of the large "open land" designation under UDP Policy N11. This land has a similar role and value to Green Belt land and is afforded protection under Policy N11. Its development would not necessarily be preferable to development of Green Belt land.	
A Watson (0043), J Allison (4681), Miss Alexandra Hannant (4688), Mr John Buck (4697), Mr David Klemm (4776), SEORA (5053), Mr Paul Evans (5873), Claire Donkin (5893), Quod (1091)	Basis for distribution unclear. Why are the SHMA hypothetical distributions not used?	<p>The SHMA distribution tables (Figures 6.11 and 6.12) illustrate hypothetical distributions. Fig 6.11 extrapolates recent trends of housebuilding; Fig 6.12 distributes the forecast total according to the current distribution of dwellings in Leeds.</p> <p>The distribution set out in Core Strategy Tables 2 and 3 is based on a balance of opportunities that the City Council believes could meet the strategy for sustainable development set out in Policies SP1 and SP6. At this stage the City Council does not advocate the development of any individual sites, but has used an overall mix to help determine the dwelling distribution.</p>	No change
Michael Green (5863)	Lack of rationale to distribute the 66,000 new dwellings between the HM Characteristic areas. For example, a starting point might have been to expand settlements in proportion to their existing size.	Fig 6.12 of the SHMA provides a distribution of new housing according to the existing number of dwellings in each HM Area. However, this would not provide a good basis for distribution because it takes no account of the availability of land to deliver, nor its sustainability credentials. The distributions set out in Policy SP7 are based on an assessment of available land which could meet the Core Strategy's criteria for sustainable patterns of growth as set out in Policies SP1 and SP6.	No change
Directions Planning (5121)	The distribution of extensions in Table 2 is supported, but they should be more clearly identified as broad areas of search.	The detailed geographic choices of where urban extensions should be will be made by the Site Allocations DPD rather than the Core Strategy.	No change
<b>City Centre should be excluded from the housing requirement</b>			
Home Builders Federation (0092) Caddick Developments, Comforth and Sons, Airebank Developments, Harrow Estates, via	Sufficient land to meet the housing requirement of 78,350 dwellings should be identified from areas outside of the city centre. This means a notional 10,300 dwellings will be anticipated in the City Centre, but not be identified.	It is necessary for city centre housing land to be identified as this can then form part of Leeds' 5 year housing supply	No change

<p>White Young Green (0420), Chatford, Taylor Wimpey, Ashdale, Keyland, Warner, Kebbell, Redrow, Miller, Barratt Leeds, Barratt York, Mirfield via Dacre Son and Hartley (0480), Redrow Homes (Yorkshire) Ltd (1938), Great North Developments Ltd c/o Evans Property Gr, Redrow Homes, Barratt, David Wilson Homes, Great North Developments, East Leeds Extension Northern Quadrant Consortium, Housebuilder Consortium, Robert Ogden Partnership, Edmund Thornhill Estates, Wortlea Estates via ID Planning (5671), C/o Hileys Solicitors via LDP Planning (5867), Barratt David Wilson Homes Yorkshire Homes (5895)</p>			
<p><b>Strategic Sites are needed to ensure delivery of the housing requirement</b></p>			
<p>Harrow Estates and Rockspring Hanover Property Unit Trust, via White Young Green (0420)</p>	<p>Table 3 indicates the scale of development required in the City to provide the level of housing needed. To give confidence in strategy be advisable to identify a number of strategic sites to give market confidence for developers and house builders to invest in these locations.</p>	<p>The NPPF refers to the 'local plan' allocation of sites. Within this overall context the City Council is preparing a Core Strategy and Site Allocations DPD and does not consider it necessary to identify strategic sites. The Core Strategy is planning for 70,000 dwellings and it is not anticipated that any individual site will be so large as to warrant justification as a strategic location. The</p>	<p>No change</p>

	Clariant Works in Horsforth should be identified.	approach of the Core Strategy is for the distribution of sites, in sustainable locations, as part of the settlement hierarchy as set out in Policies SP6 and SP7. In terms of employment, the Key Diagram, also identifies a number of strategic opportunities for job growth.	
Redrow Homes (Yorkshire) Ltd (1938)	Urban/village extension strategic sites should be identified at Tingley in accordance with NPPF paragraphs 52 and 157		

**Apportionment to Housing Market Characteristic Areas – Comments about Localities**

**City Centre and Infill Housing**

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Ashdale Land and Property Company Ltd, Hallam Land Management Ltd via Barton Willmore Planning Partnership-Northern (0057), Harrow Estates via White Young Green Planning (0420), C/o Hileys Solicitors via LDP Planning (5867), Templegate Developments via Barton Willmore Planning Partnership-Northern (0057)	No evidence that the City Centre can realistically accommodate 10,200 dwellings over the plan period, particularly given that Objective 1 gives priority to development of town centre uses in the City Centre	Leeds' SHLAA 2011 identifies land for over 160,000 dwellings. Of these 16,169 are concluded to be deliverable in the city centre housing market characteristic areas during the plan period (2011/12 to 2027-28).	No change
Caddick Developments, Cornforth via White Young Green (0420), Quod (1091)	SP7 at Table 2 anticipates that 70% of new housing supply will come forward from within the MUA. This equates to 40200 new homes, thus implying a very high density of development. There is no evidence to support this approach and as such there must be a flexibility of approach that will enable other sites to come forward which can deliver sustainability in order to assist in the delivery of housing.	Leeds' SHLAA demonstrates that dwellings in the housing market characteristic areas and by settlement hierarchy typology can be delivered during the plan period.  Reasonable realistic densities were agreed for different zones of Leeds with the SHLAA Partnership and individual site assessment took account of site specific characteristics.	No change
Comforth and Sons and Harrow Estates via White Young Green (0420)	SP7 Table 2 total infill 46,600 dwellings. It is questionable whether this is deliverable.	The dwelling delivery conclusions of the SHLAA were ratified by the SHLAA Partnership which includes a range of local representatives of different housing interests, including house builders. This provided a level of "market testing" to ensure that conclusions were realistic.	
MFS Land Ltd via Mosaic Town Planning (5672)	We do not consider that the proposed distribution of housing land will enable delivery to be achieved and therefore the plan will not be 'effective' in line with the requirement of NPPF (paragraph 182). The areas of focus are of questionable	The SHLAA is subject to updates, normally annually. The 2011	

	<p>viability and delivery is heavily dependent on public sector funding which is evidently going to be restricted in future years. There is no evidence of any viability assessments of the brownfield sites in these locations.</p> <p>The focus on urban/infill will make it difficult to deliver affordable housing because of the lack of viability (EVA 2010)</p> <p>Reliance on Aire Valley in delivering 6,500 – 9,000 dwellings is over-optimistic because of abnormal costs, incoherence of area and lack of interconnectedness of sites.</p> <p>Therefore, a greater reliance on outer areas is required including use of UDPR PAS land.</p>	<p>update had the effect of moderating some of the more optimistic site delivery conclusions of the 2009 SHLAA.</p> <p>Policy SP7 provides guidance for the plan making process to ensure that housing allocations support the strategy of the plan. Policy H2 provides for more flexibility by allowing sustainable windfall development over and above the distribution expected by Policy SP7.</p> <p>The greater difficulty of delivering affordable housing on urban/infill sites is recognised, but the focus on urban/infill is needed to help achieve a number of objectives including promotion of the vitality of urban areas, protecting countryside and the natural environment, encouraging use of PDL and minimising Green Belt land take. These are valid planning principles recognised by the NPPF (para 17).</p> <p>Recent work on the Aire Valley Leeds Area Action Plan expects a bottom line of 6,500 dwellings deliverable through identified sites during the plan period, but this can be expected to grow as the economy and housing market strengthens from its current low point.</p>	
Renew (5105)	This seems a sensible approach, although the feasibility of over 10,000 additional units in the City Centre may be questionable. Does this need a view as to allocation in the two time periods?	A conservative estimate of 10,200 dwellings are planned for the city centre against the 2011 SHLAA figure of 16,169. To divide the 10,200 into separate time periods would not serve any obvious planning purpose and would add unnecessary complexity.	No change
<b>Outer South West</b>			
Signet Planning (5039)	Supports the 11% of housing being directed to the Outer South West Character Area.	Support welcome	No change
McGregor Brothers Ltd via West Waddy ADP (5884)	Support the focus of major growth to the Outer South West, including the statement to this effect in paragraph 4.6.18	Support welcome	No change
Pegasus Planning Group (4388)	Policy SP7 sets precise figures for distribution, although the supporting text at para 4.6.18 uses 'indication' and 'guide' and states that they are not intended to be rigid targets. Policy SP7 reduces the flexibility of the Core Strategy to deliver the necessary growth, in particular in terms of utilising sustainable urban extensions to the major settlements. If some of the city centre/main urban area sites cannot deliver the level of housing anticipated, there should be flexibility for additional	Sustainable urban extensions form a key part of supply. Phasing through Policy H1 will ensure that needs are always addressed by bringing forward phases as necessary to ensure a 5 year land supply plus appropriate buffer required by the NPPF.	No change

	growth to be delivered through sustainable urban extensions.		
Mr M Dunstall (4743)	NPPF advises that "plans should take account of market signals such as land prices and housing affordability and set out a clear strategy for allocating sufficient land suitable for development in their area taking into account of the needs of the residential and business communities". Is the LPA confident that Spatial Policy 7 fully meets the needs of the residential community as required by national policy?	The City Council is confident that Policy SP7 has been conceived to meet the varied residential needs of Leeds.	No change
Redrow Homes (Yorkshire) Ltd (1938)	Outer south west 11% apportionment is about right, but the total dwelling number needs to be increased to reflect a higher overall housing requirement – if 8% were from urban extensions this would equate to 6,268 dwellings	The City Council does not believe that the housing requirement needs to be increased, but if it is concluded to be necessary the percentage proportions of Policy SP7 would need reconsideration.	No change
Michael Green (5863)	Outer south west 11% apportionment is greater numerically and proportionately than any of the other non-priority areas. The only way of achieving this level of development would be significant extension of Morley itself which would lead to settlement coalescence.	The Outer South West is relatively well structured to accept its share of housing growth having a train station and a large town centre in Morley. It also contains a substantial employment base and is well connected to the Main Urban Area.	No change
Mrs Lisa Jackson (5885)	The scale of development proposed for Outer South West will eat into the narrow strips of Green Belt leading to settlement coalescence. Funding isn't available for the infrastructure improvements to schools, health centres, dental practices, community buildings, roads, sewerage and drainage needed to support this amount of housing.	The Site Allocations DPD will seek to make best use of available brownfield infill sites and minimise the harm to Green Belt objectives, including coalescence and take account of local capacity issues too.	
P & K Cook (5899)	The amount of housing in the Morley area would affect all our roads, schools, health centres and residents. We will have no open spaces to enjoy.	The housing requirement for Leeds will inevitably put pressure on local services and transport throughout Leeds. The City Council plans to use the Community Infrastructure Levy (CIL) to help address the infrastructure burden of new development.	
Andrew Hepworth (5864)	Objects to housing development in the vicinity of Daisy Hill, Morley. It will exacerbate traffic, particularly on the A643 and cause environmental harm		
Miller via Dacre Son & Hartley (0480)	This submission advances the case for the development of land at Spring Gardens, which is located within the settlement limit of Drighlington and is an allocated Safeguarded site under Policy N34 of the Leeds UDPR 2006. The SHLAA (ref 2124) identifies that the site has a capacity to deliver 208 dwellings.	The merits of individual development sites will be considered through Allocation DPDs rather than the Core Strategy	No change
Barratt Leeds Via Dacre Son & Hartley (0480)	This submission advances the case for the development of land off Bruntcliffe Road in south Morley and an application for 200 dwellings was submitted on 22 <sup>nd</sup> March 2012. Part of the site is in the employment allocation area. The SHLAA (ref 1064 and 1281) identifies that the site has a capacity to deliver		



	498 dwellings.		
Taylor Wimpey (via Dacre Son & Hartley) (0480)	This submission advances a case for the development of land in East Ardsley & Tingley which is an allocated safeguarded site in the Leeds UDP Review under policy N34 (2006). The sites are included within the 2011 SHLAA (ref 1218, 2128 and 1143) but one of the sites is not (land at Westerton Road, Tingley).		
Mirfield via via Dacre Son & Hartley) (0480)	This submission advances a case for the development of Green Belt land between Asquith Avenue and Gelderd Road		
<b>Outer North West</b>			
Taylor Wimpey via Turley Associates (1743)	A third of the housing requirement for Outer north west depends on delivery of the East of Otley and Rumpolecroft UDP Housing Allocations (approx. 685 dwellings). Given the dependency of East of Otley on delivery of a bypass, more sites need to be identified in this housing market area and use must be made of PAS land in the area.	It is not the purpose of the Core Strategy to identify land. The Site Allocations DPD will need to identify sufficient sites taking account of deliverability issues of potential sites.	No change
Taylor Wimpey via Turley Associates (1743)	The support for growth of Leeds Bradford Airport means that more housing land will be needed in locations with easy public transport access to the airport, in accordance with CS Objective 7.	Airport growth is subject to surface transport improvements to access the city as a whole, not just the Outer north west housing market area. See also response given under Policy SP6.	No change
Taylor Wimpey via Turley Associates (1743)	Outer northwest housing market area – SP7 Table 3 shows 2000 dwellings up to 2028, but SHMA states requires 2362 dwellings. Therefore shortfall in delivery is likely to result.	Fig 3.12 of the SHMA shows Outer north west has a potential capacity of 2362 dwellings. But this is merely a SHLAA based capacity and should not be misinterpreted as a requirement.	No change
A Watson (0043), J Allison (4681), Miss Alexandra Hannant (4688), Mr John Buck (4697), Mr David Klemm (4776), SEORA (5053 and 5940), Mr Paul Evans (5873), Claire Donkin (5893), Zoe Main (5900), Alec Main (5901), Sharron Smith (5902), Nicola McNally (5903), Brendan McNally (5904), Shelagh Connor (5907), Joe & Karen Bentley	Outer North West requirement of 2000 dwellings creates a disproportionate pressure on Otley to provide supply. Infrastructure is already over capacity and will be overloaded by new housing development, particularly the A660 road corridor and the train line through the area. Otley is a distant outlying settlement in Leeds district and green field development would not help regenerate the main urban area. The UDPR Planning Inspector reached these conclusions. Otley has brownfield site availability evidenced by a 2009 Survey which shows 23.2ha available now.  Not clear why Outer North West has nearly as much housing (2,000) as Aireborough (2,300) when the latter has three towns compared with just Otley in Outer North West (5121).	The Outer North West is apportioned a relatively modest share of the total housing requirement. The Site Allocations DPD will seek to make best use of available brownfield infill sites and minimise the harm to Green Belt objectives, including coalescence and take account of local capacity issues too. The housing requirement for Leeds will inevitably put pressure on local services and transport throughout Leeds. The City Council plans to use the Community Infrastructure Levy (CIL) to help address the infrastructure burden of new development.	No change

<p>(5909), Wanda Phillips (5910), Alison Watson (5912), Graham George (5914), Mr Michael Littlewood (5917), Yvonne Smith (5918), Peter Smith (5919), John Powell (5921), Raymond Georgeson (5922), Peter Knighton (5926), Rosie Knighton (5927), David Ginn (5928), Louise Warrington (5929), Mark Seghetti (5932), Maria Crosby (5933), Sheila Collins (5934), Stephen Seddon (5935), Sandra Biss (5936), Karl Prime (5937), Brian Biss (5938), Mrs Deborah Biss (5939), Directions Planning (5121)</p>			
<p>Taylor Wimpey (via Dacre Son &amp; Hartley) (0480)</p>	<p>This submission advances a case for the development of land in Rumpolecroft which is an allocated Phase 3 housing land allocation site in the Leeds UDP Review (2006), with an estimated dwelling capacity of 135 units. The site is included within the 2011 SHLAA (ref 744) with an area of 5.7ha.</p>	<p>The merits of individual development sites will be considered through Allocation DPDs rather than the Core Strategy</p>	<p>No change</p>
<p>Barratt Leeds (Via Dacre Son &amp; Hartley) (0480)</p>	<p>This submission advances the case for the development of land in East Otley, reliant on the implementation of the east Otley relief road and is an allocated housing site under the Leeds UDPR 2006. The SHLAA (ref 745) identifies that the site has a capacity to deliver 550 dwellings.</p>		
<p><b>Outer South</b></p>			
<p>Hallam Land Management Ltd via Barton Willmore</p>	<p>Question whether the Major Settlements are capable of accommodating 4,000 dwellings as infill development. The SHLAA 2011 Update in respect of Rothwell/ Oulton/</p>	<p>The capability of the Major Settlements to absorb housing development is demonstrated by the SHLAA and site assessment. The City Council has tested a balance of</p>	<p>No change</p>

Planning Partnership-Northern (0057)	Woodlesford only, we note that there are very few infill sites available, certainly not up to the 666 dwellings that could potentially be required as infill development here (4,000 dwellings divided by the 6 Major Settlements). On this basis, our Client believes that the majority of new housing development in Rothwell will need to come from sustainable Green Belt release sites, such as their site at Fleet Lane / Methley Lane, Oulton.	opportunities that the City Council believes could meet the strategy for sustainable development set out in Policies SP1 and SP6. At this stage the City Council does not advocate the development of any individual sites, but has used an overall mix to help determine the dwelling distribution, including for the Major Settlements.  It should not be assumed that there will be equal apportionment of the 4000 dwellings between the 6 Major Settlements.	
<b>Aireborough</b>			
Mr Cedric Wilks (4783)	Aireborough is chosen to receive a further large influx of housing. In view of the number of houses recently built in this area could not a percentage of these planned houses be allocated to the North East of Leeds? A derelict land survey is necessary to see if there are small pockets of building land available to support some house building.	The distribution in Policy SP7 already accounts for making best use of PDL which is found all over Leeds but concentrated in certain areas such as North and East Leeds. Such land is identified in the SHLAA.	No change
WARD (Wharfedale & Airedale Review Development) (5852), Martin Gostling (5872)	2,300 dwellings for Aireborough is too many because of inadequate infrastructure. The A65 road, public transport, schools and GPs are all overloaded. Also, the 3,100 dwellings proposed by Bradford City Council along the A65 corridor will exacerbate the problem.	The housing requirement for Leeds will inevitably put pressure on local services and transport throughout Leeds. The City Council plans to use the Community Infrastructure Levy (CIL) to help address the infrastructure burden of new development.  The Site Allocations DPD will seek to make best use of available brownfield infill sites and minimise the harm to Green Belt objectives and take account of local capacity issues too.	No change
Martin Gostling (5872)	The small independent centres of Rawdon, Guiseley and Yeadon have been and would be more compromised by housing growth		
Susan Kelly (5870)	Rawdon lacks capacity to support new housing in terms of overloaded roads (and potential for accidents), schools and public transport.		
Flora Pearson (5931)	Proposed development of Rawdon Billing - unsound because this is green belt, Harrogate Road and the A65 are very congested already, infrastructure of schools dentists and GPs are full to capacity, and has Horsforth Rawdon coal seam which is full of unrecorded bell pits.		
Chatford (via Dacre Son & Hartley) (0480)	This submission advances a case for the development of land in Bramhope, across the road from the Hilton Grange and Hilton Mews housing developments. Review as phase 3 housing land allocation (2006). The site is included within the 2011 SHLAA (ref 1036) with a capacity of 13 dwellings.		
Warner via Dacre Son & Hartley (0480)	This submission advances a case for the development of Green Belt land at Coach Road, Guiseley. The SHLAA identifies a site development capacity of 65 to 70 dwellings.	The merits of individual development sites will be considered through Allocation DPDs rather than the Core Strategy	No change
Redrow via Dacre	This submission advances a case for the development of land		

Son & Hartley (0480)	designated under UDP Policy N5 at Outwood Lane, Horsforth. It is a SHLAA submission (Ref: 1310).		
<b>Outer North East</b>			
Lisa Fox (5880)	The strategy to use Green Belt land for housing is at odds with national government and local MP statements to protect it. Building on the Green Belt around Barwick in Elmet will damage the rural visual setting of the village.	<p>The Core Strategy aims to make the best use of urban, brownfield and regeneration sites so that the use of countryside, including Green Belt land, is minimised. Nevertheless, the housing need in Leeds is so great that some Green Belt land will be needed. This means that, based on assessment, some land will be taken out of the Green Belt through the plan making process to allow for development. This is consistent with NPPF paras 83-85. The NPPF continues to protect land that is Green Belt from inappropriate development, which may account for national government statements to this effect.</p> <p>The Site Allocations DPD will seek to minimise the damage on Green Belt objectives and visual setting of villages in its determination of the best mix of sites to meet the housing requirement.</p>	No change
Linton land Owners via Ian Bath Planning (5883), Walton and Co (5510), DPP(5543)	A greater proportion of the housing should be sought from the Outer North East. This should be particularly the settlements near to Wetherby, including Linton; the close proximity to this Major Settlement make the adjoining settlements sustainable. More use should be made of land identified in the Outer North East through the SHLAA (5883). Doubtful whether 3,300 is achievable on the East Leeds Extension during the plan period	<p>Starting with the site deliverability conclusions from the SHLAA, and using the locational strategy criteria set out in Policies SP1 and SP6, the City Council has assessed what available SHLAA sites best fit the criteria. From this, a palate of sites can be identified from which the apportionment of dwelling numbers to housing market characteristic areas can be made. Officers have prepared and maintained a palate of sites that are considered to meet the locational criteria of the Core Strategy. This palate is not suggested to be a definitive set of sites to be advanced in the Site Allocations DPD; that would be misleading and premature. However, the palate is considered to be an evidence based way of providing an indication of the appropriate geographical distribution of housing growth in Leeds.</p> <p>Hence, the quantum of housing assigned to the Outer North East can be shown to provide a sustainable pattern of growth. Any additional housing may not be sustainable given the remoteness and lack of facilities in many of the settlements. Detailed distribution of housing within the Outer North East, whilst expected to accord with the Core Strategy's overall policies on sustainable location, will be a matter for the Site Allocations DPD and Neighbourhood Plans.</p>	No change

		The SHLAA 2011 gives evidence that over 3500 dwellings can be delivered on the East Leeds Extension during the CS period.	
Barrett York via Dacre Son & Hartley (0480)	This submission advances a case for the development of land in Boston Spa which is an allocated safeguarded site in the Leeds UDP Review (2006). The site is included within the 2011 SHLAA (ref 2137) with a capacity of 109 dwellings.	The merits of individual development sites will be considered through Allocation DPDs rather than the Core Strategy	No change
Kebbell Homes via Dacre Son & Hartley (0480)	This submission advances a case for the development of brownfield land in the Green Belt at Sandhills Yard, Thorner being land located just outside the village of Thorner in the settlement of Sandhills		
Kebbell Homes via Dacre Son & Hartley (0480)	This submission advances a case for the development of a Green Belt site at Carr Lane, Thorner It is referenced as site 1040 in the SHLAA.		
<b>Outer South East</b>			
McGregor Brothers Ltd via West Waddy ADP (5884)	Support the focus of major growth to the Outer South East, including the statement to this effect in paragraph 4.6.18	Support welcomed	No change
Taylor Wimpey and Ashdale via Dacre Son & Hartley (0480)	We advance the case for the allocation of land which immediately abuts land allocated for employment use in Micklefield currently designated as PAS or safeguarded land under Policy N34 of the UDPR 2006. Micklefield is a relatively compact settlement with excellent infrastructure links as recognised in the Core Strategy which not only identifies the settlement for housing growth but additionally promotes a new rail station and park and ride facility.	The merits of individual development sites will be considered through Allocation DPDs rather than the Core Strategy	No change
Taylor Wimpey and Ashdale via Dacre Son & Hartley (0480)	The Safeguarded Land off Park Lane at Allerton Bywater covers a considerable area and has the ability to deliver a mix of uses that would over the life of the Core Strategy help transform Allerton Bywater into a self-sustaining location. The Safeguarded Land is capable of delivering new homes, employment, retail, education and greenspace without impacting on the Green Belt.		
<b>East Leeds</b>			
DPP (5543)	Questionable that 17% of the housing requirement can be met from East Leeds	There is evidence to demonstrate this is possible in the SHLAA 2011	No change
Taylor Wimpey (Via Dacre Son & Hartley) (0480)	The master planning, development and implementation of ELE should be carried out in a comprehensive and coordinated manner which ensures the creation of a successful, well designed urban extension which is well integrated with the existing urban area. The comprehensive delivery and	The ELE is already a housing allocation.	No change

	programming of all essential infrastructure is of great importance to the project and its close association with the regeneration of existing East Leeds communities and the AVL.		
<b>North Leeds</b>			
Taylor Wimpey (via Dacre Son & Hartley) (0480)	This submission advances a case for the development of land in Cookridge which is an allocated safeguarded site in the Leeds UDP Review under policy N34 (2006). The site is included within the 2011 SHLAA (ref 1199) with a capacity of 298 dwellings. The majority of the site is designated Protected Area of Search.	The merits of individual development sites will be considered through Allocation DPDs rather than the Core Strategy	No change
Chatford (via Dacre Son & Hartley)	This submission advances a case for the development of land in Headingley, just South of the town centre boundary. The site is included within the 2011 SHLAA (ref 1120).		
Barratt Leeds (Via Dacre Son & Hartley) (0480)	This submission advances the case for the development of land in Adel, and is a protected area of search under the Leeds UDPR 2006. The site is a SHLAA (ref 2130). Planning permission has been granted for 45 dwellings subject to the completion of a 106 agreement.		
<b>Outer West</b>			
Chatford (via Dacre Sons & Hartley) (0480)	This submission advances a case for the development of land in Farsley which is mostly allocated in the Leeds UDP Review as phase 3 housing land allocation (2006). The site is included within the 2011 SHLAA (ref 648 and 652) with a capacity of 45 dwellings.	The merits of individual development sites will be considered through Allocation DPDs rather than the Core Strategy	No change
Taylor Wimpey (via Dacre Son & Hartley) (0480)	This submission advances a case for the development of land in New Farnley which is an allocated safeguarded site in the Leeds UDP Review under policy N34 (2006). The site is included within the 2011 SHLAA (ref 2137) with a capacity of 129 dwellings.		
Taylor Wimpey (via Dacre Son & Hartley)	This submission advances a case for the development of land in Farnley at Wood Lane/ Whitehall Road. The site is included within the 2011 SHLAA (ref 3056 and 1171) with a capacity of 720 dwellings.		
Keyland via Dacre Son & Hartley) (0480)	This submission advances a case for the development of Green Belt land at Houghside Sewage Works (built circa 1890's and redundant since 1998). The land has SHLAA site references 1213, 1060 and 3048.		



## Report of the Director of City Development

**Report to: Development Plan Panel**

**Date: 11<sup>th</sup> September 2012**

**Subject: LDF Core Strategy – Publication Draft, Analysis of Consultation Responses: Housing Policies H1 (Phasing), H2 (Development on non-allocated sites), H3 (Density), H4 (Mix) and H8 (Independent Living)**

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 6 weeks public consultation during February – April 2012. Section 3 of this report summarises the issues raised and the Tables in the Appendices 1a, 2a, 3a, 4a and 5a suggest how the City Council should respond. Where changes to the policies are suggested Appendices 1b, 2b and 3b illustrate how the text of Policies H1, H2 and H3 would need to be altered in response to comments. There are no suggested changes to Policies H4 and H8.
  
2. It is not considered that there are any issues significant enough to justify major changes.

### Recommendations

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 1a, 1b, 2a, 2b, 3a, 3b, 4a and 8a 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 (6<sup>th</sup> June), the purpose of this report is to review consultation responses in relation to Policies H1, H2, H3, H4 and H8 of the housing chapter. The appendices attached, summarise the representors, key issues raised, the City Council's view and proposed action.

## **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 28<sup>th</sup> February to 12<sup>th</sup> 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)

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 **Policy H1** sets out an approach to phase the release of housing land, with criteria to help place the most sustainable sites in the early phases. The following issues were raised:

- i) Phasing according to Previously Developed Land (PDL) targets should not be a constraint on development
- ii) The windfall allowance should not feature in phasing
- iii) The city centre should be excluded from phasing
- iv) Whether exceptions to phasing are acceptable or should be widened
- v) The clarity and soundness of the PDL target criteria in the final paragraph of the policy

- 3.2 **Policy H2** sets the criteria to consider planning applications for housing development on non-allocated sites, in other words on "windfall" sites. The main points raised include:



- i) How enforceable is the infrastructure capacity clause
- ii) Is the criterion about sites meeting accessibility standards too onerous and prescriptive
- iii) Revising the definition of “Greenfield” to include private gardens in accordance with the NPPF
- iv) Whether the clause on protecting spaces for their use and character is too restrictive, too lax or not clearly enough worded
- v) Whether the Greenspace clause is clear and supported by robust evidence
- vi) Is an additional employment clause necessary

3.3 **Policy H3** sets minimum density standards for housing development in different geographical areas of Leeds. The main points raised include:

- i) Whether the density levels are too high
- ii) If specialist housing should be treated exceptionally
- iii) Whether the policy is too restrictive and should simply accept any density that suits the character of the area
- iv) Compliance with national policy

3.4 **Policy H4** expects developments to provide an appropriate mix of house types and sizes. The main points raised include:

- i) The targets in Table H4 are too prescriptive
- ii) Control of dwelling size/type will impact on development viability
- iii) The Policy lacks flexibility
- iv) Compliance with national policy
- v) Housing market influence on dwelling size and type
- vi) The role of specialist housing

3.5 **Policy H8** expects larger housing developments to contribute to supporting needs for independent living. It also contains locational criteria expecting sheltered housing schemes to have good access to local facilities. The main points raised include:

#### 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 City 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, 10<sup>th</sup> 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 about Policies H1 – H4 and H8. None of the issues are considered significant enough to justify any major changes. The remaining issues warrant only minor changes or no changes at all.

## **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 1a, 1b, 2a, 2b, 3a, 3b, 4a and 5a to the report) for presentation to Executive Board for approval.

## **7. Background documents<sup>1</sup>**

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) web pages or by contacting David Feeney on 247 4539.

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<sup>1</sup> 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.

**Core Strategy Publication Draft - Analysis of Consultation Responses**

**Policy H1: Managed Release of Housing Sites**

Representors	Issue and Suggested Changes	LCC Opinion	LCC Action
<b>Phased release based on PDL targets as a constraint to development</b>			
<p>Redrow Homes (Yorkshire) Ltd (1938), Spawforths (2663), Evans Homes No. 2 Ltd via Drivers Jonas Deloitte (5034), Signet Planning (5039), Beterspot Ltd via Robert Halstead Chartered Surevior (5649), Bramham Park Estate, Ledston Estate, Lady Elizabeth Hastings Estate Charity, Hatfield Estate, Diocese of Ripon and Leeds, Meadowside Holdings, AR Briggs &amp; Co via Carter Jonas (5681), Home Builders Federation (0092), Barratt David Wilson Homes Yorkshire Homes (5895), Templegate Developments, Ashdale Land and Property Company Ltd, Hallam Land</p>	<p>Policy H1 is contrary to the NPPF because it seeks to hold back Greenfield housing site release if LCC PDL targets are not met. The thrust of the NPPF is to ensure sufficiency of housing supply through provision of a 5 year (+ 5% or +20%) of deliverable sites. If the policy is constraining delivery then it is likely to be judged inappropriate at an appeal situation (paragraph 48). The NPPF also emphasises the need for plan policies to be flexible (paragraph 21) to accommodate needs not anticipated in the plan to allow a rapid response to changes in economic circumstances.</p> <p>The NPPF only states that development of PDL may be “encouraged” (para 17) and says “Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.”(para 111).</p> <p>PDL targets have no foundation in national guidance and should be deleted (5681)</p> <p>Paragraph 4.6.7 (explanatory text for Strategic Policy SP6) sets out a phased approach to housing provision, with numbers increasing after the first 5 years. This is stated to be “because the current economic climate has impacted on a range of factors, which have in turn frustrated recent housing delivery”. A phasing policy should aim to bring forward housing to meet needs rather than hold it back (5672).</p>	<p>Whilst PPS3 paragraph 62 endorsed managed delivery of housing land to address PDL trajectory targets, the NPPF merely encourages its use (para 17) and says local authorities may set a local PDL target (para 111).</p> <p>The NPPF also promotes a number of principles as set out in paragraph 17, bullets 1, 5, 6, 7, 8, and 11 that recognise the importance:</p> <ul style="list-style-type: none"> <li>- of a positive vision for an area shaped by local people,</li> <li>- of the need to promote the vitality of urban areas, protecting Green Belt and countryside,</li> <li>- of reuse of existing resources, including conversion of existing buildings</li> <li>- of conserving the natural environment, preferring land of lesser environmental value where consistent with other NPPF policy</li> <li>- of encouraging the re-use of PDL</li> <li>- of managing patterns of growth to make the fullest use of public transport, walking and cycling</li> </ul> <p>The Core Strategy echoes these principles with objectives to make best use of land and premises in urban sustainable locations and prioritising PDL. Re-use of PDL is also a key strand of Policy SP1. It is consequently necessary for Policy H1 to translate the preference for PDL into the consideration of phased release of housing. The three criteria in the final paragraph of Policy H1 are positively worded, so that</p>	<p>No change</p>

<p>Management Ltd via Barton Willmore Planning (0057), MFS Land Ltd via Mosaic Town Planning (5672)</p>		<p>provided at least one applies further phases of housing can be released.</p> <p>Also, it is clear from the wording of paragraph 5.2.2 of the supporting text that the City Council is seeking a balanced approach that achieves both a sustainable pattern of development with a focus on urban and regeneration areas and to phase the release of allocations to ensure there is always a 5 year supply of housing land..</p>	
<p>Spawforths (2663), Pegasus Planning Group (4388), Directions Planning (5121)</p>	<p>Policy H1 release mechanism should hinge upon the definition of deliverability set out in NPPF footnote 11 on page 12. Deliverable sites should come forward alongside or prior to previously developed sites in order to maintain the housing supply and achieve the housing requirement. A PDL target should not impede this.</p>		
<p>Redrow Homes (Yorkshire) Ltd (1938), Spawforths (2663), Signet Planning (5039), Betterspot Ltd via Robert Halstead Chartered Surevyor (5649), Edward Thornhill Estates, TGMF Emsley, Barratt David Wilson Homes, Great North Developments, Redrow Homes, Robert ogden Partnership, East Leeds Extension Northern Quadrant Consortium, Housebuilders Consortium, Wortlea Estates, Great North Developments c/o Evans via ID Planning (5671), Home Builders Federation (0092), Barratt David Wilson Homes Yorkshire Homes (5895)</p>	<p>A PDL target cannot be part of the release mechanism of Policy H1. The purpose of Policy H1 should be phasing to ensure sufficiency of housing supply in sustainable locations. Inclusion of the PDL target makes the policy confusing and lacking rationale.</p>		

DPP (5543) Pegasus Planning Group (4388)	Is there evidence to justify the PDL targets of 65% and 55%? Query whether the 20,000 dwellings in outstanding planning permissions contributed to the setting of the PDL target	The PDL targets are based upon a realistic palette of SHLAA sites which are capable of satisfying the housing requirement and the strategic policy criteria of Policies SP1 and SP6. The dwelling delivery numbers and rates are those agreed in the SHLAA which may not necessarily include the 20,000 dwellings with outstanding planning permission referred to in paragraph 4.6.13 of the Core Strategy.  The targets are realistic. They are lower than PDL percentage achievements in Leeds over the last 10 years, but that is because a greater amount of greenfield land is needed to satisfy the housing requirement.	No change
Morley Town Council (4825)	Based on performance over many years, the 65% first five-year LDF brownfield target for housing land supply is unreasonably low, the 55% for later years even more so. An overall target of 75% would be modest in the light of recent brownfield achievements of more than 90% and should be fortified by the upward re-assessment of windfall potential encouraged in NPPF.		
Renew (5105)	The policy to maintain development of previously developed land is sound however, it is questionable whether adoption of a previously developed land target of 65% in the first five years can be achieved, or whether it could be compromised by financial viability issues.		
Signet Planning (5039),	Policy H1 should be recast to assess the suitability of sites for inclusion in the LDF Allocations Document, rather than control phased release	Policies SP6 and SP7 already provide criteria and locational targets to guide the Site Allocations DPD in identifying sites.	No change
McGregor Brothers Ltd (5884)	Location on Previously Developed Land should feature as an additional criterion in the first paragraph.	The preference for PDL already features in the criteria of Policy SP6 for helping site allocations plans to identify sites. Policy H1 includes PDL targets which will influence how the sites are phased in the Site Allocations DPD in order to achieve the targets. As such, a PDL criterion in Policy H1 is unnecessary	No change
DPP (5543)	The geographical distribution according to Policy SP5 should apply throughout the plan period, not just the 1 <sup>st</sup> 5 years	Agree.	Minor Change. Reword the second sentence of Policy H1 to clarify that the geographical distribution applies throughout the plan period
Leeds Civic Trust (0062)	In site release priorities v) add "existing and proposed" before "green infrastructure"	Agree	Minor Change. Add "existing and proposed" before "green infrastructure" in criterion v)
Redrow Homes (Yorkshire) Ltd (1938), Edward Thornhill Estates, TGMF	There should be 3 phases: 2012/2013 – 2017/2018, 2018/2019 – 2024/2025, 2025/2026 – 2029/2030	It is not necessary for the Core Strategy to prescribe phase periods. Policy H1 allows new phases to be brought forward when needed.	No change

<p>Emsley, Barratt David Wilson Homes, Great North Developments, Redrow Homes, Robert Ogden Partnership, East Leeds Extension Northern Quadrant Consortium, Housebuilders Consortium, Wortlea Estates, Great North Developments c/o Evans via ID Planning (5671), Barratt David Wilson Homes Yorkshire Homes (5895)</p>			
<p>Redrow Homes (Yorkshire) Ltd (1938), Edward Thornhill Estates, TGMF Emsley, Barratt David Wilson Homes, Great North Developments, Redrow Homes, Robert Ogden Partnership, East Leeds Extension Northern Quadrant Consortium, Housebuilders Consortium, Wortlea Estates, Great North Developments c/o Evans via ID Planning (5671), Barratt David Wilson Homes Yorkshire Homes (5895)</p>	<p>LCC should make the Site Allocations DPD Preferred Approach available for the Core Strategy Examination in order that the phasing criteria of Policy H1 can be tested and shown to be realistic</p>	<p>This will depend upon timing, but the City Council accepts that the housing distribution and phasing policy could be better understood if site allocation options are available.</p>	<p>No change</p>
<p><b>Windfall</b></p>			

MFS Land Ltd via Mosaic Town Planning (5672), Bramham Park Estate, Ledston Estate, Lady Elizabeth Hastings Estate Charity, Hatfield Estate, Diocese of Ripon and Leeds, Meadowside Holdings, AR Briggs & Co via Carter Jonas (5681)	The windfall allowance of 500 dwellings per annum in paragraph 5.2.2 is not justified by evidence. No account is taken of “windfall leakage” – ie the percentage of permissions that do not materialise	The windfall allowance is based upon rates of actual historic completions, so there is no need for a leakage rate which might be necessary if rates of historic permissions had been used.	No change
Templegate Developments, Ashdale Land and Property Company Ltd, Hallam Land Management Ltd via Barton Willmore Planning (0057)	Windfall should not be accounted for in the release of housing land. Delete paragraph 5.2.2. and all references to windfall.	The NPPF (para 48) is supportive of the use of windfall allowances.	No change
<b>City Centre</b>			
Redrow Homes (Yorkshire) Ltd (1938), Edward Thornhill Estates, TGMF Emsley, Barratt David Wilson Homes, Great North Developments, Redrow Homes, Robert Ogden Partnership, East Leeds Extension Northern Quadrant Consortium, Housebuilders Consortium, Wortlea Estates, Great North Developments c/o Evans via ID Planning (5671), Barratt David	The City Centre should be excluded from the phasing. It is too large and disparate in terms of market and residential product; it is in essence a separate and independent market in terms of product and location to the rest of the District.	The city centre is a distinctive Housing Market Characteristic Area (HMCA) but it contributes to meeting Leeds housing requirement like all the other HMCAs. It is necessary for city centre housing sites to be identified and form part of the phasing.	No change



Wilson Homes Yorkshire Homes (5895)			
Redrow Homes (Yorkshire) Ltd (1938), Edward Thornhill Estates, TGMF Emsley, Barratt David Wilson Homes, Great North Developments, Redrow Homes, Robert Ogden Partnership, East Leeds Extension Northern Quadrant Consortium, Housebuilders Consortium, Wortlea Estates, Great North Developments c/o Evans via ID Planning (5671), Barratt David Wilson Homes Yorkshire Homes (5895)	In the event that sites within the City Centre do not deliver 572 dwellings by the end of each year (31 March), applications on sites outside the City Centre in the next phase of development will be considered favourably until the shortfall has been met.		
<b>Exceptions to Phasing</b>			
Redrow Homes (Yorkshire) Ltd (1938), Edward Thornhill Estates, TGMF Emsley, Barratt David Wilson Homes, Great North Developments, Redrow Homes, Robert Ogden Partnership, East Leeds Extension Northern Quadrant Consortium, Housebuilders	Provision of other housing benefits such as affordable housing should be added as a reason for allowing sites to be released early.	The “special circumstances” outlined in Policy H1 are deliberately limited to assisting provision of housing development and infrastructure in Regeneration Priority Areas.	No change

Consortium, Wortlea Estates, Great North Developments c/o Evans via ID Planning (5671), Barratt David Wilson Homes Yorkshire Homes (5895)			
Bramham Park Estate, Ledston Estate, Lady Elizabeth Hastings Estate Charity, Hatfield Estate, Diocese of Ripon and Leeds, Meadowside Holdings, AR Briggs & Co via Carter Jonas (5681)	Given the onus within the NPPF to work in collaboration with the development industry and to have regard to market trends we would suggest that the policy includes a reference to market indicators for the release of green field sites.	It is not clear what is meant by “market indicators” for the release of greenfield sites. Policy H1 needs to ensure a sufficiency of supply of deliverable sites and the City Council is concerned that this should not lead to land-banking of greenfield sites that are released but not developed. A market indicator factor would add an unnecessary dimension of complexity to the policy.	No change
DPP (5543)	The special early release clause for regeneration areas should apply to all locations	There needs to be a public benefit to justify early release. Investment in regeneration areas is considered to provide public benefit; investment in other areas would not.	No change
McCarthy & Stone (Developments) Ltd (1935).	McCarthy and Stone has special locational criteria for its housing developments designed for elderly people. Specialist housing for the elderly should be excluded from Policy H1	Policy H1’s existing criteria will favour the type of urban accessible sites that McCarthy and Stone favour for its housing for the elderly.	No change
Directions Planning (5121)	Neighbourhood Plans should be able to override district wide phasing	It is necessary for Neighbourhood Plans to be in general conformity with the Core Strategy which would not allow them to contradict district-wide phasing.	No change
Directions Planning (5121), Bramham Park Estate, Ledston Estate, Lady Elizabeth Hastings Estate Charity, Hatfield Estate, Diocese of Ripon and Leeds, Meadowside Holdings,	The policy should not allow sites to be advanced early that deliver regeneration benefits. This would promote “backdoor” planning, involving deals outside of the development plan system. It could also lead to more appeals.  The wording “In special circumstances,...” is vague and should be deleted.	Inserting the exceptions criteria into the policy is a transparent means of helping to ensure probity in the taking of planning decisions.	No change

AR Briggs & Co via Carter Jonas (5681)	This approach is contradictory to planning principles which require that development proposals should mitigate their own effects, but not address existing shortcomings or investment shortfalls in alternative schemes.		
<b>Final Paragraph of Policy H1</b>			
Redrow Homes (Yorkshire) Ltd (1938), Spawforths (2663), Walton & Co (5510), Edward Thornhill Estates, TGMF Emsley, Barratt David Wilson Homes, Great North Developments, Redrow Homes, Robert ogden Partnership, East Leeds Extension Northern Quadrant Consortium, Housebuilders Consortium, Wortlea Estates, Great North Developments c/o Evans via ID Planning (5671), MFS Land Ltd via Mosaic Town Planning (5672), Bramham Park Estate, Ledston Estate, Lady Elizabeth Hastings Estate Charity, Hatfield Estate, Diocese of Ripon and Leeds, Meadowside Holdings, AR Briggs & Co via	An additional buffer of 5% or 20% should be incorporated into the 5 year supply reference in criterion iii).	The NPPF is clear that 5 year supplies should have, "...an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20%..."  As Leeds cannot be certain that it will be 5% authority for the full plan period, wording of Policy H1 should reflect the possibility of a buffer of 5% or 20% being applicable, depending upon the circumstances of the period.	Minor change. Add "(plus appropriate NPPF buffer)" after "Where a five year supply..." in the first line of the last paragraph of Policy H1.

Carter Jonas (5681), Barratt David Wilson Homes Yorkshire Homes (5895)			
Leeds Civic Trust (0062)	The phrases in the criteria of the last paragraph could encourage the release of unnecessary greenfield sites if there are no safeguards to guarantee delivery of available PDL. Developers can dictate whether PDL is deliverable or not and are therefore in a position to reduce the five year supply. Developers may argue that, because development on brownfield sites is not viable (because of the depressed housing market keeping prices too low to cover site preparation costs, for example) a five year supply is not available, thus justifying release of further greenfield sites. In these circumstances approvals on further releases of greenfield sites must be linked to delivery of PDL which has been included in the 5 year supply figures. Excepting UDP allocations greenfield sites should not be released while there are brownfield sites available.	Agree. Policy H1 has criteria to consider performance against PDL targets. The Core Strategy's PDL targets and its whole focus on urban regeneration will be undermined if landowners and/or housebuilders are able to use viability as a reason to release more sites. Whilst it is accepted that in the current economic climate, many brownfield sites may not be viable, it will be important to ensure that released greenfield sites are not land banked on spurious reasons of viability.	Minor change. Add clarification that the City Council will interpret the NPPF definition of deliverable sites to include land-banked greenfield sites which are viable for development.
Micklefield Parish Council (0122)	The last three sub clauses listed in Policy H1 appear to be worded in a way that gives the opposite meaning to what is logically intended from the previous text. The three sub clauses are worded in the positive, which means that the Policy as written is unsound. The last three sub clauses should be amended, so that they are worded in the negative: THE RELEASE OF FURTHER PHASES OF HOUSING LAND MAY BE CONSIDERED IF IT IS FOUND THAT EITHER: (I) DELIVERY ON PDL IN THE PAST YEAR HAS NOT MET THE TARGET; (II) DELIVERY ON PDL IS NOT EXPECTED TO MEET THE TARGET FOR THE NEXT FIVE YEARS; OR (III) A SUFFICIENT NUMBER OF SITES (EQUIVALENT TO THE FIVE YEAR SUPPLY FIGURE MINUS THE WINDFALL ALLOWANCE) ARE NOT REASONABLY CAPABLE OF BEING DEVELOPED.	The final paragraph is reasonably clear and deliberately worded in the positive to accord with the NPPF. Minor change to clarify the intention of the policy..	Minor change Replace "may be" with "will only be" to provide more certainty

Templegate Developments, Ashdale Land and Property Company Ltd, Hallam Land Management Ltd via Barton Willmore Planning (0057)	Criterion iii) of the final paragraph of Policy H1 is confusing and should be clarified		
<b>UDP Housing Allocations</b>			
Alastair Watson (0043), Graham George (5914), Michael Littlewood (5917)	Concerned about the statement in paragraph 5.2.3 that the UDP housing allocations will not be subject to phasing. The remaining UDP allocated housing sites should be subject to sustainability assessment to ensure that only those in sustainable locations are carried forward. Those sites such as East of Otley, that the UDP Review inspector concluded had sustainability issues, should not be released until their sustainability is improved	The UDP allocated housing sites are too far advanced through the planning process to be reviewed now, and have already been subject to thorough assessment through the UDP Review Examination process.	No change
Redrow Homes (Yorkshire) Ltd (1938)	Phase 1 releases should include all existing deliverable UDPR Allocations and suitable UDPR Safeguarded (PAS) sites.	Paragraph 5.2.3 clarifies that UDP housing allocations will not be subject to phasing. PAS sites will need to be assessed for their inclusion and phasing in site allocations plans.	No change
<b>Miscellaneous</b>			
Highways Agency (0060)	In addition to comments on the scale of allocations to some of the District's sub-areas made separately in relation to Spatial Policy 7 Distribution of Housing Land and the Key Diagram, there will be detailed comments from the Agency on a site-by-site basis when the Site Allocations DPD is brought forward for consultation.	Noted	No change
Pegasus Planning Group (4388)	Support recognition of need to bring forward large sites early in the plan period	Support welcomed.	No change
		Typing errors in paragraphs 5.2.3 and 5.2.3	Minor change. References to "Policy P1" should be changed to "Policy H1"

## Appendix 1b: Changes to Policy H1

### a) Housing

- 5.2.1 In seeking to respond to the challenges of population growth and housing needs, the delivery of these objectives during current economic and market conditions is a considerable task. As emphasised throughout the Core Strategy, housing delivery in sustainable locations, which respects local character and distinctiveness, maximises opportunities to recycle previously developed land, whilst minimising greenfield and Green Belt release is a priority. Plan monitoring, review and a degree of realism and flexibility will be necessary to achieve these ambitions.
- 5.2.2 Within this framework and in support of Spatial Policies 6, 7 and 10, Policy H1 describes the need for phasing to achieve the aims of a sustainable pattern of development, with focus on the Main Urban Area and regeneration of areas within it. The policy explains that the phased release of allocations will ensure that there is always a 5 year supply of housing land. When determining the five year supply, the windfall allowance of 500 units per annum will be deducted from the total number of units needing to be identified. This aligns with SP6 which seeks to identify 66,000 out of the 74,000 gross units required.
- 5.2.3 In providing a basis for housing supply in the early years of the plan (the first 5 years), there are a number of sites which benefit from a planning permission and in addition there are housing allocations released as part of the UDP (phases 2 and 3). These sites are not regarded as being subject to phasing as part of Policy ~~H1 P4~~ *H1 P4*, as they are regarded as currently available for development. Only sites which do not have an extant planning permission (for housing) or allocation, will be identified as new allocations and phased, through LDF allocations documents (Site Allocations DPD and Aire Valley Area Action Plan).
- 5.2.4 In reflecting the district's strong historical performance in the delivery of previously developed land (PDL), Policy ~~H1 P4~~ *H1 P4* identifies a target of 65% (taken from the Regional Spatial Strategy "The Yorkshire and Humber Plan" 2008). According to the amount of deliverable PDL land identified in the SHLAA, 65% presents a realistic target for the first 5 years of the Plan. Beyond this period, although sources of PDL supply are still likely to come forward, more greenfield land as part of the overall balance, will be needed to sustain the housing supply, consequently the target drops to 55%.
- 5.2.5 Recognising the relatively long lead in time and technical issues associated with bringing forward larger sites for residential development, which will often necessitate the need for phasing and the provision of infrastructure, consideration will be given to opportunities to bring such sites forward for development, as part of earlier phases, where this is appropriate and consistent with the overall strategy.
- 5.2.6 In seeking to meet housing need and to help support the viability of housing delivery, there may also be opportunities for sites to be brought forward, in advance of their particular phasing where appropriate. Examples could include where there are opportunities through early release, to provide higher levels of Affordable Housing through off site contributions or the use of City Council assets

(within regeneration areas) as a basis to 'pair' with greenfield sites in private ownership

*5.2.6b Deliverable sites for the purposes of this policy will include released greenfield sites which are capable of delivering dwellings within 5 years taking account of the cost and time needed to deliver any necessary infrastructure or remediation.*

#### **POLICY H1: MANAGED RELEASE OF SITES**

LDF Allocation Documents will phase the release of allocations according to the following criteria in order to ensure sufficiency of supply, geographical distribution in accordance with Spatial Policy 7, and achievement of a previously developed land target of 65% for the first 5 years and 55% thereafter. ~~Subsequent phases (after the first 5 years of the Plan)~~ *Subject to these considerations, phases with the earliest release* should be made up of sites which best address the following criteria:

- i. Location in regeneration areas,
- ii. Locations which have the best public transport accessibility,
- iii. Locations with the best accessibility to local services,
- iv. Locations with least impact on Green Belt objectives,
- v. Sites with least negative and most positive impacts on *existing and proposed* green infrastructure, green corridors, green space and nature conservation

Consideration will be given to bringing forward large sites, of more than 750 dwellings, to facilitate, early delivery in the Plan period.

In special circumstances, allocated sites may be permitted to be released in advance of their phasing outlined above, so long as the permitted site delivers infrastructure and housing investment that is needed within Regeneration Priority Areas. In such cases, suitable mechanisms will be agreed to ensure that delivery within the Regeneration Priority Area occurs either before, or in conjunction with the delivery of the permitted site.

Where a five year supply (*plus appropriate NPPF buffer*) of deliverable housing sites cannot be demonstrated through annual monitoring, consideration will be made to release the subsequent phase or phases of sites to help address the shortfall. ~~The~~ *Any* release of further phases of housing land ~~may~~ *will only* be considered if it is found that either:

- i) Delivery on PDL in the past year has met the target;
- ii) Delivery on PDL is expected to meet the target for the next five years; or
- iii) A sufficient number of sites (equivalent to the five year supply figure minus the windfall allowance) are reasonably capable of being developed.

## Core Strategy Publication Draft - Analysis of Consultation Responses

### Policy H2: New Housing Development on Non-Allocated Sites

Representors	Issue and Suggested Changes	LCC Opinion	LCC Action
<b>General Comments</b>			
D Westwood & Son via WYG (0420)	Generally supportive of policy.	Support welcomed	No change
Home Builders Federation (0092)	<p>The policy is unsound as it is not positively prepared and is unjustified. It lacks rationale. The existence of this policy suggests that the Council has little faith in its strategy of identifying a sufficiency of housing land as required by the NPPF.</p> <p>The inclusion of Policy H2 confirms our doubts about the achievability of the policies in respect of containing the majority of development within the MUA in the first phase of the plan, and the priority to be attached to PDL. It is not a positive planning policy but one that seeks to insulate the Council from the unrealism of its adherence to concentrating development in the MUA and on PDL.</p> <p>The policy should be deleted.</p>	<p>LCC policy toward windfall development has moved from one of embargo against all greenfield development to one of acceptance of greenfield development with provisos to protect land with intrinsic qualities as set out in Policy H2. These qualities of land are recognised in the NPPF.</p> <p>Whilst Policies SP6 and SP7 will ensure that a sufficient quantum of housing land will be identified to meet needs, Policy H2 is likely to be less restrictive on windfall development than policy applied in recent years upon which Leeds' windfall allowance is predicated.</p>	No change
Banks Development (5036)	<p>Policy H2 is too restrictive to assist in early delivery of non-allocated sites. It undermines the overall objectives of the Core Strategy and in particular the assumed provision of windfall housing. It should be more in line with the presumption in favour of sustainable development found in NPPF.</p> <p>SUGGESTED CHANGE Priorities early release of PAS sites in advance of the site allocation DPD</p>		
Directions Planning (5121)	This policy needs to be reviewed in light of NPPF.	The policy is not incompatible with the NPPF	No change
<b>Infrastructure Capacity Clause</b>			
Leeds Civic Trust (0062)	Permissions for housing have previously been given that have exceeded infrastructure capacity. What will be the tests	The NPPF makes clear in paragraph 173 that identified housing sites should not be subject to such a scale of	No change



	<p>applied to measure capacity and ensure that this policy is meaningful and properly applied in future?</p> <p>Amend policy so that proposed development only acceptable if it can be <i>demonstrated</i> that there is sufficient infrastructure capacity.</p>	<p>obligations and policy burdens that viability is threatened. But at the same time paragraph 177 states that it is important to be reasonably certain that planned infrastructure will be delivered in a timely fashion.</p> <p>The city council will need to make a judgement on the sufficiency of infrastructure and the information submitted to support proposed development. Sufficiency of infrastructure does not need to be demonstrated by the applicant in every housing application, but can be examined in more depth if necessary for particular applications that raise concerns about sufficiency of infrastructure.</p>	
<b>Accessibility Clause</b>			
Cornforth & Sons via WYG (0420)	<p>Paragraph 5.4.3 states that the accessibility standards set out in Table 2 at Appendix 2 are based on the RSS evidence base. However, they take no account of the settlement hierarchy described in Table 1 of the Core Strategy and simply apply the same 15 minute service criteria to the whole of the Leeds District for developments of more than 5 dwellings. In contrast, the RSS applies its accessibility standard in accordance with the settlement hierarchy i.e. developments in the main urban areas have a higher standard applied than those in more outlying areas.</p> <p>The accessibility standards should be based on those set out at Tables 13.8 and 13.9 in the RSS utilising the same hierarchical approach, with the more onerous standards applied in the main urban areas reducing to more appropriate standards for the villages/rural settlements.</p> <p>CS paragraph 4.1.13 concerning the Settlement Hierarchy suggests that it may be possible to support development in smaller settlements within current levels of service, and this should also be reflected in Table 2.</p>	<p>It is considered that the most appropriate interpretation of the accessibility standards of the RSS is that the standards applying to Regional Cities would apply throughout the Leeds District, not just to the urban areas. Likewise the standards applying to rural areas would apply to rural areas on a regional scale – ie the large tracts of countryside found in the predominantly rural authorities of the region.</p> <p>In Leeds, for new employment/social infrastructure uses it is appropriate to have slightly easier standards for smaller settlements and rural areas to help support the rural economy and enable facilities to be provided that help serve existing rural communities.</p> <p>Because new housing development in Leeds is needed to meet the population growth of the city as a whole, it is appropriate to channel it to locations that are sustainable, particularly in terms of transport. Hence, it is appropriate to apply a single accessibility standard across the district.</p>	No change
Banks Development (5036)	The accessibility standards are too prescriptive.	The accessibility standards need to be clear what is required and insertion of words, “seek” or “aim” would cloud the purpose of the standards. For housing development, they are no stricter in terms of adherence than the RSS standards which applied to all developments. In fact the Core Strategy standard may	Minor Change already agreed by Development Plan Panel of 2/7/12 with the addition of “or a 5 minute walk to a bus
DPP (5543)	Too prescriptive and does not allow for a reasonable level of flexibility. We would suggest that after the word ‘should’ a word such as ‘seek’ or ‘aim’ should be inserted, at the very least.		

Harrow Estates via WYG (0420)	Policy H2 makes strict adherence to the accessibility standards a prerequisite – see notes re Appendix 2.	be less strict in applying only to developments of 5 or more dwellings. In terms of the level of the standards these are generally no more onerous than those that apply to the urban areas of the Region in RSS.	<i>stop offering a direct service at a 15 min frequency.”</i>
McGregor Brothers Ltd via West Waddy ADP (5884)	<p>Policy H2 on New Housing Development on Non Allocated Sites states that ‘for developments of 5 or more dwellings the location should accord with the accessibility standards in Table 2 of Appendix 2.’ The criteria given in appendix 2 are cumulative and must all be met. One of the important objectives of new development in smaller settlements should be to maintain local services. However, under the criteria if a site is close to local services but is not within a 20 minute walk of primary health care, housing development would be unacceptable.</p> <p>Recent NHS reforms include the removal of practice boundaries - meaning that patients will have the right to register with the GP of their choice regardless of distance, which is a further argument why this accessibility standard is not appropriate.</p> <p>The policy is therefore too inflexible and likely to result in housing development being refused from sustainable locations, where it would actually help to support local services.</p> <p>THE ACCESSIBILITY STANDARDS IN APPENDIX 2 SHOULD BE AMENDED TO PROVIDE MORE FLEXIBILITY, IN PARTICULAR RECOGNISING THAT HOUSING DEVELOPMENT COULD BE STILL IN A SUSTAINABLE LOCATION IF IT DOES NOT MEET ALL OF THE ACCESSIBILITY STANDARDS. SUCH DEVELOPMENT WILL BE DESIRABLE IN SOME INSTANCES TO MEET LOCAL HOUSING NEED AND TO PROVIDE ADDITIONAL CUSTOM TO LOCAL SERVICES TO ENABLE THEM TO REMAIN COMMERCIALY VIABLE.</p>	<p>It is agreed that the standard for accessibility of housing developments to Primary Health / Education is onerous as a 20minute walk only. In considering responses to Policy T2, Development Plan Panel of 2/7/12 agreed to the addition of “<i>or a 5 minute walk to a bus stop offering a direct service at a 15 min frequency.</i>”</p>	
<b>Greenfield Land Definition</b>			
Leeds Civic Trust (0062)	Greenfield land needs further defining in the Glossary to include gardens and other private spaces not used by the public and therefore not falling under the definition of “□reenspace”. Amend definition of “greenfield” land in the glossary to include private gardens and grounds.	Agree. The Glossary needs updating to reflect the NPPF	Add “but can also include private residential gardens” after “...forestry, or parks”

<b>Intrinsic Value Clause</b>			
English Heritage (0099)	We support the requirement that greenfield land should not be developed if it has intrinsic value as amenity open space or makes a contribution to the visual, historic and/or spatial character of the area. This will help to ensure that open areas which contribute to the character of the District are not lost.	Support welcomed	No change
Leeds Civic Trust (0062)	The sub-paragraph a) in the policy is too loose as it only prevents development if the land has both intrinsic value and is important to the character of the area, rather than either/or Alter para. A) to read “.....nature conservation, OR makes a valuable contribution .....”etc	Agree. There may be cases where it would be appropriate to resist development that would detract from either amenity, recreational or nature conservation value OR from the visual, historic or spatial character of an area	Minor change. After “...nature conservation” replace “and” with “or”
Banks Development (5036)	A proposal might be refused where the site is considered to make a “special contribution to the visual or spatial character” of the area. This could be applied to any site which is not overtly derelict. The policy is too restrictive.	The qualities that part a) of Policy H2 are seeking to protect are valid ones. They are supported by the Core Planning Principles of the NPPF (para 17) including recognition of “the intrinsic character and beauty of the countryside” (bullet 5), “contribute to conserving and enhancing the natural environment...” (bullet7), recognition “...that some open land can perform many functions (such as for wildlife, recreation...)” (bullet 9), “conserve heritage assets in a manner appropriate to their significance...” (bullet 10) and “...support local strategies to improve health...”. By seeking to protect these valid qualities from development it is inevitable that some level of restriction will be necessary, but this is not overly restrictive.	No change
DPP (5543)	Criterion a) the words and terms utilised in this criteria are too vague to allow the formation of judgement as to whether planning permission is reasonably likely to be permitted e.g. such phrases as ‘valuable contribution’, ‘spatial character’ and ‘intrinsic value’ are all too vague. This criterion needs to be amended.	The factors for consideration cannot be couched in measurable and quantifiable tests because they will largely be matters of judgement on a case by case basis informed by visual appearance and knowledge of past and current usage.	No change
Boston Spa Parish Council (0112)	No reference is made to the requirements of the Localism Act for local communities to define protected green space areas in Neighbourhood Plans.  Add to clause a) “or if it has been designated as a protected green area in the relevant Neighbourhod Plan”	The policy refers to land use in generic terms. If land is designated in an adopted Neighbourhood Plan as a protected green area it would clearly have the intrinsic value referred to in the policy. The same would go for all other designations of land of environmental value which do not need to be listed in Policy H2 to be protected.	No change
Friends of Allerton Grange (5857)	Policy H2 needs to be in conformity with NPPF Para74: Don't build on existing open/greenspace unless a) assessment taken to show surplus b) loss from development would	The wording and intention of Policy H2 is in general conformity with the NPPF in seeking to protect acknowledged qualities of land that are threatened by	No change

	<p>improve quality or quantity in suitable location c) development provides for another sport/rec provision which outweighs loss.</p> <p>It also needs to conform to Para 77: Local green space designation only appropriate where a) green space close to community serves b) where area demonstrably special to local community and holds local significance c) green area is local in character and not an extensive tract of land</p> <p>SUGGEST THAT THE POLICY H2 (A) IS REWORDED AS FOLLOWS-          "IN ADDITION GREENFIELD LAND:          A) SHOULD NOT BE DEVELOPED IF IT HAS INTRINSIC VALUE AS AMENITY SPACE OR FOR RECREATION <b>(INCLUDING AS A PLAYING FIELD)</b> OR FOR NATURE CONSERVATION, AND MAKES A VALUABLE CONTRIBUTION TO THE VISUAL AND/OR SPECIAL CHARACTER OF AN AREA "</p>	<p>development. The suggested wording is unnecessary as a playing field would obviously fall within the definition of greenfield land with intrinsic value for recreation.</p>	
<b>Designated Greenspace Clause</b>			
Sport England (1982)	For the reasons detailed under our comments on policy G3, the Open Space and Recreation Assessment is not sufficiently robust and up to date to allow decisions to be made on whether sports facilities are genuinely surplus to requirements. Reliant on this evidence would be unsound.	As per LCC response to Sport England's comments on Policy G3, the City Council considers the Assessment to be fit for purpose. Therefore, it is appropriate to use it as a test of sufficiency of open space used for sport and recreation.	No change
The Diocese of Ripon and Leeds, AR Briggs & Co, Ledston Estate, Meadowside Holdings, Bramham Park Estate, Lady Elizabeth Hastings Charity Estate, Hatfield Estate via Carter Jonas (5681)	This policy supports housing development on non-allocated sites. We would suggest that the latter part of the policy should be clarified as it seems to relate to designated/allocated greenspace.	There is no contradiction. The policy concerns development on land that is not allocated for housing. Part b) of the policy concerns land designated as green space. In the Leeds UDP allocations are used for land being set aside for future development, like housing or employment. A range of other land designations are made, concerning a range of existing land qualities. Land would not be "allocated" for Greenspace.	No change
<b>Add wording to protect employment sites</b>			
Directions Planning (5121)	The loss of key employment sites and the decrease in the number of local employment opportunities is of real concern to Otley. It is necessary to ensure that key employment sites and a range of employment sites are	<p>Paragraph 22 of the NPPF urges against policies which seek the long term protection of employment sites.</p> <p>The Core Strategy relies upon Policy EC3 to help protect</p>	No change

	<p>safeguarded in order to protect local employment opportunities. This will ensure the town remains viable and sustainable as an independent settlement and growth does not simply turn it into a dormitory town.</p> <p>Propose stronger wording in favour of safeguarding existing employment sites and also a range of employment sites in Policy H2 and other appropriate Policies in the Core Strategy.</p>	<p>employment sites. There is therefore no need for a clause about protecting employment land in Policy H2 which could do no more than duplicate the provisions of Policy EC3.</p>	
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## Appendix 2b: Text of Policy H2

5.2.7 Policy H2 is needed to enable housing developments to be permitted on land that was too small to allocate or becomes available unexpectedly. It concerns the principle of housing development rather than details which may be controlled through other policies. For example, development of a residential garden for housing would depend on how much the garden contributes to the visual and spatial character of an area, not on the quality of design which is the domain of Policies P9 and P10.

### **POLICY H2: NEW HOUSING DEVELOPMENT ON NON ALLOCATED SITES**

New housing development will be acceptable in principle on non-allocated land, providing that:

- i) The number of dwellings does not exceed the capacity of transport, educational and health infrastructure, as existing or provided as a condition of development.
- ii) For developments of 5 or more dwellings the location should accord with the accessibility standards in Table 2 of Appendix 2
- iii) Green Belt policy is satisfied for sites in the Green Belt

In addition, greenfield land:

- a) Should not be developed if it has intrinsic value as amenity space or for recreation or for nature conservation, ~~and~~ *or* makes a valuable contribution to the visual, historic and/or spatial character of an area, or
- b) May be developed if it concerns a piece of designated greenspace found to be surplus to requirements by the Open Space, Sport & Recreation Assessment (PPG17Audit).

## Appendix 3a

### Core Strategy Publication Draft - Analysis of Consultation Responses Policy H3: Density of Residential Development

Representors	Comments	LCC Response	LCC Change																					
1186 ID Planning for TGMF Emsley 5671 ID Planning for Barratt David Wilson Homes, Great North Development, Edmund Thornhill Thornhill Estate, ELE Northern Quadrant Consortium, Wortlea Estates, Redrows Homes Yorkshire Ltd, Housebuilder Consortium, Robert Ogden Partnership Ltd, 1938 Redrow Homes (Yorkshire) Ltd	<p>Too high in policy. Suggest a range of densities;</p> <ul style="list-style-type: none"> <li>i) City Centre and fringe 60 units/ha</li> <li>ii) Other urban areas 35-60 units/ha</li> <li>iii) Fringe urban areas 30-35 units/ha</li> <li>iv) Smaller Settlements 25-30 units/ha</li> </ul> <p>Too difficult to meet proposed levels in CSPD as the Residential Design Guide combined with the Street Design Guide place too many requests for private amenity space, dwelling separation, bin storage, turning circles, footpaths on either side, etc, making it difficult to deliver at densities above 35dph.</p> <p>NPPF removed density requirements</p>	<p>The Density levels used in Policy H3 are based off the density levels used in the Strategic Housing Land Availability Assessment, which is one of the main pieces of evidence regarding future housing land supply.</p> <p>The SHLAA also takes into account that not all of the site will be developable – and applies the standard multiplier to only part of the site, based on site size and location:</p> <p>Above 2 ha, it is assumed only 75% of the total site area would be developable leaving 25% for roads, open space and other facilities. Between 0.4 &amp; 2ha, it is assumed only 90% would be developable. Below 0.4ha (city centre only) it is assumed all of the site would be developable.</p> <p>The proposed densities as compared to the SHLAA are outlined in the table:</p> <table style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>SHLAA</th> <th>CSPD</th> </tr> <tr> <th>SHLAA Zones</th> <th>Density</th> <th>Density</th> </tr> </thead> <tbody> <tr> <td>City Centre</td> <td>350</td> <td>65</td> </tr> <tr> <td>Edge of City Centre</td> <td>60</td> <td>65</td> </tr> <tr> <td>Other urban areas</td> <td>40</td> <td>40</td> </tr> <tr> <td>Edge of urban areas</td> <td>35</td> <td>35</td> </tr> <tr> <td>Rural/Smaller Settlement</td> <td>30</td> <td>30</td> </tr> </tbody> </table>		SHLAA	CSPD	SHLAA Zones	Density	Density	City Centre	350	65	Edge of City Centre	60	65	Other urban areas	40	40	Edge of urban areas	35	35	Rural/Smaller Settlement	30	30	No change
	SHLAA	CSPD																						
SHLAA Zones	Density	Density																						
City Centre	350	65																						
Edge of City Centre	60	65																						
Other urban areas	40	40																						
Edge of urban areas	35	35																						
Rural/Smaller Settlement	30	30																						
0065 Oulton Civic Society,	Density levels for settlements are too high.																							
5121 Directions Planning	Too high as not been justified. Feel past developments of high rises, etc did not allow for quality open space. Need for lower density to enable family housing as higher density does not provide quality living space.	The evidence base supports the use of a density policy to guide development. The densities used in the SHLAA were based on long term trends of actual developments in Leeds, with the lower end of ranges chosen to reflect the onset of the housing market crash in 2008-09. The policy allows for other considerations to be made which will affect the density, to ensure that the most efficient																						

		use of land is achieved whilst also considering other factors.	
2956 Cllr Thomas Leadley	Should be average densities not minimum.	At a general level minimum densities are needed to help ensure that most housing land is used efficiently and the housing requirement is met. The use of average densities would raise practical issues including whether extremes may be acceptable if balanced out by each other, what timescales and what geographical areas to use for measurement.	No change
5105 Renew, 0420 White Young Green for Harrow Estates	Will the 60 units/ha for City Centre enable lower density family housing with integral greenspace and amenity?  Conflicts with SP3 need to deliver family housing in City Centre	The SHLAA used a density rate of 350 dwellings/ha for sites which did not have a planning permission. Sites where there was a planning permission in place used the figures identified in the permission.  The SHLAA 2011 identifies that there is capacity for 11,500 units in the area of the City Centre not overlapped by the Aire Valley Leeds AAP area, and over 16,000 in the whole of the city centre. The Core Strategy sets a conservative expectation of 10,200 dwellings to be delivered in the whole of the city centre during the plan period.  It is considered that 65 dwellings per hectare is a reasonable minimum density for the city centre and fringe that could deliver family housing. Virtually all dwellings built within the city centre over the last 15 years have been flats with only a handful of houses built. One means of attracting families will be to build larger flats with amenity spaces and supporting facilities. The densities of larger flats with amenity space can be expected to be considerably in excess of 65dph. But even if developments of entirely houses are built, according to CABE, terraced housing can normally be expected at a density of 60-80 dwellings per hectare. It is reasonable to assume that a city centre fringe location would major in terraced houses. It is also reasonable to expect that most city centre or fringe locations would comprise of a mix of houses and flats. Hence, it is not considered likely that the 65dph minima for the city centre and fringe areas would constrain the provision of family housing.	No change
1935 McCarthy & Stone Developments Ltd	Do not think that the development they deliver (C2 specialist units) should be subject to density requirements as their development seeks to deliver more than just housing units – i.e. communal space, etc.	The delivery of specialist housing is part of the overall housing need calculation (household formation). Therefore the delivery of C3 housing units, be it for seniors or students, is part of the overall housing strategy. This would mean that C3 developments will be subject to Policy H3 in the same way as all other housing development is. However, residential institutions (C2 specialist	Minor change.  Clarify in supporting text that all forms of housing development (including specialist development)



		<p>units) which do not comprise of individual dwellings, will be excluded.</p> <p>The policy already identifies that if there are overriding reasons concerning townscape, character, design or highway capacity than these will be taken into consideration.</p>	<p>will be subject to Policy H3.</p> <p>Add new sentence to end of 5.2.8: The density policy will apply to all forms of housing development, including specialist housing, but not residential institutions (Class C2).</p>
<b>Character should be used, not density</b>			
2663 Spawforths for Spawforths and Miller Strategic Land	Density should reflect character of areas – therefore higher density levels could be in all of the areas or in none of the areas, depending on the character. Policy approach based on character would be more suitable and less onerous.	<p>The density bands intrinsically reflect the character of areas. Hence the highest density in the City Centre reflects the historic urban form of the area and the lowest densities in smaller settlements reflect their generally lower intensity of land use.</p> <p>Nevertheless, the policy H3 and the text in 5.2.8 makes clear that townscape, character, design or highway capacity can be overriding factors.</p> <p>If the policy were to be based on character alone there is a danger that land will not be used efficiently. Low density estates of the past might simply be replicated for the sake of townscape conformity, rather than good quality design. If land is not used efficiently, more land in the countryside will be required for development.</p> <p>No evidence or justification that the density of rural communities or smaller settlements should be determined on merit whereas other areas wouldn't. Current policy enables all applications to be delivered on merit but to seek to meet density rates.</p>	No change.
874 Barwick-in-Elmet & Scholes Neighbourhood Development Plan Steering Group; 0111 Barwick in Elmet & Scholes Parish Council, 0112 Boston Spa Parish Council,	<p>Contradicts Spatial Policy One and paragraph 1.8 and 2.13 to respect local character, community identity and the environment.</p> <p>Think rural communities and small settlements density should be determined on merit having regard to the existing surrounding neighbourhood – which are compatible with exception reasons described in paragraph 5.2.8.</p>		
5681 Carter Jonas for Lady Elizabeth Hastings Estate Charity, The Bramham Park Estate, Meadowside Holdings, Ltd, AR Briggs and Co, the Ledston Estate, The Diocese of Ripon and Leeds, The Hatfield Estate	Policy is too negative and instead factors such as townscape, character, design and amenity considerations should inform density and not an arbitrary figure		

0480 Dacre Son and Hartley for Warner, Miller, Chatford, Keyland, Taylor Wimpey, Redrow, Kebbell, Taylor Wimpey and Ashdale, Barratt Leeds, Barratt York, Mirfield,	Current wording is restrictive and inflexible as the rates are not realistically deliverable.		
0420 White Young Green for Harrow Estates	Too prescriptive – should be assessed site by site.		
<b>Support for Policy</b>			
5867 LDP Planning c/o Hileys Solicitors	Support indicative policies and the requirement to consider other material factors which provides basis to negotiate lower densities.	Support welcomed	No change
0099 English Heritage	Support reference that densities might be varied having regard to townscape or character and that special consideration will be given to Conservation Areas.		
0420 D Westwood & Son (via White Young Green Planning)	Support proposed density, particularly for smaller settlements.		
<b>Does not comply with NPPF</b>			
5036 Banks Development, 5543 DPP	At odds with NPPF and character in areas. Minimum densities established in past does not mean that creates sustainable development or provide for housing needs.	The NPPF Core Planning Principals state need to actively manage patterns of growth to make fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.	No change.
5681 Carter Jonas for Lady Elizabeth Hastings Estate Charity, The Bramham Park Estate, Meadowside	No basis in NPPF to specify particular densities and specific densities now removed from national guidance.	Paragraph 47 bullet 5 says local authorities should “...set out their own approach to housing density to reflect local circumstances”. Also, paragraph 58 bullet 3 expects development policies to “...optimise the potential of the site to accommodate development...”	

Holdings, Ltd, AR Briggs and Co, the Ledston Estate, The Diocese of Ripon and Leeds, The Hatfield Estate		<p>Policy H3 supports this through ensuring that land is used efficiently whilst making allowances for townscape, character, design or highway capacity.</p> <p>Therefore it is considered that the policy of setting minimum density levels with specified exceptions accords with the NPPF by not unduly constricting development of housing to satisfy Leeds' housing needs and still making efficient use of land.</p> <p>The need to deliver density levels also accords with Policy H4, and SP7. Policy H4 helps set out a housing mix whilst Policy SP7 identifies a broad spatial distribution. Policy SP6 sets the housing level and Policy H3 seeks to ensure that development is delivered in a sustainable manner.</p>	
0480 Dacre Son and Hartley for Warner, Miller, Chatford, Keyland, Taylor Wimpey, Redrow, Kebbell, Taylor Wimpey and Ashdale, Barratt Leeds, Barratt York, Mirfield,	Give more recognition to NPPF which no longer has minimum density requirement.		
<b>Other</b>			
4825 Morley Town Council	Suggest is unsound and need to recalculate other housing supply policies.	Would need more information as to comment as to why the policy is unsound.	No change

## Appendix 3b: Text of Policy H3

### Housing Density

5.2.8 A minimum density policy is needed for Leeds to ensure sustainable housing development. This means efficient use of land in order to avoid more green field land being developed than is necessary and in order to achieve a higher populations in proximity to centres. Lower density schemes will be accepted in exceptional circumstances relating to townscape and character. Exceptional townscape reasons for lower densities will need to consider quality of townscape character including recognition through conservation area character statements, neighbourhood design statements and other published assessments. For clarity, 'urban areas' within Policy H3 includes both the Leeds main urban area as well as major settlements, and 'smaller settlements' includes sites within and adjacent to them. For all other areas, no minimum density applies because other housing Policies only allow for a small amount of housing development in these areas. *The density policy will apply to all forms of housing development, including specialist housing, but not residential institutions (Class C2).*

### **POLICY H3: DENSITY OF RESIDENTIAL DEVELOPMENT**

Housing development in Leeds should meet or exceed the following densities unless there are overriding reasons concerning townscape, character, design or highway capacity:

- i) City Centre and fringe\* - 65 dwellings per hectare
- ii) Other urban areas - 40 dwellings per hectare
- iii) Fringe urban areas - 35 dwellings per hectare
- iv) Smaller settlements - 30 dwellings per hectare

Special consideration will be given to the prevailing character and appearance in Conservation Areas.

\* fringe is defined as up to 500m from the boundary

## Appendix 4a

### Core Strategy Publication Draft - Analysis of Consultation Responses Policy H4: Housing Mix

Representors	Comments	LCC Response	LCC Change
<b>Targets</b>			
Ashdale Land & property Company Ltd, Northern Hallam Land Management Ltd (via Barton Willmore Planning Partnership-Northern (0057)	Table H4 (preferred housing mix) sets out minimum and maximum percentages as well as an overall target for different types and sizes. The table should be deleted, and the policy should refer to meeting the assessed needs of the market as well as site specific characteristics. Object to the policy.	<p>The intention of Policy H4 to plan for new housing developments to deliver an appropriate mix of housing is legitimate in terms of the NPPF and the objectives of the Core Strategy.</p> <p>The NPPF (para 50) asks local authorities to plan for a mix of housing based on demographic trends, market trends and community needs in order to deliver a wide choice of high quality homes, creating sustainable, inclusive and mixed communities. They are expected to "...identify the size, type, tenure and range of housing required in particular locations, reflecting local demand..."</p>	No change
0057 Templegate Developments (via Barton Willmore Planning Partnership-Northern)	The density as set out in Table 4 (Housing Mix) should be more flexibly applied, with indicative ranges, rather than "targets" for each dwelling type	<p>The Core Strategy has an objective (No. 9) to "...plan for a sufficient mix, tenure and type of housing to meet a range of community needs..." A mix of housing in terms of tenure, type and size to reflect local needs also forms one of the housing growth principles set out in paragraph 4.6.2. These principles were established in the summer of 2011 through a series of consultation workshops with the housing development industry and community stakeholders.</p>	
5105 Renew	Support Table H4, and the requirement for local housing needs/market assessment. It is important that the assessments combine housing needs and housing market assessment.	<p>The Policy does not require the mix of housing of new development to adhere to the percentages in Table H4. The table provides a long term benchmark for the minimum, maximum and target mix of different types and sizes of new housing, based on evidence of trends of provision, existing mix, population forecasts and survey preferences.</p>	
<b>Viability</b>			
0420 Harrow Estates (via WYG Planning)	The prescriptive nature of policy and additional financial burden needs to be considered in terms of financial viability.	The policy is not prescriptive; it asks for an appropriate mix of dwelling types and sizes to address needs but also to reflect the nature of the development and character of the	No change

0420 Harrow Estates (via WYG Planning)	Housing mix in H4 fails to take into account the market viability and deliverability of sites in the present economic climate. Over reliance on delivering 1 and 2 bed unit targets - and by a degree, flats, at the present time, we believe is counter productive	<p>location. In the case of larger developments that exceed the thresholds, developers are invited to submit their own assessment of local housing needs. Housebuilders typically undertake market research to make sure they are building houses that people want to buy, so it will not be onerous to share their findings to influence the conclusion of what an appropriate mix for the development should be.</p> <p>The lack of prescription means that Policy H4 will have negligible impact on viability of development.</p> <p>There is not over-reliance on 1 and 2 bed flats. The table percentages are not prescriptive, and in any case the minimum for flats is only 10% and there is no minimum expectation at all for 1 bedroom flats. The percentages correlate closely with SHMA evidence on dwelling preferences.</p>	
<b>Flexibility</b>			
2663 Spawforths 2663 Miller Strategic Land (via Spawforths)	The Core Strategy should not dictate the housing mix across the District. The Core Strategy should achieve this through identifying the level of provision and the broad distribution of new housing. is both unnecessary and inflexible to seek to control the housing mix, since it would mean the housing market would be unable to adjust to market movements	The policy is not prescriptive; it asks for an appropriate mix of dwelling types and sizes to address needs but also to reflect the nature of the development and character of the location. In the case of larger developments that exceed the thresholds, developers are invited to submit their own assessment of local housing needs. Housebuilders always undertake market research to make sure they are building houses that people want to buy, so it will not be onerous to share their findings to influence the conclusion of what an appropriate mix for the development should be.	No change
5543 DPP	The CS approach of a one set of targets fits all, particularly given the size and diversity of the District, is inappropriate, need for the policy to be more precise.		
<b>Unsound Policy</b>			
Barratt David Homes, Great North Developments, Wortlea Estates, Edmund Thornhill Estates, ELE Northern Quadrant Consortium, Redrow Homes (Yorkshire) Ltd, Robert Ogden	It is considered that Policy H4 is unsound in relation to the 50 dwelling threshold on sites in or adjoining smaller settlements. We are not opposed to a housing mix policy in the Core Strategy as long as it is based on evidence of type and size appropriate to the area in which it is developed. The market generally dictates what houses are required on a site and the type and size mix will vary over the life of the plan period. The SHMA will need to be updated to reflect changing demands over the plan	The requirement for developments above thresholds to provide local housing need assessments is not excessively onerous. Housebuilders typically undertake market research to make sure they are building houses that people want to buy, so it will not be onerous to share their findings to influence the conclusion of what an appropriate mix for the development should be. The lower threshold of 50 dwellings for smaller settlements is appropriate because the needs of and the impact on the local community is likely to be more pronounced than the impact on Major Settlements	No change

Partnership Ltd, Consortium of Housebuilders, Great North Developments Ltd c/o Evans Property, Gr Wilson Homes, Great North Developmet via ID Planning (5671)	period.	and the Main Urban Area. It is important for Smaller Settlements that the local housing needs to be addressed by schemes of 50+ dwellings are properly examined.	
5543 DPP	Threshold for a Housing Needs Assessment is high and that few developers will be affected by this part of the policy but nevertheless the NPPF at paragraph 50 makes it clear that it is for the local planning authority to identify the size, type tenure and range of housing that is required in a particular location	Policy H4 is sound. The NPPF (para 50) asks local authorities to plan for a mix of housing based on demographic trends, market trends and community needs in order to deliver a wide choice of high quality homes, creating sustainable, inclusive and mixed communities. They are expected to "...identify the size, type, tenure and range of housing required in particular locations, reflecting local demand...". The policy is not prescriptive. The percentages of Table H4 are based on SHMA evidence.	
Cllr Thomas Leadley	Unsound	It would not be appropriate for the Core Strategy set out detailed guidance on what a Housing Needs Assessment for the local area should include. Typically, an assessment would start with marketing information, possibly bolstered by the results of any local survey or focus group work.	
2663 Spawforths 2663 Miller Strategic Land (via Spawforths)	Concerned that for large schemes a Housing Needs Assessment will need to be produced. However there is no guidance within the Core Strategy of what this entails. This lack of information on implementation of the policy renders this unsound. The requirement for a Housing Needs Assessment should be removed.	Table H4 is intended to endure for the plan period, but it is expected that the SHMA will be updated. Depending on any degree of divergence, new SHMA findings will either be treated as additional material considerations or cause to review the plan.	
5543 DPP	No need to provide an additional study unless the developers disagree with the Councils assessment of need. Consider that the policy is not consistent with national policy and has not been positively prepared and object to this policy.		
AR Briggs and Co, Ledston Estate, Bramham Park Estate, Lady Elizabeth Hastings Estate Charity, Meadowside Holdings Ltd, Hatfield Estate, The Diocese of Ripon and Leeds via Carter Jonas (5681), Barratt David Wilson Homes Yorkshire	NPPF supports the provision of an appropriate mix of housing as supported by the SHMA and other evidence. There appears to be no provision within the policy and justification to ensure that SHMA is reviewed regularly this undertaken. Whilst the SHMA is one source it is important to have regard to market signals and intelligence to reflect housing demand as well as any locally generated specific need.		

Homes (5895)			
C/o Hileys Solicitors via LDP Planning (5867)	Requirement to submit a housing needs assessment at application stage is considered to be onerous and serve little value. Large sites will provide a mix of housing in keeping with the character of the local area and attractive to the market. Support the aim of the policy but not need for HNA.		
5884 McGregor Brothers Ltd (via West Waddy ADP)	The need to be provide a HNA would impose an onerous requirement on developers, as would require extensive research and questionnaires relating to the whole development and is contrary to NPPF, para 50. Policy should be amended to make it clear that LCC will provide details of housing needs in particular localities so that developers can ensure that these needs are addressed in their development proposals.		
Redrow Homes (Yorkshire) Ltd (1938)	The SHMA will need to be updated to reflect changing demands over the plan period. We are not opposed to the proposed preferred housing mix in Table H4 as it is flexible enough to allow a minimum and maximum outside of an overall preferred target.		
<b>Number of Bedrooms</b>			
Harrow Estates via WYG (0420)	Over reliance on delivering 1 and 2 bed unit targets and flats, at the present time is counter productive	There is not over-reliance on 1 and 2 bed flats. The table percentages are not prescriptive, and in any case the minimum for flats is only 10% and there is no minimum expectation at all for 1 bedroom flats. The percentages correlate closely with SHMA evidence on dwelling preferences.	No change
<b>Housing Type</b>			
5543 DPP	Agree with providing a range and choice of dwellings on a site. However there is no market at present for flatted developments, even having a 10% min contribution is unreasonable if no demand.	Policy H4 is not prescriptive about imposing the percentage minima, maxima or targets on individual developments. The table provides a long term benchmark only.	No change
5105 Renew	Some developers are considering provision of dwelling forms that are neither traditional houses, nor traditional flats. How will these be assessed.	If some kind of hybrid dwelling becomes the norm, this would need to be factored in Leeds' Annual Monitoring Reports and should be treated as a material consideration	No change



		until policy is reviewed.	
2527 Leeds Residential Property Forum(via Bury and Walker solicitors)	Policy simply categorises properties in terms of one bed and upwards and therefore is unsound.	It is not clear from the comment how the objector thinks the policy mix should be influenced through policy.	No change
<b>Specialist Housing</b>			
Ashdale Land & property Company Ltd Northern Hallam Land Management Ltd (via Barton Willmore Planning Partnership-Northern (0057)	As it is covered by another Policy reference to the need to provide for 'Independent Living' should be deleted within Policy H4.	The Council is conscious of the importance of catering for the needs of the elderly population which is forecast to grow substantially during the plan period. It is important that the needs of this group is addressed, particularly by major housing developments, and that cross reference is made to Policy H8	No change
Harrow Estates via WYG (04200	Reference to independent living in H4 and H8 needs to be clarified to provide certainty to developers.		
1935 McCarthy & Stone (Developments) Ltd	Standard unit sizes and prescribed density is impractical and undesired, and would recommend that specialist housing for the elderly be exempt from this policy. Townscape and design considerations should prevail over prescriptive standards. Specialist housing for the elderly is well designed to house small households (mostly 1 bed), with many residents	Policy H4 does not prescribe unit sizes and density.	No change
1935 McCarthy & Stone (Developments) Ltd	The NPPF highlights the need to '... create sustainable, inclusive and mixed communities. Local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community...such as...older people'.  The NPPF expects authorities to 'identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period' which 'meets household and population projections, taking account of migration and demographic change' and 'addresses the need for all types of housing', including housing for 'older people'.	The SHMA 2011 assesses the need for older person households in Leeds indicating that there will be a substantial growth in older person households (65+) and particularly those over 85 years during the plan period. The cross reference to Policy H8 is therefore appropriate	No change
2527 Leeds	No reference to shared housing. This is a particular	Policy H4 concerns provision of new housing through	No change

Residential Property Forum (via Bury & Walker Solicitors)	type of accommodation which is already widely in use in the City and there needs to be proper planning going forward to enable the quantity to be expanded. A Policy which fails to do this cannot be sound.	conversion or new build. The current new-build housing market is dominated by housing built for sale. The City Council would not want to introduce policy that seeks to control the mix of private rented and owner occupied housing because it will be beyond the ability of most developers to deliver, and too prescriptive to impose.	
5036 Banks Development	No reference to need for Executive housing as a specialist housing type. It has been demonstrated that by planning for executive housing local authorities can increase economic activity in their area because they attract entrepreneurial individuals who will set up businesses and create employment.	Executive housing is a marketing label rather than a type of specialist housing.	No change
Renew (5105)	Growth in single person households may include a proportion with a family housing need ie separated parents with joint custody, or death of a spouse.	Comment noted	No change

## Appendix 5a

### Core Strategy Publication Draft - Analysis of Consultation Responses Policy H8: Housing for Independent Living

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Representors	Comments	LCC Response	LCC Change
<b>General Policy Soundness</b>			
<p>Taylor Wimpey, Kebbell, Chatford, Taylor Wimpey, Ashdale, Warner, Redrow, Barrett York, Keyland, Mirfield, Barratt Leeds, Miller (via Dacre Son &amp; Hartley (0480), 1186 T G M F Emsley, TGMF Emsley, Edmund Thornhill Estates, Redwrows Homes (Yorkshire) Ltd, Consortium of Housebuilders, Barratt David Wilson Homes, Great North Developments, Wortlea Estates, Robert Ogden Partnership Ltd, Housebuilder Consortium, Great North Developments Ltd c/o Evans Property Gr, ELE Northern Quadrant Consortium, Barratt David Wilson Homes Yorkshire Homes via ID Planning (5895)</p>	<p>We object to this policy in the manner in which it has been written. The policy as written is vague and ambiguous. It is considered that Policy H8 is unsound. It is not based on a robust evidence base and therefore fails the 'justified' soundness test.</p>	<p>The SHMA 2011 assesses the need for older person households in Leeds indicating that there will be a substantial growth in older person households (65+) and particularly those over 85 years during the plan period. It is therefore right that the Core Strategy contains policy to help deliver new housing designed to meet the needs of this population group.</p> <p>The policy wording expects larger developments to make a contribution to meeting needs for older person households. This is reasonable in the context of evidence of increasing housing needs. The open nature of the requirement, rather than being considered vague or ambiguous, provides flexibility and scope for negotiation on what type of contribution should be made.</p>	<p>No change</p>
<b>The contribution expected from large developments</b>			
<p>T G M F Emsley, TGMF Emsley, Edmund Thornhill Estates, Redwrows Homes (Yorkshire) Ltd, Consortium of House-builders, Barratt David Wilson Homes, Great</p>	<p>There is no justification for including a trigger of 50 dwellings in which to pursue a contribution or on site development of housing for independent living. The policy as written is vague and ambiguous.</p>	<p>A threshold of 50 dwellings is reasonable for a city the size of Leeds with a housing requirement of 70,000 dwellings. A sufficient number of housing developments would be subject to the policy to enable a reasonable contribution to be made. The threshold of 15 used in West Lancashire</p>	<p>No change</p>

<p>North Developments, Wortle Estates, Robert Ogden Partnership Ltd, Housebuilder Consortium, Great North Developments Ltd c/o Evans Property Gr, ELE Northern Quadrant Consortium, Barratt David Wilson Homes Yorkshire Homes via ID Planning (5895) (1186)</p>		<p>would be more appropriate for a rural authority with fewer large housing schemes.</p> <p>Overall, it is considered that Policy H8 is sufficiently positive towards provision of housing for older people. It urges larger housing developments to make appropriate contributions and it expects LDF allocation plans to identify suitable land.</p>	
<p>1935 McCarthy &amp; Stone (Developments) Ltd</p>	<p>Welcome inclusion of policy H8. However the need as identified in the SHMA has not been properly taken into account within the policy wording. Concerned that the policy does not sufficiently focus on elderly housing, but instead restricts itself to making generic references to all types of housing. Suggest inclusion of the following: 'This Strategy supports in principle, the provision of a range of accommodation by specialist private sector developers and housing organisations which will be specifically designed to support the needs of an ageing population'.</p> <p>In addition, the Council could consider promoting the development of specialist housing for the elderly even further by setting a defined requirement within the Core Strategy as for example set by West Lancashire Core Strategy ie the Council will expect that at least 20% of units within residential developments of 15 or more dwellings should be designed specifically to accommodate the elderly, except in cases where it is clearly inappropriate to do so'.</p>		
<p><b>Policy advice on suitable locations for older persons accommodation</b></p>			
<p>1935 McCarthy &amp; Stone (Developments) Ltd</p>	<p>Within Appendix One an overview (as set out in Prof M Ball) of private sheltered schemes and the benefits they can provide to the elderly be provided. In light of the multiple benefits that owner occupied private sheltered housing for the elderly provides for residents and the wider community, and the increasing 'need' for this type of specialist accommodation, suggested that the following policy also be introduced that supports the delivery of</p>	<p>It is considered that the second paragraph of Policy H8 provides for the kind of locational preferences suggested in the wording advanced by McCarthy &amp; Stone. The City Council considers that the level of public transport accessibility expected for all non-allocated housing developments through Policy H2 will be sufficient for those schemes aimed at older people. Policy</p>	<p>No change</p>

	<p>specialised accommodation for older people, such as sheltered housing.  'Development proposals for accommodation designed specifically for the elderly will be encouraged provided that they are accessible by public transport or a reasonable walking distance to community facilities such as shops, medical services, places of worship and public space. '</p> <p>Specialised housing for the elderly often greatly enhances the sustainability of businesses in nearby town and local centres and provides many benefits to include communal facilities and specific features within the apartments designed to meet the particular needs of the elderly. Extra Care (Assisted Living) aimed at enabling independent living for the "frail elderly", persons typically aged 80 and over. Extra Care accommodation possesses a number of 'enhanced facilities' in terms of the communal facilities available and provides a higher level of care when compared to private retirement housing.</p>	<p>H8 also expects good access either to a town/local centre or a range of local community facilities.</p> <p>Policy H8 goes further by expecting LDF allocations documents to seek to identify suitable land for housing for elderly or disabled people.</p>	
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<b>Need for Independent Living</b>			
Renew (5105)	<p>It is worth noting that a large proportion of over 65's will be able to live independently without additional support or adaptations to their housing. Many will be mobile, may still be working and able to accommodate their needs in mainstream housing. Some with people staying 'younger' longer, then the need for specific housing may diminish. Some housing schemes may be encouraged to provide for households seeking to 'downsize' as their children leave home. It is more likely that specific sheltered or extra care housing will be needed more for the growing number of over 85 year olds, and possibly the 75 – 85 year olds</p>	<p>The essential point that the housing needs for elderly people are growing is acknowledged in paragraph 5.2.29 of the Core Strategy</p>	No change

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Report author: David Feeney  
0113 2474539

**Report of the Director of City Development**

**Report to: Development Plan Panel**

**Date: 11 September 2012**

**Subject: LDF Core Strategy – Publication Draft, Analysis of Consultation**

**Responses: Spatial Policy 10: Green Belt**

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 key issues which have arisen in response to this part of the Core Strategy include comments in relation to the overall scope of the Green Belt review (some support/concerns regarding the review) and the need for the approach to be clarified. A number of comments have also been raised regarding detailed Policy wording and the need to consider proposals outside the Settlement Hierarchy. A number of issues have been raised also regarding the approach to Protected Area of Search and the need for this to be clarified.

**Recommendations**

Development Plan Panel is requested to:

- i). note and comment on the contents of the report and the course of further action (as detailed in Appendix 1 to the report).

## **1.0 Purpose of this Report**

- 1.1 Within the context of the Core Strategy Initial Report of Consultation (6<sup>th</sup> June), the purpose of this report is to review consultation responses in relation to Spatial Policy 10. Appendix 1 attached, summarises the representors, key issues raised, the City Council's view and proposed action. Appendix 2, details wording changes to the Core Strategy text, where changes are considered necessary, in response to representations received.

## **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 28<sup>th</sup> February to 12<sup>th</sup> 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)

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 The key issues which have arisen in response to this part of the Core Strategy include comments in relation to the overall scope of the Green Belt review (some support/concerns regarding the review) and the need for the approach to be clarified. A number of comments have also been raised regarding detailed Policy wording and the need to consider proposals outside the settlement hierarchy. A number of issues have been raised also regarding the approach to Protected Area of Search and the need for this to be clarified.

## **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 City 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, 10<sup>th</sup> 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 Policy SP10 of the Publication Draft Core Strategy. Within this context, minor policy wording changes are proposed to update the Policy in relation to the NPPF and to reflect potential of sites, outside settlements (where exceptionally and within the context of Housing Market Characteristic Areas), it can be demonstrated that sites are in sustainable locations and are able to meet the full range of local facilities and services.

## **6. Recommendations**

- 6.1 Development Plan Panel is requested to:
- i). note and comment on the contents of the report and the course of further action (as detailed in Appendix 1 to the report).

## **7. Background documents<sup>1</sup>**

- 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) web pages or by contacting David Feeney on 247 4539.

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<sup>1</sup> 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**

**SPATIAL POLICY 10: GREEN BELT**

<b>Representor/Agent</b>	<b>Representor Comments</b>	<b>LCC Initial Response</b>	<b>Action</b>
(0420) Caddick Developments (via White Young Green Planning)	Support selective review of GB. Given that Table 2 recognises that 19, 400 new homes are to be provided as extensions to settlements, then the need for a GB review is fundamental at an early stage in order to accommodate the scale of housing identified in SP6	Support welcomed	No change.
(2663) Miller Strategic Land (via Spawforths  (2663) Spawforths)	Supports the need to undertake a Green Belt review to deliver the development needed in the District over the Plan period.	Support welcomed	No change.
(5867) C/o Hileys Solicitors (via LDP Planning)	Support for Green Belt review as considered essential to meet housing and employment needs. Particularly important for major and small settlements so can expand to deliver urban extensions. SP10 suitable basis to undertake the review but need to strengthen consideration presumption in favour of sustainable development, in undertaking the review.	Support welcomed	No change.
(0057) Hallam Land Management Ltd (via Barton Willmore Planning Partnership-Northern)	Support for the approach to Protected Areas of Search Land (Paras. 4.8.6 – 4.8.7) and puts forward sites at Rothwell & Oulton, regarded as suitable.  Support for selective Green Belt Review and use of criteria (iv – SP10), which is considered to be consistent with the NPPF.	Support welcomed	No change.
(0057) Ashdale Land and Property Company Ltd (via Barton Willmore Planning Partnership-	Support for the approach to Protected Areas of Search Land (Paras. 4.8.6 – 4.8.7) and puts forward sites at Micklefield & Kippax regarded as suitable.	Support welcomed  Sites at Micklefield and Kippax noted. It is not the focus of the Core Strategy to consider individual sites/proposals. This	Support welcomed

Northern)	Support for selective Green Belt Review and use of criteria (iv – SP10), which is considered to be consistent with the NPPF.	is a matter for consideration as part of the preparation of the Site Allocations DPD.	
(0057) Templegate Developments (via Barton Willmore Planning Partnership-Northern)	Support for selective Green Belt Review and use of criteria (iv – SP10), which is considered to be consistent with the NPPF and puts forward land adjacent to Skelton Gate, regarded as suitable for development.	Support welcomed.  Site at Skelton Gate noted. It is not the focus of the Core Strategy to consider individual sites/proposals. This is a matter for consideration as part of the preparation of the Site Allocations DPD.	No change.
(4388) Pegasus Planning Group	Support for Policy which clearly sets out where Green Belt review will be necessary in order to meet identified needs and deliver growth sustainably.  View that Green Belt review around Garforth is necessary to meet identified need.  Support for the identification of additional Protected Areas of Search land to meet growth beyond 2028 but this should be over and above that required to meet the housing target, not part of the anticipated supply.	Support welcomed.  Points regarding Garforth are noted. It is not the focus of the Core Strategy to consider individual sites/proposals. This is a matter for consideration as part of the preparation of the Site Allocations DPD.	No change.
(0420) Leeds Trinity University College (via White Young Green Planning)	Support the proposed selective review of the Green Belt detailed in Spatial Policy 10, which will include a review of the Green Belt around Horsforth which falls within the Main Urban Area. However, the policy needs to be amended to state that the selective review will also consider Green Belt release at existing education institutions where sites are currently constrained by Green Belt.	Support welcomed.  The focus of the Policy (within the context of the Core Strategy as a whole), is for a selective review, associated with housing and employment growth issues. It is not considered appropriate at this time to consider a Green Belt review on the basis of individual education establishments.	No change.
(5666) Brownberrie Farm (via J & J Design)	Supports for the selective review of the Green Belt but considers the purposes of the review should be expanded to include community facilities including education provision.	Support welcomed. The focus of the Policy (within the context of the Core Strategy as a whole), is for a selective review, associated with housing and employment growth issues. It is not considered appropriate at this time to consider a Green Belt review on the basis of community	No change.

		facilities/education establishments.	
(0420) Leeds Bradford International Airport (via White Young Green Planning)	The Policy outlines in broad terms the areas in which a selective review of the Green Belt may be necessary in order to accommodate future employment and housing needs. The airport is currently washed over by Green Belt, which is considered to be inconsistent with the future development of the airport, and the purposes of Green Belt set out in PPG2. The potential to review the Green Belt at LBIA should therefore be acknowledged in the Policy.	<p>The Airport has a key role to play as part of the District's strategic infrastructure and as an employer. However, It is not clear why a Green Belt review of land in relation to the Airport is necessary. Existing allocations are in place (yet to be fully taken up) and the extent of the operational land boundary at the Airport, allows scope for growth.</p> <p>Further consideration of planning issues at the Airport, will need to be taken into account, as part of the development of the emerging Airport Master Plan.</p>	No change.
(5681) Lady Elizabeth Hastings Estate Charity, The Diocese of Ripon and Leeds, The Hatfield Estate, Meadowside Holdings Ltd, The Ledston Estate, AR Briggs and Co, Bramham Park Estate (via Carter Jonas)	<p>Support need to undertake a Green Belt review and that that Protected Areas of Search (PAS land) will be identified through this Review to provide a contingency for growth should the supply of allocations prove insufficient.</p> <p>Support for the statement that the Site Allocations DPD will provide the detailed mechanism for such a review.</p> <p>Concern that there is no reference to a review of Green Belt boundaries to ensure that they remain robust where the character of the Green Belt has changed as a result of individual or cumulative development proposals or land use changes, or where the land is no longer considered to contribute to Green Belt purposes.</p> <p>Clarification is needed that there is no intention to increase the extent of the Green Belt within the District would be appropriate for example to the north and east of the River Wharfe at Thorp Arch.</p>	<p>Support welcomed.</p> <p>The scope of SP10 is to set out the requirements for a selective Green Belt review, to be undertaken as an integral part of the preparation of the Site Allocations DPD. Detailed boundary issues will be considered at this time, in relation to the assessment of individual sites, as a basis to make allocations.</p> <p>The 'Rural Land' designation, situated to the NE of the district, will continue to be retained as a UDP saved policy.</p>	No change.
(5884) McGregor Brothers Ltd (via West	Support for Selective Green Belt Review, as necessary to support housing growth.	Support welcomed.	No change.

Waddy ADP)	Commitment to review Green Belt around the smaller settlements (listed in Table 1, which includes East Ardsley), is particularly welcomed.	Point regarding East Ardsley is noted. It is not the focus of the Core Strategy to consider individual sites/proposals. This is a matter for consideration as part of the preparation of the Site Allocations DPD.	
(1091) Quod (via Land Securities & Evans of Leeds	The Policy will need to be updated to reflect the NPPF, and in particular the criteria for the review of the Green Belt should be consistent with paragraph 85 of the NPPF.	SP10 (iv), will need to be updated to delete reference to PPG2 and to the 'Draft' NPPF. The remainder of the Policy is considered to be consistent with the NPPF.	Change:  Delete the words 'PPG2' & 'Draft' from (iv):  (iv) '...identified in national guidance ( <del>PPG2/Draft</del> National Planning Policy Framework)'.  
(0062) Leeds Civic Trust	Concern that the drafting of the policy implies that Green Belt can be altered to suit the needs of development, rather than have regard to longer term permanence. It is suggested that the policy should be amended to list the purposes of Green Belt, not the need for development land. Land removed from Green Belt should also be the lowest priority for development.	As set out in the Policy wording, a selective review of the Green Belt is considered necessary to accommodate the scale of housing and employment growth set out in the plan. This is a legitimate planning reason for the review and does not imply that a revised Green Belt boundary will not have longer term permanence. It is not considered necessary to list the purposes of Green Belt in the Policy wording, as cross reference to the NPPF is made in (iv). The selective Green Belt review will be undertaken as part of the preparation of the Site Allocations DPD and individual sites will be assessed on their merits against sustainability and Green Belt criteria	No change.
(0942) Mr Anthony L Silson	Release of greenfield and Green Belt land is unsound as fewer dwellings are needed than forecast, developers will prefer to build on the green sites first negating the policy of prioritising brownfield sites, the priority to development of green sites near settlements is contradictory as the very places where Green Belt/fields are essential are close to settlements, 4. it is contradictory to identify Green Belt land as protected but then release some for development. All Green Belt, Greenfield and Green Infrastructure needs therefore to be retained,	The concerns are noted. However, on the basis of the Core Strategy evidence base, Leeds does need to plan for population growth and housing need. Within the context of the Spatial Vision and overall policy framework, the Core Strategy does seek to give emphasis to the use of brownfield land, as a focus for growth and regeneration. The plan also gives prominence to the importance of local character and distinctiveness as well as the role of Green Infrastructure (SP 13 and G1), in planning for growth.	No change.

<p>(1930) Lawrence Walker</p>	<p>The Guiseley, Yeadon, Rawdon and Otley areas should be removed from proposed selective review of Green Belt, considering the location of Guiseley/Yeadon/Rawdon as outer Leeds areas, and in the interests of retaining the balance of their rural and urban characteristics.</p> <p>A sequential approach to identifying sites for development has not been carried out</p> <p>The amenity of residents within these areas would be significantly compromised if parts of the surrounding Green Belt were to be released. The Chevin area of Otley and Billing area of Rawdon should be specifically protected. The plan is unsound due to the lack of demonstrable demand for new housing. View that the plan is withdrawn from the examination timetable and amended to reflect comments.</p>	<p>As set out in the Core Strategy document, a key component of the plan is to deliver longer term regeneration and growth via the Settlement Hierarchy. Within this context, Guiseley, Yeadon, Rawdon and Otley, are included as Major Settlements. Policy SP10, sets out the scope of the review in relation to the Settlement Hierarchy, including Major Settlements. Consequently, the review of Green Belt in these locations is consistent with the overall strategy.</p> <p>The identification of individual sites, consistent with the overall approach of the Core Strategy, will be undertaken as part of the preparation of the Site Allocations DPD. Within this context, individual sites will be assessed against sustainability and Green Belt criteria.</p> <p>Based on the Core Strategy evidence base, the City Council does need to plan for housing growth, it is not therefore accepted that the plan is unsound and should be withdrawn.</p>	<p>No change.</p>
<p>(5869) Briony Spandler</p>	<p>Concern that Green Belt development is short sighted and not imaginative way to address housing needs, an alternative solution is needed.</p> <p>Land identified in Rawdon as Green Belt has been identified for good reason.</p>	<p>The concerns are noted but the Core Strategy is seeking to maximise the potential of opportunities within urban areas to contribute towards housing growth. Based upon the evidence base, a selective Green Belt review is however required to plan for longer term population growth and housing needs.</p>	<p>No change.</p>
<p>(5875) Dr Jonathan Davies</p>	<p>Concerns relate to the intended removal of Green Belt status from the area including and surrounding Rawdon Billing.</p> <p>The area one of outstanding natural beauty with a rich diversity of woodland, scrub and water all of which nurture a significant biodiversity, it is an area of land which is used by the local community.</p> <p>Proposed development would put an</p>	<p>The concerns are noted. The consideration of individual sites and infrastructure requirements, will be considered as part of the Site Allocations DPD, consistent with the overall approach of the Core Strategy. In planning for District wide infrastructure requirements, the Core Strategy is supported by an Infrastructure Delivery Plan and the City Council is also in the process of developing a Community Infrastructure Levy, as a basis to secure funding, arising from development proposals.</p>	<p>No change.</p>

	intolerable strain on the infrastructure of the local area (including increased traffic congestion, increased demand for schooling at facilities that are already at capacity, increased demand for NHS services).		
(5871) Mr Tony Blackmore	The selective review of Green Belt release is not in accordance with the NPPF, which states Green Belt should only be used in exceptional circumstances, this should be reflected in the Core Strategy.	Policy SP10, sets out the scope of the selective review, which is considered to be consistent with the approach of the Core Strategy and the overall approach of the NPPF.	No change.
(5913) Mr Keith Sharkey	Concern that the Core Strategy is unsound on the basis of need to maximise brownfield sites as a priority over greenfield, insufficient consideration has been given to existing under occupied housing stock (public & private).  Policy SP10 needs to be amended (iv), to include assessment against tourism and leisure activity.	The concerns are noted but the Core Strategy is seeking to maximise the potential of opportunities within urban areas to contribute towards housing growth. The City Council, is continuing to work with a range of partners, to deliver a range of initiatives to make best use of the existing housing stock.  Leisure and tourism within the Green Belt are covered by existing UDP saved policies and as part of the general provisions of the NPPF, it is not therefore considered appropriate for them to be duplicated within SP10.	No change.
(4783) Mr Cedric Wilks	Need for coordination of the implications of the Localism Act, to avoid disagreements and inconsistencies.	The City Council is actively supporting the provisions of the Localism Act (through Neighbourhood Planning and Duty to Cooperate arrangements) and will need to consider any implications for Green Belt which may arise, in planning positively for Leeds.	No change.
(0045) Alwoodley Parish Council	The Parish Council is concerned that the Strategy allows for some use of the Green Belt but is not site specific.	The concerns are noted but the Core Strategy is seeking to maximise the potential of opportunities within urban areas to contribute towards housing growth, whilst recognising the needs for a selective Green Belt review (reflecting the evidence base). It is not the purpose of the Core Strategy to identify individual sites, this is the role of the Site Allocations DPD.	No change.



(0065) Oulton Civic Society	<p>Concern that the Policy is unsound &amp; Para. 4.8.4 needs to be amended to make reference to ‘.in very exceptional circumstances..’.</p> <p>Concern of the impact of the selective Green Belt review upon Rothwell and Oulton re. Special Landscape Areas, Green Infrastructure and the potential to ‘narrow the gap’ between Leeds and Wakefield (especially given development proposals within Wakefield MDC - Site Specific Proposals propose to release 57 hectares as a Freight and Distribution Centre alongside a planning application to release 89 hectares for a mixed use development).</p> <p>Support for contingency to identify new areas of Protected Areas of Search but consider references to existing PAS as ‘one of the prime sources of housing allocations in the LDF’ to be unsound. New PAS sites need to be assessed against existing PAS sites for sustainability.</p>	<p>Policy SP10, is set within the overall context of the Spatial Vision of the Core Strategy and national guidance. Based upon the evidence base, Leeds needs to plan for urban regeneration and growth. Whilst seeking to secure the delivery of previously developed land within the urban area, a selective Green Belt review is also necessary, within an overall approach which is considered to be sound.</p> <p>Concerns regarding Rothwell are noted and the relationship to proposals within Wakefield MDC. However, It is not the purpose of the Core Strategy to identify individual sites, this is the role of the Site Allocations DPD, where detailed site assessments will be made.</p> <p>General support for approach to Protected Areas of Search welcomed. The reference in the Core Strategy to the role of existing PAS sites, is a reflection of the status of the sites which have been established through the UDP and the fact that these have been set aside for longer term development needs. The sustainability merits of all sites to be considered through the Site Allocations process will need to be taken into account.</p>	<p>No change.</p> <p>No change.</p>
(0106) Aberford Parish Council	<p>The NPPF states that new Green Belt (s) should only be established in exceptional circumstances i.e. new settlements and major urban extensions, does this mean that the use of Green Belt for other purposes – i.e. smaller scale development in the Outer North East Area should be dismissed ?</p>	<p>The scope of the Core Strategy selective review is set out in Policy SP10 and relates to the delivery of the housing requirement and distribution (set out in Policies SP6 &amp; SP7) and is linked to the Settlement Hierarchy. This also takes into account opportunities linked to Smaller Settlements and other settlements, subject to the provision of local facilities and consistency with the Core Strategy.</p>	<p>No change.</p>
(0111) Barwick in Elmet & Scholes Parish Council, (5874) Barwick-in-	<p>Have been advised by Dept of Communities &amp; Local Government (DCLG) that Green Belt review should be determined by communities through</p>	<p>There appears to be a misunderstanding on this point. Neighbourhood Plans need to be in conformity with the Development Plan (i.e. the Core Strategy and Site Allocations DPD). Neighbourhood Plans provide scope for</p>	<p>No change.</p>

<p>Elmet &amp; Scholes Nhood DevPlan Steering, (0112) Boston Spa Parish Council</p>	<p>Neighbourhood Development Plans but consider that the Core Strategy should establish permanent Green Belt boundaries, which should be reflected in revisions to SP10 (including the deletion of the word “Exceptional”). Policy in current form will be open to legal challenge.</p> <p>Locations identified as Protected Areas of Search will be the subject of a sustainability appraisal and recognise any constraints which may arise from communities adopted or emerging “Neighbourhood Development Plans”.</p>	<p>development proposals to reflect this conformity and for higher levels of development. Policy SP10 as drafted, allows for some flexibility in considering such proposals as they emerge and is considered to reflect national guidance as set out in the NPPF.</p> <p>Sites identified as part of the Site Allocations DPD process will need to be subject to sustainability appraisal, as will Neighbourhood Plans.</p>	
<p>(5879) Mr Martin Fox</p>	<p>Concern regarding the impact of Green Belt review upon Berwick, Open views to countryside is a key feature of the village; therefore the Green Belt needs to be preserved.</p> <p>Concern that the selective Green Belt review, contravenes Localism Act and advice from local MP.</p>	<p>Concern regarding the impact of Green Belt review is noted. A key aspect of the Core Strategy is to respect local character and distinctiveness, whilst planning for longer term regeneration and growth. Any site allocations for Berwick will be subject to individual assessment against sustainability and Green Belt criteria. The overall approach of the Core Strategy (and selective Green Belt review), is considered to be consistent with national planning guidance and the Localism Act.</p>	<p>No change.</p>
<p>(0122) Micklefield Parish Council</p>	<p>Considered that the Policy is unsound because it does not expressly state that the selective review of the Green Belt will consider sub clauses (I). (ii) &amp; (iii) in that order of priority. Spatial Policy 10 is also fundamentally flawed because no strategy is articulated in the policy itself as to how many hectares of new PAS Land designations are needed.</p> <p>There is no attempt to broadly outline where extensions to the Main Urban Area (MAU) should be expected (neither in the policy, nor in the accompanying Key Diagram. Concern that as a result, the Site Allocations DPD will be a free-for-all.</p> <p>Concern that the Core Strategy provides no</p>	<p>Spatial Policy 7 Table. 2, gives an indication of the broad housing distribution by Settlement Hierarchy. For each level of the Settlement Hierarchy, the Table sets out the number of anticipated dwellings by number and as a percentage, whilst also identifying if this will be delivered as an “Infill” or as an “Extension”. Within this context, sites will need to be identified through the Site Allocation DPD process, consistent with this overall approach and with regard to Policy SP10. As set out in paras. 4.8.6 – 4.8.7, the Core Strategy, consideration will also need to be made to the identification of Protected Areas of Search. The precise location of such areas will need to be considered as part of the preparation of the Site Allocations DPD and at this stage it is anticipated that this should account for at least 10% of the total land identified for housing. This overall approach is considered to be reasonable and realistic but will need to be subject to review through the Site Allocations process.</p>	<p>No change.</p>

	<p>overarching guidance at a local (i.e. Leeds) level to identify where there is a need for additional PAS Land, or where the balance is to be struck across the district.</p> <p>Concern that the northern quadrant of the MAU from Horsforth round to Scarcroft appears to play no quantifiable part in the new housing allocations in Spatial Policy 6 and there is nothing in Spatial Policy 10 to indicate that the northern quadrant will even have a part to play in the designation of additional PAS Land, i.e. to ensure that the boundary of the Green Belt has permanence well beyond the end of the Plan Period (2028).</p> <p>The Policy therefore needs to be significantly revised in order to guide the selective review, identify how much land is needed and where in relation to the settlement hierarchy – prioritised by settlement size. This growth needs to be balanced across the district and have regard to community need, market need and locational capacity.</p>	<p>As noted above, Table 2 in Policy SP7 sets out the broad quantum and distribution of housing allocations District-wide. Table 3 of SP7 also sets out housing distribution and a quantum and percentage District wide, by Housing Market Characteristic Area.</p>	<p>No change.</p>
(0136) Drighlington Parish Council	<p>Considers that the number of outstanding planning permissions for housing together with the low levels of building and further scope for finding brownfield land means that there is no practical need for the release of large amounts of greenfield or greenbelt land for development.</p> <p>Green Belt in 'Outer South West Leeds' often is reduced already to narrow and fragile strips which are vital to the prevention of coalescence of settlements. Any loss of greenbelt in this area would be harmful to the structure of West Yorkshire</p>	<p>Policy SP10, is set within the overall context of the Spatial Vision of the Core Strategy and national guidance. Based upon the evidence base, Leeds needs to plan for urban regeneration and growth. This overall approach takes into account existing planning permissions and the availability of brownfield land. Within this context, whilst seeking to secure the delivery of previously developed land within the urban area, a selective Green Belt review is also necessary.</p> <p>Concerns regarding the extent of current Green Belt are noted. A key aspect of the Core Strategy is to respect local character and distinctiveness, whilst planning for longer term regeneration and growth. Any site allocations within the 'Outer South West', will be subject to individual assessment against sustainability and Green Belt criteria.</p>	<p>No change.</p>

	and it would undermine the openness and separation which maintain district communities in green settings.		
(4825) Morley Town Council	<p>Concern that Green Belt may be released for employment. This should be resisted strongly: there are many acres of late 1950s to early 1980s sub-standard big sheds in Leeds which might be cleared.</p> <p>Potential windfall generation of brownfield land for employment use should be calculated; without this Core Strategy would be unsound as it might endanger Green Belt unnecessarily.</p> <p>Need to recalculate housing land need following publication of NPPF and questions about population growth and economic capacity to pay for large numbers of new dwellings.</p> <p>Need to re-instate "brownfield first" as the City Council's flagship development land policy.</p> <p>Green Belt is vital in maintaining separation and distinctiveness of settlements, not just in Leeds, but, throughout West Yorkshire (this is particularly so in the conurbation core of which Morley is a part).</p> <p>Need to work closely with neighbouring authorities, otherwise the Core Strategy is unsound.</p>	<p>Concerns regarding unnecessary Green Belt release is noted. A key strand of the Core Strategy is to make best use of land within urban areas, including employment. However, in order to support longer term economic growth and to provide opportunities for local job creation, the Core Strategy acknowledges, that employment allocation may need to be made in association with locations identified for housing growth, as a basis to ensure the integrated planning and sustainability of new communities.</p> <p>It is not clear what specific impact the NPPF has upon the housing land calculations made in support of the Core Strategy. Within this context, the NPPF offers encouragement to PDL as a component of housing land supply, which is supporting of the City Council's position. Further details of the City Council's consideration of responses raised regarding housing calculations is covered in the analysis report to SP6.</p> <p>As set out on the Spatial Vision and Objectives of the Core Strategy (and a range of Policies including SP1 &amp; H1), the plan seeks to give a preference for the use of brownfield land, consistent with the overall approach of the NPPF.</p> <p>A key aspect of the Core Strategy is to respect local character and distinctiveness, whilst planning for longer term regeneration and growth. Any site allocations within the Morley area, will be subject to individual assessment against sustainability and Green Belt criteria.</p> <p>This point is noted and is reflect in proposed changes to the Introductory section of the Core Strategy.</p>	<p>No change</p> <p>No change</p> <p>No change.</p> <p>No change</p> <p>See changes proposed to Introduction/'Spatial Vision'.</p>

	<p>UDP Protected Area of Search (PAS) allocations were extensive, in part because the UDP Inspector based calculations of housing land need on an average density of 25 dwellings to the hectare, or ten to the acre, far less dense than current in the 1990s or at any time since. Careful and realistic management of land allocation could see much UDP PAS land carried forward into the LDF.</p>	<p>PAS sites will be reviewed alongside other sites via the preparation of the Site Allocations DPD, in order to make the best use of allocations/sites, consistent with the overall approach of the Core Strategy.</p>	<p>No change.</p>
<p>(5863) Mr Michael Green</p>	<p>Concern that the housing target for Outer South West's target is greater numerically and proportionately than any of the other non-priority areas. Concern that the only way of achieving this level of development would be significant extension of Morley itself which would lead to merging of Morley with the Main Urban Area (via the release of Green Belt).</p>	<p>Concerns are noted. A key aspect of the Core Strategy is to respect local character and distinctiveness, whilst planning for longer term regeneration and growth. Any site allocations within the Morley area, will be subject to individual assessment against sustainability and Green Belt criteria.</p>	<p>No change.</p>
<p>(5885) Mrs Lisa Jackson</p>	<p>View that population growth forecasts for Leeds are speculative, low levels of building and brownfield capacity, mean that greenfield/Green Belt release is not warranted. Concern re. housing requirement in Outer South West and impact upon local character and coalescence of settlements through Green Belt release. Concern re. scale of development upon local infrastructure capacity (schools, roads, drainage etc).</p>	<p>Policy SP10, is set within the overall context of the Spatial Vision of the Core Strategy and national guidance. Based upon the evidence base (including population forecasts), Leeds needs to plan for urban regeneration and growth. This overall approach takes into account existing planning permissions and the availability of brownfield land. Within this context, whilst seeking to secure the delivery of previously developed land within the urban area, a selective Green Belt review is also necessary. An Infrastructure Delivery Plan has been prepared as part of the Core Strategy and more detailed local assessment will be undertaken as part of the preparation of the Site Allocations DPD.</p>	<p>No change.</p>
<p>(0092) Home Builders Federation</p>	<p>Support in principle for a Green Belt review but the Policy is considered to be unsound as a Green Belt review should be completed prior to the submission of the Core Strategy to inform the spatial strategy.</p> <p>The policy is also considered to be unsound also, as it is very unclear when the Green Belt review will be completed</p>	<p>General support welcomed.</p> <p>The approach of the Core Strategy is consistent with NPPF. The Core Strategy and emerging Site Allocations DPD, form part of the 'local plan' for Leeds, with the Core Strategy setting the strategic context for the site allocations. It is not necessary for the Green Belt review to be conducted in advance of the submission of the Core Strategy.</p>	<p>No change.</p>

	<p>even though development on former Green Belt sites will be necessary to deliver the housing strategy.</p>	<p>The Core Strategy emphasises the need for early progress to be made with the preparation of the Site Allocations DPD. A scoping report for the preparation of the Site Allocations DPD has been agreed by the City Council's Executive Board and it is envisaged that consultation on Issues and Options will take place in early 2013, consistent with the agreed programme and timetable.</p>	
<p>(0420) Cornforth &amp; Sons (via White Young Green Planning).</p>	<p>Support for SP 10 in principle.</p> <p>Support for the definition of Bardsey as a Smaller Settlement (Table 1 - Identification of Settlement Types). Within this context, Policy SP 10 should be amended to recognise that Green Belt releases are not solely about the tests previously stipulated within PPG2 but about delivering sustainable sites. Spatial Policy 10: Green Belt although supported in principle is not acceptable in its current form. It is considered that it is not acceptable to determine if Green Belt sites should be allocated by criteria (iv) (National Guidance) and (v) (Saved UDP Policies and emerging guidance) as sustainable locations are not defined in criteria (i) – (iii). By exception only the determination on whether a site in other settlements should be released from the Green Belt should be clarified, the determination criteria does not advise whether sustainability or Green Belt comes first.</p>	<p>Support welcomed.</p> <p>The approach set out as part of Policy SP10, is considered to be consistent with national guidance. As with the NPPF, the policy framework of the Core Strategy needs to be read as a whole. Within this context Policy SP1 sets out the broad locational criteria and the Spatial Vision and Objectives, set out the broad sustainability criteria for development. In addition, sites to be considered as part of the Site Allocations process, will be subject to assessment against sustainability and Green Belt criteria.</p>	<p>No change.</p>
<p>(0420) D Westwood &amp; Son (via White Young Green Planning)</p>	<p>Support for undertaking a selective review at an early stage, but considers that the policy should be reworked to make clear that Green Belt release will be considered in suitable locations in villages and other rural settlements as well as the areas identified in points (i)-(ii) to ensure that Green Belt release is delivered in the most sustainable locations.</p>	<p>Support welcomed.</p> <p>The Policy text following (iii) recognises that in 'exceptional cases', sites in other settlements could be considered, where they are in sustainable locations.</p>	<p>No change.</p>

(5034) Evans Homes No. 2 Ltd (via Drivers Jonas Deloitte)	Support need for Green Belt review, a full review should be undertaken in tandem with the production of the Core Strategy. This will allow policies to be informed by it, and would be consistent with the NPPF (para 83). Support to the recognition to major settlement of Wetherby as an area where a Green Belt review would generally be considered.	Support welcomed.  The approach of the Core Strategy is consistent with NPPF. The Core Strategy and emerging Site Allocations DPD, form part of the 'local plan' for Leeds, with the Core Strategy setting the strategic context for the site allocations. It is not necessary for the Green Belt review to be conducted in advance of the submission of the Core Strategy. A selective review can be justified on the basis of the strategic approach to locating growth, consistent with the Settlement Hierarchy and the scale and broad distribution of housing growth which is being planned for.	No change.
(0466) Savills	Support for Green Belt Review and the need to create additional Protected Areas of Search but concern it will only be a 'selective review'. Government advice contained in the NPPF advises that boundaries should endure and that they should not need to be altered at the end of the plan period. The Policy should therefore be changed to specify that a full review should be undertaken.  The Policy also needs to be revised to be clearer on how to treat villages (Thorner) within the Green Belt. Villages should only be incorporated in the Green Belt if their open character contributes towards the wider openness of the Green Belt. Within this context Thorner needs to be removed from the Green Belt.	Support welcomed.  The approach of the Core Strategy is consistent with NPPF. The Core Strategy and emerging Site Allocations DPD, form part of the 'local plan' for Leeds, with the Core Strategy setting the strategic context for the site allocations. It is not necessary for the Green Belt review to be conducted in advance of the submission of the Core Strategy. A selective review can be justified on the basis of the strategic approach to locating growth, consistent with the Settlement Hierarchy and the scale and broad distribution of housing growth which is being planned for.  The approach of the Core Strategy is clear with regard to villages/rural (as set out in the Settlement Hierarchy). Within this context, the Policy as worded, allows some scope for development within 'other settlements' subject to exceptions and sustainability considerations.	No change.
(5105) Renew	Need to consider need for additional criteria re. small settlements, "to assist and ensure the continuance of local amenities in smaller settlements that selective housing development could bring".	Point noted but development in all settlements, will be expected to make the necessary contributions, consistent with the overall approach of the plan.	No change.
(5039) Signet Planning	Support for Policy and (in hierarchical terms), release around the 'smaller settlements' should be the last resort.	Support welcomed.	No change.

	<p>The need to identify additional PAS land is also supported, although this does not necessarily need to be at the cost of Green Belt and could be on other land outside of current development limits.</p> <p>The Green Belt review should be undertaken alongside the preparation of the Allocations DPD to ensure unnecessary release is avoided.</p> <p>Paragraph 4.8.6 recognises the need to identify land for unidentified needs (PAS land). Whilst PAS land is already identified within the existing UDP, it needs to be considered that additional PAS land should be identified for the forthcoming plan period to provide a safety net should there be a change in circumstances.</p>	<p>The approach of the Core Strategy is consistent with NPPF. The Core Strategy and emerging Site Allocations DPD, form part of the 'local plan' for Leeds, with the Core Strategy setting the strategic context for the site allocations. It is not necessary for the Green Belt review to be conducted in advance of the submission of the Core Strategy. The Core Strategy recognises the importance of PAS in contributing towards longer term development requirements.</p>	<p>No change.</p> <p>No change.</p>
(0480) Warner, Redrow, Taylor Wimpey, Mirfield, Keyland, Barratt Leeds, Kebbell, Barrett York, Chatford Miller and Ashdale (via Dacre Son & Hartley)	<p>Support in principle for the selective review and the identification of new Protected Areas of Search, concern that the lack of detail and timing of the review.</p> <p>The proposed amount of PAS land to be identified of at least 10% is not justified and it is considered this is not the most appropriate strategy when considered against the reasonable alternatives.</p>	<p>Support welcomed.</p> <p>As set out in paras. 4.8.6 – 4.8.7, the Core Strategy, consideration will also need to be made to the identification of Protected Areas of Search. The precise location of such areas will need to be considered as part of the preparation of the Site Allocations DPD and at this stage it is anticipated that this should account for at least 10% of the total land identified for housing. This overall approach is considered to be reasonable and realistic and will be subject to review through the Site Allocations process.</p>	<p>No change.</p> <p>No change.</p>
(1186) T G M F Emsley (via ID Planning) (1938) Redrow Homes (Yorkshire) Ltd (5671) Great North	<p>Support for the proposed selective review of the Green Belt but concern that there is very little detail how the selective review will take place and the timing of the review (other than reference to the Site Allocations</p>	<p>Support welcomed</p> <p>The Core Strategy emphasises the need for early progress to be made with the preparation of the Site Allocations DPD. A scoping report for the preparation of the Site Allocations DPD</p>	<p>No change.</p> <p>No change.</p>



<p>Developments Ltd c/o Evans Property Group, Barratt David Wilson Homes, Consortium of Housebuilders Edmund Thornhill Thornhill Estates, Redrow Homes (Yorkshire Ltd.), Housebuilder Consortium, Robert Ogden Partnership Ltd, ELE Northern Quadrant Consortium, Wortlea Estates (via ID Planning) (5895) Barratt David Wilson Homes Yorkshire Homes</p>	<p>DPD). This is a key strategic issue which needs to be addressed.</p> <p>Support for existing Protected Areas of Search to be identified for housing and for the identification of new PAS land.</p> <p>The proposed amount of PAS land to be identified of at least 10% is not justified and it is considered this is not the most appropriate strategy when considered against the reasonable alternatives.</p>	<p>has been agreed by the City Council's Executive Board and it is envisaged that consultation on Issues and Options will take place in early 2013, consistent with the agreed programme and timetable.</p> <p>As set out in paras. 4.8.6 – 4.8.7, the Core Strategy, consideration will also need to be made to the identification of Protected Areas of Search. The precise location of such areas will need to be considered as part of the preparation of the Site Allocations DPD and at this stage it is anticipated that this should account for at least 10% of the total land identified for housing. This overall approach is considered to be reasonable and realistic and will be subject to review through the Site Allocations process.</p>	<p>No change.</p>
<p>(5835) Persimmon Homes</p>	<p>Support for Green Belt review but concern regarding lack of detail regarding when it will take place and how it will be done.</p> <p>Need to ensure that new Green Belt boundaries will endure. All existing PAS land should be identified for housing allocation at earliest opportunity Support for approach to identify new Protected Areas of Search land.</p>	<p>Support welcomed.</p> <p>The Core Strategy emphasises the need for early progress to be made with the preparation of the Site Allocations DPD. A scoping report for the preparation of the Site Allocations DPD has been agreed by the City Council's Executive Board and it is envisaged that consultation on Issues and Options will take place in early 2013, consistent with the agreed programme and timetable.</p> <p>It is accepted that Green Belt boundaries will need to endure and this will be an important consideration as part of the Site Allocations DPD process. Within this overall context, existing and potential future PAS, will need to be considered.</p>	<p>No change.</p>
<p>(5121) Directions Planning (on behalf of Otley Town Partnership &amp; Mr and Mrs Haigh)</p>	<p>Support in principle for the Green Belt review and for the Core Strategy to be adopted at the earliest opportunity but concern that a Green Belt review is necessary so soon after UDP Review (2006), given the need for Green Belt permanence, as set out in national guidance. The Core Strategy Green Belt review therefore needs to take into account</p>	<p>Support welcomed.</p> <p>Policy SP10, is set within the overall context of the Spatial Vision of the Core Strategy and national guidance. Based upon the evidence base (including population forecasts), Leeds needs to plan for urban regeneration and growth. This overall approach takes into account existing planning permissions and the availability of brownfield land. Within this context, whilst seeking to secure the delivery of</p>	<p>No change.</p>

	<p>growth beyond the plan period.</p> <p>Exceptional reasons are also required for the release of Green Belt land.</p> <p>Criterion (iv) and (v) need to be reviewed and updated in light of the NPPF.</p> <p>The approach needs to be reviewed because saved policies in the UDP now carry limited weight.</p> <p>The policy fails to mention the approach towards major development sites in the Green Belt. The policy also fails to mention the new requirements of a Green Belt review as set out in the NPPF, which includes looking at potential impacts beyond the district and Green Belt boundary.</p>	<p>previously developed land within the urban area, a selective Green Belt review is also necessary. This overall approach is considered to be consistent with the NPPF.</p> <p>Government advice is that where 'Saved Policies' remain consistent with national guidance, they can be retained. A number of UDP saved policies relating to the Green Belt are very detailed and in any event, it would not be appropriate for them to be reviewed as part of a Core Strategy.</p> <p>Major Development sites in the Green Belt are no longer identified as a separate category in the NPPF.</p>	<p>No change.</p> <p>No change.</p>
(5510) Walton & Co	<p>The Green Belt review needs to be significant, not selective, as view that the housing requirement is too low and need for the Green Belt boundary to endure beyond the plan period.</p>	<p>Policy SP10, is set within the overall context of the Spatial Vision of the Core Strategy and national guidance. Based upon the evidence base (including population forecasts), Leeds needs to plan for urban regeneration and growth. This overall approach takes into account existing planning permissions and the availability of brownfield land. Within this context, whilst seeking to secure the delivery of previously developed land within the urban area, a selective Green Belt review is also necessary. Detailed boundaries will need to be considered as part of the Site Allocations DPD process. This overall approach is considered to be consistent with the NPPF. It is not accepted that the housing requirement is too low. The requirement reflects the conclusions of the Core Strategy evidence base and is considered to be acceptable and realistic. (see also analysis of responses to Spatial Vision section and SP6).</p>	<p>No change.</p>
(5543) DPP	<p>The Core Strategy should undertake a full rather than selective Green Belt review.</p>	<p>The approach of the Core Strategy is consistent with NPPF. The Core Strategy and emerging Site Allocations DPD, form part of the 'local plan' for Leeds, with the Core Strategy setting the strategic context for the site allocations. It is not necessary for the Green Belt review to be conducted in</p>	<p>No change.</p>

	<p>Support that the review will consider Green Belt releases around the Main Urban Area, the Major Settlements including Wetherby and the Smaller Settlement including Boston Spa, Bardsey, Collingham and Barwick in Elmet. In this regard the policy has been positively prepared and is justified.</p> <p>Support that new Protected Areas of Search ('PAS Land') will be identified to replace those areas that will be allocated but need to be more specific on the quantum required to ensure Green Belt boundaries endure (to be consistent with national guidance).</p>	<p>advance of the submission of the Core Strategy. A selective review can be justified on the basis of the strategic approach to locating growth, consistent with the Settlement Hierarchy and the scale and broad distribution of housing growth which is being planned for.</p> <p>Support welcomed.</p> <p>Support welcomed. As set out in paras. 4.8.6 – 4.8.7, the Core Strategy, consideration will also need to be made to the identification of Protected Areas of Search. The precise location of such areas will need to be considered as part of the preparation of the Site Allocations DPD and at this stage it is anticipated that this should account for at least 10% of the total land identified for housing. This overall approach is considered to be reasonable and realistic and will be subject to review through the Site Allocations process.</p>	<p>No change.</p> <p>No change.</p>
(5649) Betterspot Limited (BBB) (via Robert Halstead Chartered Surevyor)	<p>General support for Policy but need for the relevant NPPF paragraphs to be inserted into (iv) e.g. para 80 of the NPPF.</p> <p>View that reallocation of current Green Belt land to allocations under the LDF should be a last resort and that current open land within the urban/built up areas (non green belt) should be allocated for future development. Within this context, view that, It is difficult to see how an exceptional case for green belt releases can be made (when there is other suitable and available non green belt land which can accommodate housing or employment</p>	<p>Support welcomed. The overall policy approach is considered to be consistent with the NPPF and it is not considered appropriate to repeat extensive sections of the NPPF within the policy wording.</p> <p>The approach of the Core Strategy is consistent with NPPF. The Core Strategy and emerging Site Allocations DPD, form part of the 'local plan' for Leeds, with the Core Strategy setting the strategic context for the site allocations. It is not necessary for the Green Belt review to be conducted in advance of the submission of the Core Strategy. A selective review can be justified on the basis of the strategic approach to locating growth, consistent with the Settlement Hierarchy and the scale and broad distribution of housing growth which is being planned for.</p>	<p>No change.</p> <p>No change.</p>

	development in a sustainable manner).		
(0782) University of Leeds	<p>The Core Strategy has failed to consider the full range of opportunities for accommodating the estimated housing need. Not considered whether a new settlement (new Garden City for Leeds) in principle, and specifically located at Bramham as a strategic site would address the housing issues. Therefore is unsound.</p> <p>Employment, local services, and community facilities would also be provided as part of a new settlement, plus dedicated high frequency bus service to make it a highly sustainable location.</p> <p>Inevitable that there will be Green Belt loss in Outer North East area. 1999 UDP Inspector's report considered harm to objectives of the green belt and concluded it is sufficiently separated from Bramham and Tadcaster that would preserve the separate identities of the settlements, and the site only performs a limited function in terms of checking the sprawl of the main urban area. (Concluded no new settlement was necessary at that time).</p>	<p>The focus of the Core Strategy approach has been developed as part of the Issues and Options and Preferred Approach stages. A key outcome of this process has been the need to give emphasis to the use of brownfield land within urban areas, as a focus for regeneration and growth, whilst recognising the need for some greenfield development and a selective Green Belt review. Integral to this approach also is the need to maintain the character and distinctiveness of Leeds and the Settlement Hierarchy.</p> <p>In reflecting this overall approach, Policy SP10 as drafted, focuses the selective Green Belt review upon the settlement hierarchy. The supporting text which follows (iii) accepts that exceptions may exist for development in 'other settlements', where opportunities reflect the broad support of the plan and sustainability considerations. Within this context also, (v) also sets out an approach to proposals, outside of the selective review.</p> <p>Against this framework and within the context of the Outer North East Housing Market Characteristic Area, the proposal may have some potential, if it can be demonstrated that the development is in a sustainable location, is able to provide a full range of local facilities and services, to meet its needs and can make a significant contribution to housing delivery within the plan period. To reflect this view a change to the policy wording is recommended.</p>	<p>Change:</p> <p>Amend the policy text after (iii) as follows:</p> <p><del>"Exceptionally, sites in other settlements</del> <i>outside the Settlement Hierarchy</i> could be considered, where they <del>are</del> <i>will be</i> in sustainable locations <del>with access to and are able to provide a full range of local facilities and services and</del> <i>within the context of their Housing Market Characteristic Area, and where sites</i> are more appropriate in meeting the spatial objectives of the plan than the alternatives <del>in higher order settlements</del> <i>within the Settlement Hierarchy</i>. Otherwise review of the Green Belt will not be considered to ensure that its general extent is maintained.</p>

## APPENDIX 2 - CHANGES TO CORE STRATEGY TEXT

### 4.8 Green Belt

#### SPATIAL POLICY 10: GREEN BELT

A selective review of the Green Belt will need to be carried out to accommodate the scale of housing and employment growth identified in Spatial Policy 6 and Spatial Policy 9, as well as an additional contingency to create new Protected Areas of Search (to replace those in the UDP which will be allocated for future development). The selective review will generally consider Green Belt release around:

- (i) the Main Urban Area (Leeds City Centre and surrounding areas forming the main urban and suburban areas of the city);
- (ii) Major Settlements of Garforth, Guiseley/Yeadon/Rawdon, Morley, Otley, Rothwell and Wetherby;
- (iii) Smaller Settlements (listed in Table 1 : Settlement Hierarchy);

Exceptionally, sites ~~in other settlements~~ *outside the Settlement Hierarchy* could be considered, where they ~~are~~ *will be* in sustainable locations ~~with access to~~ *and are able to provide a full* range of local facilities and services and *within the context of their Housing Market Characteristic Area*, ~~and where sites~~ are more appropriate in meeting the spatial objectives of the plan than the alternatives ~~in higher order settlements~~ *within the Settlement Hierarchy*. Otherwise review of the Green Belt will not be considered to ensure that its general extent is maintained.

In assessing whether sites in the selective Green Belt review should be allocated for development, the following criteria will be applied:

- (iv) Sites will be assessed against the purposes of including land in Green Belts identified in national guidance (~~PPG2/Draft~~ National Planning Policy Framework). These purposes are:
  - to check the unrestricted sprawl of large built up areas,
  - to prevent neighbouring towns from merging,
  - to assist in safeguarding the countryside from encroachment,
  - to preserve the setting and special character of historic towns; and
  - to assist in urban regeneration.
- (v) Development proposals not part of the selective Green Belt review will be considered against the suite of Green Belt policies saved from the UDP and through the emerging guidance and legislation of the Localism Act.

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Report author: Liz Bennett  
78228

**Report of the Director of City Development**

**Report to: Development Plan Panel**

**Date: 11<sup>th</sup> September 2012**

**LDF Core Strategy – Publication Draft, Analysis of Consultation Responses:  
Policy SP12 ‘Managing The Growth Of Leeds Bradford International Airport’.**

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 6 weeks public consultation during February – April 2012. Section 3 of this report summarises the issues raised and the Table in Appendix 1 suggests how the City Council should respond. Appendix 2 illustrates how the text of the Core Strategy would need to be altered.
  
2. Of the wide range of issues raised in SP12 ‘Managing the growth of Leeds Bradford International Airport’ (LBIA), 1 major change and 1 minor change have been proposed.

**Recommendations**

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.

## **1.0 Purpose of this Report**

- 1.1 Within the context of the Core Strategy Initial Report of Consultation (6<sup>th</sup> June), the purpose of this report is to review consultation responses in relation to SP12 'Managing the growth of Leeds Bradford International Airport'. Appendix 1 attached, summarises the representors, key issues raised, the City Council's view and proposed action. Appendix 2 illustrates how the text of the Core Strategy would need to be altered.

## **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 28<sup>th</sup> February to 12<sup>th</sup> 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)

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 The representations received with regard to SP12 were polarised, with regard to the expansion of the airport, and the mitigation of environmental impacts. Following the analysis of the consultation responses to SP12, this report recommends a major change to SP12 (i) and a minor change to SP12 (iv). These changes have been outlined in Appendix 2.
- 3.2 The representations were grouped into the following themes; airport growth, surface access to the airport, airport car parking and airport environmental impacts. A summary of the representations is given below, Appendix 1 attached, summarises the representors, key issues raised, the City Council's view and proposed action.



### 3.2.1 Airport Growth;

- There was general support for SP12 enabling airport growth, however, there should be firmer support for the airport's expansion.
- Leeds, York and N Yorkshire Chamber of Commerce raised concerns that the expansion of the airport was tied to infrastructure delivery with no recognition of how it would be delivered nor by whom.
- Taylor Wimpy put forward the representation that with LBIA as a key economic driver, there is a need to match economic growth opportunities with the provision of homes.

### 3.2.2 Surface Access to the Airport;

- LBIA outlined in their representation that surface access requirements will form part of any planning application, and it is therefore not necessary or reasonable for the growth of LBIA to be contingent on a Surface Access Strategy.
- LBIA also raised concerns regarding the implication that the growth of the airport cannot be sustained without improved connectivity. These major infrastructure proposals are supported by LBIA, however these are longer term objectives, which can only be delivered by a partnership of stakeholders including LBIA. The assertion is that airport's growth is not and should not be contingent on their delivery.
- Leeds Civic Trust suggest that the Surface Access Strategy should have a primary aim of improving public transport access and that a new link road would be contrary to this.
- There was general support for the airport Tram Train link, together with representations from both Harrogate Borough Council and Bradford Metropolitan District Council regarding the details of the scheme.

### 3.2.3 Airport Car Parking;

- LBIA made the representation that co-ordinated management of car parking should be addressed within the Core Strategy, and that the development of car parking to serve LBIA should be contained wholly within the AOLB, and should be prohibited outside of the AOLB.

### 3.2.4 Airport Environmental Impacts;

- LBIA raised concerns regarding references to the impacts of air travel on climate change within the Core Strategy, as well as SP12(iv) 'The management of any local impacts and implementation issues', due to the lack of explanation on how this will be interpreted or applied.
- Concern was raised by the Leeds Civic Trust regarding the expansion of the airport and the Core Strategy's position on climate change.

## 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 City 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, 10<sup>th</sup> 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 about Policy SP12. On the basis of these, it is considered that a major change should be made to the wording

of the Core Strategy; in addition two of the responses merit minor changes. All of the others warrant no further changes.

## **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 documents<sup>1</sup>**

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) web pages or by contacting David Feeney on 247 4539.

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<sup>1</sup> 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**  
**SP12. - Managing the Growth of Leeds Bradford International Airport**

Representor/Agent	Representor Comments	LCC Initial Response	Action
Craven District Council.	<p><u>1. Support</u>  <u>1a. Support General</u>                      Support for SP12 enabling Leeds Bradford International Airport to fulfil its role as an important regional airport subject to mitigating factors.</p>	Support is welcomed.	No change.
Metro.	<p><u>1.b Airport Surface Access Support</u>                      Growth is subject to the delivery of improved surface access to the airport as stipulated in the policy. Metro, LCC and LBIA have successfully worked in partnership to ensure the airport is served by bus. As the airport expansion proposals are developed we would expect a step change in the surface access as identified in the policy.</p>	Comment noted.	No change.
Mr Cedric Wilks.	Support the tram/train link from the Leeds/Harrogate line.	Support is welcomed.	No change.
MFS Land LTD.	<p>Support for 'Tram Train' especially with regards to the sustainability of smaller settlements such as Bramhope.                      Support for NGT Park and Ride (Boddington) providing an additional public transport option for commuters from Bramhope to the city centre.</p>	Support is welcomed.	No change.
Leeds, York and N Yorkshire Chamber of Commerce	We welcome the support for future development and expansion of Leeds Bradford Airport at Policy 12.	Support is welcomed.	No change.
Leeds Bradford International Airport.	<p><u>2. Airport General</u>                      SP12 does not reflect the importance of the airport in delivering transport connectivity, which has been highlighted elsewhere in the Core Strategy. Suggested changes; LBIA is recognised as an asset of City and Regional significance. It is a key driver of the City and Region's economic growth, prosperity and competitiveness and is a key element of the City and Region's transport system.</p>	The importance of the airport is recognised in the Profile of Leeds Metropolitan District (para 2.27) as well as para 4.9.13 of the Spatial Development Strategy chapter. However, additional text can be added to paragraph 4.9.13 to strengthen the reference to the role of the Airport, as a key component of transport infrastructure and as a 'gateway' to the City Region.	Minor change. Add additional text to paragraph 4.9.13:  <i>"Leeds City Station and the Airport provide key components of strategic infrastructure, for businesses, residents and visitors. These facilities provide</i>

<p>MUSE Development</p> <p>Meadowside Holdings Ltd, The Hatfeild Estate, AR Briggs and Co, Lady Elizabeth Hastings Estate Charity, The Ledston Estate, The Bramham Park Estate, The Diocese of Ripon and Leeds</p>	<p>Yes - Integrated Planning.</p> <p>No comments upon this policy but reserve the right to comment further if the situation changes.</p>	<p>The meaning of this representation is unclear. The Council is unable to provide a response to this comment.</p> <p>Comments noted.</p>	<p><i>'gateways' to the City Region as a whole. The national, Trans Pennine and local linkages from Leeds City Station (including those to Manchester International Airport) are complemented and expanded by the national and international connections afforded by LBIA. In accessibility terms also, the Airport is well connected to the key settlements of Bradford, Harrogate and York, as well as Leeds".</i></p> <p>No change</p> <p>No change.</p>
<p>Leeds Bradford International Airport</p>	<p><b>3. Airport Growth</b>  SP12 makes the growth of the airport contingent on matters which are not clearly defined, already addressed in other legislation and guidance, or beyond the remit of the airport to deliver alone.</p> <p>There has not been any distinction made between short, medium</p>	<p>The policy framework of SP12 and UDP retained policy T30A provides a basis to guide decisions for future growth. SP12 makes it clear that growth of the airport will be supported. The completion of a Masterplan and an accompanying Surface Access Strategy are key to enabling this growth to take place and the Council will continue to</p>	<p>No change</p>

	<p>and long term growth, and the very different surface access requirements that would apply at these stages</p> <p>The policy fails to provide either an appropriate strategic or development control basis to consider airport growth.</p> <p>The emphasis that we have attached to the need for the local authority to work with the airport to deliver airport growth has recently been supported by the National Planning Policy Framework (NPPF).</p>	<p>work with the Airport in progressing its future plans outlined in the two documents.</p>	
Leeds, York and N Yorkshire Chamber of Commerce	<p>Policy SP12 is formulated on the basis of 'managing growth' at the airport subject to the delivery of key infrastructure. There is no recognition as to how that infrastructure will be delivered, or who will be responsible for delivering it, and an inference that without it, there will be no opportunity for the continued development of LBIA. We are concerned that the Policy makes future growth of the airport dependent on such improvements. The development of the Airport is essential to the city's economic competitiveness.</p>	<p>The mechanism for the delivery of transport infrastructure will need to be addressed in the Surface Access Strategy (and within the context of the Airport Masterplan) and this will need to include a partnership approach. SP11 includes surface access improvements to LBIA as a spatial priority, and this is also reflected in the Leeds City Region Transport Strategy.</p>	No change
Directors Planning	<p>The Policy should be more firm in its support for the expansion of the airport based on an understanding of the real impacts of growth. It should also be more positively worded in relation to recognising and harnessing benefits for the surrounding settlements of Yeadon, Guiseley, Rawdon and Otley, instead of simply focusing upon mitigating and managing potential effects. The policy does not support the airport's plans far enough, by not outlining the opportunities that arise from expansion, such as the economic and transport infrastructure benefits to the surrounding settlements.</p>	<p>Policy SP12 states that the continued development of the airport will be supported subject to the requirements of the policy. The value of the airport as a local employer is recognised in the supporting text (Para 4.9.13)</p>	No change
Taylor Wimpey UK	<p>Paragraph 4.9.13 fails to take account of NPPF requirement (paragraph 158) to consider and integrate strategies for housing and employment and to express this spatially. As the CS proposes to facilitate the growth of LBIA as a key economic driver, there is a need to match economic growth opportunities with the provision of homes.</p> <p>A key consideration to meet CS Objective 7. Making the land available for development around settlements where there are existing direct public transport links to the airport in</p>	<p>See above</p> <p>Housing requirements are informed by the Regional Econometrics Model which takes account of employment growth.</p>	No change

	place, including positive contribution of PAS land, would be a logical approach to maximising the opportunities presented by LBIA.		
Leeds Bradford International Airport	<p><b>4. Airport Surface Access General</b> As part of any planning application for the growth of the airport, LBIA will need to address surface access requirements, any impact which requires mitigation would also form part of either a condition or obligation agreed as part of a planning permission. For these reasons, it is not necessary or reasonable, for the growth of LBIA to be contingent on the agreement of a surface access strategy. Suggested changes LCC support the continued improvement and growth of LBIA in accordance with the ATWP subject to: Seeking to ensure that any new operational development minimises its impact upon the local environment including the local highway Network.</p> <p>In the supporting text and at criterion of SP12 (i), it is indicated that the growth of the airport cannot be sustained without improved connectivity, making reference to tram-train and the A65/A658 link road. These major infrastructure proposals are supported by LBIA, but it must be recognised that these are longer term objectives, which can only be delivered by a partnership of stakeholders including LBIA. The airport's growth is not and should not be contingent on their delivery.</p> <p>In the short to medium term, there are a range of measures relating to improved bus access including increased frequencies, new routes, and improved marketing, and travel plan co-ordinator, which would support the shift towards more sustainable modes of access to the airport. These options are being considered through a review of the airport's surface access strategy and on an ongoing basis by LBIA and its partners at LBIA's transport forum.</p> <p>Suggested changes; LCC will work with LBIA and other partners to maximise accessibility to the airport by public transport and other sustainable means in preference to single occupancy car journeys.</p>	<p>SP12 makes it clear that growth of the airport will be supported. The completion of a Masterplan and an accompanying Surface Access Strategy are key to enabling this growth to take place. It is recognised that a partnership approach will be necessary to deliver any major transport interventions. Existing permissions will already allow a significant amount of growth of LBIA.</p> <p>It is recognised that SP12 (i) as currently phrased would rule out any further growth without the delivery of specific interventions. Nevertheless incremental expansion beyond the current permissions are not consistent with Leeds City Council and Regional aspirations. It is considered that the Surface Access Strategy should identify agreed trigger points that would specify a timetable for the delivery of such interventions. It is consequently proposed to amend SP12 as follows:</p> <p>(i) Provision of major public transport infrastructure (such as tram train) and surface access improvements <b>at agreed passenger levels</b>; (ii) Agreement of a surface access strategy with identified funding <b>and trigger points</b>;</p>	<p>No change</p> <p>Major change: (i) Provision of major public transport infrastructure (such as tram train) and surface access improvements <i>at agreed passenger levels</i>; (ii) Agreement of a surface access strategy with identified funding <i>and trigger points</i>;</p>
Harrogate Borough Council.	The Tram Train Link from Leeds to the Airport should be changed to reflect the need to upgrade the complete rail link through to	The supporting documents LTP3 and Draft Rail Plan7, give further details of Harrogate line	No change.

<p>Leeds Civic Trust</p> <p>Bradford Metropolitan District Council, Bradford Metropolitan District Council (Highways)</p>	<p>Harrogate Knaresborough and York. The proposed Tram Train (phase 1 and 2) on the key diagram and on Map 9, should be combined to one phase to give equal high priority to the link through to Harrogate. The notation should be changed from 'Tram Train' to 'Electrification'.</p> <p>Improving surface access needs to be the subject of a comprehensive study. The surface access strategy should have a primary aim of improved public transport for users and employees. Concern has been raised that a new road link would encourage more car use at the expense of public transport, and increase congestion at the Horsforth Roundabout.</p> <p>Public transport should not be from only Leeds City Station. Public Transport caters for both passengers, employees and local journeys. Medium term improvements are needed as many bus services are hourly</p> <p>The Key Diagram shows the tram train link to LBIA via Harrogate Line. There would be more benefit accrued for West Yorkshire as a whole by integrating the links from both cities to LBIA utilising the Wharfedale line via Shipley.</p>	<p>improvements. Rail Plan7 includes the aspiration to electrify the Harrogate line and provide modern trains, as well as the provision of Tram-train from Leeds to LBIA. The Tram Train phase 1 and 2 on the key diagram and map 11 reflect the aspirations of Rail Plan 7.</p> <p>The new link road would relieve existing communities such as Horsforth and Rawdon, as well as providing an enhanced route to the airport for general traffic and buses from the A65. Improvements are also planned for Horsforth roundabout.</p> <p>Existing bus services provide links to LBIA from Bradford and other communities.</p> <p>Draft Rail Plan7, forms part of LTP3 and sets out Metro's plans to improve rail travel for customers. The plan confirms that a future tram train link to LBIA would spur from the Harrogate Line.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>
<p>Leeds Bradford International Airport</p>	<p><u>5. Airport Car Parking</u> Airport car parking is a critical source of revenue to fund new airport facilities and support bus services. Car parking supply and pricing is also important in the co-ordinated management of car parking to promote more sustainable modes of access to the airport. This matter should be addressed within the Core Strategy. The development of car parking to serve LBIA should be contained wholly within the AOLB, and should be prohibited outside of the AOLB, in order to secure a comprehensive and co-ordinated approach to the airport's surface access.</p>	<p>Parking as a whole is just one element of any access strategy. Evidence needs to be provided to demonstrate how a policy on off-site parking would help achieve delivery of the surface access improvements. The means of providing evidence should be through the review of the Airport Masterplan and Airport Surface Access strategy.</p>	<p>No change.</p>
<p>Leeds Bradford International Airport</p>	<p><u>6. Airport Environmental Impacts</u> The supporting text makes reference to the impact of air travel on climate change, and the impact on the local environment, context is not provided on the impact of air travel on CO2 emissions, and the inclusion of air travel in the EU Emissions Trading Scheme.</p>	<p>The supporting text provides a context to the implications of airport growth, however, SP12 does not place any constraint on LBIA growth with respect to CO2 emissions. As para 4.9.12 makes clear, these issues will be balanced with</p>	<p>No change</p>



Leeds Civic Trust	<p>Court decisions in 2011 outline this is an national issue and that climate change is not a consideration for LA's in planning applications for airport development. If climate change and local environmental impacts are referenced within the supporting text to the policy, then sufficient context should be provided to explain how these matters relate to aviation and LBIA specifically.</p> <p>Impacts on the local environment do not take account of 'leakage' previously acknowledged in the Regional Economic Strategy.</p> <p>There is no mention that noise and air quality emissions are controlled by a comprehensive monitoring mechanisms enshrined within planning conditions, and that the airport complies with these requirements.</p> <p>Criteria (iii) of the policy, LBIA has, and will continue to, seek to minimise local environmental impacts. The need for formal environmental assessment, as indicated in SP12, is a matter already covered by separate environmental legislation and therefore it is not necessary to include any reference to it in the Core Strategy.</p> <p>In the absence of any explanation of what criterion (iv) relates to, or how it will be interpreted or applied, we object to the inclusion of this criterion. Suggested changes; LCC will work with LBIA and other partners, including the local community, to seek to minimise the environmental impact of operations at, and connected with, the airport.</p> <p>The Core Strategy seems to have contradictory position on Climate Change and Airport expansion. How are the "environmental assessment and agreed plans" (iii) to be carried out and enforced? Targets should also be set. Mitigation plans should not be nullified by the phrase "where appropriate" which effectively provides an option for non compliance.</p>	<p>national objectives and guidance.</p> <p>It is recognised that growth at LBIA may reduce the number of journeys to Manchester, however, the principal impact of growth would fall on communities within Leeds.</p> <p>It is not considered that this needs to be mentioned in the Core Strategy.</p> <p>SP12 (iii) ensures that local environmental impacts not covered by separate legislation are considered, such as drainage and nature conservation.</p> <p>The management of any local impacts is expected to primarily cover visual and highway issues. SP12 (iv) will be amended as follows: (iv) The management of any local impacts and implementation issues, <b>including visual and highway issues.</b></p> <p>The supporting text provides a context to the implications of airport growth, however, SP12 does not place any constraint on LBIA growth with respect to CO2 emissions. As para 4.9.12 makes clear, these issues will be balanced with national objectives and guidance. Growth of all types inherently has environmental consequences. The strategy is to make growth as sustainable as possible.</p>	<p>No change</p> <p>No change</p> <p>No change</p> <p>Minor change. Amend criterion (iv) of Policy SP12 adding: <i>"including visual and highway issues."</i></p> <p>No change</p>
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## **APPENDIX 2 - CHANGES TO CORE STRATEGY TEXT**

### **4.9 Integrating Transport and Spatial Planning**

4.9.13 Leeds Bradford International Airport (LBIA) makes an important contribution to the economic growth of Leeds and the City Region, both in terms of economic attractiveness and as a local employer. It is estimated that LBIA provides in the order of 2,500 jobs within the City Region economy (Arup and Oxford Economics LBIA Impact Assessment 2009). *Leeds City Station and the Airport provide key components of strategic infrastructure, for businesses, residents and visitors. These facilities provide 'gateways' to the City Region as a whole. The national, Trans Pennine and local linkages from Leeds City Station (including those to Manchester International Airport) are complemented and expanded by the national and international connections afforded by LBIA. In accessibility terms also, the Airport is well connected to the key settlements of Bradford, Harrogate and York, as well as Leeds.* For the future growth of the airport to be sustained, improved connectivity via surface access needs to be delivered. The Leeds City Region Transport Strategy (2009) identifies improved surface access to the airport as a policy priority. Measures are currently being investigated including a tram-train link from the Leeds-Harrogate line and an A65/A658 road link.

#### **SPATIAL POLICY 12: MANAGING THE GROWTH OF LEEDS BRADFORD INTERNATIONAL AIRPORT**

The continued development of Leeds Bradford International Airport will be supported to enable it to fulfil its role as an important regional airport. ~~The further growth of the airport will be supported subject to:~~

- (i) Provision of major public transport infrastructure (such as Tram Train) and surface access improvements *at agreed passenger levels*;
- (ii) Agreement of a surface access strategy with identified funding *and trigger points*;
- (iii) Environmental assessment and agreed plans to mitigate adverse environmental effects, where appropriate;
- (iv) The management of any local impacts and implementation issues, *including visual and highway issues*.



Report author: David Feeney  
0113 2474539,

**Report of the Director of City Development**

**Report to: Development Plan Panel**

**Date: 11 September 2012**

**Subject: LDF Core Strategy Consultation Responses in Relation to Miscellaneous Topics (including Soundness, NPPF compliance, General Environment & Economy, Consultation, Habitat Regulations Assessment, Sustainability Appraisal, Equality Impact Assessment and Health Impact Assessment).**

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 key issues which have arisen in response to this part of the Core Strategy including comments on Soundness, NPPF compliance, General Environment & Economy, Consultation, Habitat Regulations Assessment, Sustainability Appraisal, Equality Impact Assessment and Health Impact Assessment.

**Recommendations**

Development Plan Panel is requested to:

- i). note and comment on the contents of the report and the course of further action (as detailed in Appendix 1 to the report).

## **1.0 Purpose of this Report**

- 1.1 Within the context of the Core Strategy Initial Report of Consultation (6<sup>th</sup> June), the purpose of this report is to review consultation responses in relation to a number of Miscellaneous topics (including Soundness, NPPF compliance, General Environment & Economy, Consultation, Habitat Regulations Assessment, Sustainability Appraisal, Equality Impact Assessment and Health Impact Assessment.) for which consultation responses have been received. Appendix 1 attached, summarises the representors, key issues raised, the City Council's view and proposed action. The suggested changes to the Core Strategy text arising from this analysis has been included in Appendix 2.

## **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 28<sup>th</sup> February to 12<sup>th</sup> 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)

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 The main issues on these topics relate to comments including Soundness, NPPF compliance, General Environment & Economy, Consultation, Habitat Regulations Assessment, Sustainability Appraisal, Equality Impact Assessment and Health Impact Assessment.

## **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 City 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, 10<sup>th</sup> 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 a series of Miscellaneous topics. Following consideration of representations received, recommendations for a number of minor changes have been made and have been consolidated in Appendix 2, to this report.

## **6. Recommendations**

- 6.1 Development Plan Panel is requested to:
- i). note and comment on the contents of the report and the course of further action (as detailed in Appendix 1 to the report).

## **7. Background documents<sup>1</sup>**

- 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) web pages or by contacting David Feeney on 247 4539.

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<sup>1</sup> 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**

**MISCELLANEOUS COMMENTS**

<b>Representor/Agent</b>	<b>Representor Comments</b>	<b>LCC Initial Response</b>	<b>Action</b>
<b>General Comments on Soundness</b>			
(0025) Kippax Parish Council	The whole plan is sound	Support Welcome	No change.
(1029) University of Leeds	Overall sound	Support Welcome.	No change.
(4825) Morley Town Council	Core Strategy is unsound, is unnecessarily harmful to the city's green setting and internal environment, is not supported by reliable evidence or reasonable argument, and is not compliant with NPPF.	Concerns are noted. As set out in the Core Strategy's Spatial Vision & Objectives, the plan is seeking to deliver necessary urban regeneration and growth, whilst seeking to maintain the local distinctiveness and character of Leeds and associated settlements. As set out in the opening sections of the plan, achieving all of these objectives at the same time is a key challenge but necessary to deliver the principles of sustainable development as advocated by the NPPF. The plan has been subject to a Sustainability Appraisal, which has appraised the plan against a series of interrelated environmental, economic and social objectives and adjustments to policies have been made where necessary.  In terms of the 'green environment' more generally, this has a high priority across the plan, including specific policies for Green Infrastructure and Greenspace protection and enhancement.	No change.
<b>Compliance with National Planning Policy Framework (NPPF)</b>			
(0806) Aviva Life & Pensions (UK), and The Crown Estate (via Indigo Planning) (1027) Gaunts Ltd (via Peacock and Smith) (1186) T G M F Emsley (via ID Planning)	The Core Strategy is unsound as does not demonstrate full compliance with the NPPF, the document needs to be reviewed.  The Core Strategy has not been prepared with regard to the NPPF and has been prepared with only the original three tests of soundness, not the current four tests set out in NPPF	In order to check compliance with the NPPF, the City Council has assessed the Core Strategy using the Planning Advisory Service (PAS) NPPF checklist. Using this checklist, the City Council is satisfied that the Core Strategy is in compliance with the NPPF. Where adjustments have been considered necessary a number of changes have been made to the document, which will be subject to further consultation prior to formal submission.	No change.

<p>(1743) Taylor Wimpey UK (via Turley Associates)  (2663) Spawforths  (2663) Miller Strategic Land (via Spawforths)  (2956) Cllr Thomas Leadley  (5024) CDP Limited  (5671) ELE Northern Quadrant Consortium  Great North Developments Ltd c/o Evans Property Gr, Consortium of Housebuilders, Barratt David Wilson Homes, Great North Development Edmund Thornhill, Thornhill Estates (via ID Planning)  (5681) The Ledston Estate, AR Briggs and Co,  5681 The Hatfield Estate, The Diocese of Ripon and Leeds, Lady Elizabeth Hastings Estate Charity, Jonas), The Bramham Park Estate, Meadowside Holdings Ltd  (via Carter Jonas)  5719 Scarborough Development Group  (via RED Property Services)</p>	<p>Need public consultation to make sound against NPPF.</p> <p>The Core Strategy does not consider development viability in the round and lacks consideration of this issue in depth. Unsound. To make the plan sound, the Core Strategy needs to consider viability in the round and should provide a framework for site assessment as and when site allocations are considered.</p>	<p>In relation to viability issues, the City Council is continuing to develop its evidence base and to progress a Community Infrastructure Levy (CIL) charging schedule. Within this context, further work has been commissioned on Economic Viability. This will take into account the Council's current and potential future policy requirements, such as for affordable housing, greenspace, Code for Sustainable Homes, and other relevant assumptions. This includes the policy requirements for new development in the emerging Core Strategy.</p>	<p>No change.</p>
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<b>General Environment</b>			
<p>(0046) Environment Agency</p>	<p>Raise a number of points regarding the Management of Water Resources and the relationship with the Natural Resources and Waste DPD.</p> <p>In particular, it is considered that the Core Strategy lacks sufficient reference, to the efficient use, quality &amp; effective management of water resources and the Water Framework Directive.</p> <p>With regard to the Leeds Flood Alleviation Scheme (FAS), it is considered that the Core Strategy and related documents need to be updated to reflect the latest position and a specific Policy for the FAS, needs to be included.</p> <p>Further clarity is also requested regarding the status of save policies (Culverting and Sustainable Urban Drainage).</p> <p>It is recommended that the Council look to update the Leeds Strategic Flood Risk Assessment (SFRA 2007), in the light of additional modelling.</p>	<p>As noted in the response from the Environment Agency, the City Council has prepared a Natural Resources and Waste DPD, which is nearing adoption. This Policy document includes a series of detailed Policies regarding the management of water resources including Water Efficiency, Water Quality, the Functional Flood Plain, Development in Flood Risk Areas, Zones of Rapid Inundation, Flood Risk Assessments and Surface Water Run Off. These Policies in turn, provide a robust framework for the City Council's and its partners to manage water resources effectively and to manage responsibilities under the Water Framework Directive. In order to emphasise this further, it is accepted that the Core Strategy text could be strengthened to make the appropriate cross references.</p> <p>Reference is made to the Leeds Flood Alleviation Scheme in Core Strategy Policy EN5 (viii) and the project is also included within the Core Strategy's draft Infrastructure Delivery Plan. Whilst noting that specific details of the proposal may be subject to change, it is considered that the Policy references in both the Core Strategy and Natural Resources and Waste DPD are sufficient.</p> <p>Unless replaced as a consequence of the Core Strategy or related DPD, the City Council in tends to retain saved policies, where they remain consistent with national guidance. The Natural Resources &amp; Waste DPD in Policy Water 7 covers Surface Water Run Off, which makes reference in the supporting text to retained City Council Supplementary Planning Guidance SPG22. Saved UDP Policy N39B is a detailed Policy for Culverting (not covered in the Core Strategy or NRWDPD) and will continue to be saved.</p> <p>Comments are noted. The City Council is in receipt of regular modelling/mapping updates from the Environment Agency, which are used when considering Planning Applications and for Development Plan updates. It is not therefore considered necessary to update the SFRA at this stage.</p>	<p>Change:</p> <p>Add additional wording to the final sentence of Para. 5.5.52.:<i>Further details on the actions identified in Policy EN5 and detailed Policies in relation to the efficient use, quality &amp; effective management of water resources are in the Natural Resources and Waste DPD. These Policies in turn provide a basis for the City Council and its partners, to help manage responsibilities under the Water Framework Directive.</i>"</p>

(0058) Natural England Consultation Service	<p>Notes that previous representations appear to have been taken forward by the City Council and considers the publication draft of the Core Strategy to be legally compliant and in accordance with the relevant tests of soundness.</p> <p>In the light of the NPPF, Natural England request that they are consulted on any further Core Strategy changes.</p>	<p>Comments welcomed.</p> <p>Comments noted.</p>	<p>No change</p> <p>No change</p>
(2560) Mr Lee Davidson	<p>The Main Document refers to walking and cycling 9 times and makes about 50 references to 'green infrastructure', often linked with the term 'network' but it never shows that it understands the crucial role which Public Rights of Way play in that network and how they relate to the rest of the network, substantial parts of which may be informal.</p> <p>Table of Contents (4.9) needs to be corrected, 'Integration' should read 'Integrating' which is the word used later in the document heading.</p> <p>Glossary should include Public Right of Way, Public Footpath, Public Bridleway and Permissive Footpath/Bridleway</p>	<p>The need to strengthen reference to Public Rights of Way has been acknowledged in proposed additional text to Para. 2.39 (iii) Our Green Environment – in the Analysis of Spatial Vision responses.</p> <p>Need for correction noted and will be corrected through final editing.</p> <p>Agree, it would be useful for these to be added to the Glossary</p>	<p>See changes to 2.39.</p> <p>Make correction through final editing.</p> <p>Change to add Public Right of Way, Public Footpath, Public Bridleway and Permissive Footpath/Bridleway to Glossary.</p>
(5051) West Yorkshire Archaeology Advisory Service	<p>Detailed comments regarding the interpretation of the NPPF in relation to the role of 'local plans' and the natural and historic environment. It is noted that equal weight is given to the natural and historic environment; within this context it is proposed that the Core Strategy includes a strategic Policy on the historic environment. The representation also covers the key role</p>	<p>These comments have been noted and addressed through changes to the Urban Design &amp; Conservation section of the document to strengthen the supporting text and Policy wording. Within the context of these changes and the coverage of the Spatial Vision and Objectives, the introduction of a further strategic policy is not necessary.</p>	<p>See changes proposed in relation to Urban Design &amp; Conservation.</p>

	of the WYAS in respect of commenting on planning applications.		
<b>General Economy</b>			
(3410) Gareth Brown	Considered that there is little mention in the document to 'marquee developments' i.e. attracting big national projects such as relocation of a National Museum/relocation of a Government Dept/Attracting Blue Chip companies/Hosting big events.	These comments are noted. The focus of the Core Strategy is to provide a spatial planning framework to deliver the Vision for Leeds and is primarily concerns with the scale, location and broad distribution of development. Within this context, the Core Strategy reflects the priorities set out as part of the Leeds City Region and Leeds Growth Strategy. Within this context, the Core Strategy provides a broad framework to attract major projects and companies and to promote such programmes, over the lifetime of the plan.	No change.
(1029) University of Leeds	The Innovation City Leeds building and bio-incubator project has been cancelled and due to changing funding arrangements and the closure of Yorkshire Forward. Consequently, delete reference to the scheme in the Draft Leeds Infrastructure Delivery Plan at section 4.35 and in the Kirkstall and Headingley Area table on p.57.	Comments noted.	Update the Draft Infrastructure Delivery Plan to reflect these changes.
<b>Development Management &amp; Policy Implementation</b>			
(0420) White Young Green Planning	It is understood that the CC will not seek to promote a Development Management document through which specific normal development control policies will be reflected. Unclear as to the clarity for the implementation of some policies. The potential to change use of office in the City Centre to mixed use for a bar/restaurant and residential is not reflected in SP3 or CC1. The document should make clear support to encourage flexibility within the CC to enable diversity of uses which respond to market demand when these uses will assist in the regeneration and vitality of local areas.	This point is addressed in Policy CC1, which allows for some flexibility.	No change.
<b>Consultation Process</b>			
(0065) Oulton Civic Society	Concern with the consultation process, there is little feedback/representation from individual members of the public due to lack	Consultation on all LDF documents is undertaken in accordance with the adopted Statement of Community Involvement and statutory regulations. Within this context,	No change.

	<p>of awareness that the consultation is taking place, difficult to understand and are therefore unable to make comment, the consultation process is poor or they are simply not interested.</p> <p>The Core Strategy is clearly justified and necessary but to be effective it will rely on the Site Specific Proposals being acceptable to the local community under the Localism Act.</p>	<p>Leeds is a large and complex City, with challenging issues and opportunities to address. Within this context, whilst every effort is made to present documents in a variety of accessible formats, it can be difficult to effectively engage with communities and members of the public. The Core Strategy is about broad strategic issues and it is therefore likely that higher level of engagement will be experienced through the preparation of the Site Allocations DPD and Neighbourhood Plans, when the implications of the strategy are applied to site specifics and local areas.</p>	
(1930) Lawrence Walker	<p>Unsound due to the fact that previous versions of the plan are not publicly available, and that the principle of releasing green belt land has not been put forward until this version of the plan. Further consultation should be undertaken in order to bring forward a plan that is representative of the needs of residents and will secure a sustainable city for the future.</p>	<p>Through early engagement work in 2007, Consultation of Issues &amp; Options in 2007, Preferred Approach in 2009 and the Publication Draft in 2012, all emerging versions of the Core Strategy have been subject to public consultation and have therefore been made available. Throughout this process, housing issues have been integral to the preparation of the plan and how the District might grow and develop in the future. Within this overall context, the RSS was adopted in 2008 (which set a housing requirement for Leeds) and work has been ongoing in the preparation of the Leeds evidence base for housing (including the Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment). Further consultation on housing growth principles was also undertaken in summer 2011. This work combined to inform the Publication Draft Consultation document (February 2012). Further changes to the document arising from this phase of consultation, will be subject to further consultation on the document prior to formal submission.</p>	No change.
(2703) Cllr John Illingworth	<p>The consultation period is too short and this makes it difficult for voluntary organisations to convene a meeting and agree a collective response before the deadline.</p>	<p>Comments noted, consultation on the Core Strategy has been undertaken in accordance with the adopted Statement of Community Involvement and statutory regulations. Whilst difficult, within this context a balance needs to be struck between allowing sufficient time for comment (consistent with these requirements) and in moving the Core Strategy production programme forward to Examination and Adoption.</p>	No change.
(5852) WARD (Wharfedale & Airedale Review Development)	<p>Comment that they wish to participate in the consultation process but insufficient time is allowed. Note in response that Aireborough is non parished.</p>	<p>Comments noted, consultation on the Core Strategy has been undertaken in accordance with the adopted Statement of Community Involvement and statutory regulations. Whilst difficult, within this context a balance needs to be struck</p>	No change.

		between allowing sufficient time for comment (consistent with these requirements) and in moving the Core Strategy production programme forward to Examination and Adoption.	
(5873) Mr Paul Evans	Regarding this consultation it is wholly unfair to the people of Otley as the Otley library has no hard copy of the proposals, nor do any of the staff have any knowledge of its existence. This is wholly weighted against older people or anyone without a computer or anyone who is not computer literate. The on-line introduction to this consultation procedure specifically states a copy will be available at libraries across Leeds. This situation is utterly unacceptable.	A paper copy of the Core Strategy Main document was placed in all City Council Libraries and 'One Stop Centre'. The City Council makes LDF documents available in a variety of formats, including electronic.	No change but will check availability of documentation for future consultations.
(5879) Mr Martin Fox (5880) Mrs Lisa Fox	I do not consider there to have been sufficient consultation, indeed any consultation with residents in Barwick regarding the selection of potential sites for development feeding in to the City Council's SHLAA. Promises have been made that after the last round of development in our village, including infill on greenfield garden sites, there will be no more development in Barwick. The selection of sites in Green Belt land around our village totally undermines these promises. Without consultation with affected residents, the Core Strategy looks to have been largely a desktop exercise. I have seen no information about proposed development sites as a resident until the Parish Council sent out a flyer in December 2011 saying that Leeds City Council has selected sites in Green Belt land around Barwick to develop 500 houses. This cannot be fair!	Comments noted, consultation on the Core Strategy has been undertaken in accordance with the adopted Statement of Community Involvement and statutory regulations. Whilst difficult, within this context a balance needs to be struck between allowing sufficient time for comment (consistent with these requirements) and in moving the Core Strategy production programme forward to Examination and Adoption.  As emphasised in the Core Strategy document, it is the role of the Site Allocations DPD, to identify specific sites, consistent with the overall approach of the plan. Information derived from the SHLAA will help inform this process, which in turn will be subject to public consultation.	No change
<b>Document Format</b>			
(5693) NHS Leeds	We note that the full Core strategy is 158 pages long and would benefit from being more concise and arranged in a framework that can be effectively used to affect delivery	Comments noted and the fact that there are a variety of ways of presenting such documents. The Leeds Core Strategy is relatively concise and is presented in a structured and accessible style. The document is also supported by a	No change.

	and steer policies. Without this there is the danger of many of the actions and recommendations being lost and never being implemented	monitoring framework, infrastructure delivery plan and will be subject to review, to ensure effective implementation.	
<b>New Homes Bonus</b>			
(5864) Mr Andrew Hepworth	My understanding of the New Homes Bonus Scheme is that Government will give £1 for every £1 of Council Tax receipts on new homes and that further financial incentives are available for vacant properties to be brought back into use. Any monies received under this scheme are not ring fenced and may be spent outside of the locality at which the properties were located. Is my understanding correct? Is the financial incentive the same for empty properties as new build? If not, what is it? Are empty properties brought back into use eligible for New Homes bonus incentive? Are new homes built by Housing Associations considered under the scheme? What is Leeds City Council's definition of sustainable development? What are the requirements of providing supporting infrastructure? Will the full cost of providing supporting infrastructure be met by developers? If more housing is built in Morley, where does the City Council propose any additional schools, nurseries, health centres and the like to be sited? Morley Academy is already over subscribed.	<p>The New Homes Bonus is a Central Government initiative to help support housing delivery and improvements to the housing stock and infrastructure. As a means of delivery, Core Strategy Policy ID1: Implementation &amp; Delivery Mechanisms makes reference to the New Homes Bonus. The detailed mechanism for this however lay outside the Core Strategy process.</p> <p>The NPPF sets out a definition for sustainable development and the Core Strategy through it's Spatial Vision, Objectives and Policy Framework, reflect this definition in meeting environmental, economic and social objectives at the same time.</p> <p>In terms of infrastructure delivery, a draft Infrastructure Delivery Plan has been prepared in support of the Core Strategy and the City Council is currently developing its approach in the preparation of the Community Infrastructure Levy, to help fund new infrastructure in association with development.</p>	No change.
<b>Habitat Regulations Assessment</b>			
(0058) Natural England Consultation Service	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.	Comments welcomed.	No change.
<b>Sustainability Appraisal Comments</b>			

<p>(0099) English Heritage</p>	<p>Note factual errors in the Number of Conservation Areas included and comments that there is no indication of the relative scale or importance of the District's heritage assets compared to other Authorities (Leeds has the third highest total of Listed Buildings of any Authority in Yorkshire and the Humber, the second highest number of Conservation Areas, and the second-highest number of Historic Parks and Gardens). This information helps to justify the need for a robust strategy within the Core Strategy for the management of this resource.</p> <p>Since 2009 English Heritage has produced a national "Heritage at Risk Register" which has provided information on the state of all designated heritage assets in Leeds (with the exception of Grade II Listed Buildings). It would be more appropriate to use the information contained in the 2011 Register (perhaps as a separate Section after Scheduled Monuments) since it contains a more accurate picture of the condition of all the designated heritage assets in the District. In 2011, Leeds had the greatest number of Buildings at Risk in Yorkshire and the Humber. 8 of the 11 buildings had been on the "at risk" Register since its inception in 1999.</p> <p>Historic Environment: This Section should also make reference to non-designated heritage assets. West Yorkshire Archaeology Service should be able to provide information on the scale of this resource.</p> <p>Comparison of Core Strategy Objectives against SA Objectives. It would have been</p>	<p>English Heritage make a number of very useful and detailed comments regarding the Sustainability Appraisal. These can be addressed as follows:</p> <p>The factual error relating to the number of Conservation Areas can be rectified by amending the figure in future baselines. Importantly, it should be noted that the figure used in the Core Strategy Publication draft SA, does not affect any of the conclusions drawn from the SA.</p> <p>The advice and updated information relating to the 2011 heritage at risk register is useful. This can be included within future baseline reports.</p> <p>With regard to the comments concerning the consistency of the SA objectives in the assessment, in relation to Table 2. It is not clear what this means (and no example has been given), as they are the same objectives on page 10.</p> <p>With regard to the number of Objectives appraised, these comments are noted but can confirm that all Objectives were appraised.</p> <p>The detailed comments regarding alternative scores are noted. It would that none of the suggested alternative scores lead to negative score and as a consequence, do not necessarily weaken the sustainability of the Core Strategy. However, it would be useful to consider the assessments made by English Heritage, within the context of the SA Addendum of further changes, at which point recommendations can be made.</p> <p>A number of suggestions are made as to improving the SA indicators. As part of an ongoing process, the City Council is in the process of updating the SA for future DPDs.</p>	<p>Check and update SA baseline with number of Conservation Areas.</p> <p>Incorporate the 2011 heritage at risk register, in future baseline reports.</p> <p>No change.</p> <p>Check consistency of Objectives.</p> <p>Consider the assessments made within the context of the SA Addendum of further changes, as a basis to make any further recommendations.</p> <p>Consider updates to SA indicators, in updating the SA for future DPDs.</p>
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	<p>helpful to have included a key denoting what the various symbols used on this table mean.</p> <p>SA Objectives: The Sustainability Appraisal Objectives used in this Assessment are not the same as shown on Table 2 on page 10. Therefore need to set out why they were amended It would be helpful to set out why they were amended.</p> <p>Core Strategy Objectives: This Table assesses the SA Objectives against 25 Core Strategy Objectives. However, there are only 24 Core Strategy Objectives in the DPD.</p> <p>Comparison of Core Strategy Objectives against SA Objectives: Core Strategy Objective 19 against SA Objective 21 – low carbon and energy efficient heat and power schemes could, potentially, result in harm to the significance of heritage assets. The actual effects will depend upon how and where such proposals are developed. Consequently, it would be more appropriate to record the effects as “D”.</p> <p>Policy PS6 against SA Objective 21 and Appendix 3 p. 195: Whilst the inclusion of a requirement that opportunities are taken to enhance local distinctiveness would have a positive impact against SA Objective 21, nonetheless, accommodating 70,000 new homes could have a significant impact upon a number of the District’s heritage assets or their settings. Consequently, it would be more appropriate to record the effect as “+/D” and to note the potential for harm to Leeds’ historic environment. significant impact upon local character and could affect the significance of heritage assets (e.g. if the</p>		
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	<p>site is in a Conservation Area). Therefore, there is a relationship between this Policy and both SA Objective 20 and SA Objective 21. The precise impact upon both will depend upon the nature of the scheme and the area in which it is developed. However, the Policy does include a caveat relating to the character of the area and to Conservation Areas so the effects upon both SA Objectives is probably “D/+”.</p> <p>P108 Policy G6 against SA Objectives 20 and 21 and Appendix 3 p. 281: Greenspaces make an important contribution to the character of Leeds’ settlements and, in many cases, to the character and setting of its heritage assets. A Policy which safeguards these elements could, potentially, have a positive impact against SA Objectives 20 and 21 – although the Policy would have to be amended to protect areas of amenity value (as indicated in our representation on this Policy in the Core Strategy).</p> <p>Appendix 4, p. 312 Objective 12: Indicator 12d – It would be preferable to use an Indicator based upon the national “Heritage at Risk Register” which considers the “state” of all the designated assets in the plan area. It is suggested that this Indicator is amended to read:- “Number of designated heritage assets in Leeds identified as being at risk on the English Heritage “Heritage at Risk Register”</p> <p>Appendix 4, p. 327 Policy P11: Indicator 12b – It would be preferable to use an Indicator based upon the national “Heritage at Risk Register” which considers the “state” of all the designated assets in the plan area. It is</p>		
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	suggested that this Indicator is amended to read:- "Number of designated heritage assets in Leeds identified as being at risk on the English Heritage "Heritage at Risk Register"		
(2522) Rob Murphy	<p>Comments on the number of buildings at risk to be removed, these needs to reflect the latest Leeds Buildings at Risk Strategy.</p> <p>The phrase "Heritage Assets" should be used instead of "Heritage at Risk Register", to reflect English Heritage advice.</p> <p>Under Decision Making Criteria in Sec 21: 21a should read "historic" instead of "historical".</p> <p>21b should read "other designated heritage assets" instead of "other designated historic features".</p> <p>As a consequence, the Indicators in Section 21 should be amended to read "No. of Heritage Assets: scheduled monuments, listed buildings, listed places of worship, conservation areas, registered parks and gardens, and registered battlefields", and, "No. &amp; % of the above (six) types of heritage asset that are At Risk".</p>	<p>Comment noted and the need to update.</p> <p>Comment noted and the need to update. It should be noted that reference to the 'buildings at risk register' in Policy P11 has previously been updated as a change (Development Plan Panel 7<sup>th</sup> August), to refer to 'register of historic assets'. The detailed comment to text and indicators are noted for improving the SA indicators. As part of an ongoing process, the City Council is in the process of updating the SA for future DPDs.</p>	<p>Need to update in future baselines to reflect the latest position.</p> <p>Need to update in future baselines to reflect the latest position.</p> <p>Consider updates to text and SA indicators, in updating the SA for future DPDs.</p>
(2560) Mr Lee Davidson	Page 21 - Correct 'public right of ways' to 'public rights of way'.	Need for correction noted and will be corrected through final editing.	Make correction through final editing.
(0058) Natural England Consultation Service	Natural England has no further comments to make in relation to the Core Strategy Sustainability Appraisal.	Noted.	No change.
<b>Equality Impact Assessment Comments</b>			

(2560) Mr Lee Davidson	The document mentions that women who make more journeys on foot have a greater need for footpaths. This claim which needs to be supported by research and opens up questions on the attitudes and needs of pedestrians/walkers which are simply not acknowledged in the main document. The equalities issue is important but it is only one corner of a much larger set of questions. Unsound 1B.	Comments noted. The EIA reflects City Council information on accessibility. These findings may prompt further detailed questions. However, the Core Strategy is a broad strategic document which is seeking to enhance and improve accessibility in broad terms, rather than address attitudes/needs in specific detail. Such issues can be addressed more effectively outside of the Core Strategy process, for example the Rights of Way improvement Plan.	No change.
(5693) NHS Leeds	The Core Strategy would benefit from a greater emphasis on Children in the main document. The Equality Impact Assessment only mentions children when it refers to women as mothers. More explicit links could also be made with work being developed to create a Child Friendly City. Under the Local Policy Framework (section 4 in the Health Background Paper) the implications of the Leeds Children's and Young People's Plan (2011-2015 should be noted).	Comments noted. The Core Strategy is seeking to plan for all of the current and future population of the District, within its overall framework and within the plan period. Within this overall context, acknowledgement is made within the document to a number of 'population drivers' including an ageing population, as well as planning for young people. Following from this, a number of Policy areas, including housing and environmental resources are seeking to put in place the interventions, which reflect priorities for Children (as well as other sectors of the population, where these are relevant to the planning process.	No change.
<b>Draft Infrastructure Delivery Plan</b>			
(0099) English Heritage	<p>Comments on the importance of the cultural infrastructure and the importance of heritage assets as economic assets.</p> <p>The intention for the plan to improve the quality of existing open spaces, is welcomed. The historic environment and heritage assets can make a valuable contribution to green infrastructure networks and its wider functions, as for example in providing leisure and recreation opportunities, encouraging walking and cycling and strengthening local character. Historic places such as historic parks and gardens, archaeological sites, the grounds of historic buildings and greenspaces within conservation areas can form part of a green infrastructure network as well as underpin</p>	Support welcomed.	No change.

	<p>the character and distinctiveness of an area and its sense of place.</p> <p>The intention to create a network of improved greenspaces and public realm throughout the City Centre, is welcomed.</p> <p>With regard to CIL, a wide definition of infrastructure continues to be promoted in terms of what can be funded by the levy and is needed for supporting the development of an area. This can include: · Open space: as well as parks and green spaces, this might also include wider public realm improvements, possibly linked to a Heritage Lottery Fund scheme, conservation area appraisal and management plan, and green infrastructure; · ‘In kind’ payments, including land transfers: this could include the transfer of an ‘at risk’ building; · Repairs and improvements to and the maintenance of heritage assets where they are an infrastructure item as defined by the 2008 Act, such as cultural or recreational facilities. The Localism Act also allows CIL to be used for maintenance and ongoing costs.</p> <p>It is advised that Infrastructure Delivery Plans and or supporting Supplementary Planning Guidance on Developer Contributions identify the ways in which CIL, planning obligations and other funding streams can be used to implement the historic environment strategy and policies within the Local Development Framework.</p> <p>P49 Draft Infrastructure Schedule Area D, Green Infrastructure: Support for the intention for improvements to greenspace quality as a result of new housing</p>	<p>Support welcomed.</p> <p>These comments are noted, the City Council is the process of developing CIL, which will be subject to public consultation at the appropriate time.</p> <p>Comments noted</p>	<p>No change.</p> <p>No change</p> <p>No change.</p>
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	<p>developments. A number of areas within the Green Infrastructure network are either designated as being of historic importance, contribute towards to the character of the District's Conservation Areas, or provide a setting for its Listed Buildings.</p> <p>P56 Draft Infrastructure Schedule Area CW, Regeneration: Support for proposals for the refurbishment of the group of Listed Buildings this historic part of the settlement with Armley Town Centre.</p> <p>P60 Draft Infrastructure Schedule Area CN E, Regeneration: Support the proposals for a Town Centre Improvement Programme for Chapel Allerton. This lies at the heart of the Chapel Allerton Conservation Area and includes a number of Listed Buildings.</p> <p>P62 Draft Infrastructure Schedule Area CE, Regeneration: Within the regeneration initiative for this part of Leeds mention should be made of refurbishment of the Grade II* Hunslet Mills - a significant landmark lying at the heart of the Urban Eco Settlement area and which is a building which has been identified as being at risk since 1999.</p> <p>P64 Draft Infrastructure Schedule Area CS, Regeneration: Inclusion of the heritage-led regeneration schemes in this part of the City (such as the Tower Works scheme within Holbeck Urban Village), welcomed. These demonstrate how investment in heritage assets can assist in the wider regeneration of an area. Should the reference to "Granary Works" be "Granary Wharfe"?</p> <p>P65 Draft Infrastructure Schedule Area CS,</p>	<p>Comments noted.</p> <p>Comments noted.</p> <p>Comments noted.</p> <p>Support welcomed, agree to update text.</p> <p>Support welcomed.</p>	<p>No change</p> <p>No change.</p> <p>Change supported to update Infrastructure Delivery Plan.</p> <p>Change supported to update Infrastructure Delivery Plan.</p> <p>No change.</p>
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	<p>Culture: The intention to undertake restoration of the Grade II* Listed Central Library and the Grade II Listed Art Gallery – two key cultural assets on The Headrow, welcomed.</p> <p>P67 Draft Infrastructure Schedule Area CS, Regeneration: We support the proposed refurbishment of the streetworks in this historic part of the City. As part of the package of infrastructure measures for the Holbeck area mention should be made of the refurbishment of Temple Works - a significant landmark of the area and which has been identified as being at risk since 1999. We welcome the proposed investment in the Grade I Listed Kirkgate Market, for the funding towards the restoration of the Grade II* Listed First White Cloth Hall (two of the most important buildings within this part of the City Centre), and for the refurbishment of Kirkgate (the oldest street in Leeds which links the Parish Church to the City Centre). However, it might be more appropriate if the Scheme referred to “Kirkgate Regeneration” rather than simply identifying one of the elements of that regeneration package.</p>	Support welcomed, agree to update text.	Change supported to update Infrastructure Delivery Plan
<b>Health Impact Assessment</b>			
(2560) Mr Lee Davidson	This paper makes 17 references to walking, emphasising the need to improve the other documents so that they display a proper understanding of the infrastructure required to support walking.	Comments noted, within the context of the Core Strategy, the need to strengthen reference to Public Rights of Way has been acknowledged in proposed additional text to Para. 2.39 (iii) Our Green Environment – in the Analysis of Spatial Vision responses.	See changes to Para. 2.39.
(5693) NHS Leeds	Identify key health issues for the population of Leeds: Reducing health inequalities, Changing lifestyle behaviour- in particular increasing physical activity, reducing alcohol consumption, and improving nutrition, Improving mental health, Reducing social isolation, Securing better access to services	These comments are noted and are reflecting in the Core Strategy through reference to Deprivation and Health Inequalities (paras. 2.30 – 2.32). With the completion of the Joint Needs Assessment, there is clearly a wealth of detailed information on this topic. In strategic terms, the Core Strategy is seeking to improve quality of life through a range of policies including design, regeneration, the provision of	No change.

	<p>and facilities , particularly in those areas with greatest health needs, It is suggested that these themes are used throughout the Core Strategy so that every development (and transport systems) can be assessed as to it's impact on the health and wellbeing outcomes.</p> <p>The 2010 Marmot strategic review recommendations could be used to address reducing health inequalities in Leeds as a principle through out the Core Strategy.</p> <p>In terms of national policy, the Health Background Topic Paper could also note the document "Improving Outcomes and Supporting Transparency- A Public Health Outcomes Framework for England 2013-2016." This includes a focus on the determinants of health. The involvement of the views of stakeholders including communities is described within the separate paper on the consultation process. However, the Health Background Topic</p> <p>Empowering communities to become involved in place shaping and planning decisions is itself inherently health promoting, and strengthening this as part of the Core Strategy process has the potential to contribute to health improvement.</p> <p>2.2 Joint Strategic Needs Assessment (JSNA) The Health Background Topic Paper cites the Joint Strategic Needs Assessment (JSNA). However we feel that the JSNA needs to be emphasised more both here and throughout the Core Strategy as a key evidence base for policy.</p>	<p>services and infrastructure, new homes etc. The themes identified are reflected in the Core Strategy objectives and are integral throughout the plan. The plan has been supported and improved through the completion of a sustainability appraisal, which assesses the plan against a series of economic, environmental and social objectives. Consequently, where these issues can be addressed through the Core Strategy, they are embedded within the plan.</p> <p>These recommendations are a useful source of reference but where they can be addressed by planning, they are reflected in the above approach.</p> <p>Comments noted and can be included in future updates to the HIA.</p> <p>Comment noted. This is inherent as part of the Core Strategy Consultation process and will also be reflected in the preparation of the Site Allocations DPD and the CITY Council's role in facilitating the preparation of Neighbourhood Plans.</p> <p>As commented above the JSNA provides a wealth of detailed information. In broad terms, the strategic approach of the plan reflects the need to tackle deprivation and health inequality issues and through specific policies, seeks to make improvements, where these can be achieved through the planning system.</p>	<p>No change.</p> <p>Change to include in future updates to the HIA.</p> <p>No change.</p> <p>No change.</p>
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	Mental Health and wellbeing is mentioned but it is recommended that it should be noted more explicitly in the National Policy section of the Health Background Topic Paper and the implications of key strategic direction in “No Health without Mental Health”.	Comment noted, and can be included in future updates to the HIA.	Change to include in future updates to the HIA.
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## **APPENDIX 2 - CHANGES TO CORE STRATEGY TEXT**

### **Flood Risk**

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 *and detailed Policies in relation to the efficient use, quality & effective management of water resources* are in the Natural Resources and Waste DPD. *These Policies in turn, provide a basis for the City Council and its partners, to help manage responsibilities under the Water Framework Directive.*

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