

**Report of Director of City Development**

**Report to Development Plan Panel**

**Date: 11<sup>th</sup> December 2013**

**Subject: Leeds Site Allocations Development Plan Document (DPD) - Report of Consultation**

Are specific electoral Wards affected? If relevant, name(s) of Ward(s): City wide	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input checked="" type="checkbox"/> Yes	<input 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. Consultation on the Site Allocations Plan 'Issues & Options' for housing, retail, employment and greenspace took place over 8 weeks from 3<sup>rd</sup> June to 29<sup>th</sup> July 2013; an initial Report of Consultation was reported to Members at the last Development Plans Panel on 27<sup>th</sup> August 2013. This covered the scope and methods of the consultation and initial information on how it went.
2. Officers have subsequently been sorting; reading and entering the representations received and are now able to report to Members on the numbers of respondents and comments made.
3. **7,738** comments (by 6,434 individual people<sup>1</sup>) have been made. The responses cover the following issues - housing (5,970), green space (441), retail (166) and employment (157).
4. The Draft Report of Consultation only provides a breakdown of numbers. A further report(s) will be prepared in due course to consider the outcomes of the consultation and subsequent actions;
5. This Panel report covers the main issues resulting from the overall breakdown of the numbers of people who have responded and by each Housing Market Characteristic Area and sets out the next steps.

<sup>1</sup> A person/agent commenting may have put in more than one representation to comment on different sites, in addition, due to people responding in writing (hard copy); emails and the online web form, there are a number of duplications in the overall total of representations received. The report attached provides further breakdown each Housing Market Characteristic Area . Appendix7 to the Report of Consultation lists all comments received.

## **Recommendations:**

Development Plan Panel is requested to:

- 5.1 Note the key headlines from the consultation;
- 5.2 Note the attached Draft Report of Consultation. Further analysis of the responses and consideration of the outcomes of the consultation and subsequent actions will be reported to Panel at future meeting(s).

## **1.0 Purpose of this Report**

- 1.1 This report summarises the numbers of respondents who have commented on the recent Site Allocations Plan Issues and Options consultation. The Draft Report of Consultation provides details of the consultation process and the responses received. No analysis of the comments has taken place at this stage and further reports will be presented to panel as we progress through the next stages

## **2.0 Background Information**

Scope and Purpose of the Consultation

- 2.1 Following consideration by Development Plan Panel and Executive Board, the consultation focussed on the following targeted issues and options:
  - 2.1.1 Locations for a range of Housing sites to meet the needs of the local current and future population;
  - 2.1.2 Locations for a range of Employment sites;
  - 2.1.3 Locations for Retail development (town centre boundaries and shopping centre frontages);
  - 2.1.4 Greenspace (review of existing allocations and potential new sites and proposed amendments arising from the open space needs assessment)
- 2.2 The report to Panel on 27<sup>th</sup> August 2013 set out a summary of the consultation programme; the principles that informed the consultation; the marketing and promotion and consultation material. These are all set out in the attached Draft Report of Consultation.
- 2.3 Subsequent to the closure of the Issues and Options consultation, officers have been sorting, reading and entering the representations into a database to assist in the analysis of comments. This initial analysis of the numbers of people who have commented is now available and all the comments received are available to view online.

## **3.0 Main Issues**

Level of interest and number of responses:

- 3.1 A total of **7,738** comments were received by or behalf of, **6,734** individual people responded to the consultation. A person commenting may have put in more than one representation to comment on different issues or more than one site. In addition, due to people responding in writing (hard copy); emails and the online

web form, there are a number of duplications in the overall total of representations received. The full list of all those that have commented can be found in Appendix 7 to the Report of Consultation. This list provides each person with their own unique 'representor' number.

- 3.2 1,931 responses were received via the online form. 3,332 by paper (hard copy) and 2,475 via email. 116 comments were recorded as late (after 12 midnight on 29<sup>th</sup> July 2013).
- 3.3 Appendix 7 is an export of the raw data entered into the database and due to its size is only being made available electronically. The Report and Appendices are publicly available on the Site Allocations webpages at [www.leeds.gov.uk/site\\_allocations](http://www.leeds.gov.uk/site_allocations). A paper copy will be made available at Development Plans Panel for reference purposes.

### **General Issues**

- 3.4 The figures provided are based on the total number of comments. In some cases one comment can be multiplied as it relates to multiple sites in one or more Housing Market Characteristic Area.
- 3.5 In some cases a comment only states a "yes" or "no" answer and is not qualified further. These have still been counted as comments.
- 3.6 The database records site specific comments against whether the comment was in "support", "objection" or "neutral". A glitch in the database has meant that not all comments have been linked against these three categories, and therefore there is a fourth "unclassified" category. Officers are in the process of tidying this data up and hope to provide a verbal update at Panel.
- 3.7 Support comments are in the main comments that support development, but the breakdown in the totals does not distinguish between whether somebody supports the sites current colour or whether they want it changed. For example Mr A Smith may support development on an 'amber' site and want it changed to a 'green site'. This is not so clear when recording comments made to "red sites". Objections to development have been recorded as a support for the sites "red" coding. However there have been data inputting inconsistencies and therefore the figures provided need to be treated with caution.
- 3.8 Neutral comments are comments that have been linked to a site, but don't state clearly whether the comment is in objection or support to the site.

### **Housing**

- 3.9 The majority of comments were on housing issues. A high number of comments have been received from Morley, Aireborough, Garforth, East Ardsley, Cookridge, Adel, Horsforth and Thorp Arch .
- 3.10 The majority of the comments made were objection focussed (only objecting to sites), rather than solution-focussed (i.e. offering alternative sites). Both the general

and site specific issues are covered below by each Housing Market Characteristic Area and detailed in the Draft Report of Consultation.

- 3.11 A number of general comments have been made (which apply across the district) in relation to the consultation process or to general issues of building on vacant land and re-using empty buildings. The majority of general comments received are of a localised nature in regard to concerns over increased traffic and road congestion/pollution and concerns over capacity in schools and health facilities.

### **Retail**

- 3.12 The number of comments made on the retail issues and options is significantly low, however there is a fair spread of comments on various centres across the district. The majority of comments received are from the business/ developer community seeking additional sites to be included for retail purposes. It is considered that most people find it difficult to engage with issues such as detailed town centre boundaries and instead comments reflect and focus more on the vitality of centres and the types of services and facilities they provide, particularly around issues of transport to the centres.

### **Employment**

- 3.13 The number of comments made on the employment issues and options is significantly low. It could be considered that employment proposals are less contentious. A small number of comments suggest new sites for employment uses. General comments have been made on the “surplus” of offices in the city centre and the lack of local “workshop” space and the general trend for (older) warehouses to be converted to residential uses, pushing local employment out of communities.

### **Greenspace**

- 3.14 The comments made on the greenspace issues and options are also significantly low, though a number of localised concerns about the loss of greenspace/greenbelt land were included in comments made in comments made on the housing issues and options.

## **Housing Market Characteristic Areas**

- 3.15 The following provides a summary for each of the Housing Market Characteristic Areas. Site specifics are covered in the attached Draft Report of Consultation.

### **3.16 Aireborough**

**Housing** – 1810 comments were made by 1579 people

- **1,890** comments were linked to “GREEN SITES”.  
(1,812 objections / 35 supports / 37 neutral comments)
- **1,377** comments were linked to “AMBER SITES”.  
(1341 objections / 14 supports and 20 neutral comments)
- **681** comments were linked to “RED SITES”.

- (173 objections /366 supports /139 neutral comment)
- **21** comments made on “Lime Green sites” (those that have planning permission/allocated in the UDP)
  - **9** comments made on “purple” (sites that have been ‘sieved out’ of the assessment process (removed from further consideration)).

**Greenspace** – 59 comments were made by 51 people

**Retail** – 9 comments were made by 7 people

**Employment** – 5 comments were made by 5 people

### 3.17 City Centre

**Housing** – 13 comments were made by 13 people

- **49** comments were linked to “GREEN SITES”.  
(3 objections / 4 supports / 42 neutral comments)
- **23** comments were linked to “AMBER SITES”.  
(3 objections / 1 support and 19 neutral comments)
- **4** comments were linked to “RED SITES”.  
(no objections / 1 support / 3 neutral comments.)
- **3** comments received on “Lime Green sites” those that have planning permission/allocated in the UDP.
  - **1** comment was received on site 1230 which falls within the Aire Valley Leeds Area Action Plan (AAP). This comment will be considered in detail in the AAP.

**Greenspace** – no comments were made

**Retail** – 2 comments were made by 2 people

**Employment** – 3 comments were made by 3 people

### 3.18 East

**Housing** – 238 comments were made by 228 people

- **30** comments were linked to “GREEN SITES”.  
(8 objections / 10 supports / 12 neutral comments)
- **151** comments were linked to “AMBER SITES”.  
(138 objections / 2 supports and 9 neutral comments).
- **25** comments were linked to “RED SITES”.  
(5 objections / 13 supports / 6 neutral comments)
- **81** comments linked to “Lime Green sites” (those that have planning permission/allocated in the UDP).

**Greenspace** – 20 comments were made by 20 people

**Retail** – 1 comment was received

**Employment** – 5 comments were made by 3 people

### 3.19 Inner

**Housing** – 96 comments were made by 86 people

- **127** comments were linked to “GREEN SITES”.  
(74 objections / 15 supports / 36 neutral comments)
- **190** comments were linked to “AMBER SITES”.  
(79 objections / 36 supports and 73 neutral comments)
- **91** comments were linked to “RED SITES”.
- **6** comments received on “Lime Green sites” (those that have planning permission/allocated in the UDP).

**Greenspace** – 109 comments were made by 106 people

**Retail** – 10 comments were made by 9 people

**Employment** – 5 comments were made by 5 people

### 3.20 North

**Housing** – 2030 comments were made by 1842 people

- **1876** comments were linked to “GREEN SITES”.  
(1374 objections / 454 supports / 46 neutral comments). Site 1199 Moseley Wood Gardens, Cookridge received the greatest number of objections to development in this area (1,003 objections).
- **378** comments were linked to “AMBER SITES”.  
(298 objections / 44 supports and 35 neutral comments)
- **2362** comments were linked to “RED SITES”.  
(393 objections / 1887 supports / 76 neutral comments.
- **55** comments received on “Lime Green sites” (those that have planning permission/allocated in the UDP)
- **13** comments made on “Purple” sites (sites that have been ‘sieved out’ of the assessment process (removed from further consideration).

**Greenspace** – 92 comments were made by 89 people

**Retail** – 6 comments made by 5 people

**Employment** – 4 comments by 4 people

### 3.21 Outer North East

**Housing** – 807 comments were made by 739 people

- **408** comments were linked to “GREEN SITES”.  
(219 objections / 161 supports / 28 neutral comments)
- **732** comments were linked to “AMBER SITES”.

- (591 objections / 51 supports and 88 neutral comments).
- **915** comments were linked to “RED SITES”.  
(133 objections / 703 supports / 77 neutral comments).
- Spen Common: **323** comments were linked to site 3391.  
(66 objections / 151 supports / 103 neutral comments)
- **116** comments received on “Lime Green sites” (those that have planning permission/allocated in the UDP)
- **139** comments made on “Purple” sites (those that have been ‘sieved out’ of the assessment process (removed from further consideration)).

**Greenspace** – 36 comments were made by 36 people

**Retail** – 21 comments were made by 20 people

**Employment** – 11 comments were made by 11 people

### 3.22 Outer North West

**Housing** – 1069 comments were made by 1005 people

- **57** comments were linked to “GREEN SITES”.  
(5 objections / 42 supports / 10 neutral comments).
- **2006** comments were linked to “AMBER SITES”.  
(1773 objections / 166 supports and 34 neutral comments)
- **1340** comments were linked to “RED SITES”.  
(385 objections / 915 supports / 28 neutral comments).
- **147** comments received on “Lime Green sites” (those that have planning permission/allocated in the UDP)
- **15** comments made on “Purple” sites (those that have been ‘sieved out’ of the assessment process (removed from further consideration)).

**Greenspace** – 26 comments were made by 26 people

**Retail** – 3 comments were made by 3 people

**Employment** – 3 comments were made by 3 people

### 3.23 Outer South

**Housing** – 288 comments were made by 257 people

- **240** comments were linked to “GREEN SITES”.  
(189 objections / 27 supports / 17 neutral comments)
- **165** comments were linked to “AMBER SITES”.  
(131 objections / 15 supports / 15 neutral comments).
- **110** comments were linked to “RED SITES”.  
(There were 53 objections / 40 supports / 17 neutral comments).
- **9** comments received on “Lime Green sites (those that have planning permission/allocated in the UDP)

- **9** comments made on “Purple” sites (sites that have been ‘sieved out’ of the assessment process (removed from further consideration).

**Greenspace** – 10 comments were made by 9 people

**Retail** – 2 comments were made by 1 person

**Employment** – 2 comments were made by 2 people

### 3.24 Outer South East

**Housing** – 494 comments were made by 459 people

- **750** comments were linked to “GREEN SITES”.  
(694 objections / 37 supports / 17 neutral comments)
- **1381** comments were linked to “AMBER SITES”.  
(1020 objections / 78 supports / 277 neutral comments).
- **625** comments were linked to “RED SITES”.  
(24 objections / 573 supports / 28 neutral comments).
- **20** comments received on “Lime Green sites” (those that have planning permission/allocated in the UDP).

**Greenspace** – 26 comments were made by 26 people

**Retail** – 32 comments were made by 32 people

**Employment** – 12 comments were made by 10 people

### 3.25 Outer South West

**Housing** – 996 comments were made by 870 people

- **2244** comments were linked to “GREEN SITES”.  
(1886 objections / 246 supports / 61 neutral comments)
- **1935** comments were linked to “AMBER SITES”.  
(There were 1842 objections / 31 supports / 39 neutral comments)
- **1227** comments were linked to “RED SITES”.  
(301 objections / 832 supports / 66 neutral comments).
- **20** comments received on “Lime Green sites” (those that have planning permission/allocated in the UDP)
- **20** comments on “purple” sites (sites that have been ‘sieved out’ of the assessment process (removed from further consideration).

**Greenspace** – 86 comments were made by 78 people

**Retail** – 60 comments were made by 55 people

**Employment** – 71 comments were made by 70 people



### **3.26 Outer West**

**Housing** – 430 comments were made by 380 people

- **164** comments were linked to “GREEN SITES”.  
(96 objections / 25 supports / 40 neutral comments)
- **496** comments were linked to “AMBER SITES”.  
451 objections / 10 supports / 29 neutral comments.
- **155** comments were linked to “RED SITES”.  
(31 objections / 85 supports / 39 neutral comments).
- **18** comments received on “Lime Green sites” (those that have planning permission/allocated in the UDP)
- **12** comments on “purple” sites (those that have been ‘sieved out’ of the assessment process (removed from further consideration).

**Greenspace** – 14 comments were made 14 by people

**Retail** – 7 comments were made by 6 people

**Employment** – 4 comments were made by 4 people

### **Evaluation**

3.27 The consultation events were generally well received, with many positive comments made on the consultation material and an appreciation of the opportunity for one-to-one discussions with officers. The availability of material to take away was also appreciated by many, especially by those who wanted more time to consider the issues.

3.28 There were two main criticisms made of the consultation – that not enough was done to publicise the consultation and to make comments online was confusing and too time consuming. The Report of Consultation has a more comprehensive account of these issues and will include lessons for the future also.

### **Next steps**

3.29 The immediate next steps will be for officers to continue to tidy up the raw data in the consultation database. Further reports to Development Plan Panel will be prepared to consider responses to the issues raised, with a view to preparing The Publication Draft Plan as quickly as practicable. A programme timetable will be developed more fully within the context of the analysis of the consultation responses. It should be emphasised also that the overall timetable will be subject to the progress of the Core Strategy through Examination. It is anticipated at this stage that the Publication Draft will be subject to consultation in 2014 with a view to adopt in 2015.

## **4.0 Corporate Considerations**

### **4.1 Local Development Framework (LDF)**

4.1.1 The Site Allocations Plan forms part of the Local Development Framework ('Local Plan') for Leeds. The Site Allocations Plan will eventually identify allocations for development which are consistent with the overall policy approach of the Core Strategy, whilst responding to and balancing the needs and aspirations of local communities and business.

4.1.2 The Core Strategy was submitted for independent examination in April 2013 and the Examination in Public commenced in October 2013. The hearing sessions are now suspended pending consideration of a number of issues by the Inspector.

### **4.2 Consultation and Engagement**

4.2.1 The 8 week period of consultation undertaken is longer than the usual statutory 6 week consultation period. This reflects the complexity of the task for not only the Council but to meet the needs of local communities and business.

4.2.2 The consultation strategy has been framed within the context of the City Council's adopted Statement of Community Involvement (SCI).

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

4.3.1 The consultation undertaken has provided an opportunity for all communities across Leeds to participate in the process. In terms of preparing the consultation material it should be noted that an Equality Impact Assessment Screening was undertaken on the Core Strategy Publication draft and pre-submission changes. This document sets the strategic context for the Site Allocations Plan. In addition, an EIA was completed in the preparation of the Site Allocations Issues & Options document.

### **4.4 Council Policies and City Priorities**

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

### **4.5 Resources and value for money**

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

4.5.2 A summary of costs relating to the consultation on Site Allocations Issues & Options Plan is provided below.

Table 4.5.2 Summary of Site Allocations spending

Advertising		7,143.96	
Printing	documents	26,568.00	LCC internal recharge
	exhibition material	24,679.00	
Room Hire		1,261.75	Majority LCC internal recharge
Other	Postage	373.23	
Other	Translation costs	80.00	
IT Support		19,027.20	LCC internal recharge
<b>Total</b>		<b>£79,133.14</b>	

#### 4.6 Legal Implications, Access to Information and Call In

4.6.1 The plan is being prepared within the context of the LDF Regulations and statutory requirements. The plan is a Budgetary and Policy Framework document and as such will be considered by Scrutiny Board (Sustainable Economy and Culture) at the appropriate time.

#### 4.7 Risk Management

4.7.1 The plan is being prepared within the context of the LDF Regulations and statutory requirements. 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 The level of interest in the consultation has been substantial with very high response rates in some areas, with most comments made on housing issues and options. This, and the complexity of some of the issues presents a challenge for the Council. This will continue to be a challenge for the council as we seek to deliver sustainable allocations that reflect both the wider needs identified in the Core Strategy and community aspirations.  
The final Report of Consultation will be presented to Members of this Panel as soon as practicable.

### 6. Recommendations

Development Plan Panel is requested to:

- 6.1 Note the key headlines from the consultation;
- 6.2 Note the attached draft Report of Consultation. Further analysis of the responses and consideration of the outcomes of the consultation and subsequent actions will be reported to Panel at future meeting(s)

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

### **7.1 Draft Report of Consultation**

<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.