

Report of Chief Planning Officer

Report to Development Plan Panel

Date: 6th January 2015

Subject: Site Allocations Plan – Site Allocation Proposals (Employment, Green space & Retail)

Are specific electoral Wards affected? If relevant, name(s) of Ward(s): All	<input checked="" type="checkbox"/> Yes	<input 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 Leeds Core Strategy was adopted by the City Council on 12th November 2014 and takes forward the spatial and land use aspects of the Vision for Leeds, City Priority Plans and the Best Council Plan (in particular, Objective 2: to 'Promote sustainable and inclusive economic growth), in aspiring to be the 'best city in the UK'. Within this overall context and policy framework the focus of this report concerns the consideration of site allocations proposals, for the Site Allocations Plan (SAP). The purpose of this is to enable Development Plan Panel, prior to consideration by Executive Board to take a view on these proposals. Subject to this consideration, the next step will be to prepare a Publication document, to be 'placed on deposit' later in 2015 (Summer/Autumn 2015). The attached material relates to proposed allocations for Employment, Green space and Retail (Town & Local Centre boundaries), in compliance with the overall policy approach, scale and distribution of growth set out in the Core Strategy and the scope of the SAP previously agreed.
2. It should be emphasised that at this stage the Council is not creating a draft plan. The proposed allocations provide the basis for producing a draft plan, which will then be placed on deposit to enable public comment to be made. The Council is not therefore proposing to engage in public consultation on the proposals contained in this report at this stage, as this would be premature, pending completion of the draft Plan. The additional details include site

specific proposals, phasing of housing (Core Strategy Policy H1) and identifying potential sites for Gypsies, Travellers and Travelling Show People (Core Strategy Policy H7). Following the completion of more detailed work in relation to the proposals covered in this report, together with work in relation to outstanding matters, further consideration by the Development Plan Panel will be needed in the preparation of the emerging Plan.

3. Members will recall, that the scope of the SAP was agreed at Executive Board on 16th May 2012, prior to an 8 week period of District wide consultation (3rd June – 29th July 2013) on 'Issues and Options' relating to Housing, Employment, Green space and Retail allocations for Leeds (excluding the Aire Valley Leeds AAP). The preparation of the site allocations proposals follows a review of representations previously received (over 7,000), joint working across Council services, (including with Children's Services), extensive dialogue with Development Plan Panel and ward members - via a series of site visits and workshops – taking place between June – December 2014, for each of the 11 Housing Market Characteristic Areas (HMCAs, identified in Spatial Policy 7 of the Core Strategy), together with on-going engagement with external infrastructure providers and agencies.
4. National planning guidance (the NPPF) requires the Council to set out a planned approach to housing and economic growth, policies to support the vitality and viability of retail Centres and for the protection and enhancement of the environment (including green space provision). In addressing these areas for Leeds, the Adopted Core Strategy, provides a planning framework for 2012 – 2028 and sets out the overall requirements for the scale and distribution of growth. In helping to deliver this approach, the SAP is required to identify appropriate sites. In the context of these national and local drivers considerable work has been undertaken with members and through the Development Plan Panel to ensure that the package of sites put forward for consideration is as sensitive to local concerns as possible, limiting the impact on the green belt and respecting the character and identity of communities. Housing has been by far the most contentious issue given the scale of the land requirement, the need to meet the housing targets, to provide for an additional element of safeguarded land and the need to use greenfield and green belt land.
5. This report presents the selection of sites for allocation in relation to Employment, Green space and Retail. Development Plan Panel on 13th January 2015 will consider allocations for Housing and safeguarded land. Once the sites are agreed in principle, then the detailed plan will need to be drafted and agreed.

Infrastructure

6. An integral consideration in the preparation of these proposals has been issues in relation to the provision of infrastructure, to support the growth requirements of the Core Strategy. This includes the provision of school places, highways and transportation provision (both public and private), together with community and medical facilities. As a consequence, the proposals as set out in this report have been subject to a range of Council

services and external agencies, as appropriate. This is part of an on-going dialogue, which will continue as the draft Plan is prepared and more detailed requirements identified.

Recommendations:

6. Development Plan Panel is recommended to:
 - i) agree the site allocations proposals set out in this report and recommend to Executive Board that these provide a basis to prepare a Publication draft Plan for deposit in 2015,
 - ii) note, as set out reflected in para. 2 of this report, that following the completion of more detailed work in relation to the proposals covered in this report, together with work in relation to outstanding matters, further consideration by the Development Plan Panel will be needed in the preparation of the emerging Plan.
 - iii) note that the proposals are not being agreed for public consultation at this stage but that they will be subject to public consultation later in 2015.

1.0 Purpose of this Report

- 1.1 This report seeks Development Plan Panel's consideration and agreement of the site allocations set out in the attached documents, as a basis to prepare a Publication Draft SAP to be placed on deposit for a period of formal consultation, later in 2015. A number of matters, as outlined above are outstanding and will need further consideration through Panel in preparing the plan, prior to deposit.
- 1.2 In aspiring to be the 'best city in the UK', the adopted Core Strategy takes forward the spatial and land use elements of the Vision for Leeds and corporate objectives (reflected in City Priority Plans, the Best Council Plan and the Housing Growth 'break through' project). Central to this approach is the desire to plan for anticipated population changes and the homes, jobs, education and investment needed across the District in a sustainable manner. Consequently, whilst supporting the ambitions for regeneration, growth and infrastructure, a key emphasis of the plan is for this to be achieved in a form which respects and where possible, addresses local needs, character, distinctiveness and the management of environmental resources. Leeds has in the past successfully accommodated growth and a buoyant economy whilst protecting the green belt and the identity and character of its settlements.
- 1.3 Within the context of the policy framework and requirements set out in the Core Strategy, the District needs to plan for substantial additional growth over the plan period allowing the economy to continue to grow and recognising the changing demographics, meeting the housing needs of the young and of the growing elderly population, whilst seeking to manage growth with the necessary infrastructure (including health provision and school places). As a basis to achieve these objectives and to plan for these requirements, it is the

task of the SAP to identify the sites to meet these needs, building on this past success and delivering the ambitions and principles set out in the Core Strategy. This will in turn help inform and be informed by emerging Neighbourhood Plans.

- 1.4 Once the sites to be allocated in the SAP are agreed in principle the detailed plan will need to be drafted and agreed. Some details of the plan will need further consideration through Development Plan Panel and where appropriate, Executive Board.

2.0 Background Information

Context

- 2.1 The National Planning Policy Framework requires the Council to have an up to date development plan, or 'Local Plan'. This needs to include both strategic policies and the site specific allocations that put the policies into effect. The Council has recently adopted its Core Strategy (November 2014) which amongst other things sets the housing target for the district and provides the context for site allocations. The SAP will deliver the policies and proposals set out in the Core Strategy for retail, employment, green space and housing across Leeds (except for the Aire Valley, which is subject to a separate Area Action Plan).
- 2.2 Site allocation is part of a process that must ultimately lead to the delivery of new development of an appropriate form and quality, alongside the necessary infrastructure. It is not simply a matter of allocating land but about place making and the "liveability" of the communities we create. Work on site allocations is a continuation of the work undertaken on the Core Strategy involving dialogue with other Council services, infrastructure providers, communities and other stakeholders. It will be important to recognise the changing demographic picture to ensure that the schools, elderly care facilities, recreation facilities and provision for other community needs reflects the emerging picture.
- 2.3 Since the close of the public consultation on Issues and Options for the plan at the end of July 2013, officers have been considering the representations submitted, assessing new sites submitted for consideration, collating comments from infrastructure providers, working across Council services (including Children's Service's and Health) and undertaking sites visits and workshops with members of Development Plan Panel and ward members. For the purposes of plan preparation and in order for a wide range of member views to be considered and for officers to research and explore issues arising, through the Executive Member it was agreed that these sessions should be confidential as working meetings. Eleven meetings, covering the 11 Housing Market Characteristic Areas (HMCAs) defined in the Core Strategy have been held with members of Development Plan Panel and ward members for the relevant wards concerned from June 2014 to December 2014. The meetings have comprised both site visits followed by a workshop session, covering all proposed allocations (retail, employment, green space and housing) within the area concerned. Highways officers attended all meetings, and have

undertaken transport modelling of the sites selected for development. Officers from Children's Services also attended all meetings and provision for both primary and secondary schools has been a main consideration in the selection of sites (some sites being identified as needing to be reserved for new school provision).

- 2.4 There is a significant amount of site assessment work sitting behind the material presented to Development Plan Panel today. Each site suggested for proposed employment, green space and retail (Town & Local Centre) designation has been subject to assessment. With regard to employment this has been via: site the assessment proforma previously agreed with members (see Annex to Volume 1 of the SAP Issues and Options) which provides a consistent basis for considering the development potential of a site; and infrastructure providers (including these bodies with responsibilities for of an interest in Highways, Public Transport, Ecology, Education, Public Health, Utility provision, Built Heritage, Archaeology and the Environment) with any comments received included in the site assessments. Sites identified for Green space and Retail (Town & Local Centres), have been identified via the evidence base used in support of the Core Strategy including the Leeds Open Space , Sport and Recreation Assessment (July 2011) and analysis of Town and Local Centres across the District. This work has been supplemented by the SAP – consultation on Issues & Options (summer 2013), the members workshops and further site visits as appropriate.
- 2.5 Within this overall context, a Sustainability Appraisal report will accompany the Publication Draft Plan. More details of the scope of this and work undertaken to date is covered in paras. 4.1 – 4.7 of this report.
- 2.6 The material before the Panel today presents sites to be allocated for the various uses (within the scope of the SAP). At the Issues and Options stage of the plan we asked questions, as a basis to consider alternative site options. Representations received, on going technical work and engagement with members, have combined to identify a series of site proposals. The aim now is to agree a definitive set of allocations in principle.

3.0 Main Issues

Overview

- 3.1 The material presented to Development Plan Panel reflects the debate through member workshops and site visits. It is clear from the workshops that, members remain concerned about the scale of development and the impact this has on the green belt and other greenfield sites. It is recognised that all greenbelt land is sensitive and the debate has aimed to achieve a range of sites that have least impact on the purposes of green belt, whilst also recognising the Core Strategy aspirations to respect local character and identity. The importance of trying to retain as much as possible of the green belt wedges that extend into the main urban area was a factor recognised particularly on the site visits.

- 3.2 Another area of concern has been the relationship between the site allocations and the infrastructure needs this implies. Members have continuing concerns that the infrastructure requirements will be significant in some areas and timing of delivery is uncertain. This is entirely understandable. The selection of sites presented has considered all comments from infrastructure providers, with Highways and Children's Services attended the member meetings. On going discussion with infrastructure providers and further work, will therefore be needed to further align allocations proposals and infrastructure requirements.

Employment

- 3.3 The Core Strategy (Spatial Policy 9) sets out the overall requirements for general employment land (493ha) and for office floorspace (1,000,000sqm). The source of sites for initial assessment came from the Employment Land Review and a call for sites. The position on employment land is very different to that for housing. In this case much of the requirement can be met from existing allocations and permissions. Employment opportunities tend to be concentrated in well-established and key strategic locations, such as the City Centre and Aire Valley. As such, there is not a specific target for each HMCA. However an integral component of the approach is to ensure that there is an optimum balance of appropriate and deliverable sites across the District. This is necessary in order to provide a portfolio of sites that are attractive to inward investors, businesses and companies who may wish to relocate to Leeds and for local employers and employees.

Overall Approach

- 3.4 As with the other uses being addressed in the SAP, it is assumed that employment sites that have planning permission will contribute to meeting the Core Strategy targets. In the case of existing employment allocations made in the Unitary Development Plan, these have been subject to re-assessment in the Employment Land Review 2010 to ensure that only those employment allocations that are considered suitable, available, deliverable and appropriate for modern business purposes are taken forward into the SAP, and counted towards the need.
- 3.5 It should also be noted that some sites previously listed in the Issues and Options consultation are not proposed to be taken forward for allocation. All sites are listed in Appendix 1, together with reasons for their allocation or not. Site assessment work is on-going, the current position will be available on line prior to the Panel meeting.
- 3.6 In considering allocations for general employment and office development, the following terminology is used:
- Identified Sites = permissions as at 31/11/14 or suitable UDP allocations,
 - Allocations = preferred sites for allocation,
 - Sites not Preferred = sites not proposed to be allocated,
 - All three types may include an employment element within a mixed use allocation.

Core Strategy

3.7 The adopted Core Strategy provides the context for the SAP:

- strategic policy direction for employment growth and
- quantification of how much employment land is needed city-wide

3.8 Overall, the Core Strategy encourages growth to be focussed in the Main Area and in the Major Settlements (Policy SP1). In line with national policy, Office development is to be focussed in centres, with the Core Strategy expecting the vast majority of new office development to be provided in Leeds City Centre. As such, it is important that the SAP identifies and allocates sufficient sites for offices in the City Centre. Locations with the best public transport accessibility should be favoured for office accommodation in accordance with Policy CC1 part a). The Core Strategy and SAP, does recognise however, that employment opportunities need to be supported in established locations (which may be 'out of centre' and have planning permissions in place), where such sites are contributing to local employment opportunities and contribute to the wider employment portfolio across the District.

3.9 Within the context of Core Strategy Policies SP 1 (v) and EC1, new sites for general employment (research and development, industry, warehousing and waste uses) should be allocated in the following locations:

- In accessible parts of the Main Urban Area, Major Settlements and Smaller Settlements, including sites with good access to the motorway, rail and waterway networks,
- In regeneration areas,
- In established industrial areas,
- As part of urban extensions linked to new housing proposals.

3.10 In particular, freight storage and distribution sites are sought along rail corridors (especially the Aire Valley) and along the Aire and Calder Navigation.

Quantity

3.11 Policy SP9 of the Core Strategy sets out the quantities of office floorspace and land for general employment use (research and development, industry and distribution) needed over the plan period:

- Offices – 1,000,000sqm of floorspace is sought, made up of 840,000sqm in existing permissions, and 160,000sqm new provision in/edge of centre locations
- General employment land – a minimum of 493ha city-wide

The Issues and Options stage of the Plan

3.12 Volume 1 of the Issues and Options provided an overview of how the Plan is proposes to address employment needs. It set out the categories of employment use and the quantities of general employment land and office floorspace needed. It explained how the Aire Valley will provide a significant portion of Leeds' overall employment needs, but that this will be dealt with through the Aire Valley Leeds Area Action Plan (AVLAAP). The SAP will

need to take account of the quantities of office and employment land that the AVLAAP is set to deliver.

- 3.13 Volume 2 of the Issues and Options divided the District into 11 documents covering each of the eleven Housing Market Characteristic Areas. These documents set out the need and supply position for housing and employment, and suggestions for shopping frontages and Town Centre boundaries and which green space sites should be protected. For employment, the quantity of employment sites with planning permission was calculated – these sites are proposed to be “identified” as contributing to Leeds’ employment needs; these sites were coloured lime green on the maps. Another set of sites was listed with “traffic light” recommendations regarding suitability – green (good for allocation), red (not good for allocation) and amber (possible). The Council received very few public consultation responses on the employment site proposals.

Local Member Review

- 3.14 Local Members were given the opportunity to give their views on which sites should be allocated for employment at a series of workshops between June and December 2014. As the employment need figures apply for the whole of Leeds, it was calculated that there was an overall surplus for office provision, but a small deficit for general employment land (industry and warehousing). Hence, at each of the HMCA meetings, local members were presented with additional general employment land site possibilities (and were also provided to identify local opportunities), including some sites that had been put forward and rejected for housing, and some sites suggested through the “Call-for-Sites” process.

Proposed allocations - Summary

Offices

- 3.15 In terms of offices to meet the 1,000,000 sqm need figure the supply expected through the Aire Valley Leeds Area Action Plan (AVLAAP) of 208,000sqm needs to be deducted.
- 3.16 In addition, the total of “identified” office sites outside of the AVLAAP area 451,181sqm which have planning permission as of 1/4/14, or had permission at the base date of the Plan – 1/4/12, can also be deducted. These identified office sites include some sites that comprise a mix of office and housing and some sites that are wholly office. These sites are set out in Appendix 1.
- 3.17 The suggested set of sites to be allocated for office development (including mixed use) is set out in Appendix 1. These allocations include some sites that comprise a mix of office and housing and some sites that are wholly office. The total floorspace for allocations outside of the AVLAAP area equates to 515,774sqm, so together with the Aire Valley and “identified” floorspace the total office supply equates to 1,174,955sqm.

- 3.18 The vast majority of offices supply is in the City Centre, including the Aire Valley Leeds AAP, part of the City Centre. This accords with the Core Strategy's policy to focus office provision in-centre.

General employment

- 3.19 In terms of general employment land to meet the 493 hectare requirement figure the supply expected through the AVLAAP of 232ha needs to be deducted.
- 3.20 Then we can deduct the total of "identified" general employment sites outside the AVLAAP area which have planning permission as of 31/11/14, or had permission at the base date of the Plan – 1st April 2012, which equates to 120.46ha. These identified general employment sites include some sites that comprise a mix of general employment and housing and some sites that are wholly general employment. These sites are set out in Appendix 1.
- 3.21 The suggested set of sites to be allocated for general employment is set out in Appendix 1. These allocations include some sites that comprise a mix of general employment and housing and some sites that are wholly general employment. The total quantity equates to 164.63ha, so together with the AVLAAP and "identified" land the total general employment land supply equates to 517.39ha. It should be noted that the general employment land proposed allocations, also includes provision at Thorp Arch for over 70ha (based on the developable area proposed in the planning application for 2000 dwellings). Delivery of this figure will depend upon the resolution of a number of issues including highways requirements, the protection of biodiversity interests (in relation to the designated SEGI) and historical character and relationship to the adopted Natural Resources and Waste Plan designations.

Leeds Bradford International Airport (LBIA)

- 3.22 Leeds Bradford International Airport (LBIA) plays an important economic role in Leeds (and to the City Region as a whole) and provides a key element of transport infrastructure. This is recognised through the Leeds Core Strategy and in particular through Spatial Policy 12. This Policy supports the important role of LBIA and provides a context for managing longer term growth, linked to the Airport Masterplan and Airport Surface Access Strategy.
- 3.23 Executive Board (September 2014) have recently considered issues relating to airport growth and the broad role of LBIA in providing an 'employment hub', in enhancing the wider economic development offer of the City. In parallel with this, consultation of the SAP Issues and Options (summer 2013) raised a specific question relating to the extent of airport growth and the implications of this for site allocations within the vicinity of LBIA. Through this process, the employment and economic benefits of the airport were acknowledged but concerns were also raised regarding the provision of infrastructure to support growth.
- 3.24 The West Yorkshire Combined Authority (WYCA) have committed to detailed consideration of a link road and the Department for Transport published the LBIA, 'Connectivity Study: Option Assessment Report' (December 2014).

These proposals are however still at a very early stage and further work is yet to be undertaken. Consequently, the implications and timing of this option still needs to be considered within the context of the Airport Masterplan and Airport Surface Access Strategy. Further work is therefore needed to assess these issues and how they may impact on the scale and timing of airport growth. At this stage therefore, it is not possible to quantify what this may mean for future general employment or other airport related allocations. These matters will therefore need to be fully considered in the preparation of the Publication draft SAP and via Development Plan Panel at the appropriate time. Any eventual allocation will add to the pool of employment land and the 'Leeds offer', as well as providing local employment opportunities in a part of the District with a local shortfall of employment land (Core Strategy, para. 5.2.60).

Green space

Overall Approach

- 3.25 One of the key distinguishing features of Leeds, is the scale, distribution and connectivity of Green Infrastructure and Green space across the District. This overall network includes multi-functional green spaces, both urban and rural, which include protected sites, public parks and amenity areas, which in many instances serve both a local and strategic function. The importance and significance of this Green space is recognised through specific Policies within the adopted Core Strategy and allocations within the UDP. These currently provide the strategic planning and policy context for the protection and enhancement of green space in Leeds. This framework in turn is supported by a range of City Council initiatives and services, with a role in seeking to improve green space accessibility (for recreation and enhanced public health benefits) and to ensure on going green space maintenance.

Process

Initial Phase

- 3.26 Two sources of information relating to green space within the District have been used to initially establish which areas of green space should be protected through the SAP:
- 1) Existing green space sites protected in the UDP under policies N1 (general green space), N1A (allotments), N6 (playing fields) and N5 (proposed green space) which were in a green space use at the time of the Open Space, Sport and Recreation Assessment (OSSRA) (July 2011).
 - 2) Sites newly identified through the OSSRA (new areas of greenspace and existing greenspace which was not specifically protected through the UDP).
- 3.27 In many cases the UDP and the OSSRA green space sites do overlap, showing a continued and long standing green space use, but there are cases where boundaries are, to varying degrees, different. The presumption has been to identify the more recent boundary as identified through the OSSRA

though further investigations have been undertaken in some cases to ensure boundaries shown on the SAP maps reflect the up to date situation (as at 2014). In a few cases UDP green space sites have not been identified in a green space use at all in the OSSRA either due to their size (due to more accurate measurement, sites are found to be below 0.2ha threshold) or because they are no longer in a green space use. These sites are proposed for deletion. A table of proposed UDP deletions was included in each area volume of the SAP Issues and Options documents (June 2013).

Post Issues and Options

3.28 A number of representations were received during the Issues and Options public consultation exercise expressing support or opposition to the sites proposed for protection and, in some cases, proposing additional sites. Further work has therefore been undertaken and the green space proposals in this report now reflect the following:

- Revisions that have been raised through comments made during the public consultation period,
- Revisions that have been made resulting from DPP and ward member comments,
- Amendments to typology to reflect the current characteristics more accurately,
- Deletion of green space which overlaps sites with planning permission as well as proposed housing, employment and Protected Areas of Search/safeguarded land allocations. Although not shown on the maps, green space overlapping proposed allocations where re-provision on site will be sought will be included in revised assessments of green space quantity, quality and accessibility in recognition that it currently exists and provides opportunities for recreation. It is the intention that green space will be provided as part of any housing development in accordance with Policies G4 and G5 and will be protected in due course.

Comparison – UDP and proposed SAP Green space

3.29 A total of 4,325.5ha (1131 sites) of greenspace was protected under policies N1, N1A, N5 and N6 in the UDP. Most of these sites are proposed for complete or partial protection through the SAP, though a small number are proposed for total deletion (listed and shown on the Plan in Appendix 2 (i)) for reasons set out in paras 3.27 and 3.28 above. The SAP is also proposing to formally protect a number of additional sites which were not specifically protected through the UDP but were identified in a green space use in the OSSRA. The majority of these are not 'new' green spaces (created since the UDP Review in 2006), rather long standing open spaces with recreational value that were not formally protected as such through the UDP. A total of 6486.2ha (1763 sites) of green space is proposed for protection through the SAP which represents an increase of 2,160.7ha (50%) of protected green space compared to the UDP. This includes all typologies identified through the OSSRA except private golf courses which are not considered publically accessible. The plans contained in Appendix 2 (ii) show the following information by HMCA:

- Greenspace protected under the UDP (green),
- Greenspace identified as in a greenspace use in the OSSRA (hatched) (with updates to reflect changes since the OSSRA).

The presumption is that the sites identified in the OSSRA (as updated) will be protected. Any part of any UDP site not covered by hatching is therefore proposed for deletion. The OSSRA has identified a number of 'additional' sites for protection. Whilst some of these sites are genuinely 'new' greenspace laid out since the UDP Review, many are long standing areas of open space that were not previously protected. The SAP will therefore represent a 50% increase in the area of protected greenspace compared to the UDP rather than a 50% increase in the amount of greenspace per se.

- 3.30 The OSSRA identified 76 cemeteries, disused churchyards and other burial grounds only 9 of which are protected in the UPD as N1. All 76 sites are currently identified for protection however not all these will necessarily fulfil this function therefore their typology classification will be reviewed prior to the Publication Draft SAP.

Improving green space provision (quantity, quality and accessibility)

- 3.31 Green space sites need to be fit for purpose and provide a safe, quality environment for recreation which is easily accessible to as many people as possible. It's not simply a matter of achieving the required amount of green space but also a matter of providing open space that people can access, use and enjoy safely. There inevitably will have to be carefully considered balance between quantity, quality and accessibility which should be made in the context of the policy framework for the area, local characteristics and with community and Member input.

Quantity

- 3.32 There are a number of key ways to achieve an increase in the amount of green space. These include:
- Masterplanning – help to ensure the provision of green space is an integral part of any scheme and located in suitable positions and well designed,
 - Site specific policies - give clear and robust guidance on green space provision through site-specific policies in the SAP and the Aire Valley Leeds Area Action Plan,
 - New housing development – Policy G4 sets out the framework for requiring new green space provision through new development outside the City Centre. Policy G5 sets a similar framework for within the city centre. These policies greatly strengthen the focus on providing new green space on site rather than commuted sums in lieu of on-site green space and run parallel with the changes introduced from April 2015 by the CIL Regulations and the Council's CIL Charging Schedule and Regulation 123 List, whereby it will not normally be possible to seek S106 contributions for off-site green space contributions,
 - New off - site provision – this is therefore only likely to arise in exceptional circumstances as part of a planning application where the

Council specifically agrees to accommodate some of the required area off-site, such as at the East Leeds Extension Northern Quadrant or in regeneration areas, where there are opportunities to revitalise existing green spaces through improvements to provision,

- CIL/other grants - Other new green space outside of new housing schemes would be created through the Council's own initiatives, including using CIL funds and various other grant sources, capital receipt funding etc. Such schemes will evolve as schemes come forward and circumstances change. The SAP cannot pre-judge where and when opportunities will arise. The green space position will change over the life of the plan as new development brings forward new areas of green space,
- Neighbourhood Plans – these local level statutory plans can identify and protect Local Green Space. There are approximately 35 communities preparing Neighbourhood Plans across Leeds many of which are looking to protecting additional areas. The City Council is working closely with these groups to support their endeavours to provide new green space by providing expertise and knowledge,
- Changing typology – areas of green space in a typology in surplus could be laid out to be a typology in deficit e.g. by putting in sports pitches or allotments on an existing amenity space. Whilst this would not increase the overall supply of green space, it would help to balance over and under supply of typologies,
- Public use of private open space – there are areas of green space which are privately owned or have limited public access, such as in educational establishments. Better levels of public access should be strongly encouraged.

New green space has been and will continue to be provided through specific projects such as the creation of a new City Park on the South Bank, St Aidens Park near Allerton Bywater and new country park in East Leeds.

Quality

- 3.33 Green space provision is not purely a matter of how much open space there is across the District, these spaces should be fit for purpose and provide a high quality environment designed for and enabling recreation. They should be welcoming, safe, secure, clean, well maintained and, where appropriate, conserve important habitats, landscape features and historic structures. All sites were assessed and scored out of 10 using various criteria as part of the OSSRA and subsequent surveys and it is noticeable how many fell below the desired score of 7 as set out in Policy G3. It is therefore important that funding and initiatives are focussed on improving the quality of existing open spaces. The Council's Green space Strategy (prepared by Parks and Countryside) recognises this need and this has shaped the approach taken by the Council for many years. The focus has been on improving existing areas rather than necessarily laying out new areas.

Accessibility

- 3.34 Communities also need to be able to get to open spaces as easily and safely as possible. The Green space Strategy aims to improve linkages to

particularly community parks through working with the planning system, developers and communities. Policy G1 (Enhancing and Extending Green Infrastructure) of the Core Strategy recognises the importance of wider strategic green networks and encourages the extension of Green Infrastructure by linking green spaces. Green spaces play an important role in achieving an extensive, connected network across the District.

Summary

- 3.35 Much work has been done to update the green space designations of the UDP to ensure the areas to be protected through the SAP are as accurate as possible at this moment in time. Some areas identified in an open space use in the OSSRA are now proposed for development rather than green space, however residential development will bring an opportunity for the provision of green space on site through Policies G4 and G5. Nevertheless, 50% more green space is proposed for protection in the SAP than was in the UDP.
- 3.36 There are various methods to increase the quantity of green space however the quality and accessibility of green space are also important factors which often need addressing if the standards set out in Policy G3 are to be met. This highlights the tension between the three elements - quantity, quality and accessibility – and that the issue is not simply providing an **amount** of green space, but providing useable, safe, attractive spaces that deliver opportunities for a variety of recreational activities.

Retail

Core Strategy Context

- 3.37 The Core Strategy adopts a 'Centres First' approach to directing new retail developments, by ensuring that new floorspace is directed to identified Centres.

Floorspace Target

- 3.38 The Leeds City Centre, Town and Local Centres Study 2011 sets out the District's capacity for additional comparison and convenience retail floorspace over set 5 year periods until 2026.
- 3.39 The Core Strategy states that to plan for this extremely large floorspace requirement over the course of the whole Plan Period would not be justified, effective, or consistent with national policy as it would most likely result in trade being diverted from existing centres and planned investment within them being stalled. The specific reasons for this is due to the particular circumstances in Leeds, linked to major retail development proposals, which have recently being delivered or are due for completion within the next few years.
- 3.40 The Core Strategy did not therefore adopt these targets and "*...takes a cautious approach given the continuing uncertainty relating to the economic climate and the importance of delivering particular major schemes*" (Core Strategy para. 4.2.3). In particular, the Core Strategy takes the approach that it is critically important that both the Trinity and Victoria Gate shopping

developments are completed and the city shopping market given time to re-adjust, before major expansion of the City's shopping floorspace is considered. A new Retail Study would then be undertaken following the completion of these major schemes, to estimate future retail capacity.

- 3.41 The Core Strategy Inspector agreed with this approach and found the plan sound.

Designating Centres

- 3.42 In addition to the City Centre, the Core Strategy identifies 27 Town Centres and 33 Local Centres. In para. 5.3.11 the plan states, "*Boundaries of all Centres, and their Shopping Frontages, will be reassessed through the Site Allocations Plan (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*".

- 3.43 The Core Strategy also proposes that a new Town Centre should be identified in the Richmond Hill area, to meet an identified foodstore deficiency. The plan stated that identifying a location would be subject to further evidence and assessment. Given that the Aire Valley Leeds Area Action Plan identifies the Copperfields site within Richmond Hill as suitable for up to 2,000sqm retail development and that at this stage no appropriate location for a Town Centre has been found, it is proposed at this stage, that therefore the SAP will not identify a Town Centre in the Richmond Hill area.

Issues and Options

- 3.44 The Issues and Options consultation documents set out proposed boundaries for all Centres, Primary Shopping Areas (PSA), and Primary and Secondary Shopping Frontages for the City Centre, Town Centres and Higher Order Local Centres. For Lower Order Local Centres only centre boundaries were identified. For each centre a review of the centre boundary and survey of current uses was undertaken in order to draw up accurate boundaries and frontages. In addition, the document contained an assessment of 'call for sites' sites which had been submitted to us for consideration.

- 3.45 The consultation documents also set out a series of questions asking consultees for their views on 1) the subdivision of large stores, 2) proposed Centre and Primary Shopping Area boundaries, 3) proposed frontage designations, 4) the 'call for sites' sites, 5) any other sites that suitable for retail development. In addition the City Centre consultation document asked a series of questions, specifically related to City Centre retailing issues.

Process for arriving at this stage

- 3.46 Following the consultation exercise all responses were reviewed and changes made accordingly, if considered appropriate. In addition, retail and town centre issues were discussed at the Members workshops and support sought for any proposed changes that came out as a result of public consultation.

Changes made

3.47 Following the analysis of representations received and the Member workshop sessions, the proposals set out as part of the Issues and Options document are largely unchanged. However, there are some changes in relation to particular Centre Boundaries, Primary Shopping Areas and Shopping Frontages which reflect up to date evidence of the form and function of the District's Centres and have resulted in adjustments to certain boundaries and frontages. Plans of Centres with proposed changes (with the exception of the City Centre which is contained within Appendix 3 (ii)) are contained within the Appendix 3 (i); all other Centres are as proposed within the Issues and Options document and can be viewed separately within that document. The Centres that have been subject to change following the Issues and Options consultation stage are as follows :

1. Boston Spa
2. Bramley
3. Chapel Allerton
4. Cross Gates
5. Dewsbury Road
6. Farsley
7. Garforth
8. Halton
9. Harehills Lane
10. Kirkstall Road
11. Middleton Park Circus
12. Moortown Corner
13. Otley
14. Rothwell
15. Royal Parks
16. Weetwood Far Headingley

3.48 In addition to this, following public consultation, a new Centre has been designated at Cardigan Road, straddling the Inner and North HMCAs. This Centre was missed in the 2011 Centres Study and therefore was not included within the list of Centres designated in Policy P1 of the Core Strategy. However, following a detailed assessment of the Centre, Development Plans Panel are advised that this Centre has met the criteria for a Centre. This proposal was supported at the Inner and North HMCA Members workshops. The plan for the new Centre is contained within Appendix 3 (i).

Retail Opportunity Sites

3.49 As set out within the Issues and Options consultation documents, the SAP is not allocating sites specifically for retail, rather it identifies where opportunities exist for further retail expansion (or other Town Centre uses, where appropriate) within Centres. These are identified within the Centre maps in Appendix 3 (i). Details of the wording of the policy covering this designation will be developed in time for Publication consultation.

Large Store Units

- 3.50 It is proposed that no policy will be progressed to protect large store units from subdivision as it has not been possible to empirically demonstrate what should constitute a 'large store', and consultation responses were too varied on this point of size to be categoric on a particular size threshold. Where stores are located within Primary or Secondary Shopping Frontages, appropriate guidance will apply, as it does for all units within Primary and Secondary Shopping Frontages.

Leeds City Centre

- 3.51 The City Centre Boundary remains unchanged from the Issues and Options consultation report, which is a reflection of the approach adopted in the Core Strategy. The Primary Shopping Area remains unchanged from the Issues and Options consultation report.
- 3.52 Following the City Centre HMCA Members workshop it was agreed that the SAP should adopt a different approach to shopping frontages within shopping centres (such as Trinity and the Merrion Centre), than shopping frontages on streets. This approach was suggested as a preferred approach through the Issues and Options consultation report and it is proposed that this approach should be carried through to the Publication stage. It is proposed that shopping centres will be characterised as either Primary or Secondary Shopping Centres and a blanket percentage of total internal frontages will be applied to the shopping centre (either over the whole centre, or across an individual floor where specified). This will allow for a greater degree of flexibility for shopping centre owners but will still ensure that they retain a strong A1 retail function, at either 80% or 50% depending on a Primary or Secondary designation. On-street Shopping Frontages remain unchanged from those consulted on within the Issues and Options consultation report.
- 3.53 Appendix 3 (ii) shows the boundaries and frontages for Leeds City Centre. Shopping Centres have been identified indicatively, as further work is required to draw precise shopping centre boundaries. This will be completed as part of the finalised Publication document. Details of the wording of Shopping Frontage guidance/policy will also be developed in the preparation of the Publication document.

Call for Sites

- 3.54 Sites submitted for retail consideration under the 'Call for Sites' have not been progressed to allocation. This reflects the Core Strategy approach to future retail expansion. A full list of the 'Call for Sites' sites is contained within Appendix 3 (iii).

Flood risk

- 3.55 The Council is required to undertake a flood risk sequential and exception test of sites proposed for allocation, in accordance with national planning policy. A draft flood risk assessment, which includes a sequential and exception test, has been prepared with input from the Council's Flood Risk Management Team and in consultation with the Environment Agency. Further technical

work is being undertaken to progress the flood risk work, in conjunction with site proposals.

4.0 Other considerations

Sustainability Appraisal

4.1 As outlined in this report, the Core Strategy provides the overall strategic context for the preparation of the SAP. Proposals contained in this Plan, therefore need to be consistent with the overall approach of the Core Strategy, which in itself has been subject to a Sustainability Appraisal (and was considered by the Inspector, who found the Plan and supporting City Council evidence, sound).

4.2 The purpose of the Sustainability Appraisal (SA) is to assess a document or plan against the delivery of social, economic and environmental objectives. This is a requirement of the Strategic Environmental Assessment (SEA) Directive, which was transposed into English Law in the form of The Environmental Assessment of Plans and Programmes Regulations 2004.

4.3 The SA of the SAP assesses the effects of the site allocations against the SA objectives. An SA Report was prepared to accompany the Issues & Options document and was published as part of the consultation process in 2013. At that stage the SA Report provided an individual assessment of sites being considered for allocation for retail, employment and housing use with an expectation that the SA at the Publication draft would consider the cumulative effects of the proposed site allocations coming forward collectively.

Work Undertaken Since Consultation

4.4 Following Issues and Options consultation in summer 2013, further work has been undertaken to progress the SA assessment. This has included:

- Completing site assessments following receipt of outstanding site information from consultees and infrastructure providers;
- Undertaking site assessments of new sites submitted during the Issues & Options consultation and subsequently through the Strategic Housing Land Availability Assessment (SHLAA) process;
- Reviewing and revising the scoring criteria used for assessing sites against the SA objectives, for example as a result of consultee comments, checking consistencies, introducing new evidence sources and making scoring easier to understand;
- All of the SA assessments have been moved onto the SAP database, enabling improved data application and analysis.

4.5 The SA at this stage, of the individual sites is nearing completion and will be circulated to members prior to the Panel meeting.

Next Steps to Publication Stage

4.6 The next stage will involve looking at the proposed allocation sites collectively and assessing the potential cumulative impact, informed by work being undertaken through transport modelling and other work streams. The current baseline information will need to be updated to 2015 and the SA report

written. The findings from the SA of the individual allocation sites will be used as one of the sources of information to identify site requirements.

How will the SA inform the Site Allocations Process to Publication Stage ?

- 4.7 The assessment work for the SA process is informed by evidence provided from a number of data sources and consultees both within and external to the Council. This has informed the assessment of sites on for example, transport and accessibility, flood risk, pollution, and natural resources and waste. This information has been used to consider the suitability of sites for the proposed use. It has also identified where mitigation measures would be needed to offset negative impacts identified through the SA process or further assessment work needed at planning application stage, such as detailed ecological assessment, flood risk measures or consideration of effects on the historic environment. This will be reflected in the site requirements identified for proposed allocations.

Duty to co-operate

- 4.8 The Localism Act (2011) and the National Planning Policy Framework (March 2012), provides details of legal and soundness requirements that the Council and other public bodies have to satisfy. This includes a 'duty to cooperate' on planning issues that cross administrative boundaries, especially those that relate to strategic priorities and allocations set out as part of the Core Strategy and related Development Plan Documents (including the homes and jobs planned for). As emphasised in this report, the SAP has been prepared within the context of the adopted Leeds Core Strategy. In finding the Plan sound, the Core Strategy Inspector confirmed that the City Council had demonstrated compliance with the Duty to Co-operate requirements. Within the context of the preparation of the SAP, the broad strategic approach and quantum of development have therefore been accepted through the Duty to Co-operate process. Any further issues will therefore relate to detailed matters set out in the SAP. As a consequence, the City Council will continue to work through the established Duty to Co-operate processes, in the preparation of the Publication draft Plan, although no major issues are anticipated.

5.0 Corporate Considerations

5.1 Consultation and Engagement

- 5.1.1 As outlined in para. 3 above, following consideration by Development Plan Panel and Executive Board, the Site Allocations Plan – Issues & Options, has been subject to an 8 week consultation period (3rd June – 27th July 2013). Two weeks longer than the usual statutory period of 6 weeks. This consultation entailed a wide range of activity, including of community exhibitions and 'drop in' sessions and is detailed in the Report of Consultation presented to Development Plan Panel in December 2013.
- 5.1.2 The consultation resulted in over 7,000 representations being received, together with the receipt of on-going correspondence and telephone calls regarding SAP issues. As outlined in this report, the preparation of the emerging proposals is a consequence of an intensive process of engagement

and joint working with Development Plan Panel and ward members (through a series of site visits and workshop sessions) between June – December 2014, together with cross Directorate work between City Development, Children's Services, Adult Services, Health and Legal. In addition, on-going consultation with external bodies (including the Environment Agency and NHS England) has also taken place. As part of this overall process, correspondence has also been issued to the Neighbourhood Planning groups across the District. This information not only updated such groups on the overall process and timetable but also requested details of possible allocations local communities wish to identify (to be reflected in Neighbourhood Plans) and to bring forward.

5.1.3 As outlined in this report, following consideration by Executive Board, the proposed allocations will form the basis of the preparation of a Publication draft Plan. Within the context of the LDF Regulations, this plan will need to be subject to a 6 week period of consultation, in order for representations to be made. Following the City Council's consideration of such representations, the plan can then go forward for submission and examination by an independent (PINS) Inspector.

5.2. Equality and Diversity / Cohesion and Integration

5.2.1 The SAP is set within the strategic context of the adopted Core Strategy and needs to be in conformity with it. The Core Strategy was subject to EIA screening at each key stage. In seeking to delivery the strategic objectives of the Core Strategy, the emerging SAP allocations, seek to reflect the overall scale and distribution of growth (for housing and economic development) to allocate sites for green space (consistent with overall typologies and levels of provision) and to reinforce the 'centres first' approach through the identification of Town and Local Centre boundaries. Such policy approached and allocations seek in turn to support Equality, Diversity, Cohesion and Integration issues, through the provision of housing sites to meet a range of housing needs across the district (including Affordable Housing and homes for older people), the provision of green space (to promote local identity, recreation and to contribute positively to public health) and supporting the vitality and viability of Town and Local Centres, to help safeguard local services and infrastructure.

5.3. Council Policies and City Priorities

5.3.1 As outlined above, the SAP is being prepared within the strategic context of the adopted Core Strategy, which in turn takes forward the spatial objectives of the Vision for Leeds and the priorities set out in the City Priority Plans and the Best Council Plan (in particular Objective 2: to 'promote sustainable and inclusive economic growth'). Significantly also the SAP is a key mechanism to deliver one of the City Council's 'break through' projects to deliver Housing Growth. This will be supported through the identification of land and it's phasing for housing growth through the SAP.

5.4 Resources and value for money

- 5.4.1 The SAP is being prepared within the context of local priorities, National Planning Guidance and the statutory LDF Regulations. The preparation of such plans is a resource intensive process not only for the City Council (officers and members) but for the community as a whole (in engaging with the plan's preparation) and external agencies and infrastructure providers. The plan is currently being prepared within existing budget provision. This will however need to be kept under review within the context of the City Council's overall budget position (and priorities) and the costs entailed with plan preparation. These include technical work to support the plan's evidence base, document printing, legal costs and the public examination process. As with the preparation of the Core Strategy, these costs will be closely monitored and value for money secured to ensure the best use is made of available resources.
- 5.4.2 An important component of the plan is to identify sites, consistent with the overall scale and distribution of growth set out in the Core Strategy. This process helps facilitate the co-ordination of service provision and investment decisions, over the plan period, to enable available resources to be effectively used.

5.5 Legal Implications, Access to Information and Call In

- 5.5.1 The SAP will follow the statutory development plan process (Local Development Framework). The report is not eligible for call in as no decision is being undertaken.

5.6 Risk Management

- 5.6.1 Without a current allocations plan(s), aspects of the existing UDP allocations will become out of date and will not reflect or deliver the Core Strategy policies and proposals. Early delivery is therefore essential to enable the Council to demonstrate that sufficient land will be available when needed to meet the Core Strategy targets. Without an up to date plan the presumption in favour of development by the Government means that any development or neighbourhood plan in conformity with national policy will be acceptable, regardless of any previous positions of the authority. The more the work progresses, the more material weight can be given to it.

6.0 Conclusion

- 6.1 Within the context of the adopted Core Strategy, the SAP Issues and Options consultation, the Member's workshops (June – December) and on-going technical work, this report sets out proposed allocations for Employment (general employment and offices), Green space and Retail Town and Local Centre boundaries (where these have changed following Issues and Options consultation). These proposals are not for public consultation at this stage and are intended for the consideration of the Development Plan Panel, as a basis to prepare a draft Plan for consultation in 2015.

7.0 Recommendations

7.1 Development Plan Panel is recommended to:

- i) agree the site allocations proposals set out in this report and recommend to Executive Board that these provide a basis to prepare a Publication draft Plan for deposit in 2015,
- ii) note, as set out reflected in para. 2 of this report, that following the completion of more detailed work in relation to the proposals outlined, together with work in relation to outstanding matters, further consideration by the Development Plan Panel will be needed in the preparation of the emerging Plan.
- iii) note that the proposals are not being agreed for public consultation at this stage but that they will be subject to public consultation later in 2015.

Appendices

Appendix 1: Employment

- (i) Schedule of sites
- (ii) District-wide Plans of Proposed Office & General Employment sites (by HMCA Areas)

Appendix 2: Green space

- (i) Sites proposed for deletion
- (ii) District-wide Plans of proposed Green space Allocations (by HMCA Areas)

Appendix 3: Retail

- (i) Plans of changes to Centre boundaries following Issues & Options consultation
- (ii) City Centre Map
- (iii) List of 'Call for sites'