

**Report of Chief Planning Officer**

**Report to Development Plan Panel**

**Date: 13<sup>th</sup> January 2015**

**Subject: Site Allocations Plan – Site Allocation Proposals (Housing & Safeguarded Land)**

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 12<sup>th</sup> 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 Housing and designations of safeguarded land, 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) and sites suitable for elderly accommodation.

3. Members will recall, that the scope of the SAP was agreed at Executive Board on 16<sup>th</sup> May 2012, prior to an 8 week period of District wide consultation (3rd June – 29<sup>th</sup> July 2013) on 'Issues and Options' relating to Housing, Employment, Green space and Retail allocations. 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 determine the scale of housing needed over the plan period (2012 – 2028). Within this context, the SAP is required to identify appropriate sites. Against 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. Following consideration of allocations for Employment, Green space and Retail at the Development Plan Panel meeting on 6<sup>th</sup> January, this report presents the selection of sites for allocation in relation to Housing and for designation as 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 discussion with 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:

7. Development Plan Panel is recommended to:

- i) support, 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, that further refinement to the proposed allocations for housing and safeguarded land may be necessary in the light of the work on plan preparation and further evidence coming forward,
- iii) note, as set out 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,
- iv) 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 profile 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, it was agreed with the Executive Member and Panel Chair that these sessions should be confidential as working meetings/workshops. 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 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. All sites considered for housing and safeguarded land have been subject to assessment. This has been via a site assessment proforma previously agreed with members (see Site Allocations Plan, Issues & Options Annex to Volume 1). This provides a consistent basis for considering the development potential of a site. 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) have been consulted with any comments received included in the site assessments. This work has been supplemented by the Site Allocation Plan – 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 Housing and designated as Safeguarded land. 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 the member workshops, site visits and all the background information described in section 2. Through the member workshops, 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 Green Belt 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. As far as possible and taking into account local choice, sites have been selected that provide a rounding off to a settlement or could reasonably be considered to be infill and which are visually and physically contained. The importance of trying to retain as much 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 attending the member meetings. On going discussion with infrastructure providers and further work, will therefore be needed to continue to align allocations proposals and infrastructure requirements. The Council will also need to make decisions on how it allocates resources including the Community Infrastructure Levy (CIL) and New Homes Bonus (NHB) to support areas of growth. Infrastructure needs and other site requirements will be considered when deciding the phasing of development for housing. The phasing of sites allocated for housing is not part of the discussion today – once sites are agreed in principle the more detailed work and writing of the plan will commence.

## **Housing**

### **Core Strategy**

- 3.3 The identification of housing allocations in the SAP is fundamentally driven by the approach set out in the Core Strategy. Spatial Policy 1 (SP1) establishes some guiding principles. It indicates that development will be based on the settlement hierarchy, with the majority of new development to be concentrated in or adjoining urban areas, also reflecting regeneration priorities and a need for an appropriate balance of brownfield and greenfield sites. It goes on to advise that:
- (i) The largest amount of development will be located in the Main Urban Area and Major Settlements. Smaller Settlements will contribute to development needs, with the scale of growth having regard to the settlement's size, function and sustainability,
  - (ii) In applying (i) above, the priority for identifying land for development will be as follows:
    - a. Previously developed land and buildings within the Main Urban Area/relevant settlement
    - b. Other suitable infill sites within the Main Urban Area/relevant settlement
    - c. Key locations identified as suitable extensions to the Main Urban Area/relevant settlement,
  - (iii) For development to respect and enhance the local character and identity of places and neighbourhoods,
  - (vi) To recognise the key role of new and existing infrastructure (including green, social and physical) in delivering future developments to support communities and economic activity,
  - (vii) In meeting the needs of housing and economic development (and in reflecting the conclusions of the Appropriate Assessment Screening), to seek to meet development requirements, without adverse nature conservation impacts upon Special Protection Areas and Special Areas of Conservation, in particular the South Pennine Moors (including Hawsworth Moor),

- (viii) To undertake a review of the Green Belt (as set out in Spatial Policy 10) to direct development consistent with the overall strategy.

3.4 The total amount of housing to be accommodated is set out in Spatial Policy 6 (SP6) as 70,000 (net) of which 8,000 is anticipated to come from small and unidentified sites. Allowing for assumed demolitions over the plan period the policy indicates that this will leave a need to allocate land for 66,000 dwellings. Building on the general approach set out in SP1 the policy advises that in allocating land the following considerations should apply:

- (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, (including Educational and Health Infrastructure,
- (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, green space and nature conservation,
- (vii) Generally avoiding or mitigating areas of flood risk.

3.5 The Core Strategy emphasises that the overall approach is to achieve opportunities for housing growth in sustainable locations, linked to the settlement hierarchy, whilst respecting local character and distinctiveness. Reflecting this and the policy considerations set out above Spatial Policy 7 (SP7) sets out the proposed distribution of housing land to deliver the 66,000 dwellings. The Core Strategy advises that the distribution is indicative and provides a framework for housing distribution for future LDF land allocation documents, such as the SAP. The policy is set out in full below.

**SPATIAL POLICY 7: DISTRIBUTION OF HOUSING LAND AND ALLOCATIONS**

The distribution of housing land (excluding windfall) will be planned based on Tables 2 and 3:

Table 2 [in Core Strategy]: Housing Distribution by Settlement Hierarchy

Settlement level	Number		Percentage	
	Infill	Extension	Infill	Extension
City Centre	10,200		15%	
Main Urban	30,000	3,300	45%	5%

Area*				
Major Settlements	4,000	10,300	6%	16%
Smaller Settlements	2,300	5,200	3%	8%
Other rural	100	600	1%	1%
<b>Total</b>	<b>46,600</b>	<b>19,400</b>	<b>70%</b>	<b>30%</b>

\* excluding City Centre

Table 3 [in Core Strategy]: Housing Distribution by Housing Market Characteristic Area

Housing Market Characteristic Area	Number	Percentage
Aireborough	2,300	3%
City Centre	10,200	15.5%
East Leeds	11,400	17%
Inner Area	10,000	15%
North Leeds	6,000	9%
Outer North East	5,000	8%
Outer North West	2,000	3%
Outer South	2,600	4%
Outer South East	4,600	7%
Outer South West	7,200	11%
Outer West	4,700	7%
<b>Total</b>	<b>66,000</b>	<b>100%</b>

3.6 There are other policy considerations that will affect the allocation of land for housing. Policy H1 identifies a target that 65% of housing in the first five years of the plan should be on brownfield land and 55% thereafter. Paragraph 4.6.16 advises that where the regeneration of previously developed land is in locations that are or can be made sustainable then opportunities outside the



settlement hierarchy can be considered, which would inevitably affect the distribution in SP7.

- 3.7 Perhaps the other key consideration is where land is proposed for allocation that is currently in the Green Belt. The Core Strategy recognises the importance of the Green Belt to the character of the District and in maintaining the separate identity of many of its settlements. However, it also recognises that the use of Green Belt land will be necessary if the housing target is to be met. Spatial Policy 10 (SP10) advises that sites to be allocated through Green Belt review should relate to the settlement hierarchy and should have regard to the impact on Green Belt purposes set out in National Guidance. The policy does however allow for opportunities to be considered unrelated to the settlement hierarchy where they provide the most sustainable option to meet needs within a particular HMCA. Any such opportunities identified will again imply a departure from a strict adherence to the distribution in SP7.
- 3.8 SP10 advises that review of the Green Belt is needed to accommodate the scale of housing, employment and safeguarded land to meet policy requirements and states that otherwise review of the Green Belt will not be considered to ensure that its general extent is maintained. The Core Strategy is consistent with national guidance in recognising that Green Belt boundaries should be permanent and should only be changed in exceptional circumstances. The appropriate approach is therefore that the SAP should only remove as much land from the Green Belt as is essential to meet targets for allocation (or safeguarding) and no more, otherwise exceptional circumstances will not be demonstrated.
- 3.9 SP7 is therefore a guide to site allocations, it does not anticipate that the final distribution will precisely match that given in the tables. Given that the allocations will need to reflect and balance the wide range of considerations set out in the policies, including the matters highlighted above, there will inevitably be compromise based on sometimes conflicting priorities and the available opportunities. It is also important to consider the distribution in the round as a substantial proposal in one HMCA may well have wider implications. Nevertheless it will be important to consider the extent to which the proposed distribution matches that set out in SP7.

#### Site Allocations Progress to Date

- 3.10 The Council has already undertaken an initial consultation on potential site allocations in its Issues and Options publication of June 2013. Although this consultation pre-dated the adoption of the Core Strategy it was based on the strategic approach and distribution of the draft plan which has essentially been carried forward unchanged into the adopted plan.
- 3.11 The Issues and Options documents explain the process of site identification and assessment to identify sites to meet the Core Strategy target for each of the 11 Housing Market Characteristic Areas (HMCAs) listed in Table 3 above. It should be noted that at this stage some sites were 'sieved out' but not for Green Belt reasons. The source of sites for consideration has been the

Strategic Housing Land Availability Assessment (SHLAA) together with any new sites put forward for consideration through consultation on Issues and Options. As a first stage in the process, sites were 'sieved out' of the assessment process where they fell wholly within an area of high flood risk (zone 3b functional floodplain), or a Site of Special Scientific Interest or national nature conservation designation, were within minerals safeguarded sites, the airport safety zone, or fell outside the settlement hierarchy of the Core Strategy (with the policy exception).

- 3.12 Sites with planning permission and existing UDP allocations contribute towards the targets, leaving a residual requirement to find in each area. All sites completed, under construction, and with planning permission but not yet started, or recently expired, and UDP housing allocations, from end March 2012, updated to end September 2014 have been included in the figures in this report. Further updates will be completed to ensure that the Publication Draft Plan presents the most up to date data possible, so the totals categorised as 'identified housing sites, and sites allocated for housing', will still be subject to change. Column 3 on Table 1 at Appendix 1 gives the total capacity from identified sites for each HMCA.
- 3.13 Remaining sites have been subject to an individual site assessment which includes consideration of Green Belt issues, where relevant. At Issues and Options stage sites were categorised using a green, amber and red traffic light system as a basis for inviting public comment. The initial colour coding and reasons for it were an indicator as to which sites are most favoured for allocation. This, together with the process described below at para 3.15 has informed which sites are proposed for allocation for housing. Hence, the majority of the proposed housing allocations were shown as 'green' sites at Issues and Options stage. These were defined as sites with the greatest potential to be allocated for housing. The majority of the sites not proposed for allocation for housing were shown as 'red' at Issues and Options stage. These were defined as sites which are not considered suitable for allocation for housing. Unless new evidence has come to light to alter the initial assessment on these sites, they have been either allocated for housing, or not, respectively.
- 3.14 In general, there has been more debate and choice around the amber sites, which were defined as 'sites which have potential but where there may be issues which need to be resolved, or the site may not be in such a favoured location as those highlighted in green', because, by definition, these sites had both potential, but were not seen to be as suitable for allocation as those shown green. The process has sifted out those amber sites considered to represent the best and most sustainable choice for development in each area to make up the required target.
- 3.15 The assessment process has considered site attributes – whether it can be developed physically, considering comments from infrastructure providers, as well as the relationship of the site to the settlement hierarchy, whether brownfield or greenfield, the more preferable sites to release in Green Belt review terms – (those having least effect on the five Green Belt purposes),

and local preference (from the representations received at the Issues and Options public consultation) and ward members views, as well as the findings of the sustainability assessment of sites and legal advice on planning policy. It is a combination of all these factors that have led to the proposals before Panel today.

- 3.16 In some areas, meeting the Core Strategy target has been difficult – for example East HMCA. This is partly as a result of translating strategic targets into specific sites. However, the Inner and City Centre HMCAs have allocated more than their targets. In this situation it is felt that overprovision in one area can help to make up the shortfall in an adjacent area. Column 5 on Table 1, Appendix 1 gives the total capacity from allocated housing sites for each HMCA.
- 3.17 Specific details of the sites and proposals for each area are given at Appendix 3 (1 – 11 for each HMCA). Appendix 1 details overall figures for each HMCA. For each of the eleven HMCAs, the Core Strategy target is listed. Taking off this those sites which will be ‘identified housing sites’ (see para 3.12 above), each area is left with a residual target to find in terms of housing allocations. Sites proposed for allocation, sites proposed as safeguarded land, and sites not proposed for allocation for housing or safeguarded land are listed in Appendix 3, with the reason, together with the previous colour coding at Issues and Options stage.

#### Infrastructure and site requirements

- 3.18 The proposals as set out in this report have been subject to consultation with 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. Specific ongoing work includes:

#### Transport modelling

- 3.19 Detailed transport modelling has been undertaken of proposed allocations to establish any strategic and detailed highway improvements required. This work has informed the selection of sites and will also input into the next stage of the plan – once the sites have been agreed in principle, informing the detailed site and off site requirements for each allocation. This will also influence decisions as to proposed phasing of housing allocations, which will be brought to future Development Plan Panel meetings. A full background paper on transport modelling will be produced to accompany the Publication Draft Plan.

#### Schools provision

- 3.20 Children’s Services have been continually involved in the work on site allocations, and have advised where new school provision is needed as part of an allocation to meet the future needs generated by the housing allocations, and where future needs can be accommodated by expansion of existing schools. Appendix 2 lists sites where a new school is expected to be provided within an allocation. The location of proposed new schools is also

shown on the plans at Appendix 3. A full background paper on schools provision will be produced to accompany the Publication Draft Plan.

#### Flood risk

- 3.21 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.

#### Health facilities

- 3.22 As part of the on-going work with infrastructure providers, the preparation of the attached proposals have also taken account of comments from health providers. The provision of health facilities falls within the remit of NHS England and at a local level, Leeds' three Clinical Commissioning Groups (CCGs). The amount of new housing identified for the District up to 2028, would equate to an average of 5 – 6 new GPs a year across Leeds (based upon a full time GP, with approximately 1800 patients). Leeds already has over 100 existing practices of varying sizes, so the addition of 5 – 6 GPs a year, is not a significant number, given the overall population of Leeds.
- 3.23 Within the context of the SAP, proposals for health facilities e.g. doctors surgeries and dentists, will be supported and co-ordinated (as part of overall infrastructure requirements), subject to need, site issues and location, in relation to policy requirements and as part of specific planning briefs for individual sites, as appropriate. However, due to health legislation and operating requirements, the SAP cannot allocate land specifically for health facilities, as providers plan for their operating needs and local demand. Existing practices determine for themselves (as independent businesses) whether to recruit additional clinicians in the event of their practice registered list growing. Practices can also consider other means to deal with patient numbers, including increasing surgery hours. It is up to individual practices as to how they run their business. Practices also consult with the NHS about funding for expansion, but due to current reductions in public spending, funding is limited.

#### Distribution of Housing Land and Allocations

- 3.24 Within the overall context of the approach set out in this report, the sites now proposed for allocation are identified in the attached plans and schedules. The outcome is illustrated in the following table which compares the distribution of the proposed allocations to that in Table 2 of SP7 of the Core Strategy.

**Table 1.**

**Comparison of proposed allocations against Core Strategy policy SP7  
Distribution of Housing Land and Allocations, excluding the Outer NE area.**

<b>SP7 targets. No PAS. Outer NE included</b>				
SP7 Level	SP7 Type	Total capacity	SP7 Target	% surplus
City Centre	Infill	11329	10200	11
Main Urban Area	Infill	29705	30000	-1
Main Urban Area	Extension	5360	3300	62
Major Settlement	Infill	3553	4000	-11
Major Settlement	Extension	6681	10300	-35
Smaller Settlement	Infill	2498	2300	9
Smaller Settlement	Extension	3310	5200	-36
Other Rural	Infill	282	100	182
Other Rural	Extension	218	600	-64
Other	Other	3359	0	

3.25 At SAP Issues and Options stage, as an alternative option within the Outer North East HMCA, a site at Spen Common Lane, Bramham (site 3391) was identified as having potential as a new settlement. The breakdown in Core Strategy Table 2, is inevitably affected by the choice of a major development site in the Outer North East (Outer NE) area that sits outside the settlement hierarchy. Whilst the overall approach of the Core Strategy is to promote growth in relation to the Settlement Hierarchy (Spatial Policy 1), SP10 (see para. 3.7 above), exceptionally allows for sites in sustainable locations where they can be supported with the necessary infrastructure. In this case, the inclusion of a new settlement at Headley Hall/Spen Common Lane east of Bramham, is considered to be the most sustainable option, within the Outer NE HMCA. The NPPF advises (para 52) that new housing can sometimes be best delivered by large scale development such as new settlements. In Core Strategy terms this proposal also has the benefit of protecting the character and identity of the many relatively small communities that are a distinctive feature of this part of the District. If this proposal for Outer NE is removed from the totals then the distribution in Table 2 would be as follows:

**Table 2.**

**Comparison of proposed allocations against Core Strategy policy SP7  
Distribution of Housing Land and Allocations, (all areas).**

<b>SP7 targets. No PAS. Outer NE excluded</b>				
SP7 Level	SP7 Type	Total capacity	SP7 Target	% surplus
City Centre	Infill	11329	10200	11
Main Urban Area	Infill	29030	27600	5
Main Urban Area	Extension	5360	3036	77
Major Settlement	Infill	3382	3680	-8
Major Settlement	Extension	6191	9476	-35
Smaller Settlement	Infill	2146	2116	1
Smaller Settlement	Extension	3286	4784	-31
Other Rural	Infill	188	92	104
Other Rural	Extension	88	552	-84
Other	Other	352	0	

3.26 The tables illustrate that there is broad accord with the distribution envisaged in SP7 and with the approach of the Core Strategy more generally. The great majority of development is to be accommodated in and adjoining the main urban area (including the City Centre) and major settlements. This is consistent with SP1, reflecting the settlement hierarchy and a preference for brownfield and regeneration sites. This position is reinforced if the distorting effect of the major new settlement proposal in Outer NE is removed. As anticipated smaller settlements take only a modest amount of new housing. Infill in smaller settlements matches the contribution anticipated in SP7 whilst the figure for extensions is below. This can be seen as a positive outcome given their place in the settlement hierarchy, the objective of protecting character and identity and a preference for brownfield land with minimum impact on green belt. The “Other Rural” category makes a minimal contribution to the overall total which is again entirely consistent with the overall strategy. The proposed delivery against Table 3 of SP7 is illustrated in Table1 of Appendix 1. This shows that most HMCA’s substantially reflect the numbers anticipated in SP7. The City Centre and Inner Area can deliver a greater share which is consistent with the policy approach in SP1. The outer areas are often below the SP7 figures but this generally reflects local

circumstances relating to the settlement hierarchy and green belt considerations. For instance the only major settlement in Outer North West is Otley and opportunities for expansion are severely constrained by proximity to Bradford and North Yorkshire as well as the physical constraints of the Wharfe Valley. The position is similar in Outer North East in relation to Wetherby. In Outer South East, Garforth is the only major settlement and is taking a very substantial urban extension. Elsewhere opportunities are more limited. East Leeds has little opportunity for further expansion but whilst the proposals are below the SP7 figure the area is nevertheless taking the highest number of dwellings of any of the HMCAs. Overall it can be concluded that the proposed package of allocations broadly reflects both the strategic direction set by Core Strategy policies and the indicative distribution of SP7.

- 3.27 The Core Strategy also anticipates that the package of sites will provide for around 65% of development in the first five years to be on brownfield land reducing to 55% thereafter. At this stage the suggested package of sites is not phased so it not possible to provide a breakdown in this form. However based on the package as a whole the split is estimated at 58% brownfield and 42% greenfield. If it is assumed that the great majority of windfall will be in recycled brownfield land, then of the 74,000 gross housing target, approximately 62% will be brownfield.

### **Safeguarded Land/Protected Areas of Search (PAS)**

- 3.28 In addition to land for housing the SAP needs to identify sites as safeguarded land (referred to as PAS in the UDP) to provide a reserve for possible long term use beyond the plan period. The Core Strategy says that the Council will identify sites to accommodate at least 10% of the total land identified for housing; that is land for at least 6,600 dwellings. As outlined in the safeguarded land report to the Development Plan Panel (16<sup>th</sup> December, see Appendix 6), the Core Strategy does not indicate how the safeguarded land should be distributed across the District but SP10 does set out the basis for Green Belt review to meet this need in the same terms as for housing allocations. In the 16<sup>th</sup> December report, a number of options are considered for how future PAS should distributed and designated, consistent with national guidance.
- 3.29 The PAS distribution proposed is not an even one across the HMCAs, Table 3 below, sets out the current distribution. This reflects the fact that some HMCAs by definition cannot provide safeguarded land as they have no Green Belt boundary, for instance the City Centre and Inner areas, or otherwise have tight boundaries offering little or no opportunity, e.g. East Leeds. Based on these issues, the 16<sup>th</sup> December report highlighted that a working assumption to be considered, was a target of 19% for HMCAs where PAS could be

accommodated but the contribution on this basis may be higher or lower due to other factors. This was a simple arithmetic calculation, given that some areas could not provide any safeguarded land. The 19% was based upon the HMCAs of the City Centre, East and Inner not being able to contribute. The North HMCA is also constrained. The consequence of not having any safeguarded land within the North HMCA is that the arithmetic 19% working assumption would be further increased if an even share of this sort were to be used as the basis of distribution.

**Table 3 Distribution of safeguarded land**

<b>HMCA</b>	<b>CORE STRATEGY TARGET</b>	<b>SITES TO BE ALLOCATED AS PAS TOTAL</b>	<b>% OF PAS BEING DELIVERED (OF HMCA TARGET)</b>	<b>% OF 6,600 PAS AS CONTRIBUTION DISTRICT WIDE</b>
Aireborough	2,300	316	14	5
City Centre	10,200	0	0	0
East	11,400	0	0	0
Inner	10,000	0	0	0
North	6,000	0	0	0
Outer North East	5,000	1359	27	21
Outer North West	2,000	540	27	8
Outer South	2,600	220	8	3
Outer South East	4,600	1616	35	24
Outer South West	7,200	1845	26	28
Outer West	4,700	715	15	11
<b>Total</b>		<b>6,611</b>		

3.30 It is also the case, that in some HMCAs, there remain existing PAS sites which are retained as safeguarded land where they are not proposed for allocation. This is partly on the basis that a previous inspector has determined that these sites are capable of development and are in broadly sustainable locations. In addition if these sites do not continue to be safeguarded then the only option would be to remove yet more land from the Green Belt. This would run counter to the view that the Green Belt should be impacted as little as possible and not meet the exceptional circumstances test for Green Belt change. Otherwise the choice of sites generally reflects the same considerations as for housing sites, attempting to balance a range of policy considerations.

3.31 A further dimension of PAS relates to issues associated with the airport. In the site allocations report of 6<sup>th</sup> January to Development Plan Panel,



paras.3.22 – 3.24, make reference to the need to consider the contribution of Leeds Bradford International Airport (LBIA) to the economic development and growth in the District and the need for this to be supported by the necessary infrastructure and for further consideration of these issues to be made. Prior to the consultation on the deposit Plan, further work with LBIA is therefore needed to consider the potential scale and timing of airport growth. Within this context also there is the potential to review existing airport allocations and to consider further PAS, to support the potential of future growth. Should this be the case, supported by the necessary evidence (including the Airport masterplan and Surface Access Strategy), this would contribute further to the overall PAS totals in the District.

- 3.32 The overall outcome for PAS (excluding the airport) is illustrated on the accompanying plans and shows that whilst the resulting distribution is not even, there is safeguarded land in all parts of the District providing choice at a future date should this be necessary.

#### **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 on the sustainability appraisal

- 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 for consistency 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. Appendix 4 provides the revised scoring criteria uses to assess the proposed housing sites against the 22 SA Objectives and the schedule of sites. The schedules for the housing sites in the Aire Valley Area Action Plan, considered by Development Plan Panel on 16<sup>th</sup> December are also provided.

#### Next Steps in sustainability appraisal 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.

#### New site suggestions and representations on revised site boundaries

4.8 As the SHLAA is an ongoing process, we have received further submissions of sites to SHLAA and late representations suggesting new sites or revised site boundaries be considered in the site allocations process. Where new sites have been submitted after the meetings held with members (i.e. hence members may not be aware of them), we have listed these, plus reasons for proposing them for allocation or not, at Appendix 5. New sites are also included on the plan and schedule of sites at Appendix 3. In some cases we have not yet received comments back from infrastructure providers on these sites as they were submitted more recently. The site assessments will therefore be added to over time. Appendix 5 also gives details of any late representations asking for a boundary alteration, or part of a site only to be considered. We have also received many further submissions from

developers/agents giving further details/reasons as to why a particular site should be allocated for development. These may include further ecology reports, highways reports and other supporting information. Whilst a site may be capable of being developed, and supporting information may demonstrate this, this alone is not sufficient grounds for allocating a site for development. See para 3.15 above which explains the process for evaluating sites.

- 4.9 Over the past few months potential allocations have been reviewed by members of the Development Plan Panel and ward members on an HMCA basis. This has included site visits so that members were fully aware of any new opportunities and were then well informed to consider the options. This has allowed for local views to inform the outcome alongside policy and technical considerations.
- 4.10 The allocations proposed in this report bring together the outcome of this review and consider the position in the round, across the district as a whole. In attempting to balance the many competing and sometimes conflicting interests it is important to recognise that the choice of sites to allocate is not an exact science. In many cases there may be little difference in terms of policy compliance, Green Belt impact and technical considerations between a site selected for allocation and one that is not. In some instances this may be due the nature of the opportunities which may vary between HMCAs but may also apply within a local area. In such cases the choice becomes one of local preference. This is entirely appropriate given what the NPPF says about plans reflecting local needs and priorities, providing that the decisions will deliver sustainable development consistent with the approach in the Core Strategy and are not unreasonable.
- 4.11 The choices stem from the consideration of a wide range and number of alternatives. This is apparent from the Issues and Options documents which noted that the SHLAA contained some 1,092 sites. This has been added to through consideration of new sites submitted through the consultation and the SHLAA update. It should be noted that there has been no policy constraint on the inclusion of sites in the SHLAA, so that all Green Belt submissions have been considered. This is consistent with the decision of the Core Strategy inspector to delete the reference to a “selective” review of the Green Belt. All alternatives identified to the Council have therefore been considered, and this has applied equally to sites currently in the Green Belt as to opportunities on non-Green Belt land. As explained earlier there has been a Green Belt review of all sites within the SAP process, where land is currently in the existing Green Belt.
- 4.12 The alternative sites considered through the allocations process that it is not proposed to allocate are identified on the attached plans (Appendix 3).

#### Duty to cooperate

- 4.21 The Localism Act (2011) and the National Planning Policy Framework (March 2012), provide 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 already 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 SAP.

- 4.22 In meeting the City Council’s obligations under the Duty to Co-operate, there are established officer and member governance arrangements (through the portfolio holders meetings and the Leaders Board), to work with neighbouring and City Region authorities and bodies. Within this context, early consideration takes place regarding emerging Development Plan proposals which may impact upon Leeds (due to ‘cross boundary issues’) and for representations to be made. Consequently, the City Council monitors the progress being made by LCR local planning authorities in the preparation of their Development Plan Documents. In terms of neighbouring authorities, the current position is as follows:

<b>Local Authority</b>	<b>Development Plan Position</b>
Bradford MDC	Core Strategy yet to be submitted but likely to proceed to examination in Spring 2015.
Harrogate BC	Adopted Core Strategy (2009), Site Allocations Plan withdrawn June 2014, The Council is now preparing a new Local Plan that will set out the overall growth strategy for the District up to 2035, together with detailed policies and proposals to deliver that growth.
Kirklees MDC	Core Strategy withdrawn in October 2013, a Local Plan is currently being prepared, early engagement and evidence gathering is ongoing and a Consultation Draft on the Preferred Options is expected to be published in summer 2015.
Selby DC	Adopted Core Strategy October 2013, currently preparing a ‘Site Allocations & Policies’ Plan.
Wakefield MDC	Adopted Core Strategy (2009) and Site Specific Policies Local Plan Allocations Plan (2012)

## **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 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. This draft plan will need to be subject to a minimum 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 delivering 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 approaches 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 its 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 2014) and on-going technical work, this report sets out proposed allocations for Housing and for designations of safeguarded land/PAS. 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.

- 6.2 Members should note that the proposals outlined in this report could change in the deposit plan reflecting changing circumstances. In particular, pending decisions by the Secretary of State on two UDP PAS sites could have implications not only for the sites in question but for the proposals more generally. This could arise from a review of the five year land supply, which could also affect the phasing of the proposed allocations which is part of the next stage in the development of the draft plan.

## **7.0 Recommendations:**

7.1 Development Plan Panel is recommended to:

- i) support, 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 that further refinement to the proposed allocations for housing and safeguarded land may be necessary in the light of the work on plan preparation and further evidence coming forward,
- iii) note, as set out 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.
- iv) 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

- |                           |   |
|---------------------------|---|
| <b><u>Appendix 1:</u></b> | Table 1 – Proposed housing allocations and sites identified for housing within each Housing Market Characteristic Area (HMCA) |
| <b><u>Appendix 2:</u></b> | Schools provision   |
| <b><u>Appendix 3:</u></b> | Distribution & Identification of Housing land allocations (Schedule & Plans)  |
| <b><u>Appendix 4:</u></b> | Sustainability Appraisal, Scoring criteria & assessment of sites (SAP & Aire Valley AAP).                                     |
| <b><u>Appendix 5:</u></b> | Schedule of new sites & late representations – suggesting revised site boundaries for consideration                           |

**Appendix 6:** 16<sup>th</sup> December DPP Report Safeguarded land/Protected Areas Search

**Appendix 1**

Table 1

Proposed housing allocations and sites identified for housing within each Housing Market Characteristic Area (HMCA)

HMCA	Core Strategy Target	No of units completed, under construction & not yet started to be deducted from the target between 31.3.12 to 30.9.14	Residual target	Proposed sites to allocate for housing total	Shortfall (-) or surplus (+) against Target
1. Airborough	2300	766	1534	1600	+66
2. City Centre	10200	5087	5113	6226	+1113
3. East	11400	5792	5608	4642	-966
4. Inner Area	10000	6869	3131	4570	+1439
5. North	6000	3689	2311	2271	+40
6. Outer North East	5000	1093	3907	3850	-57
7. Outer North West	2000	1133	867	667	-200
8. Outer South	2600	436	2164	2029	-135
9. Outer South East	4600	1259	3341	2786	-555
10. Outer South West	7200	2175	5025	4632	-393
11. Outer West	4700	2423	2277	2300	+23
<b>Totals</b>	<b>66000</b>	<b>30722</b>	<b>35278</b>	<b>35573</b>	<b>+295</b>



## **Appendix 2: Schools Provision**

**Report to: Development Plan Panel**

**Site Allocations Plan – Implications for school places.**

**Date: 16 Dec 2014**

**Report Author: Lesley Savage, Capacity Planning and Sufficiency Lead**

### **1. Introduction**

1.1. This report provides an outline of the implications of the proposed site allocations for school places in Leeds, including reference to sites identified for new schools, in order to inform the final decision on site allocations.

### **2. Background**

2.1. The Core Strategy, and site allocations which support its delivery, are essential to the economic growth of the city, and to its aspiration to be the best city in the country. This paper outlines the work done to ensure that the school provision necessary to support it can be delivered.

2.2. The context in which this work has been completed is challenging. The city is facing a rising demand for school places due to a rise in the birth rate from a low of 7,500 in 2000/1 to an average of just over 10,000 for the last 5 years. This has necessitated the creation of over 9,000 primary school places over the past four years, through expansions of existing schools, creation of new schools, and restructuring of existing schools.

2.3. As a result the capacity of the existing school estate to respond to significant new housing is limited, particularly in certain hotspots within the city, and new sites will need to be secured initially through the site allocations process and later through detailed planning applications.

2.4. As the discussions with ward members and officers regarding site allocations have progressed, Children's Services have given their views on the potential impact in each Housing Market Characteristic Area (HMCA), and suggested sites which would be well placed to create additional school provision. In addition to considering the location relative to existing schools and the impact on them, consideration has been given to the size of particular sites, and priority has been given to locating provision in the larger sites which most directly give rise to the new demand. The recommendations for school sites should therefore be sustainable in the long term.

### **3. The process and key considerations.**

3.1. As the site uses and sizes have been refined, the analysis of the impact on school places has been adjusted. This has been a lengthy iterative process balancing housing, employment and green space allocations with other infrastructure needs including schools. The site allocations commentary reflects the school as an essential requirement of any subsequent planning application

for that site, and housing yields have been adjusted to allow for the school site area on housing allocations.

3.2. As far as possible schools have not been proposed on PAS sites. Concern has been raised that to progress a school on a PAS site ahead of housing progressing may risk of premature housing development through challenge of the status. Where a school is proposed on a PAS site consideration has been given to whether this arises purely directly from that site, or form a wider need and so be needed sooner. Where it may be needed sooner, consideration has been given to how a phased opening could reduce that risk and by initially open to meet existing demand and expanding when the housing goes forward.

3.3. School attendance patterns do not map well onto the HMCA's, and having largely concluded this iterative process it was then necessary to re-aggregate the data into meaningful school place planning areas to provide a final assessment of the adequacy of provision. Whilst this represents a position statement at December 2014, any further iteration may impact on the position described.

3.4. The report describes the context for these planning areas in terms of current pressures for places, current scope of the existing estate to meet existing demand, and the needs arising from the housing allocations. It highlights the areas of concern where no solutions for school places have been found.

3.5. Local authorities are already the providers of last resort for school places, and are dependent on working with partners to commission new provision. In addition, Free Schools are commissioned independently of the local authority. This can open up opportunities to acquire privately owned land and buildings which may not feature in this plan. Given the long term nature of the housing strategy, and the likelihood of changes to the statutory and educational context of school place planning, as well as the possibility of further changes up or down in the birth rate, it is therefore not necessarily an issue to progress with the site allocations without fully sufficient school provision being identified at this stage, however these risks are highlighted so that members can make an informed choice when approving the plans.

3.6. Establishment of new school provision is subject to a statutory process, which may or may not support the suggestions made in this report. However failure to secure sites now will almost certainly leave the authority with a significant gap in its ability to respond to the planned housing. Given the context described, it is therefore essential that the site allocations describe the provision of a school site as a requirement, but that the authority is able to confirm or decline that requirement at the time of the detailed planning application being brought forward.

3.7. It is generally inappropriate to name a specific scheme to meet the demand as this would need to be tested through the statutory process, and consultation in this site allocations process would not meet the needs of school

organisation legislation. In some villages options are clearly more limited, and consideration is given to the sustainability of more than one school. Relocation to facilitate expansion may be suggested as an obvious option to meet demand. In other cases sites immediately adjacent to existing schools offer obvious expansion options. Naming of a site, and especially a particular scheme, does not presuppose that this will be supported by the consultation and statutory process. The situation at the time the school provision needs to be brought forward will need to be appraised afresh.

3.8. There is some uncertainty about the impact of new housing on this scale in terms of pupil yield. For many years now the council has used a pupil yield of 0.25 primary aged pupils per 100 house, and 10 secondary aged children. Adjusted by the number of year groups this equates to 3.5 children per year group in primary and 2 in secondary. These figures, particularly for primary, are not dissimilar to those used by other authorities, and have generally served Leeds well in planning school places.

3.9. Whilst the impact on primary school places from new housing is relatively immediate, the different rates at which houses sell, the life stages that families initially occupy houses, and the length of time families tend to stay in an area are among many factors that can take time to establish and influence school place demand, particularly for secondary. It is known that there is a small (typically 5%) drop off in cohort sizes between year 6 and year 7, as some pupils access provision in the independent sector or out of the Leeds area. There is considerable doubt if the difference in the pupil yield would be so large when whole new communities are being created and significant housing areas are being developed, and a concern that the yield should be adjusted accordingly. Work is underway to formally review and validate this, however in the meantime an average between the two pupil yields of 2,75 per year group has been used.

3.10. This more cautious approach should ensure the authority is not left with a strategic shortfall of provision, but proposals will only be brought forward where the demand is confirmed. This reinforces the need to ensure that the planning conditions insist on the need for a school to be factored in, but not necessarily enacted.

3.11. Appendix 1 summarises the number of houses approved, the pupil yield anticipated, and the sites identified as needing school provision including in the site use allocation by planning area. The following commentary summarises any residual concerns for primary provision by planning area.

3.12. Data is described in terms of forms of entry (FE). Schools are organised and funded around class sizes of 30 children, and a 1FE primary school has 1 class of 30 pupils in each year group, 2FE is 2 classes etc.

#### **4. Primary school place impact**

4.1. In total approximately 72 FE of additional primary provision are needed as a result of the housing plans, equivalent to 36 new 2 FE primary schools. The

site allocation process has identified options for 46.5 FE. With PAS sites included, this rises to demand of 80FE and solutions for 55.5FE.

4.2. The biggest gap in provision is in the city centre, where 10 FE of additional demand could be created, with no sites identified. There is a high degree of uncertainty about the pupil yield from city centre locations, but we do know that increasingly families are moving into flats, and into these locations. Some sites have been identified in peripheral areas in the inner HMCA, but this will not be sufficient to meet all needs. Between the two HMCAs 21FE of demand has been identified and only 11FE of primary provision. This is not to say that schools cannot be provided, as demonstrated by the recent establishment of the Ruth Gorse Academy, a secondary school due to open in 2016 on Black Bull Street, however it is to note the high degree of risk attached with this site allocation plan.

4.3. This pressure is located mainly around the northern / north eastern part of the city centre, in the Kirkstall / Burley, Hyde Park, Woodhouse areas and through to parts of the Burmantofts, Chapel Allerton, Harehills. These are all areas where school provision is already facing pressure.

4.4. The preferred size for new provision is 2FE this provides a degree of educational and financial breadth and stability, and allows options for downsizing rather than closure in times of declining birth rates. A number of areas do not present sufficient extra demand to warrant a new school but equally there may be problems meeting demand from the existing estate.

4.5. An analysis by planning area follows:

- a. **Alwoodley** –Site 2053B was agreed should contain a new 2FE primary school which should be sufficient, and ease pressure here, which is also impacting on the adjacent Roundhay / Wigton Moor planning area.
- b. **Ardley / Tingley** – Site 2127 Tingley Station was identified as a PAS site and would require a 2FE school only if and when it was developed due to its remote location. Sites 1032 and 2128 were identified as PAS sites, and may potentially require a school site any future housing allocation. This could potentially be phased to be a 1FE school in the short term to meet demand from other sites already progressing, expanding later to meet the needs arising directly from the PAS site itself if that were developed.
- c. **Armley / Wortley** – no school sites agreed but 1.4 FE of additional demand created. Mobile population creating some uncertainty. Of moderate concern as exiting estate already exhausted. Could link to Otter island development.
- d. **Beeston** - no school sites agreed but around 0.3FE of additional demand created. Mobile population creating some uncertainty. Of moderate concern as exiting estate already exhausted.

- e. **Belle Isle** - no school sites agreed but 0.5FE additional demand created. Mobile population creating some uncertainty. Of less concern as options may exist in existing estate.
- f. **Boston Spa** – site 3391 to include 2 x 2FE primary schools. Sufficient secondary provision in area for local children, but would need to address demand from inner east.
- g. **Bramhope / Pool** – site 1080 / 3367A in Bramhope and 1369 and 1095B (PAS) in Pool were agreed should include a primary school site each for potential solutions which create an additional 0.5FE places in each for demand from sites within the villages. The PAS site would only be needed if the PAS were developed.
- h. **Bramley** – no sites agreed for school use, and 0.6FE of additional demand created. Of less concern as options may exist in existing estate once other changes have settled.
- i. **Burmantofts** – site 2145 Dolly Lane agreed to be reserved for educational use. At this stage it has notionally been outlined as a through school with 2FE primary and 4FE secondary capacity. This would meet demand arising from the allocations, however the site has been subject to other interest including Free School bids and the optimum type of educational use has yet to be properly established.
- j. **Calverley** – no sites for school use agreed, and 0.2FE additional demand created. Existing estate already facing some pressure, but solutions in adjacent areas of Horsforth and Farsley are likely to resolve pressure.
- k. **Chapel Allerton** – 264 Roundhay Road CS offices agreed for a 2FE school, subject to AMB agreement – there is known current interest in the site. Although only 0.3FE of additional demand created directly in this area it is close to parts of other planning areas ie city centre / Woodhouse /Burantofts and Harehills, and in all these areas the existing school estate is already exhausted. The site is strategically well placed to meet demand arising from a number of sites allocated for housing.
- l. **Cookridge / Adel** – 2130 Church Lane agreed for a 2FE school. In total housing will generate almost 3FE of additional demand created, and there may be options for expansion in the existing estate to meet the remaining shortfall. Moderate risk.
- m. **EPOS Villages South** - 2134 PAS to the east of Scholes agreed to contain a school solution to create an additional 0.5FE to partially meet 1FE of additional demand from that site. Only needed if the PAS site is developed.
- n. **EPOS Villages West** – no school sites agreed 0.3FE of demand identified. Moderate risk.

- o. **Farnley** – no sites identified, 1.5FE of additional demand. Options believed to exist in the existing estate. Low risk.
- p. **Farsley** – 1114/1110 PAS agreed should contain a 2FE primary school. Would be sufficient to meet 0.5FE of demand from site itself and also strategically well located to meet demand from sites within walking distance at Clariant/Riverside, and would redistribute pupils from Rodley, all of which is currently feeding into pressures in Horsforth and Calverley. Only develop school if PAS site progresses.
- q. **Garforth** – agreed site 1232B to contain 1 x 2FE primary and 1 x through school with 2FE primary and 4FE secondary. Would be sufficient to meet the additional demand of in excess of 3FE and also address Micklefield.
- r. **Gildersome / Drighlington** – agreed site 3064 adjacent to Birchfield could provide for expansion by 1FE to partially meet 1.4FE of demand. Shortage is of moderate risk.
- s. **Guiseley / Yeadon / Rawdon** – a 2FE school from somewhere within sites 2163A, 1180A, 1311A has been agreed in principle. All are in a good general location but have access issues which may compromise housing or school use in reality. High risk as other options limited after extensive recent consultation.
- t. **Harehills** – no sites agreed with an additional 0.7FE of demand. Whilst in part this could be addressed by Roundhay Road, this is still a high risk as there are no known options in the existing estate at this time.
- u. **Holbeck** – no sites have been identified, 10.8FE of demand created. Very high risk.
- v. **Horsforth** – site 4240 has been agreed should contain a through school with 2FE primary and 4FE secondary. Part of site 1202 adjacent to Newlaithes also needed, but this was not put forward for housing.
- w. **Hunslet** – no sites identified, but 1.2FE of demand generated. Of moderate concern, some potential may exist in current estate.
- x. **Hyde Park / Headingley** – no sites identified, and 1.2FE of demand generated. Option of the use of West Park being considered through AMB, otherwise of concern as existing estate largely exhausted.
- y. **Kippax** – no sites identified, but 0.2FE of demand generated. Not of concern, scope in existing estate to accommodate.
- z. **Kirkstall / Burley / Hawksworth Wood** – a site within the Otter island complex 3390 / 3393 / 3408 / 198 was agreed should include a 2FE primary. Masterplan approach needed to confirm precise scope – this site has little access to existing schools but is only around 1FE of demand. Site 626 to include a 2FE primary, 1FE of demand arising directly but second FE would

be LA funded to meet remaining demand. Current discussions with developer. In total 3.3FE of additional demand created and solutions do not map particularly well to demand. Of some concern due to similar pressures in adjacent Woodhouse and Hyde Park / Headingley planning areas.

- aa. **Lower Aire Valley** – site 1149A, Allerton Bywater PAS if and when progressed would need to provide a 1FE primary school. It is adjacent to Brigshaw High School which may have some development potential on site to meet secondary need.
- bb. **Manston , and Swarcliffe / Whinmoor** – ELE site 797 to include provision for 3 x 2FE primary and 1 x 8FE secondary in addition to Northern quadrant site already agreed should be sufficient to meet local demand.
- cc. **Meanwood** – no sites identified but 0.4FE of additional demand created. Of moderate risk due to limited options in existing estate and current BN pressures.
- dd. **Morley** – site 1220A East of Churwell identified for 2FE school to meet 2.3FE of demand needed. Moderate risk, options for expansion largely exhausted.
- ee. **Osmandthorpe / Temple Newsam** – 2FE of additional demand. Free School already progressing on part of site 259B as a through school with 2FE primary and 4FE secondary which should address the demand arising from this housing. Also site 1295A Skelton Lake in AAVP agreed to contain a similar through school. These would be sufficient to meet demand.
- ff. **Otley** – site 745 was identified for a 2FE primary school, which may involve relocation and expansion of an existing school and so is only counted as 1FE net increase. Shortage of approx. 0.5FE compared to additional demand is of low concern as other options believed to exist within existing estate and some housing already underway is already accounted for in current projections.
- gg. **Pusley** – site 3464 was identified to include a school expansion option of 1FE. Total additional demand of 2.2 FE. An area of some concern as while some options for expansion may exist in the existing estate the area is currently facing pressure and this may not be sufficient.
- hh. **Richmond Hill** – site 1146 great clothes was identified for a potential 1FE net expansion of existing provision. Site 2080 within the AAVP which includes the former Copperfields site has been agreed to include a new 2FE primary school, however the precise location is important and must not be directly on the old school site.
- ii. **Robin Hood / Rothwell / Woodlesford** – site 4222A/B/C Fleet Lane agreed for a new 2FE primary provision. Site 3081 was not supported for housing, but was suggested for a school instead. This has been included in

the allocations and analysis, but is not clear if it would be progressed and would depend on changes in surrounding areas at that time.

- jj. **Seacroft** – site 4090 East Leeds Family Learning Centre was reserved entirety for school use for a 2FE primary, to meet the additional demand plus potentially also other educational priorities. This has been supported through the brownfield land disposal/development process. Site 2154 - Seacroft Hospital, requirement for a 6FE-8FE secondary school.
- kk. **Staningley** – no sites agreed for school provision with 0.2FE of additional demand. Of less concern as options thought to exist in current estate
- ll. **Wetherby** – no sites agreed for school use as options exist within the current estate to meet the 0.8FE of demand arising. Low concern.
- mm. **Woodhouse** – no sites agreed for school use, and 1.3FE of demand expected. Of some concern due to existing estate being exhausted and adjacency of a number of areas with insufficient solutions identified.

## 5. Secondary school place impact

5.1. In total approximately 46 FE of additional secondary provision are needed as a result of the housing plans, equivalent to 6 new secondary schools of around 8 forms of entry each. The site allocation process has identified options for 36 FE. With PAS sites included demand rises to 52 FE, but no further sites were agreed.

5.2. There is considerable current uncertainty about the capacity of secondary schools to meet anticipated demand. Changes to sixth form funding mean that any sixth form of less than around 250 pupils is not financially sustainable. As sixth forms are established collaboratively and increasingly in off site provision, there will be additional space available for statutory school age children. Translating the number of places made available by this is not straightforward as the delivery of the curriculum is not based on simple classes of 30 as in primary, and requires use of specialist facilities. Admission numbers are often therefore not rigid multiples of 30, although the language of FE is still used as an approximation.

5.3. As described in 3.6 above, a cautious approach has been taken when projecting the pupil yield for secondary school places. This uncertainty around both the projection of demand for secondary places and how it might be met should be borne in mind when considering the implications for planning school provision.

5.4. New provision agreed within this process in East Leeds Extension, AAVP, Horsforth and Garforth should address the demand arising from this site allocations plan for areas where the existing estate would otherwise be insufficient to cope. Site 2154 - Seacroft Hospital, requirement for a 6FE-8FE secondary school.



5.5. There is estimated to be over 16FE of demand arising in the inner and city centre HMCAs, with only the potential for 4FE of provision at Dolly Lane agreed through this process. Within this area the inner East and inner North East of the city already face considerable pressure for places, and work will be starting in the spring term on consultation events to address this, however it will add to the difficulty in meeting demand arising from this housing. The local authority has already started a piece of work to look at the funding of site acquisition and demand arising from this housing plan will need to be considered as part of that plan.

## **6. Conclusion and recommendation**

6.1. Housing growth is an essential requirement for the economic and social development of the city, and as we strive to be the best city for children, school place planning is a critical part of the infrastructure planning that runs alongside this. There are a number of sites which have been identified as requiring school provision to be included in any future use, and the plans panel are asked to:

6.2. Support the sites identified for school provision

6.3. Note the risks associated with housing plans in areas where insufficient school provision has been identified at this stage

6.4. Formally record this requirement in the site allocation plan as a requirement of any planning application for housing, which the local authority will confirm (or withdraw) at the point a planning application is put forward.

6.5. Note that the precise location of a school within a site will be determined at the point of the planning application/formulating detailed site requirements in drawing up the Publication Draft Plan.

6.6. Note that support of use of any council owned sites will need to be confirmed through AMB.

Appendix 1 of Appendix 2 on next page:



HMCA area	Primary Planning area	Current baseline position for primary school places	PAS sites				Non-PAS sites				Sites refs	Comments and outstanding issues.
			Housing Capacity	Number of primary FE demand generated	Number of secondary FE demand generated	Primary school FE sites identified	Secondary school FE sites identified	Housing Capacity	Number of primary FE demand generated	Number of secondary FE demand generated		
City Centre							8,374	10.0	7.7			no sites identified
Inner							9,192	10.9	8.4	11.00	8.00	2145 Dolly Lane, 264 Roundhay Road, 3390/3393/3408/198 otter island, 259 former whitebridge sch, 1146 great clothes, 4090 East Leeds Family Learning Centre,
Aire Valley (Inner)							1,928	2.3	1.8	2.00		2080 copperfields
Aireborough			304	0.4	0.3		2,175	2.6	2.0	2.00		Options within Guiseley sites 2163A, 1180A, 1311A
outer NW			461	0.5	0.4	0.5	1,761	2.1	1.6	3.50		2130 Church Lane Adel, 745 East of Otley
North						1.0	6,165	7.3	5.7	6.00	4.00	2053B Alwoodley Lane, 4240 Horsforth, 1202 Horsforth, 626 Kirkstall Forge,
Outer North East			1,339	1.6	1.2	0.5	4,737	5.6	4.3	4.00		3391/ 4167 new settlement
East							7,397	8.8	6.8	6.00	16.00	797 ELE and 2154 Seacroft hospital
Aire Valley (east)							2,404	2.9	2.2	2.00	4.00	2195A Skelton :Lake
Outer SE			1,508	1.8	1.4	1.0	3,766	4.5	3.5	4.00	4.00	1232 East of Garforth
Outer South			214	0.3	0.2	2.0	2,435	2.9	2.2	2.00		4222 Fleet Lane. 3081 Robin Hood also suggested but not clear if this is a good fit, so excluded from figures
Outer SW			1,695	2.0	1.6	2.0	6,203	7.4	5.7	3.00		1220A East of Churwell, 3064 next to Birchfield
Outer West			693	0.8	0.6	2.0	4,106	4.9	3.8	1.00		3464 adjacent to Tyersal
<b>GRAND TOTAL</b>			<b>6,214</b>	<b>7.4</b>	<b>5.7</b>	<b>9.0</b>	<b>60,643</b>	<b>72.2</b>	<b>55.6</b>	<b>46.50</b>	<b>36.00</b>	
	Alwoodley	1FE short					333	0.4	0.3	2.00		2053B Alwoodley Lane
	Ardley / Tingley	1FE short	1,311	1.6	1.2	2.0	1,563	1.9	1.4			2127 Tingley Station PAS
	Armley / Wortley	0.5FE amber					1,143	1.4	1.0			1032/2128 PAS recommended by members - school needed
	Beeston	0.5FE short					235	0.3	0.2			
	Belle Isle	0.5FE short					402	0.5	0.4			
	Boston Spa	Green - OK	248	0.3	0.2		3,180	3.8	2.9	4.00		3391/4167 Hedley Hall / Spen Common
	Bramhope / Pool	Green - OK	461	0.5	0.4	0.5	449	0.5	0.4	0.50		1369 PAS in Pool, 1080 / 3367A in Bramhope
	Bramley	1FE amber					497	0.6	0.5			
	Burmantofts	1.5FE short					1,590	1.9	1.5	2.00	4.00	2145 Dolly Lane
	Calverley	0.5FE short					159	0.2	0.1			
	Chapel Allerton	1FE short					237	0.3	0.2	2.00		264 Roundhay Road
	Cookridge / Adel	Green - OK					2,380	2.8	2.2	2.00		2130 Church Lane
	EPOS Villages South	Green - OK	902	1.1	0.8	0.5	1,129	1.3	1.0			2134 East of Scholes PAS.
	EPOS Villages West	Green - OK	97	0.1	0.1		192	0.2	0.2			
	Farmley	Green - OK	436	0.5	0.4		857	1.0	0.8			
	Farsley	Green - OK	447	0.5	0.4	2.0	385	0.5	0.4			1114/1110 Kirklees Knoll
	Garforth	Green - OK	472	0.6	0.4		2,689	3.2	2.5	4.00	4.00	1232 east of Garforth
	Gildersome / Drighlington	Green - OK					1,167	1.4	1.1	1.00		3064 adj to Birchfield
	Guiseley / Yeadon / Rawdon	Green - OK	304	0.4	0.3		2,832	3.4	2.6	2.00		2163A or 1180A or 1311A
	Harehills	1FE short					573	0.7	0.5			
	Holbeck	amber - monitor					9,073	10.8	8.3			
	Horsforth	1FE short				1.0	1,132	1.3	1.0	2.00	4.00	4240 off A65 off Horsforth roundabout and 1202 Victoria Ave
	Hunslet	amber - monitor					984	1.2	0.9			Includes 1FE primary from Aire Valley sites. Schools solutions progressed outside of this process. None in this area
	Hyde Park / Headingley	1FE amber					1,026	1.2	0.9			
	Kippax	Green - OK	166	0.2	0.2		170	0.2	0.2			
	Kirkstall / Burley / Hawskworth	1.5FE short					2,741	3.3	2.5	4.00		3390/3393/3408/198 otter island / kirkstall road, 626 Kirkstall Forge
	Lower Aire Valley	Amber - monitor	974	1.2	0.9	1.0	721	0.9	0.7			1149 Adj to Brigshaw PAS
	Manston	1FE amber					877	1.0	0.8	4.00	8.00	797 ELE, 2154 Seacroft hospital
	Meanwood	0.5FE short					311	0.4	0.3			
	Middleton	1.5FE short					602	0.7	0.6			
	Morley	0.5FE short	77	0.1	0.1		1,953	2.3	1.8	2.00		1220A East of Churwell
	Osmondthorpe / Templenewsam Area	0.5FE Amber					3,941	4.7	3.6	4.00	8.00	259 former Whitebridge school
	Otley	Green - OK					1,248	1.5	1.1	1.00		745 East of Otley
	Pudsey	1FE short	117	0.1	0.1		1,844	2.2	1.7	1.00		3464 adj to Tyersal
	Richmond Hill	Green - OK					1,957	2.3	1.8	3.00		1146 Great Clothes
	Rothwell / Robin Hood / Woodlesford	Green - OK	110	0.1	0.1	2.0	2,269	2.7	2.1	2.00		4222 Fleet lane
	Roundhay / Wigton	1.5FE short					148	0.2	0.1			
	Seacroft	1.5FE short					1,146	1.4	1.1	2.00		4090 East Leeds Family learning Centre
	Stanningley	1FE short					193	0.2	0.2			
	Swardcliffe / Whinmoor	Green - OK					4,575	5.4	4.2	2.00	8.00	797 ELE
	Wetherby	Green - OK	92	0.1	0.1		650	0.8	0.6			
	Woodhouse	Green - OK					1,090	1.3	1.0			
<b>GRAND TOTAL</b>			<b>6,214</b>	<b>7.4</b>	<b>5.7</b>	<b>9.00</b>	<b>60,643</b>	<b>72.2</b>	<b>55.6</b>	<b>46.50</b>	<b>36.00</b>	



## **APPENDIX 3**

DISTRIBUTION AND IDENTIFICATION OF HOUSING ALLOCATIONS AND  
SAFEGUARDED LAND DESIGNATIONS AND SITES NOT PROPOSED FOR  
HOUSING OR SAFEGUARDED LAND

## **APPENDIX 4:**

Sustainability Appraisal, Scoring criteria & assessment of sites (SAP & Aire Valley AAP).

## **APPENDIX 5**

New site submissions and late representations

## **APPENDIX 6**

DPP REPORT 16<sup>th</sup> DEC



