

**Report of Chief Planning Officer**

**Report to Executive Board**

**Date: 11<sup>th</sup> February 2015**

**Subject: Site Allocations Plan & Aire Valley Leeds Area Action Plan – Site Allocation Proposals**

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: 10.4(5) Appendix number: 6	<input checked="" type="checkbox"/> Yes	<input 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 the context of the need for conformity with the adopted Core Strategy (incorporating the priorities for regeneration, economic development and growth) the focus of this report concerns the consideration of site allocations proposals, for the Site Allocations Plan (SAP) and the Aire Valley Leeds Area Action Plan (AVLAAP). These proposals have previously been considered by the Development Plan Panel on the 16<sup>th</sup> December 2014, 6<sup>th</sup> January and 13<sup>th</sup> January 2015. The attached material relates to proposed allocations for Employment, Green space, Retail, 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 and AVLAAP previously agreed by Executive Board. The purpose of this report is for Executive Board to take a view on these proposals. Subject to this consideration, the next step will be to prepare Publication documents, to be 'placed on deposit' later in 2015 (Summer/Autumn 2015) for public consultation.
2. It is relevant to note that this report is that of the Chief Planning Officer, rather than the Director of City Development. The report concerns the proposed

allocation of land for development (within the context of a Development Plan led process). This is a technical process but inevitably cuts across different landowners and landed interests, including City Council assets. Given the role and responsibilities of the Director of City Development, for the management and disposal of Council assets (and also as a Board member of Yorkshire County Cricket Club – to which some of these proposals relate), it is therefore appropriate that this report is presented by the Chief Planning Officer.

3. It should be emphasised that at this stage the Council is not creating draft plans. The proposed allocations (District wide and including specific sites as part of the AVLAAP) provide the basis for producing two draft plans, 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 Plans. 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.
4. 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.
5. The scope of the AVLAAP was established by the Executive Board in May 2005, to provide the future planning framework to guide the regeneration of an area of the Lower Aire Valley. The AVLAAP plan area extends from the South East of the City Centre, to the M1 and beyond. This is a key strategic location for the District and the City Region as a whole, as the location of the Leeds City Region Enterprise Zone and includes a range of major development opportunities including the South Bank and the City Centre. The area contains over 400 hectares of development land which can help to meet overall housing requirement for Leeds and make a significant contribution to job growth.
6. National planning guidance (the National Planning Policy Framework) 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.

7. The Council's Interim Protected Area of Search (PAS) Policy was established by Executive Board in March 2013. Given that the Core Strategy is now adopted and the Site Allocations Plan has progressed, the appropriateness of the Interim PAS policy as a means of managing the Leeds housing land supply is considered.

#### Infrastructure

8. 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. It is recognised that the provision of infrastructure presents a major challenge, in meeting a range of City Council aspirations. With regard to the Core Strategy, the SAP and the AVLAAP, the identification of locations and targets for growth, does however enable, infrastructure requirements to be quantified and planned for. This in turn provides a basis to coordinate investment decisions and bid for the necessary resources for delivery, via a range of mechanisms, including the West Yorkshire Transport Fund and other opportunities as they emerge. In July 2014, the Leeds City Region partners agreed a Local Growth Deal with government. This is intended to deliver the Strategic Economic Plan and provides the partners with government investment and new freedoms and flexibilities to direct that investment where it will benefit the local economy most. The Growth Deal includes £1bn between 2015– 2035 to deliver the West Yorkshire plus Transport Fund (WY+TF). The WY+TF will tackle many of the current transport constraints on growth. The WY+TF is a balanced portfolio of 32 prioritised schemes across West Yorkshire and York that will deliver strategic transport improvements including bus and rail infrastructure enhancements, highways junction improvements and new access roads to enable development sites. Within Leeds MD there are 12 prioritised schemes, including East Leeds Orbital Road, Leeds Bradford International Airport Link Road, Leeds City Centre Package, network efficiency improvements and a new Park and Ride facility in the Aire Valley (see Appendix 7 for the full programme). The WY+TF portfolio is supplemented by on-going DfT legacy schemes: New Generation Transport (NGT) Trolley Bus, Leeds Rail Growth Package (Apperley Bridge and Kirkstall Forge stations), Leeds Inner Ring Road Maintenance and Leeds Station Southern Entrance.

## **Recommendation:**

9. Executive Board is recommended to:
  - i) Agree the site allocations proposals set out in this report and its appendices as the basis on which to prepare the Site Allocations Plan and the Aire Valley Leeds Area Action Plan Publication Draft Plans, for consideration by the Development Plan Panel and approval of the Executive Board prior to deposit for public consultation in 2015.
  - ii) To agree the areas identified in the report for further work and to note that further refinement to the proposed allocations may be necessary in the light of the work on plan preparation and further evidence coming forward
  - iii) Agree to withdraw the Council's Interim PAS Policy with immediate effect.

## **1.0 Purpose of this Report**

- 1.1 This report seeks Executive Board's consideration and agreement of the site allocations set out in this covering report and attached documents, as a basis to prepare Publication Draft Plans for the SAP and AVLAAP (to be placed on deposit for a period of formal public consultation, later in 2015).
- 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 both plans 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 need for compliance with the regeneration, economic development and housing growth 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 (and the AVLAAP) to identify the sites to meet these needs. This is necessary to build on past success and to deliver the ambitions and principles set out in the Core Strategy. This includes the desire to maintain and enhance the distinctive settlement pattern across the District and the identity

of individual communities, the protection and enhancement of green space, the delivery of the 'Centres first' approach to retail development, the need for both quality and quantity in the provision of land for employment uses (including strategic locations such as the City Centre and the Aire Valley and local opportunities) and planning for the overall scale and distribution of housing growth. This will in turn help inform and be informed by emerging Neighbourhood Plans.

- 1.4 Once the sites to be allocated in the SAP and the AVLAAP are agreed in principle, detailed Plans will need to be drafted and agreed through Executive Board.

## **2.0 Background Information**

### Context

- 2.1 The National Planning Policy Framework (NPPF) 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 Aire Valley Leeds, which is subject to the separate AAP).
- 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.

### Site Allocations Plan (SAP)

- 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).

#### Aire Valley Leeds Area Action Plan (AVLAAP)

- 2.4 Much time has passed since the close of the last formal public consultation stage on Preferred Options in 2007 and the amended AAP boundary and designation of the Urban Eco Settlement in 2011. However, preferred allocations were included in the 2011 consultation, which was undertaken following Executive Board approval for the boundary extension granted in July 2010. These are therefore not new proposals but a refinement of the details and delivery alongside continuing to work up the detailed evidence base supporting the plan. Whilst the preparation of the AVL AAP has been a key corporate priority, emphasis has been placed on the submission and adoption of the Core Strategy. With this now in place it is necessary and timely to progress the AAP concurrent with the SAP. The preparation of these documents and their adoption will enable the District to have in place a comprehensive set of allocations for development.
- 2.5 The material before Executive Board presents the sites recommended to be allocated for various uses within the AVLAAP area. The reason for showing these sites now, without the draft plan is to enable members to consider the provision of housing, employment, green space, retail and proposals for centres in this specific geographical area as well as the SAP, is to ensure that Executive Board is able to take a view on proposed site allocations across the entire District. Both the AVLAAP and the Site Allocations Plan set out how the adopted Core Strategy targets will be met over the plan period from 2012-2028. The AVLAAP will significantly assist in meeting the housing targets for the Housing Market Characteristic Areas of the City Centre; Inner and East and in a small part Outer South.
- 2.6 The scope of the AAP will differ from that of the Site Allocations Plan, reflecting the specific role of area action plans in providing a framework for delivery of major development and supporting infrastructure and the particular focus of the AVLAAP in promoting major regeneration, housing and economic development opportunities within the context of an Urban Eco Settlement.
- 2.7 Additional proposals in the AAP will include, but not be limited to the following issues:
- Proposals to improve access to job opportunities in the Aire Valley from communities in east and south Leeds;
  - Proposals for improving public health including reference to wider public health initiative in the area (including retrofitting and energy efficiency initiatives related to existing homes and initiatives to encourage people to grow more of their own food);

- A transport strategy with detailed transport infrastructure proposals including improvements to the public transport, cycle and pedestrian network and new bridge crossings;
- Identification of locally significant undesignated heritage assets;
- Identification of a local green infrastructure network and habitat network and proposals to enhance the network;
- Proposals relating to the creation of district heating network in the Aire Valley based on the Energy Recovery Facility under construction at Newmarket Lane

- 2.8 There is a significant amount of site assessment work sitting behind the material presented to the Development Plan Panel and Executive Board. All sites considered for housing, safeguarded land and employment 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, and Ecology, Education, Public Health, and 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.
- 2.9 Within this overall context, a Sustainability Appraisal report will accompany the Publication of Draft Plans for the SAP and AVLAAP. More details of the scope of this and work undertaken to date is covered in paras. 4.1 – 4.7 of this report.
- 2.10 The material before the Executive Board presents sites to be allocated for Employment, Green space, Retail, Housing and designated as Safeguarded land. At the Issues and Options stage of the SAP and similarly Issues and Options and Preferred Options for the AVLAAP 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 Executive Board reflects the debate through consultation (including the member workshops and site visits) and all the background information described in section 2. Through the workshops, Members expressed their concern 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 work to date 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. Policy SP10 of the Core Strategy provides the framework for the

Green Belt review as part of the SAP process. Consequently, this has been integral to the site assessment and selection process, which has been undertaken to date. As far as possible and taking into account local choice, sites have been selected that provide a rounding off to a settlement or which 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. In reflecting on Green Belt issues more widely, at the 16<sup>th</sup> December Development Plan Panel meeting, members considered a report relating to Protected Areas of Search/Safeguarded land. Within the overall strategic context of the Core Strategy (including Policies SP1, SP6, SP7 and SP10) and the emerging site allocations proposals (District wide and within the Outer North East HMCA), it has been appropriate to review the 'Rural Land' designation (identified in the UDP and located within the Outer North East HMCA). In seeking to minimise the extent of overall District-wide Green Belt deletion and to review the 'Rural Land' designation in the light of the Core Strategy and SAP requirements, it is considered appropriate to seek to designate the area of 'Rural Land' as Green Belt., as part of the SAP site proposals. This recommendation was subsequently agreed at the Development Plan Panel meeting on 16<sup>th</sup> December 2014.

- 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) (also included as an item on this agenda of Executive Board and if approved, will assist in supporting the funding of infrastructure provision) 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 Plans will commence.

### **Employment**

- 3.3 The Core Strategy (Spatial Policy 9) sets out the overall requirements for general employment land (493ha) and for office floorspace (1,000,000sqm). The source of sites for initial assessment came from the Employment Land Review and a call for sites. The position on employment land is very different to that for housing. In this case much of the requirement can be met from existing allocations and permissions. Employment opportunities tend to be concentrated in well-established and key strategic locations, such as the City Centre and Aire Valley. As such, there is not a specific target for each HMCA. There is a specific target for AVLAAP; this is set out in Core Strategy Policy



SP5, which requires the AVLAAP area, to provide a minimum 250 hectares of land for a range of employment uses. An integral component of the approach is to ensure that there is an optimum balance of appropriate and deliverable sites across the District. This is necessary in order to provide a portfolio of sites that are attractive to inward investors, businesses and companies who may wish to relocate to Leeds and for local employers and employees.

#### Overall Approach

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

#### Core Strategy

- 3.7 The adopted Core Strategy provides the context for the SAP and AVL AAP:
- strategic policy direction for employment growth and
  - quantification of how much employment land is needed city-wide and within the Aire Valley area.
- 3.8 Overall, the Core Strategy encourages growth to be focussed in the Main Area and in the Major Settlements (Policy SP1). In line with national policy, office development is to be focussed in centres, with the Core Strategy expecting the vast majority of new office development to be provided in Leeds City Centre. As such, it is important that the SAP and proposals within the AVLAAP identify and allocate sufficient sites for offices in the City Centre. Locations with the best public transport accessibility should be favoured for office accommodation in accordance with Policy CC1 part a). The Core Strategy, does recognise however, that employment opportunities need to be supported in established locations (which may be 'out of centre' and have planning permissions in place), where such sites are contributing to local employment opportunities and contribute to the wider employment portfolio across the District.

- 3.9 Within the context of Core Strategy Policies SP 1 (v) and EC1, new sites for general employment (research and development, industry, warehousing and waste uses) should be allocated in the following locations:
- In accessible parts of the Main Urban Area, Major Settlements and Smaller Settlements, including sites with good access to the motorway, rail and waterway networks,
  - In regeneration areas,
  - In established industrial areas,
  - As part of urban extensions linked to new housing proposals.
- 3.10 In particular, freight storage and distribution sites are sought along rail corridors (especially the Aire Valley) and along the Aire and Calder Navigation.

#### Quantity

- 3.11 Policy SP9 of the Core Strategy sets out the quantities of office floorspace and land for general employment use (research and development, industry and distribution) needed over the plan period:
- Offices – 1,000,000sqm of floorspace is sought, made up of 840,000sqm in existing permissions, and 160,000sqm new provision in/edge of centre locations
  - General employment land – a minimum of 493ha city-wide
  - Policy SP5 requires a minimum of 250ha for a range of employment uses within the Aire Valley area

#### The Issues and Options stage of the Plan

- 3.12 Volume 1 of the Issues and Options provided an overview of how the SAP proposes to address employment needs. It set out the categories of employment use and the quantities of general employment land and office floorspace needed. It explained how the Aire Valley will provide a significant portion of Leeds' overall employment needs, but that this will be dealt with through the Aire Valley Leeds Area Action Plan (AVLAAP). The SAP will need to take account of the quantities of office and employment land that the AVLAAP is set to deliver.
- 3.13 Volume 2 of the Issues and Options subdivided the District into 11 sections covering each of the eleven Housing Market Characteristic Areas. These documents set out the need and supply position for housing and employment, and suggestions for shopping frontages and Town Centre boundaries and which green space sites should be protected. For employment, the quantity of employment sites with planning permission was calculated – these sites are proposed to be “identified” as contributing to Leeds' employment needs; these sites were coloured lime green on the maps. Another set of sites was listed with “traffic light” recommendations regarding suitability – green (good for allocation), red (not good for allocation) and amber (possible). The Council received very few public consultation responses on the employment site proposals.

### Local Member Review

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

### Proposed allocations - Summary

#### Offices

- 3.15 In terms of offices to meet the 1,000,000 sqm need figure the supply expected through the Aire Valley Leeds Area Action Plan (AVLAAP) of 208,000sqm needs to be deducted.
- 3.16 In addition, the total of “identified” office sites outside of the AVLAAP area 451,181sqm which have planning permission as of 1/4/14, or had permission at the base date of the Plan – 1/4/12, can also be deducted. These identified office sites include some sites that comprise a mix of office and housing and some sites that are wholly office. A further 65,000sqm of office floorspace capacity has been identified in the AVL AAP. These sites are set out in Appendix 1.
- 3.17 The suggested set of sites to be allocated for office development (including mixed use) is set out in Appendix 1. These allocations include some sites that comprise a mix of office and housing and some sites that are wholly office. The total floorspace for allocations outside of the AVLAAP area equates to 515,774sqm, so together with the Aire Valley and “identified” floorspace the total office supply equates to 1,174,955sqm. This is in excess of the Core Strategy target but allows for contingency and changing circumstances.
- 3.18 The vast majority of offices supply is in the City Centre, including the Aire Valley Leeds AAP, part of the City Centre. This accords with the Core Strategy’s policy to focus office provision in-centre.

#### General employment

- 3.19 In terms of general employment land to meet the 493 hectare requirement figure the supply expected through the AVLAAP of 232ha needs to be deducted.
- 3.20 Then we can deduct the total of “identified” general employment sites outside the AVLAAP area which have planning permission as of 31/11/14, or had permission at the base date of the Plan – 1<sup>st</sup> April 2012, which equates to 120.46ha. A further 152.2 ha of general employment land is “identified” in the AVLAAP. These identified general employment sites include some sites that comprise a mix of general employment and housing and some sites that are wholly general employment. These sites are set out in Appendix 1.

3.21 The suggested set of sites to be allocated for general employment is set out in Appendix 1. These allocations include some sites that comprise a mix of general employment and housing and some sites that are wholly general employment. The total quantity equates to 155.73ha, so together with the AVLAAP and “identified” land the total general employment land supply equates to 508.49ha. It should be noted that the general employment land proposed allocations, also includes provision at Thorp Arch for over 70ha (based on the developable area proposed in the planning application for 2000 dwellings). Delivery of this figure will depend upon the resolution of a number of outstanding issues and the completion of further work. This includes highways requirements, the protection of biodiversity interests (in relation to the designated SEGI) and historical character and relationship to the adopted Natural Resources and Waste Plan designations. It should be noted also that Development Plan Panel has requested that the strategic housing options within the Outer North East HMCA (i.e. the potential of Thorp Arch and Headley Hall are subject to further work – see para.3.84 below).

#### Leeds Bradford International Airport (LBIA)

3.22 Leeds Bradford International Airport (LBIA) plays an important economic role in Leeds (and to the City Region as a whole) and provides a key element of transport infrastructure. This is recognised through the Leeds Core Strategy and in particular through Spatial Policy 12. This Policy supports the important role of LBIA and provides a context for managing longer term growth, linked to the Airport Masterplan and Airport Surface Access Strategy.

3.23 Executive Board (September 2014) have recently considered issues relating to airport growth and the broad role of LBIA in providing an ‘employment hub’; in enhancing the wider economic development offer of the City. In parallel with this, consultation of the SAP Issues and Options (summer 2013) raised a specific question relating to the extent of airport growth and the implications of this for site allocations within the vicinity of LBIA. Through this process, the employment and economic benefits of the airport were acknowledged but concerns were also raised regarding the provision of infrastructure to support growth.

3.24 The West Yorkshire Combined Authority (WYCA) have committed to detailed consideration of a link road and the Department for Transport published the LBIA, ‘Connectivity Study: Option Assessment Report’ (December 2014). These proposals are however still at a very early stage and further work is yet to be undertaken. Consequently, the implications and timing of this option still needs to be considered within the context of the Airport Masterplan and Airport Surface Access Strategy. Further work is therefore needed to assess these issues and how they may impact on the scale and timing of airport growth. At this stage therefore, it is not possible to quantify what this may mean for future general employment or other airport related allocations. These matters will therefore need to be fully considered in the preparation of the Publication draft SAP and via Development Plan Panel at the appropriate time. Any eventual allocation would add to the pool of employment land and the ‘Leeds offer’, as well as providing local employment opportunities in a part of the District with a local shortfall of employment land (Core Strategy, para. 5.2.60).

## Green space

### Overall Approach

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

- Parks and gardens
- Outdoor sports provision
- Amenity green space
- Children and young people's play provision
- Allotments
- Natural green space
- City centre civic space
- Allotments
- Cemeteries, disused churchyards and other burial grounds
- Green corridors
- Private provision open to the public – e.g. Harewood House

These are the typologies used in the Open Space, Sport and Recreation Assessment. These have been used as the basis for the typologies set out in Policy G3 in the Core Strategy.

### Process

#### Initial Phase

3.26 Two sources of information relating to green space within the District have been used to initially establish which areas of green space should be protected through the SAP and AVLAAP:

- 1) Existing green space sites protected in the UDP under policies N1 (general green space), N1A (allotments), N6 (playing fields) and N5 (proposed green space) which were in a green space use at the time of the Open Space, Sport and Recreation Assessment (OSSRA) (July 2011).
- 2) Sites newly identified through the OSSRA (new areas of green space and existing green space which was not specifically protected through the UDP).

3.27 In many cases the UDP and the OSSRA green space sites do overlap, showing a continued and long standing green space use, but there are cases where boundaries are, to varying degrees, different. The presumption has been to identify the more recent boundary as identified through the OSSRA though further investigations have been undertaken in some cases to ensure boundaries shown on the SAP maps reflect the up to date situation (as at 2014). In a few cases UDP green space sites have not been identified in a green space use at all in the OSSRA either due to their size (due to more accurate measurement, some sites were found to be below 0.2ha threshold) or because they are no longer in a green space use. These sites are proposed for deletion. A table of proposed UDP deletions was included in each area volume of the SAP Issues and Options documents (June 2013).

#### Post Issues and Options

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

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

#### Comparison – UDP and proposed SAP and AVLAAP Green space

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

accessible. The plans contained in Appendix 2 (ii) show the following information by HMCA (Green space sites in relation to the AVLAAP are enclosed in Appendix 2 (iii) :

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

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

- 3.30 The OSSRA identified 76 cemeteries, disused churchyards and other burial grounds only 9 of which are protected in the UDP as N1. All 76 sites are currently identified for protection however not all these will necessarily fulfil this function therefore their typology classification will be reviewed prior to the Publication Draft SAP. In terms of the overall level of Green space provision District – wide (by HMCA), the position is summarised as follows:

**Total SAP Green space proposed for protection by HMCA**

<b>HMCA</b>	<b>Area of Green space (all typologies except private golf courses)(ha)</b>
Aireborough	219.7
City Centre	12.6
East	785.1
Inner	649.9
North	1194.9
Outer North East	350.7
Outer North West	448.2
Outer South	485.4
Outer South East	755.8
Outer South West	793.4
Outer Wes	771.3
<b>TOTAL</b>	<b>6,467</b>

Nb. due to on-going and minor revisions the total figure differs to that which was included in the 6<sup>th</sup> January DPP Report.

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

community and Member input. Within this context, the housing capacities identified in this report and supporting material, take account of the need for on site green space provision. For example, site 2062 at Red Hall, has been proposed for allocation with a housing capacity of 50 dwellings, therefore allowing for the inclusion of green space, as part of the wider proposals for the site.

### Quantity

3.32 There are a number of key ways to achieve an increase in the amount of green space. These include:

- Masterplanning – help to ensure the provision of green space is an integral part of any scheme and located in suitable positions and well designed,
- Site specific policies - give clear and robust guidance on green space provision through site-specific policies in the SAP and the Aire Valley Leeds Area Action Plan,
- New housing development – Policy G4 sets out the framework for requiring new green space provision through new development outside the City Centre. Policy G5 sets a similar framework for within the city centre. These policies greatly strengthen the focus on providing new green space on site rather than commuted sums in lieu of on-site green space and run parallel with the changes introduced from April 2015 by the CIL Regulations and the Council's CIL Charging Schedule and Regulation 123 List, whereby it will not normally be possible to seek S106 contributions for off-site green space contributions,
- New off - site provision – this is therefore only likely to arise in exceptional circumstances as part of a planning application where the Council specifically agrees to accommodate some of the required area off-site, such as at the East Leeds Extension Northern Quadrant or in regeneration areas, where there are opportunities to revitalise existing green spaces through improvements to provision,
- CIL/other grants - Other new green space outside of new housing schemes would be created through the Council's own initiatives, including using CIL funds and various other grant sources, capital receipt funding etc. Such schemes will evolve as schemes come forward and circumstances change. The SAP cannot pre-judge where and when opportunities will arise. The green space position will change over the life of the plan as new development brings forward new areas of green space,
- Neighbourhood Plans – these local level statutory plans can identify and protect Local Green Space. There are approximately 35 communities preparing Neighbourhood Plans across Leeds many of which are looking to protecting additional areas. The City Council is working closely with these groups to support their endeavours to provide new green space by providing expertise and knowledge,
- Changing typology – areas of green space in a typology in surplus could be laid out to be a typology in deficit e.g. by putting in sports pitches or allotments on an existing amenity space. Whilst this would not increase the overall supply of green space, it would help to balance over and under supply of typologies,



- Public use of private open space – there are areas of green space which are privately owned or have limited public access, such as in educational establishments. Better levels of public access should be strongly encouraged.

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

#### Quality

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

#### Accessibility

- 3.34 Communities also need to be able to get to open spaces as easily and safely as possible. The Green space Strategy aims to improve linkages to particularly community parks through working with the planning system, developers and communities. Policy G1 (Enhancing and Extending Green Infrastructure) of the Core Strategy recognises the importance of wider strategic green networks and encourages the extension of Green Infrastructure by linking green spaces. Green spaces play an important role in achieving an extensive, connected network across the District.

### **Retail**

#### Core Strategy Context

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

#### Floorspace Target

- 3.36 The Leeds City Centre, Town and Local Centres Study 2011 sets out the District's capacity for additional comparison and convenience retail floorspace over set 5 year periods until 2026.
- 3.37 The Core Strategy states that to plan for this extremely large floorspace requirement over the course of the whole Plan Period would not be justified, effective, or consistent with national policy as it would most likely result in trade being diverted from existing centres and planned investment within them being stalled. The specific reasons for this is due to the particular

circumstances in Leeds, linked to major retail development proposals, which have recently being delivered or are due for completion within the next few years.

- 3.38 The Core Strategy did not therefore adopt these targets and “...takes a cautious approach given the continuing uncertainty relating to the economic climate and the importance of delivering particular major schemes” (Core Strategy para. 4.2.3). In particular, the Core Strategy takes the approach that it is critically important that both the Trinity and Victoria Gate shopping developments are completed and the city shopping market given time to re-adjust, before major expansion of the City’s shopping floorspace is considered. A new Retail Study would then be undertaken following the completion of these major schemes, to estimate future retail capacity.
- 3.39 The Core Strategy Inspector agreed with this approach and found the plan sound.

#### Designating Centres

- 3.40 In addition to the City Centre, the Core Strategy identifies 27 Town Centres and 33 Local Centres. In para. 5.3.11 the plan states, “*Boundaries of all Centres, and their Shopping Frontages, will be reassessed through the Site Allocations Plan (and future LDF Allocations Documents as appropriate), and the scope to change their designation and proposals to extend or include new Centres to reflect retail need as a result of housing growth proposals will be considered in the interim*”.
- 3.41 The boundaries and frontages for Hunslet Town Centre will be designated through the AVLAAP. The proposed plan for Hunslet Town Centre is contained within Appendix 3 (v). The Core Strategy also proposes that a new Town Centre should be identified in the Richmond Hill area, to meet an identified foodstore deficiency. The plan stated that identifying a location would be subject to further evidence and assessment. Given that the AVLAAP identifies the Copperfields site within Richmond Hill as suitable for up to 2,000sqm retail development and that at this stage no appropriate location for a Town Centre has been found, it is proposed at this stage, that therefore the SAP will not identify a Town Centre in the Richmond Hill area.

#### Issues and Options

- 3.42 The Issues and Options consultation documents set out proposed boundaries for all Centres, Primary Shopping Areas (PSA), and Primary and Secondary Shopping Frontages for the City Centre, Town Centres and Higher Order Local Centres. For Lower Order Local Centres only centre boundaries were identified. For each centre a review of the centre boundary and survey of current uses was undertaken in order to draw up accurate boundaries and frontages. In addition, the document contained an assessment of ‘call for sites’ sites which had been submitted to us for consideration.
- 3.43 The consultation documents also set out a series of questions asking consultees for their views on 1) the subdivision of large stores, 2) proposed Centre and Primary Shopping Area boundaries, 3) proposed frontage designations, 4) the ‘call for sites’ sites, 5) any other sites that suitable for

retail development. In addition the City Centre consultation document asked a series of questions, specifically related to City Centre retailing issues.

Process for arriving at this stage

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

Changes made

- 3.45 Following the analysis of representations received and the Member workshop sessions and consideration by the Development Plan Panel, the proposals set out as part of the Issues and Options document are largely unchanged. However, there are some changes in relation to particular Centre Boundaries, Primary Shopping Areas and Shopping Frontages which reflect up to date evidence of the form and function of the District's Centres and have resulted in adjustments to certain boundaries and frontages. Plans of Centres with proposed changes (with the exception of the City Centre which is contained within Appendix 3 (ii)) are contained within the Appendix 3 (in); all other Centres are as proposed within the Issues and Options, which have not been subject to change, are enclosed within Appendix 3 (iii) for completeness. The Centres that have been subject to change following the Issues and Options consultation stage are as follows:

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

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

### Retail Opportunity Sites

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

### Large Store Units

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

### Leeds City Centre

- 3.49 The City Centre Boundary remains unchanged from the Issues and Options consultation report, which is a reflection of the approach adopted in the Core Strategy. The Primary Shopping Area remains unchanged from the Issues and Options consultation report.
- 3.50 Following the City Centre HMCA Members workshop it was agreed that the SAP should adopt a different approach to shopping frontages within shopping centres (such as Trinity and the Merrion Centre), than shopping frontages on streets. This approach was suggested as a preferred approach through the Issues and Options consultation report and it is proposed that this approach should be carried through to the Publication stage. It is proposed that shopping centres will be characterised as either Primary or Secondary Shopping Centres and a blanket percentage of total internal frontages will be applied to the shopping centre (either over the whole centre, or across an individual floor where specified). This will allow for a greater degree of flexibility for shopping centre owners but will still ensure that they retain a strong A1 retail function, at either 80% or 50% depending on a Primary or Secondary designation. On-street Shopping Frontages remain unchanged from those consulted on within the Issues and Options consultation report.
- 3.51 Appendix 3 (ii) shows the boundaries and frontages for Leeds City Centre. Shopping Centres have been identified indicatively, as further work is required to draw precise shopping centre boundaries. This will be completed as part of the finalised Publication document. Details of the wording of Shopping Frontage guidance/policy will also be developed in the preparation of the Publication document. Also contained within appendix 3 (iii) are the 4 Local Convenience Centres within Leeds City Centre. These remain unchanged from Issues and Options.

### Call for Sites

- 3.52 Sites submitted for retail consideration under the 'Call for Sites' has not been progressed to allocation. This reflects the Core Strategy approach to future

retail expansion. A full list of the 'Call for Sites' sites is contained within Appendix 3 (iv).

## **Housing**

### **Core Strategy**

- 3.53 The identification of housing allocations in the SAP and site specific sites within AVLAAP 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 then sets out the following principles:
- (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 Hawksworth 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,
  - (ix) To encourage potential users of rail or water for freight movements to locate at suitable sites.
- 3.54 The total amount of housing to be accommodated is set out in Spatial Policy 6 (SP6) as 70,000 (net) new dwellings 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 for housing 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.

3.55 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 Area*	30,000	3,300	45%	5%
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

<b>Housing Market Characteristic Area</b>	<b>Number</b>	<b>Percentage</b>
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>

- 3.56 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.
- 3.57 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.

- 3.58 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.
- 3.59 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 Plan Progress to Date

- 3.60 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.
- 3.61 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).
- 3.62 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 4 (i) gives the total capacity from identified sites for each HMCA.

- 3.63 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 3.65, 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.
- 3.64 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.
- 3.65 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), local preference (from the representations received at the Issues and Options public consultation), 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 Executive Board today.
- 3.66 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 over provision in one area can help to make up the shortfall in an adjacent area. Column 5 on Table 1, Appendix 4 (i) gives the total capacity from allocated housing sites for each HMCA.
- 3.67 Specific details of the sites and proposals for each area are given at Appendix 4 (iii) (1 – 11 for each HMCA). Appendix 4 (i) 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

3.63) 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 4 (iii), with the reason, together with the previous colour coding at Issues and Options stage.

#### Infrastructure and site requirements

- 3.68 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 on-going work includes:

#### Transport modelling

- 3.69 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

- 3.70 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 4 (ii) 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 4 (iii). A full background paper on schools provision will be produced to accompany the Publication Draft Plan. As emphasised in this report, the provision of school places is a major challenge for the City Council and is subject to further work and the appraisal of options. For example, within the wider East Leeds, potential options need to be appraised to ensure that schools and the cost of school places are fairly apportioned between providers and developers, across the area as a whole.

#### Flood risk

- 3.71 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

- 3.72 As part of the ongoing 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.
- 3.73 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

- 3.74 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, (all areas).**

<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	29686	30000	-1
Main Urban Area	Extension	5241	3300	59
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	

3.75 At SAP Issues and Options stage, as an alternative option within the Outer North East HMCA, a site at Spen Common Lane/Headley Hall, 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.3.58 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 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, excluding the Outer NE area.**

<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	29011	27600	5
Main Urban Area	Extension	5241	3036	73
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	

- 3.76 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 Table 1 of Appendix 4 (i). 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 HMCA's. 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.
- 3.77 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)**

- 3.78 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), 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 be distributed and designated, consistent with national guidance.

3.79 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>		

3.80 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.

- 3.81 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.
- 3.82 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. Members are also directed to paragraphs 4.15 to 4.20 below which set out recommendations for the Council's interim PAS release policy.

#### Outstanding Matters

- 3.83 Whilst every effort has been made through the member workshops, meetings of the Development Plan Panel and ongoing technical work to resolve a wide range of issues, it is perhaps inevitable that given the scale and complexity of the material, a number of matters are outstanding at this stage. These are:
- i) Leeds Bradford International Airport (LBIA)  
As highlighted above, LBIA performs an important infrastructure and economic role in Leeds and the City Region. However, in order to determine if longer term airport growth requires changes to Development Plan designations (including the Green Belt boundary and PAS), further work is necessary to consider the evidence base and implications.
  - ii) Weetwood (Site 3376)  
Within the context of proposals for housing (and green space), Development Plan Panel has considered the merits of developing this site as a housing allocation. This site is currently green space and is located in the Green Belt, immediately adjacent to the Main Urban Area. At Development Plan Panel a number of policy issues were considered in relation to this site, together with its potential to facilitate enabling development, in support of the refurbishment of Yorkshire County Cricket Club (as a basis to retain International Test Match status). It was concluded by the Development Plan Panel that further information was necessary to consider the merits of this proposal. It should be noted also that site 1143B (Old Thorpe Lane, Tingley) has been suggested

along with site 3376 as enabling development. However, notwithstanding this, this site was a “Green” site at SAP Issues and Options stage and is considered suitable in principle as a housing allocation.

iii) Outer North East HMCA, Thorp Arch (Site 1055 A/1055B) and Headley Hall (Site 3391)

At the Development Plan Panel meetings of the 6<sup>th</sup> and 13<sup>th</sup> January, members considered potential development proposals at Thorp Arch and across the Outer North East HMCA. At the 6<sup>th</sup> January meeting, it was considered that Thorp Arch had the potential to make a significant contribution to general employment land across the District. In considering the strategic issues relating to the use of brownfield land, the potential scale of Green Belt release and the merits of Headley Hall as a new settlement in contributing to the overall level of housing provision within the HMCA, Development Plan Panel requested that further work should be undertaken to review the strategic housing options within this area in relation to the potential for housing at Thorp Arch (as part of a mixed use proposal) and the scale of Green Belt release at Headley Hall.

- 3.84 At the Development Plan Panel meeting on 13<sup>th</sup> January, members raised issues concerning a site south of the A65 at Horsforth (site 4240). Officers, including from Children’s Services and Highways responded and the outcome is that the site is included as a recommended housing allocation. Subsequent to the Panel meeting, the Council has received correspondence suggesting that the site should not be considered as it was among a list of sites in the Horsforth area which have been put forward anonymously. However, it should be noted that the site is identified as a possible option for allocation in a representation submitted as part of the SAP Issues and Options consultation in summer 2013. It has subsequently been considered through the SHLAA 2014 update and through the review of alternatives through the Member workshops and at Panel on 13<sup>th</sup> January. As such it is considered appropriate that it remains part of the pool of sites for consideration by members as part of this report.
- 3.85 Further, and following the Development Plan Panel meeting on the 13<sup>th</sup> January, in response to an issue raised by a local ward member in relation to Site 1178A (Dunstarn Lane, Adel), it has been necessary to review the boundary and site capacity to ensure consistency with the details set out at the SAP Issues and Options stage. This amendment is therefore incorporated in Appendix 4 (iii) and reflected in the overall housing totals for the North HMCA, shown in Appendix 4 (i).
- 3.86 A late submission suggesting 2 sites for consideration for housing has been received from Bradford Council. Site 5169, Woodhall Road, Pudsey is 1.22ha in size with an estimated capacity of 38. Site 5170, land at Sunnybank Lane, Pudsey is 3.49ha in size with an estimated capacity of 92 dwellings. Both sites are within the current green belt and site 5169 is designated as N6 playing field on the UDP. Site 5170 forms a northern extension to site 1201, Woodhall Road, Gain Lane, which is proposed for allocation for housing



(7.4ha, 193 dwellings), and site 5169 is an extension to the north of site 4047, Bradford Road, Sunnybank Lane (0.59ha, 19 dwellings). Bradford Council are considering an employment use on a site adjacent on Gain Lane and the sites proposed would be affected by highway improvements necessary to get to the employment site. This material has been included in Appendix 4 (iv) for completeness but due to the late receipt of these site details, site assessments have not yet been completed and it was agreed at Development Plan Panel (13<sup>th</sup> January) that ward member views should be sought.

#### **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 and the AVLAAP. Proposals contained in both plans 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). Appended to this report (Appendix 5) is the Sustainability Appraisal (SA) of proposed sites for the SAP and AVLAAP. This work follows on SA work undertaken at earlier stages of plan preparation.
- 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.

##### SAP - Work undertaken following 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, with on-going work being undertaken to complete outstanding site assessments. Appendix 5 provides the revised scoring criteria used to assess the proposed housing sites against the 22 SA Objectives and the schedule of sites.

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 on-going 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 4 (iv). New sites are also included on the plan and schedule of sites at Appendix 4 (iii). It should be noted however that some further late information has been received concerning some new i.e. additional sites (reported verbally to Development Plan Panel on 13<sup>th</sup> January). These sites are yet to be fully assessed but are listed (along with site plans) at Appendix 4. (iv) for completeness. In some cases we have not yet received comments back from infrastructure providers on sites, as they were submitted more recently. The site assessments will therefore be added to over time. Appendix 4 (iv) 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 3.65 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 4 (iii)).

#### Duty to Co-operate

- 4.13 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.

- 4.14 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 submitted for examination 12 <sup>th</sup> December 2014, 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 on-going 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)

#### Status of the Interim Policy on Protected Areas of Search

- 4.15 On 13 March 2013 Executive Board agreed an interim policy to release some Protected Areas of Search (PAS) for development in advance of the SAP. This was in the context of the publication of the NPPF, the need for the Council to strengthen its five year housing land supply and to provide a broader diversity of sites to ensure choice and competition for land. This was only one of a number of measures and initiatives introduced by the Council to significantly boost housing supply and stimulate the housing market at a time when the Core Strategy had not completed examination and work on the SAP had only addressed Issues and Options. Many of these measures, including Council initiatives such as Council House building and returning empty properties to use, are helping to boost supply and signs are that the housing market is recovering.
- 4.16 The introduction of the interim policy (IP) was unsuccessfully challenged by Miller Homes in the High Court in January 2014. The court upheld the policy as lawful, but this is now the subject of an appeal to the Court of Appeal with a hearing due in March 2015. Significantly, since the introduction of the IP, the Core Strategy has now been adopted and work on the Site Allocations Plan

has progressed with the publication of proposals for housing allocations before Executive Board today for agreement to form the basis of a SAP and AVLAAP. The IP was only ever intended to provide an interim measure, in effect to bridge the time interval until the SAP had progressed. This is noted in the judgment in the Miller Homes case. At para 13 it is said;

“The Defendant’s intention is that once the draft Site Allocations DPD is published the purpose of the Interim Policy will be finished, since the Defendant will have clarified which specific sites (including PAS sites) it supports/does not support for development”.

Given the time limited nature of the IP and within the wider context of significant progress being made on the site allocations proposals, it is therefore important to consider the appropriateness of the IP as a means of managing the Leeds housing land supply. This is necessary in order to ensure that the City Council is in a robust position in delivering the strategic objectives of the Core Strategy and the corporate priorities set out in City Priority Plans and the Best Council Plan.

- 4.17 Following its introduction, the criteria contained in the IP have been applied in the determination of planning applications, as part of a consistent approach. Relevant planning applications have been considered on their merits as part of which they have been considered against the criteria of the IP which has provided support for their release or not at that time.
- 4.18 As set out in this report, the site allocations proposals before Members today are based on detailed investigation, comparative assessment and sustainability appraisal which has included as part of this process detailed analysis of criteria very similar in substance to those identified in the IP. Consequently, the IP has therefore largely served its purpose (in supporting and defending the release of sites) and has arguably been superseded by the proposals set out elsewhere in this report in relation to the identification of future housing land supply and designation of future PAS. The underlying principles of the IP were to support a managed release of appropriate sites taking into account local circumstances such as scale, sustainability, infrastructure and the operation of draft Core Strategy policies e.g. the settlement hierarchy. These principles underpin the Site Allocations work and will continue to be used in considering the merits of sites which may come forward in advance of the adoption of the SAP.
- 4.19 Therefore, if the Executive Board agrees the site allocations proposals to form the basis of the preparation of the draft SAP (and AVLAAP) and that the IP is withdrawn the Council will determine applications on PAS sites having regard to all material considerations including:
  - i. The decision of Executive Board on the proposed status of the sites in the SAP (and AVLAAP)
  - ii. The Adopted Core Strategy policies, in particular on sustainability, location, settlement hierarchy and phasing

- iii. The National Planning Policy Framework, including: i) “that planning permission for the permanent development of safeguarded land should only be granted following a local plan review which proposes the development”<sup>1</sup>, ii) Core Planning Principles, including on the importance that plan-making should “be genuinely plan-led, empowering local people to shape their surroundings”<sup>2</sup>, iii) the issue of prematurity in advance of the Site Allocations Plan<sup>3</sup> and iv) the weight to be attached to emerging plans, including the “extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given)”<sup>4</sup>
- iv. Evidence about local land supply
- v. Emerging Site Allocations Plan evidence (and AVLAAP), in particular on the sustainability and infrastructure needs / context of sites
- vi. Site specifics

4.20 The Council’s ability to defend the release of inappropriate sites at any given time is affected by the operation of the NPPF and the requirement for the maintenance of a 5 Year Supply (5YS). This does not automatically mean that sites are inevitably going to be lost to development in the absence of a 5YS as site specific issues often have more weight, but the importance of maintaining a deliverable 5YS is highly material. A review of the 5YS and SHLAA is underway and progress will be reported to Development Plan Panel in due course.

4.21 If the recommendation to withdraw the IP is agreed, it will be necessary to inform the Secretary of State in relation to the 2 recovered appeals – Bagley Lane and Grove Road (current deadline of 30th March 2015 for the Bagley Lane decision and 15<sup>th</sup> June for Grove Road). Neither site is proposed for allocation in the SAP but is retained as PAS which is consistent with the Council’s earlier approach, therefore it is difficult to see how this action would be likely to make a material difference to the chances of a successful outcome on the appeal although it might lead to some delay in the decision. It should also be noted that the removal of the IP will have an impact on the Court of Appeal case to be heard in March. The appellants would be notified that the Council had withdrawn the IP because of the publication of the site allocation proposals to form the basis of draft SAP and AVLAAPs and in the light of this it is difficult to see why the case would proceed.

4.22 As set out above, the interim PAS policy was introduced within particular prevailing circumstances and has now been reviewed within the wider context of the adoption of the Leeds Core Strategy and significant progress being made on the identification of site proposals in relation to the SAP and AVLAAP. On the basis of this overall consideration and advice, it is considered that the interim Policy should be withdrawn.

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<sup>1</sup> NPPF, para 85

<sup>2</sup> NPPF, para 17

<sup>3</sup> Including as set out in the National Planning Practice Guidance

<sup>4</sup> NPPF, para 115

## **5.0 Corporate Considerations**

### **5.1 Consultation and Engagement**

- 5.1.1 As outlined in paras. 4, 5 and 2.4 above, following consideration by Development Plan Panel and Executive Board, the SAP and AVLAAP have been subject to wide ranging consultation and engagement activity. The SAP – Issues & Options, was 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. The AVLAAP last formal public consultation stage on Preferred Options in 2007 and the amended AAP boundary and designation of the Urban Eco Settlement in 2011.
- 5.1.2 The consultation on the SAP 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 (for the SAP and AVLAAP) 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, Public 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 Following consideration of the SAP and AVLAAP material at the Development Plan Panel meetings of the 16<sup>th</sup> December 2014 and 6<sup>th</sup> and 13<sup>th</sup> January 2015, overall it was agreed to support the site allocations proposals and to recommend to Executive Board that these provide the basis to prepare Publication draft plans for deposit in 2015. In making this recommendation Development Plan Panel agreed that in a number of specific areas (see para. 3.84) further work was needed and that taken as a whole, further refinement may be needed to proposals in the light of on-going technical work. Development Plan Panel agreed also, that the proposals at this stage are not being agreed for public consultation but that they would be subject to public consultation later in 2015, once the draft plans had been prepared.
- 5.1.4 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 for the SAP and AVL AAP. 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.

5.2.2 Against the context of the Core Strategy and the EIA Screening, EIA Screening of the SAP and AVLAAP has been undertaken. A key dimension of this is the extent to which the SAP is taking forward, through site specific allocations, the policy principles set out in the Core Strategy and their translation into specific locations and site requirements. Consequently, integral to this approach is the desire to propose Employment, Green space, Retail (Town & Local Centre boundaries) and Housing sites for allocation, to meet the strategic objectives set out in the Core Strategy. Within this overall context, the AVLAAP focusses specifically upon the delivery of regeneration Policies SP4 and SP5 of the Core Strategy, which seek to tackle issues in relation to the need to improve housing quality, access to employment and skills development, enhancing the local environment and improving local facilities and services. An important aspect of this approach and an important matter raised through public consultation and engagement with members, has been the need to meet the infrastructure requirements associated with development proposals. This is a major challenge for the City Council and for the District as a whole. However, within this context the preparation of the SAP and the AVLAAP provides an opportunity to identify infrastructure requirements (such as school places) and for these to be coordinated and phased with site proposals and requirements.

## **5.3. Council Policies and City Priorities**

5.3.1 As outlined above, the SAP and AVLAAP are 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 these Plans are key mechanisms 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 and AVLAAP.

#### **5.4 Resources and value for money**

5.4.1 The SAP and AVLAAP are 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 plans are 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 both plans 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 and AVLAAP will follow the statutory development plan process (Local Development Framework). The report is not eligible for call in, in line with the Executive and Decision Making Procedure Rule 5.1.2 – the power to call-in decisions does not extend to those being made in accordance with the Budget and Policy Framework Procedure Rules.

5.5.2 The information contained in Appendix 6 is exempt under Access to Information Rule 10.4 (5) as it contains information in respect of which a claim to legal professional privilege could be maintained in legal proceedings. It is considered that the public interest in maintaining the content of Appendix 6 as exempt outweighs the public interest in disclosing the information.

5.5.3 In line with current regulations it is a requirement to publish a notice on the Council's website 28 clear days before the related meeting, providing details of any items where a report has an exempt section/appendix and as such will be considered by the Executive in private. In line with this requirement, the required notice was published ahead of the deadline for the private consideration of an exempt appendix associated with this report at the 11<sup>th</sup> February 2015 Board meeting. However since that time, the reasons why the appendix is required to be considered in private and the relevant Access to Information Procedure Rule have been updated.

5.5.4 With this in mind, and to ensure consistency with the Executive and Decision Making Procedure Rules, approval to the updated details within the notice has

been obtained from the Chair of the relevant Scrutiny Board, together with confirmation that the Scrutiny Chair is agreeable that this matter needs to continue to be considered at the February Executive Board meeting.

## **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. It should be noted also that progress in the preparation of the Site Allocations Plan and AVLAAP, is being monitored via the City Development Risk Register on a quarterly basis.

## **6.0 Conclusion**

6.1 Within the context of the adopted Core Strategy, the SAP Issues and Options consultation, various consultation stages on the AVLAAP, the Member's workshops (June – December 2014) and on-going technical work, this report sets out proposed allocations for Employment, Green space, Retail, Housing and safeguarded land/PAS designation. These proposals are not for public consultation at this stage and following consideration by the Development Plan Panel are now before Executive Board, as a basis to prepare a draft Plans 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 Plans.

## **7.0 Recommendation:**

7.1 Executive Board is recommended to:

- i) Agree the site allocations proposals set out in this report and its appendices as the basis on which to prepare the Site Allocations Plan and the Aire Valley Leeds Area Action Plan Publication Draft Plans, for consideration by the Development Plan Panel and approval of the Executive Board prior to deposit for public consultation in 2015.
- ii) To agree the areas identified in the report for further work and to note that further refinement to the proposed allocations may be necessary in the light of the work on plan preparation and further evidence coming forward

- iii) Agree to withdraw the Council's Interim PAS Policy with immediate effect.

## 8.0 Background Documents<sup>5</sup>

8.1 None

## 9.0 Appendices

Appendix No.	Title
<b>1. Employment</b>	
1. (in)	Employment Site Schedule (General Employment & Office)
1. (ii)	Employment Sites by HMCA Areas
1. (iii)	Aire Valley Leeds AAP Employment Sites
<b>2. Green space</b>	
2. (in)	UDP Green space Proposals for Deletion (with Plan)
2. (ii)	HMCA Plans – SAP Green space for Allocation
2 (iii)	Aire Valley Leeds AAP Existing Greenspace Sites
<b>3. Retail</b>	
3 (in)	Plans of Town & Local Centres with Changes post Issues & Options consultation
3 (ii)	City Centre Frontages and Local Convenience Centres
3 (iii)	Plan of Town & Local Centres which have not changes since Issues & Options consultation
3 (iv)	Retail Call for Sites
3 (v)	Hunslet Town Centre Map (Aire Valley Leeds AAP)
<b>4. Housing</b>	
4. (in)	Table 1 Proposed Housing Allocations and sites identified within each HMCA
4. (ii)	Schools Provision
4. (iii)	Sites proposed for allocation, sites proposed as safeguarded land, and sites not proposed for allocation for housing or safeguarded land (with Plans by HMCA area and Aire Valley Leeds AAP Proposed Allocations).
4. (iv)	Schedule of new sites and suggested boundary alterations
<b>5. Sustainability Appraisal</b>	
5.	Sustainability Appraisal of Employment, Green space, Retail & Housing

<sup>5</sup> The background documents listed in this section are available to download from the Council's website, unless they contain confidential or exempt information. The list of background documents does not include published works.

	sites

<b>6. Protected Areas of Search</b>	
6.	Not for Publication – This appendix is exempt under Access to Information Procedure Rule number 10.4(5)
<b>7. West Yorkshire Plus Transport</b>	
7.	West Yorkshire Plus Transport Fund (WY + TF) Programme (Leeds)