

# LEEDS CITY COUNCIL - Core Strategy : Early

Rep No    Representor                      Representor comments

## Question

### Question 01                      Do you agree with the key objectives of the Core Strategy?

0012	Horsforth Civic Society	Yes
0020	Scholes Community Forum	No
0026	Leeds HMO Lobby	Broadly support objectives
0033	Miss Pauline Johnson	Yes
0042	The Oulton Society	Yes
0046	Environment Agency	Yes
0052	Natural England	No. The first point 'protect, enhance and manage the environment' should also include 'and natural resources'.
0063	David Wilson Homes Northern	yes
0083	Caddick Developments Ltd	yes
0092	Home Builders Federation	Yes
0095	Government Office for Yorkshire and the Humber	<p>Number/range of Spatial Options (Scenarios) Options must be realistic (eg accord with National Policy unless good reason), offer genuine choice and be adaptable to changing circumstances.</p> <p>Vision and Potential Options The vision should be expanded carrying forward the spatial aspects of the community strategy &amp; describing what Leeds will be like. It should provide the framework from which the spatial objectives can link.</p> <p>The options are too general &amp; need to be more specific to Leeds, having regard to the regional context.</p>
0099	English Heritage	Broadly support the vision - in particular the 1st bullet point relating to the protection and enhancement of the environment. Given the recognition of the distinctive character of the city to its continued economic well-being, the reinforcement of local distinctiveness should be specifically recognised within the vision of the Core Strategy. Would suggest that first bullet point reads 'Protect, enhance and manage the environment in order to reinforce the distinct identity of Leeds'.
0210	CPRE Leeds District Group	Yes
0480	East Leeds Extension consortium companies (via Dacre Son & Hartley)	Yes agree, but timetable should be 2010 to 2025 and Key Diagram begin with Adopted UDP as the starting point.

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Rep No	Representor	Representor comments
0787	Land Securities (via David Lock Associates)	Yes
0845	Leeds Initiative	Yes
0948	Yorkshire Water Services	Yes
0957	Pool Parish Council	Yes
1780	Montpellier Estates	Yes
1960	Leeds City Council	Yes
1982	Sport England	yes
2064	Keyland Developments Limited	Yes
2068	Skelton Business Park Ltd (via Skelton Business Park)	Yes
2080	RSPB Northern England Region	Yes
2373	Leeds Tenants Federation	yes
2425	Leeds City Council	Yes
2533	Ms Mary Kimble	Yes
2544	Carter Jonas LLP	Yes  Welcome adoption of the Community Strategy Vision as the CS Vision. This should help promote positive growth across the Leeds district, including the continuation of current thriving markets and support for areas in need of regeneration
2612	Mr Martin Staniforth	Yes
2656	CPRE	Yes
2668	Leeds City Council	No, see below.
2669	KPMG	yes
2670	Federation of Small Businesses	yes
2671	Mr Kenneth Ward	yes
2672	Leeds City Council	Yes

**Question 02 Do you agree with the five overarching themes for the Core Strategy?**

0012	Horsforth Civic Society	Yes
0020	Scholes Community Forum	Yes
0026	Leeds HMO Lobby	Support five key themes
0033	Miss Pauline Johnson	Yes
0042	The Oulton Society	Yes
0046	Environment Agency	Yes
0052	Natural England	No
0063	David Wilson Homes Northern	yes
0083	Caddick Developments Ltd	yes
0092	Home Builders Federation	No - housing is split into 2 themes - new devt and providing for communities
0099	English Heritage	Agree with the choice of themes in the Core Strategy - however the diagram is a bit misleading. All the themes are interconnected!
0210	CPRE Leeds District Group	Yes
0337	Aire and Calder Rivers Group	Yes
0480	East Leeds Extension consortium companies (via Dacre Son & Hartley)	Don't agree. They are too woolly. Four themes recommended: 1. The Environment, 2. Providing for Communities (including new housing), 3. A well connected city, and 4. The Economy. Regeneration should be cross-cutting throughout the 4 themes. General housing & affordable housing should be united in one theme.
0787	Land Securities (via David Lock Associates)	Yes
0845	Leeds Initiative	No
0948	Yorkshire Water Services	Yes
0957	Pool Parish Council	Yes
1780	Montpellier Estates	Yes
1960	Leeds City Council	Yes
1982	Sport England	yes
2064	Keyland Developments Limited	Yes

Rep No	Representor	Representor comments
2068	Skelton Business Park Ltd (via Skelton Business Park)	Yes
2080	RSPB Northern England Region	Support inclusion of "the Environment" as an overarching theme
2373	Leeds Tenants Federation	yes
2425	Leeds City Council	Yes
2533	Ms Mary Kimble	Yes
2544	Carter Jonas LLP	<p>Yes</p> <p>Support structuring the Vision into five interconnected themes. This acknowledges need to consider issues in a holistic way and to measure outcomes strategically. The Vision for the CS needs to more clearly set out the future for the District of Leeds and how the Council foresees the District to look in 2020. Should include specific information on growth and function of various settlements within the District and set out clear and tangible goals to form basis for development of particular policies and proposals that will enable Council to realise ambitions through careful monitoring and review.</p> <p>The term 'new development' should be replaced with something more apt. It does not provide enough focus or direction, as there is no indication as to purpose of 'new development' or what it might achieve initial caption. Suggest 'social and economic development' 'building for change' or 'building for growth' might be more appropriate.</p> <p>In future consultations LCC should highlight need to review current policy approaches as part of LDF process. Any consultation should also discuss thoroughly the pros and cons associated with each option and make it clear that there is scope to implement variations of each option. Should also reiterate need to weigh one policy objective against another in order to achieve balanced and sustainable approach towards meeting development need of the District.</p>
2612	Mr Martin Staniforth	Yes
2656	CPRE	Yes
2668	Leeds City Council	Yes
2669	KPMG	yes
2670	Federation of Small Businesses	yes
2671	Mr Kenneth Ward	yes
2672	Leeds City Council	Yes

**Question 03 Are there any other major themes which you think should be covered by the Core Strategy?**

0012	Horsforth Civic Society	Little in the document relating to the well connected city. Little consideration of transport expansion and its likely impact.
0020	Scholes Community Forum	Promoting an inclusive society in which all citizens of Leeds participate in decision making.

Rep No	Representor	Representor comments
0033	Miss Pauline Johnson	Care needs to be taken so the mistakes of the 1960s are not repeated - e.g. demolition of older housing and replacement with tower blocks. Communities were destroyed and housing problems created.
0042	The Oulton Society	Important to provide new jobs for local people to reduce the need for increased numbers of migrants from outside the entering the city. Encourage the provision of creche facilities particularly for single parent households.
0052	Natural England	The environment should also include natural resources, this would then pick up the 4th element of sustainability as set out in PPS1.
0063	David Wilson Homes Northern	Yes – a sustainable pattern of development – whilst this is included in some of the major themes it requires bringing together under a single heading. Furthermore, the Core Strategy needs to consider Leeds as a series of places (not a single place) set in the context of the City region.
0092	Home Builders Federation	Yes - the Leeds City Region Development Plan Doc should be referred to in the discussion re major themes.
0210	CPRE Leeds District Group	There is a danger of concentrating on the grand gestures and eye-catching features of regeneration. Capital expenditure is dramatic and easy, sound management to ensure a proper return needs skill and persistence. Appreciation and implementation of this must be embedded in the strategy. So, too, must be a sensitive and effective policy to provide employment for the sectors of the Leeds population which have the highest levels of unemployment; an unglamorous but essential aspect of any lasting regeneration.
0480	East Leeds Extension consortium companies (via Dacre Son & Hartley)	Yes, the LCR Development Plan (Nov 06), its growth & infrastructure plans should be added.
0787	Land Securities (via David Lock Associates)	N/A
0845	Leeds Initiative	What about 'working with communities' not just 'for communities', sounds far too 'top down', exclusive and irrelevant to many people in Leeds. I want to know how you are going to bring this to life - involve, engage, be creative – so people are interested. Needs more emphasis on narrowing the gap on the themes on pp.10. People and communities need to know how this affects them, where they can have a say and how this will impact on them having access to services etc. to improve their employment, health, wellbeing and community.
0960	Leeds Chamber Property Forum	Welcome strategy which encourages regeneration and improvement of Leeds.
1780	Montpellier Estates	Agree that objectives should mirror the 3 objectives of the Leeds Initiative. Broadly agree with the inter-connecting themes - but diagram should be altered to reflect that 'providing for communities' reflects both the residential and business community. Policies which underpin economic development area also relevant for communities generally.
1982	Sport England	no
2064	Keyland Developments Limited	No. It is the linkage between themes that is key and there is a need within the strategy to develop joined up thinking on the many issues. There must be a realistic assessment of deliverability and viability across the themes if the strategy is to be anything more than an aspirational wish-list.
2068	Skelton Business Park Ltd (via Skelton Business Park)	Key objectives and overarching themes must be translated into realistic policies and allocations. The CS requires a focus upon achieving delivery and viability. A failure to secure delivery will mean that the CS becomes an aspirational policy document only.
2080	RSPB Northern England Region	Sustainability should underlie all of the Core Strategy's policies.
2373	Leeds Tenants Federation	More affordable homes to be built alongside whichever strategy or scenario you go for.

Rep No	Representor	Representor comments
2533	Ms Mary Kimble	Making Leeds a leader in sustainable development. Solving the congestion problems with light rail. Making low emissions zone and requiring buses to be low emission and tailpipe at roof, not street level
2612	Mr Martin Staniforth	Cultural regeneration
2668	Leeds City Council	Providing Leeds as a competitive European city is virtually meaningless. Why not a world city? What does competitive means anyway? Governments set the framework not cities. Narrowing the gap is mere epithet. One can narrow the gap by praising down the successful ... the gap is narrowed.
2669	KPMG	More focus on outward (from the city) facing initiatives and profile raising.
2671	Mr Kenneth Ward	The Core strategy should be reviewed at intervals to ensure that it is in line with current thinking and requirements. I appreciate that this is no easy matter where long term decisions have to be made.
2672	Leeds City Council	New economic thinking needed to alleviate climate change and to induce greater prosperity for Leeds inhabitants. Plus the need to reduce our overall impact globally on resource and material over-consumption.

**Question 04 Does this section set out the right issues with regards to the environment?**

0012	Horsforth Civic Society	Yes
0020	Scholes Community Forum	Yes
0033	Miss Pauline Johnson	Yes
0042	The Oulton Society	Yes
0046	Environment Agency	No
0052	Natural England	<p>No. The natural environment and rural communities act (2006) places a 'duty to conserve biodiversity' on local authorities. In addition, PPS9 sets out key principles that LPAs should adhere to in order to ensure that biodiversity and geological conservation are fully considered - needs to be incorporated into this section.</p> <p>Climate change - LCC should be setting a target of zero carbon emissions from developments and having a target of reducing the carbon footprint of the Authority areas by using the REAP data and monitoring.</p> <p>The natural environment - should not be about balance between economic growth and protection/enhancement of the natural environment, but growth that will benefit both. Leeds should be looking to develop within the environmental capacity of the area.</p> <p>Built environment - design should relate to local distinctiveness. Green infrastructure corridors should link built environment with the surrounding natural environment.</p> <p>Minerals and resource/waste management - recycling of material as well as alternatives relating to primary mineral resources should be encouraged</p>
0060	Highways Agency	No
0063	David Wilson Homes Northern	Yes
0083	Caddick Developments Ltd	yes

Rep No	Representor	Representor comments
0092	Home Builders Federation	Yes
0095	Government Office for Yorkshire and the Humber	The Environment Consider the supplement to PPS1 (Dec 06 for consultation). For minerals, check para 2.11 of PPS12, MSP1 & practice guide. For waste, check para 16 of PPS10.
0099	English Heritage	Broadly agree with the issues raised.
0210	CPRE Leeds District Group	Yes
0337	Aire and Calder Rivers Group	Yes
0480	East Leeds Extension consortium companies (via Dacre Son & Hartley)	Yes, but Figs 1 & 6 concerning the environment & major constraints should be fed into the Alternative Options paper to define areas in need of environmental protection and areas likely to flood.
0787	Land Securities (via David Lock Associates)	Yes
0948	Yorkshire Water Services	Yes
0957	Pool Parish Council	Yes
1780	Montpellier Estates	Yes
1933	Metro	Yes
1960	Leeds City Council	Don't know
1982	Sport England	yes
2064	Keyland Developments Limited	Don't know
2068	Skelton Business Park Ltd (via Skelton Business Park)	No

Rep No	Representor	Representor comments
2080	RSPB Northern England Region	<p>Support potential options</p> <p><b>Climate Change</b> Encourage LCC to require buildings to be constructed to EcoHomes of BREEAM 'excellent' standard and to set ambitious targets for on-site renewable energy generation within new developments, and adopt policies that facilitate use of such technologies in existing buildings. The Core Strategy should direct development away from locations which could increase risk of flooding (on site or elsewhere) or inhibit natural water stage function of floodplains. Adopt policies that facilitate more sustainable and cost-effective ways of managing floodwater. Creation of high-quality natural habitats would encourage green tourism into the District and make it more attractive place to work, live and invest. Importance of Sustainable Urban Drainage Systems (SUDS).</p> <p><b>Natural Environment</b> The Core Strategy should direct development to sustainable locations where there are no impacts on internationally, nationally or locally designated sites or on natural resources, including protection and enhancement of internationally important South Pennine Moors Special Protection Area (SPA) and Special Area of Conservation (SAC). CS should adopt policy to facilitate conservation, restoration and creation of priority habitats. Within Leeds, the Lower Aire Valley between the M1 and A1 offers opportunity to create amazing landscape of priority habitats for benefit of wildlife and people. Reference to RSPBs vision for Lower Aire Valley. Encourage LCC to identify Lower Aire Valley as area for habitat enhancement within CS and Adopted Proposals Map and adopt supportive policies. The CS should also adopt policy to link Lower Aire Valley to city centre through mixture of cycleways, footpaths and green trails in natural settings. This should also be reflected in Aire Valley AAP.</p> <p><b>Built Environment</b> Adopt policy that protects and enhances biodiversity value of open spaces in built environment, and reflect para.14 of PPS9 that developers maximise opportunity to incorporate wildlife-friendly features within design of developments.</p> <p><b>Minerals</b> A priority of the CS should be to adopt policy that ensures secondary aggregates are used wherever appropriate in construction of new developments, as per ENV4 of RSS. Restoration of minerals sites can provide rare opportunities to contribute to national and regional BAP targets. It is essential that developers identify opportunities to create biodiversity at design stage and ring fence funding to deliver enhancements. Schemes to create biodiversity should be carefully targeted to restore networks of BAP habitats, rather than utilising parts of site unsuitable for other uses.</p> <p><b>Resource and waste management</b> Encourage LCC to adopt policy that moves all waste streams up waste hierarchy through robust targets eg reduction in amount of waste sent to landfill and support expansion of recycling schemes.</p>
2373	Leeds Tenants Federation	yes
2425	Leeds City Council	Yes
2533	Ms Mary Kimble	Yes
2544	Carter Jonas LLP	Yes
2612	Mr Martin Staniforth	Yes
2656	CPRE	Yes
2668	Leeds City Council	No



Rep No	Representor	Representor comments
2670	Federation of Small Businesses	yes
2671	Mr Kenneth Ward	yes
2672	Leeds City Council	Yes

**Question 05 Do you have any additional suggestions for potential options (environment)?**

0012	Horsforth Civic Society	Welcome statement "the protection and enhancement of local distinctiveness", but Horsforth needs a town strategy/plan - been asking for one for last 2 years.
0020	Scholes Community Forum	Promote policies to reduce the carbon footprint in Leeds, particularly transport related. Ensure the waste steam from construction waste is reduced.
0033	Miss Pauline Johnson	Important to protect the Green Belt.  In Bradford a development has solar panels and windmills - Leeds should insist on the same.  Needs to be an enquiry into health hazards associated with incinerators.
0042	The Oulton Society	More emphasis on improvements to the street scene, to remove sign clutter and improve the frontage of shops and retail premises.
0046	Environment Agency	Option related to flood risk vulnerability - development to avoid areas of high flood risk
0052	Natural England	Potential options include green infrastructure corridors, encourage recycling of material as well as alternatives relating to primary mineral resources. Policies should promote opportunities for the incorporation of beneficial biodiversity and geological conservation interests within the design of development.
0060	Highways Agency	Need to have consideration for air quality issues, which do not fall under the climate change category
0063	David Wilson Homes Northern	Climate change can only be promoted by looking at all aspects not just setting higher standards for new build. Green belt should not be sacrosanct but re-examined in the context of sustainable patterns of development rather than slavishly ticking off against PPG2.
0083	Caddick Developments Ltd	'Blanket' retention of the green belt may not be appropriate, albeit any re-allocation should be fully justified on social/ economic/ transportation grounds as well as environmental.
0092	Home Builders Federation	Climate change/renewable energy - para 1.8 of PPS12 says that planning policies should not seek to duplicate or cut across matters more appropriately within the scope of other legislative regimes. Energy efficiency in building use and construction is the responsibility of building regs part L.  Recent review suggested that houses built after 2006 will be 40% more energy efficient than new homes built in 2002. If we are to make real efficiency gains, need more attention to existing stock. Requirements on new stock makes new houses even more expensive, when affordability is a real issue.
0099	English Heritage	3rd bullet point should be amended to read 'Protect and, where appropriate, enhance Leeds urban and rural heritage and landscapes'.  Recent national policy stresses the need for the promotion of local distinctiveness. An option should include 'Reinforce the local distinctiveness of its individual communities'.
0210	CPRE Leeds District Group	It is vital that the character of the MDC be retained. This character is created by a mix of the appearance and make up of the differing parts of the city and the interaction between green and urban space. If that is lost the vitality of the city will be lost.

Rep No	Representor	Representor comments
0337	Aire and Calder Rivers Group	Para 4.5 presumably includes physical barriers in the River Aire. These must also be looked at in the context of the Water Framework Directive's object of good ecological status particularly as regards the effect of weirs on other local authorities in the Aire Valley (Wakefield, Bradford, and North Yorkshire).
0480	East Leeds Extension consortium companies (via Dacre Son & Hartley)	<p>The conclusions of the Leeds SFRA need to be incorporated into Core Strategy Environment text. It needs to explain how the tension will be resolved of i) a wide band of high flood risk land running centrally through the City and ii) this area being favoured in Scenario 3 to accommodate future development</p> <p>The "tipping points" (referred to in para 4.3) need to be identified prior to formation of the Core Strategy Options. The SA should examine this and all capacity issues.</p>
0787	Land Securities (via David Lock Associates)	N/A
0845	Leeds Initiative	No mention of green belt and why this is important.
0846	University of Leeds	<p>Agree that the CS needs policies to adapt and mitigate against climate change including % on site renewables, higher sustainable construction standards and reducing flood risk.</p> <p>The natural environment needs protection for its own sake, &amp; should not be considered a resource to attract investment. Protection &amp; enhancement of the natural environment should be an integral part of economic growth.</p> <p>Agree that Leeds needs to make the most of its built environment by conserving areas of character &amp; distinctiveness and encouraging innovative design in appropriate locations. But the amount of tall buildings being promoted is a concern. They can "suck occupiers out of low rise buildings and are more energy intensive to construct.</p> <p>New development should provide facilities to enable sorting of different categories of waste.</p>
0948	Yorkshire Water Services	<p>Are these options? They should all be aimed for.</p> <p>The Natural Environment PPS12 (para.B4) states it is important purpose of planning system to co-ordinate new development with infrastructure it demands. RPG12 states that the ability to provide adequate sewerage and waste water treatment/disposal capacity before developments become operation is most important.</p> <p>Under Water Industry Act 1991, where insufficient water or sewerage infrastructure in place to serve development, a water main or sewer for domestic purposes can be requisitioned.</p> <p>Support inclusion of policy in CS which ensures that new development is co-ordinated with provision of essential infrastructure. Example policy:- "Development will not be permitted unless infrastructure required to service the development is available or the provision of infrastructure can be co-ordinated to meet the demand generated by the new development"</p> <p>Waste Water Treatment Works Suggested policy:- "Development in the vicinity of waste water treatment works will only be permitted if it would not result in the future occupiers of the development being exposed to an unacceptable loss of amenity caused by odours or other problems. If new development is to be permitted, satisfactory mitigation and/or separation distances should be incorporated.</p>
1780	Montpellier Estates	No

Rep No	Representor	Representor comments
1933	Metro	Agree with the 5 areas proposed. However, although the design of infrastructure provision is mentioned, there is no specific mention of transport. As private transport is a major contributor to the emission of greenhouse gases, this should be given prominence in the policies in this section (ie under Climate Change)
1982	Sport England	no
2064	Keyland Developments Limited	Develop strategies and approaches which deal with degraded land and environments with policy support for schemes which bring such lands into beneficial use.
2068	Skelton Business Park Ltd (via Skelton Business Park)	The need to maintain a balance between potential options and the requirement to accommodate growth in order to secure regeneration and rejuvenation of the Leeds economy
2080	RSPB Northern England Region	As part of "Protect and enhance natural habitats, greenspace and the Green Belt", LCC identify Lower Aire Valley as an area of habitation enhancement both within CS and Adopted Proposals Map and to adopt supportive policies relating to it.
2425	Leeds City Council	Waste "aspiration to minimise waste generation" not strong enough. Our aim needs to be more radical.
2533	Ms Mary Kimble	Emissions from transport needs attention. Street trees.

2544	Carter Jonas LLP	<p>Re. How should economic growth be balanced with protection and enhancement of the natural environment?</p> <p>Potential Options Protect and enhance natural habitats, greenspace and the Green Belt - Concerned that it is too premature for LCC to be putting forward this option and needs to balance objectives of PPG9, PPG17 and PPG2 that seek to protect quality open spaces and countryside against the longer term development needs of the District. Any decision to protect land designations cannot be made until LCC undertaken thorough assessment of quality, purpose and future need in terms of existing designation and any pressures for change. Irrespective of local opinion, some difficult decisions may need to be made and these must be based on evidence and understanding of the actual situation. Any future consultation should set out findings of such evidence to allow informed discussion on future direction. It is not appropriate to base decisions on purely community opinion.</p> <p>Suggested areas of greenspace which should not be subject to future protection policy including Allotments at Armley, land to south and east of Shadwell near Adel, and areas of Urban Green Corridor. Development on greenspaces should be considered where they are sub-standard, under-utilised and do not make positive contribution to visual amenity and residential value of neighbourhoods and the environment in general. Continuation of existing policy is no longer appropriate under new planning system where it has not been thoroughly tested under new procedures ad reassessed.</p> <p>As part of LDF process, LCC should consider Green Belt release as an option.. Re. RSS requirement, whilst appropriate to consider PAS land in first instance, need for land in addition to PAS should not be ruled out at this early stage. It may also prove strategically necessary to release Green Belt land to realise spatial interpretation of the Vision for the District and meet number of sustainability criteria. Suggested sites at Guiseley, Calverley, Farsley, Garforth, Shadwell, Boston Spa, Collingham, Scholes and Ledsham.</p> <p>LCC also needs to revisit areas designated as Special Landscape Area such as Thorp Arch, Ledsham and Garforth Cliff since this is no longer a statutory designation, as set out in PPS7.</p> <p>re.How can the consumption of non-renewable resources be reduced? Admirable issue to tackle, but one this is also subject to national and European strategy for energy consumption and supply. It is understood that each mineral authority area is responsible for meeting at least some of its own mineral demand and that mineral workings are needed in the future. Therefore appropriate to continue to identify future areas of minerals for working under Safeguarded Mineral Resource Area policy. Policies to protect areas where there is potential to extract minerals from development should therefore continue, along with surrounding areas of exclusion in order that any future extraction will not be undermined due to nearby development.</p> <p>Additional comments submitted Feb 07:</p> <p>Rural Issues The rural parts of Leeds – eg villages to the north, east &amp; south - need to be planned as much as the urban parts. Opportunities to accommodate housing growth and needs in sustainable rural locations should be explored. This will help sustain the health &amp; vitality of rural communities.</p> <p>Rural needs have to be balanced against objectives to protect countryside. Current rural designations should be reviewed. Account should be given to the variety of rural settlements.</p> <p>UDP sites for long term search (PAS) should be retained. The green belt boundary should be reviewed, to take account of changes in character since the West Yorkshire GB boundary was appraised. Particular attention should be paid to the boundaries around rural settlements and urban fringe areas to allow limited sustainable growth without compromising the original purposes of the WYGB.</p> <p>PPS7 states that landscapes that do not afford statutory or regional protection should not be protected. Therefore, the Leeds Special Landscape Area designated in the UDP should be deleted.</p> <p>Urban Fringe Priority Areas, Urban Green Corridors and Greenspaces designated in the UDP should be deleted as they are non-statutory.</p>
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Rep No	Representor	Representor comments
		<p>Villages with historic buildings should not be treated as museums. Opportunities for growth through infill development should be encouraged to avoid village stagnation and decline. Policies should allow appropriately scaled development in such villages.</p> <p>Allotments Need for allotments should be assessed to see if any are surplus to requirements and could be developed, eg at Low Lane, Horsforth &amp; Armley. Only those in demand should be protected.</p> <p>Minerals Future needs for expansion of existing quarries and new ones should be addressed.</p>
2612	Mr Martin Staniforth	Will need to take into account the implications of the recent Barker report e.g. in relation to the Green Belt
2668	Leeds City Council	It is not specific enough in protecting the green belt. It is one of the great features of Leeds that people can be in the countryside so easily and quickly unlike other conurbations like Birmingham and Manchester.
2671	Mr Kenneth Ward	no
2672	Leeds City Council	I would like to see development of new economic planning and development that uses and encourages circular models as opposed to linear economic models which are the cause of environmental destruction and resource stress.

**Question 06 Does this section set out the right issues with regards to new development?**

0012	Horsforth Civic Society	Yes
0020	Scholes Community Forum	No
0033	Miss Pauline Johnson	Yes
0042	The Oulton Society	Yes
0046	Environment Agency	No
0052	Natural England	No
0060	Highways Agency	No
0063	David Wilson Homes Northern	Yes
0083	Caddick Developments Ltd	yes
0092	Home Builders Federation	No - refer to comments made on Q2
0099	English Heritage	Section has identified majority of the key issues. 2nd bullet point re determining housing densities based upon local context is a particularly important issue.
0210	CPRE Leeds District Group	Yes

Rep No	Representor	Representor comments
0480	East Leeds Extension consortium companies (via Dacre Son & Hartley)	<p>Fails to deliver spatial strategy &amp; too focussed on housing land releases. Text should be moved to "Providing for Communities".</p> <p>The scenarios are not justified by an evidence base, particularly land availability and infrastructure for development around nodal points. The UDP's housing &amp; employment allocations should be the starting point.</p> <p>Section 5 should be renamed The Economy and expanded, including employment forecasts. These should make reference to the LCR Development Programme scenario of FTE growth 2006-16 of 58,197 (Appendix 5, Table 7), but consider implications to 2025.</p>
0787	Land Securities (via David Lock Associates)	Yes
0845	Leeds Initiative	No
0948	Yorkshire Water Services	Yes
0957	Pool Parish Council	Yes
1780	Montpellier Estates	Yes
1960	Leeds City Council	No
1982	Sport England	yes
2064	Keyland Developments Limited	Don't know
2080	RSPB Northern England Region	<p>Housing Location Support principle of focussing development on previously developed land, provided it is in a sustainable location. Biodiversity value of this land can be high, particularly adjacent to existing greenspace or wildlife corridors (para.15 of PPS9). Include policy to ensure that all developments on brownfield land evaluated for biodiversity potential, and where this is of local or greater importance a design scheme incorporated into development.</p> <p>Re. Consequences of higher rates of house building in Leeds? LCC should develop policies requiring new developments to create new community facilities, including wildlife rich greenspace to meet additional needs, or contribute to enhancement of existing facilities. LCC should ensure most sustainable standards for design and construction achieved in all developments.</p> <p>Support locational criteria for new residential development. Should also include consideration of impacts on protected wildlife sites, biodiversity and natural resources.</p> <p>Land and premises Employment land should be allocated in sustainable locations where there is sufficient public and alternative transport infrastructure to ensure people can commute without use of car. Allocations should avoid designated wildlife sites or other significant biodiversity area such as Lower Aire Valley, or locations where there would be negative impacts on natural resources such as air and water.</p>
2373	Leeds Tenants Federation	yes
2425	Leeds City Council	Yes
2533	Ms Mary Kimble	Yes

2544 Carter Jonas LLP

Yes

If this section is concerned primarily with regeneration, then the title really should be changed from 'new development', as such a term does not conger up what is trying to be achieved under the theme.

re. What will be consequences of higher rates of house building in Leeds?

CS has to conform with RSS. A higher rate of house building will bring additional development pressures to the district but in turn it will contribute towards creating a stronger and more sustainable economy, as increase in population will ensure retention and expansion of key services, shops and facilities, as well as providing an easily accessible labour force for the growing economy.

The key to any future spatial strategy is not just how best to spread wealth across the district but also how to improve quality of environment in many of the older parts. It may mean greenfield land is released in and around the 'Golden Triangle', whilst initiating regeneration and housing renewal schemes in the older parts of the city. Increases in house building rates may still need to continue to be centred on the north and east of Leeds, and the outlying settlements to the south where such development will help retain people within the district, help feed neighbouring economic growth and also respond to high demand found in these areas.

Without large proportion of new development in traditional suburbs, it is unlikely the recent trend to build city centre flats will be rectified and balanced with much needed family housing. Reference to Leeds City Region study by Llewelyn Davies Yeang (Quality of Place: The North's Residential Offer - Phase lib (September 2006). The City Centre does not have capacity to accommodate many of the services and facilities needed by families, but does provide sound basis for retaining students once they enter labour market.

LCC should consider benefits of releasing greenfield land in sustainable locations on edge of the city such as Meanwood, Shadwell, Farsley and Boston Spa against releasing brownfield land in locations not meeting sustainability objectives. LCC should undertake review of Green Belt land in east and west and PAS sites and in sustainable locations such as Scholes, Farsley and Collingham. Also revisit greenspace, Urban Green Corridor and Special Landscape Areas.

Provision should be made for some open market housing of appropriate scale through infilling and small-scale extensions/rounding off. This may encourage improvement of services and facilities in marginal settlements leading to creation of more sustainable communities. Ref para 38 PPS3.

Re. Should Leeds continue to give priority to new housing on brownfield sites, even if this means increased densities?

LCC should adopt sequential approach to development (para.40 PPS3). However over recent years this has resulted in high number of high rise flats and subsequently limited market choice and exacerbated need for family housing. Peripheral and Green Belt land would provide opportunity to establish wider choice of housing (family houses) with lower densities. Through the emerging strategy the priorities for the district will need to be determined and a decision made as to whether the release of land within the suburbs of the city centre is more appropriate than releasing brownfield sites within the city centre core.

Re.Are a sufficient range of housing types and sizes being built in Leeds?

A better range of housing types and sizes could be achieved through release of land outside the city centre within sustainable and accessible locations, such as Farsley, Guiseley, Calverley, Rothwell, Shadwell, Boston Spa, Thorpe Arch and Ledston.

Re. How should the city respond to the changing economy to ensure that the city's economy is diverse and robust in the long term?

The city needs to ensure that it responds positively to changing economy by encouraging innovation and diversity. Needs to have flexibility to accommodate changing market demands and attract investment, whilst forging links and capitalising on economic activity in peripheral districts of City Region such as York and Wakefield. The LDF will need to ensure there is a plentiful supply of good quality and appropriate employment sites that will meet business needs of today and tomorrow, and ensure growth of City does not stall. Housing has a key role to play in meeting these objectives since good quality housing and an attractive living environment enables companies and organisations to attract high calibre staff.

Rep No	Representor	Representor comments
		<p>Re. How should Leeds balance the competing needs of housing and employment land?  Best approach is to ensure a wide range of good quality employment and housing land in variety of sustainable locations is allocated within the Site Allocations DPD. Where appropriate LCC should consider allocating sites for mixed use development that can offer sustainability in the long term. When considering the allocation of employment sites that LCC consults with both local and national businesses that may be looking to expand through relocation within the district or alternatively seeking sites capable of accommodating a new regional operation. Employment sites should only be protected in future where they are likely to respond to changing needs or demands. Not all employment capable of accommodating a shift in economic activity for reasons including location, labour force, land quality and value or accessibility. Certain areas of Leeds are capable of accommodating further employment development. Thorpe Park and Thorp Arch Industrial Estates are recent success stories. The A1(M) corridor between M62 and Wetherby should continue to be focus for future development.</p> <p>Further comments submitted Feb07</p> <p>Rural employment should be encouraged through workshops, live-work units, small B1 developments and B8 storage.</p> <p>Policy should allow for farms and estates to diversify, including provision of a range of housing and businesses (vets &amp; rural workshops).</p>
2612	Mr Martin Staniforth	Yes
2656	CPRE	Yes
2668	Leeds City Council	Yes
2670	Federation of Small Businesses	yes
2671	Mr Kenneth Ward	yes
2672	Leeds City Council	Yes

**Question 07 Do you have any additional suggestions for potential options (new development)?**

0012	Horsforth Civic Society	Transport problems must be addressed - city is moving towards gridlock
0020	Scholes Community Forum	Where possible (e.g. AVL and EASEL) new housing development should be linked to employment sites - to reduce the need for motorised travel
0033	Miss Pauline Johnson	House price inflation is out of control. Question the need for housing, due to the decline in industry - unless it is for the immigrant population and eastern Europeans.
0042	The Oulton Society	Where new development is proposed, local people should be trained and employed wherever possible so as not to create further transport problems. New housing should be provided with local retail outlets and community facilities. Preferable to boost facilities where new housing has put strain on these rather than decant housing to greenfield sites. PAS land should be retained for at least 15 years.
0046	Environment Agency	Option related to flood risk vulnerability - development to avoid areas of high flood risk
0052	Natural England	The criteria needs to be wider than the 4 areas identified and should include environmental capacity and biodiversity issues in the criteria.
0060	Highways Agency	This should also help address congestion and environmental issues
0063	David Wilson Homes Northern	Development pattern should look to relieve pressure upon Leeds being a single place with a radial transport pattern. Family dwellings should be the priority. Land for employment needs full consideration in the light of changing forms of employment and making land provision accordingly (support 5.15).



Rep No	Representor	Representor comments
0083	Caddick Developments Ltd	Address how and were the anticipated increased housing numbers are to be accommodated in anticipation of the RSS outcome. Also the 'knock on' consequences for facilities and infrastructure. Just opting for increased densities will, in many locations, be contentious and inappropriate. The need for more family housing outside the city centre needs to be resolved.
0092	Home Builders Federation	<p>PPS3 - policies should be based on realistic assumptions of deliverability rather than blind adherence to brownfield first sequential approach. The sequential approach to land allocation set out in PPG3 has not been carried forward into PPS3 - needs to be reflected in CS.</p> <p>Leeds has problems meeting the full range of types and sizes of family housing in urban areas - if land is not allocated for family housing in urban areas, there will be significant consequences for rural areas, where house prices will continue to rise.</p> <p>The link between the provision of sufficient housing supply for Leeds and economic development of the city is welcomed. Over last 5 years Leeds has experienced considerable economic growth and HBF has not objection to continued growth providing that housing provision matches the growth.</p> <p>Concerned if CS adopts the lowest employment growth forecast (Leeds City Region Development Programme) as this would not appear to accord with the vision for promoting and developing Leeds' role as the regional capital and a competitive European city.</p>
0095	Government Office for Yorkshire and the Humber	<p>New Development &amp; Providing for Communities Decide whether additional land will be required or PAS will be sufficient, taking account of sustainability of location (eg relation to MUA, public transport, wider locational strategy). Link new jobs to education &amp; training to provide opportunities for Leeds residents, especially workless, &amp; avoid commuting from outside of Leeds.</p> <p>Locational criteria for G&amp;T sites is required (Circ.01/06 para 31). Use "suitable" rather than "favoured" in text.</p>
0099	English Heritage	<p>First bullet point - locational criteria for new residential development should also take account of the likely environmental constraints.</p> <p>3rd bullet point - support the principle of improving decency standards. Given the embodied energy within existing buildings, if LCC is seeking a more sustainable strategy it should in the first instance, be seeking the refurb of existing housing in preference to its demolition and replacement.</p>
0210	CPRE Leeds District Group	We support the maintenance of the distinctive building styles of the various districts and the insulation and enhancement of existing properties. It is important that new building in established areas does not clash with the existing in terms of style, materials and particularly scale.
0480	East Leeds Extension consortium companies (via Dacre Son & Hartley)	More emphasis is needed on where to accommodate economic growth. The focus upon "urban capacity" is too loose & does not identify spatial locations. The LCR Development Programme offers scope to expand upon spatial preferences for accommodating new employment premises.
0787	Land Securities (via David Lock Associates)	N/A
0845	Leeds Initiative	How about accommodating families suitably? Surely we need to sort out the sites we already have – put money into the community – show people they matter and that where they live and what type of accommodation they have matter eg in Harehills, Seacroft, Gipton, Burmantofts
0846	University of Leeds	<p>Housing should be provided in all areas of Leeds, with particular efforts to provide housing in the "rim" over the next few years. There is a danger of "over-densification" of housing in the city centre and town centres - density in these areas is already high.</p> <p>There is a case for requiring housebuilders to provide the less profitable forms of housing, but requirements need to be related to the HMA. On-site provision in partnership with housing associations should be preferred over commuted sums. Sales to investors in the city centre should be limited.</p>
0948	Yorkshire Water Services	It should be noted that increased densities will put an increased pressure on existing infrastructures, mentioned in Section 4.

Rep No	Representor	Representor comments
1780	Montpellier Estates	<p>Redevelopment of obsolete employment land/premises should be permitted. New employment opportunities which are fit for purpose should be opened up including City Centre offices sites, office business parks (Thorpe Park etc.) and manufacturing/distribution locations (Aire Valley etc.). This will ensure that the city has an appropriate stock of land and premises.</p> <p>Possible new option is the development of bulky goods retail warehouses/showrooms around the city centre rim. Accessible and more sustainable than out of centre locations. By virtue of the goods they are selling, these retailers require large floorplates not easily available in the city centre.</p>
1933	Metro	Metro have software to produce accessibility maps to public transport. Would like to see this inform development locations and densities (ie most accessible locations would have the densest development). See "Metro's Proposed Land Use Policies" for further comments. In the "New Development" section, reference needs to be made to Developer Contributions to public transport (to support the SPD being produced). Consideration should also be given to developer contributions towards other sustainable travel modes.
1960	Leeds City Council	Not enough emphasis has been placed on the need for affordable housing and the right to rent. This needs to be addressed both in the inner city and rural areas. Report suggests that because of people's educational achievements will result in lower paid jobs - which will mean people will have to rent for longer.
1982	Sport England	no
2064	Keyland Developments Limited	Should be reflected that it is not just new development that creates new demands - changes in demographics, lifestyle choices and expectations also drive additional requirements that need to be considered apart from demands arising from development. PAS sites should continue to be held against future land requirements.
2068	Skelton Business Park Ltd (via Skelton Business Park)	Land needs to be identified to meet future needs of Leeds for leisure and retail development in addition to housing and employment it should not be assumed that leisure and retail development can or should be located wholly within the City Centre
2080	RSPB Northern England Region	'Green tourism' projects eg restoration of St Aidan's opencast site can provide important source of local employment and contribute to diversification of Leeds economy. CS should promote and facilitate such projects through policies.
2373	Leeds Tenants Federation	Lets go for it.
2425	Leeds City Council	I would like to see a much stronger line taken on affordable housing. The demographic of Leeds need to encourage influx of young families.
2533	Ms Mary Kimble	Adopt minimal green building standards. Require new development to put in designated bicycle access to site

2544	Carter Jonas LLP	<p>Potential Options Re. Identify a locational criteria for new residential development linked to urban capacity, 'nodal points', corridors and infrastructure requirements Support approach, however suggest any locational criteria should draw distinction between urban and rural areas. LCC should have regard to development needs of more rural areas and ensure future sustainability of communities (ref. PPS3).</p> <p>Recognise distinct characteristics across the district within the main conurbation.</p> <p>It is unlikely that a simple settlement hierarchy will respond to the district's needs if it is based on settlement size and range of existing services and facilities. More sophisticated approach may be necessary. A separate approach will then be needed to uplift the quality of life within areas on edge of city centre. Accessibility and capacity of transport network may also play important role in determining location of future development, which may play more important deciding role than other sustainable development considerations.</p> <p>Re. Determine housing densities based on local context Request that understanding is gained not only on what types of houses may be required to meet population growth (PPS3), but also what types of houses and design are popular and can meet the identified need. Increase stock of 2, 3 and 4 bed semi-detached and detached houses with only two floors.</p> <p>Re. Accept redevelopment or refurbishment of sub standard housing in order to improve decency standards Improvement of homes along with general environmental improvements would contribute towards meeting regeneration objectives and also provide affordable housing. It may be appropriate for LCC to consider seeking commuted sum payments from private house builders towards improvement of these homes instead of providing new affordable housing units on residential development sites.</p> <p>Re. Develop a criteria for how new housing and employment development can best be integrated This approach is inappropriate and unnecessary; and would be difficult to implement and may not achieve the right results. New development would be discouraged.</p> <p>Nevertheless, support integration of employment and housing development in terms of meeting general sustainability objective, which could be better achieved through combination of the following:</p> <ul style="list-style-type: none"><li>- Holistic approach to land allocations, ensuring new housing is located close to employment centres or in sustainable locations close to good transport networks thereby enabling easy access to employment</li><li>- Allocating sites for mixed use development</li><li>- Through initiatives such as Area Action Plans</li></ul> <p>Re. Consider criteria for retention of business premises and employment allocations Consider this approach is inappropriate since it could be harmful to economy and vitality of the district. If applied rigidly will not provide any flexibility to enable re-development of redundant or outdated employment sites for other uses crucial to regeneration of an area. It may also restrict expansion of established local businesses. A number of existing employment sites are also no longer suitable for employment purposes. If existing employment sites are to come forward for redevelopment, an evaluation should be made of each site as to whether it should be retained.</p> <p>Re. Explore the further use of S106 agreements for provision of training, education and workforce development Oppose this option. The key requirements set out in Circular 05/05 cannot justify the inclusion of items that relate to 'skills training' and workforce development. Neither is relevant to planning and cannot be said to be necessary in mitigating or compensating for development. It would be unreasonable and more akin to 'betterment levy' (para.B7 05/05). This issue was subject of discussions at Public Examination into Ryedale Core Strategy. Urge LCC to refer to Inspector's Report.</p> <p>Further comments submitted Feb07:</p>
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Rep No	Representor	Representor comments
		Distribution of Development The Council needs to acquire an understanding of the Leeds housing market and sub-markets through engagement with housebuilders. It needs to identify and plan for such housing markets taking account of their varying characteristics. The zones already identified for affordable housing is the start of such an approach.
2612	Mr Martin Staniforth	Need to ensure that housing/business development is flexible - current areas of growth may not continue; single person households may be a short term trend. Important that housing development is supported by services, such as food shops.
2656	CPRE	Consideration of "the distribution of and type of new housing and broad location in and around the main towns and villages".
2668	Leeds City Council	Does the city have an optimum size? Does it simply accept new development as it ... or should it have a population policy given the pressures on transportation etc.
2671	Mr Kenneth Ward	no
2672	Leeds City Council	See above comment. The current economic model of continual divergence and expansion is not sustainable. Urban modelling in Sweden is focused on declining usage of fossil fuels and the eventuality of a mixed urban/agricultural model.

**Question 08 Does this section set out the right issues with regards to regeneration?**

0012	Horsforth Civic Society	Yes
0020	Scholes Community Forum	Yes
0033	Miss Pauline Johnson	No
0042	The Oulton Society	Yes
0046	Environment Agency	Don't know
0063	David Wilson Homes Northern	Yes
0083	Caddick Developments Ltd	yes
0092	Home Builders Federation	No. The text doesn't explain how the programmes for the AAPs fit with the CS and saved UDP policy. The outcome of recent consultations on AAPs should be fed into the CS issues and options paper
0099	English Heritage	On the whole this section has identified the main issues.
0210	CPRE Leeds District Group	Yes
0337	Aire and Calder Rivers Group	Yes
0480	East Leeds Extension consortium companies (via Dacre Son & Hartley)	Following on from consultation, the conclusions of the AAPs on issues such as housing stock, employment land & infrastructure should be fed into the Core Strategy. Otherwise, consultation on the Core Strategy Alternative Options will be lacking.
0787	Land Securities (via David Lock Associates)	Partially

Rep No	Representor	Representor comments
0845	Leeds Initiative	Yes
0948	Yorkshire Water Services	Yes
0957	Pool Parish Council	Yes
1780	Montpellier Estates	Yes
1933	Metro	Yes
1960	Leeds City Council	No
1982	Sport England	yes
2064	Keyland Developments Limited	No
2068	Skelton Business Park Ltd (via Skelton Business Park)	No
2080	RSPB Northern England Region	Environmental regeneration, social and economic regeneration should be strongly promoted. Development of attractive and exciting communal spaces with local participation can improve community's sense of pride and togetherness. Eg Lower Aire Valley
2373	Leeds Tenants Federation	yes
2425	Leeds City Council	Yes
2533	Ms Mary Kimble	No
2544	Carter Jonas LLP	Yes  Re. Where should regeneration be focussed in the City? Focussed on areas that are most in need, where there is scope to tap into additional funding sources from Community England and work in partnership with public and private sectors to deliver a holistic approach and make a difference. A targeted approach based on priority need likely to be more successful than thinner broader brush approach. A targeted approach to specific areas in need will also enable very close working with stakeholders and local communities and pilot good practice initiatives. Areas on edge of city, such as Holbeck and Beeston most in need of regeneration and should be priority. Other areas do not suffer from such acute problems and may be uplifted from new residential and employment development.  Re. How can the city ensure there are sufficient local facilities and infrastructure to support new development? LCC can seek contributions from private sector developers where it can be illustrated that the requirement arises directly from a development. Any developer contributions must be reasonable. It is highly unlikely that this method alone will generate the funds required to provide sufficient local facilities and infrastructure and LCC therefore needs to explore different avenues to fund shortfalls eg PFI. Given contents of draft Planning Gain Supplement consultation paper, it is likely that LCC will need to identify where infrastructure and services are required across the district and how the delivery of improvements will be programmed in line with delivery of new development. The LCC approach should therefore make reference to draft PGS and gather evidence in relation to what infrastructure and service improvements necessary to accommodate development.
2612	Mr Martin Staniforth	Yes
2656	CPRE	Yes

Rep No	Representor	Representor comments
2668	Leeds City Council	Yes
2670	Federation of Small Businesses	yes
2671	Mr Kenneth Ward	yes
2672	Leeds City Council	No

**Question 09 Do you have any additional suggestions for potential options (regeneration)?**

0012	Horsforth Civic Society	Well covered by the document
0020	Scholes Community Forum	Prioritise and phase regeneration against existing poor housing stock and slum clearance
0033	Miss Pauline Johnson	Essential that affordable housing is not destroyed in areas of social housing or older housing. People shouldn't be driven out of their homes by crime and anti-social behaviour. Refurbishment should be the priority, not demolition.
0042	The Oulton Society	Re-consolidate buses in Leeds to provide a real and efficient passenger integrated with the trains. Even take all buses into one accountable ownership.
0046	Environment Agency	Would like to see an option that explores the environmental constraints and opportunities of different areas (contaminated land, flood risk, biodiversity)
0060	Highways Agency	No comments except should provide better sustainable transport means
0063	David Wilson Homes Northern	Development should not be concentrated solely on transport corridors, this creates more potential for grid lock. A hierarchy of centres is supported but should go further to seek to make them more self-contained in providing housing, employment, retailing, education, etc.
0099	English Heritage	An additional option might be to identify the priority areas for regeneration, together with the types of interventions which might be required.
0210	CPRE Leeds District Group	Leeds has concentrated on attracting service industries but a significant segment of the population is not suited for such work. A mix of employment is needed with a strong emphasis on apprenticeship schemes.
0337	Aire and Calder Rivers Group	The regeneration of east and west Leeds along the river corridor should be utilised to improve biodiversity.
0480	East Leeds Extension consortium companies (via Dacre Son & Hartley)	<p>The "Regeneration" theme should be subsumed into 4 thematic sections (see response to Q2).</p> <p>The second option "concentrate development on transport corridors and accessible locations" does not relate to regeneration &amp; should be moved to Sections 5 "New Development" or 7 "A well connected city".</p> <p>Concentration on nodes and corridors lacks any justification or evidence base.</p> <p>The "Hierarchy of Centres" option has little connection with regeneration &amp; should be moved to Sec 8, "Providing for Communities".</p>

Rep No	Representor	Representor comments
0787	Land Securities (via David Lock Associates)	<p>South of Leeds Regeneration Area</p> <p>Agreed that comprehensive requirements of regeneration should be considered. It is particularly important that the benefits of the Leeds Economy are spread across the south of the city as supported by the draft Yorkshire and Humber Plan, the City Region Development Programme and the Leeds Community Strategy. Important to connect areas of potential private investment and development with areas of local need. The CS should identify a South of Leeds Regeneration Area extending along the A653 to include areas in need of regeneration as well as economic nodes of activity including the White Rose. New development could be linked to Beeston/Holbeck. Use existing and future public transport nodes and routes along the A653 to enhance connectivity between homes, jobs and services and south of the city is planned in a spatial, coherent and sustainable manner.</p> <p>Role of city centre and the town and district centres</p> <p>Agree with review of hierarchy of centres retail assessment. Should quantitative and qualitative need for development be demonstrated, the review should examine potential expansion of existing centres and for new town and district centre designations. Appropriate to consider designating White Rose as Town Centre. The designation would allow for diversification and planned growth without causing harm to the vitality and viability of centres. Such a recommendation was made by the Inspector (1999) into the UDP that it was already acting as a town centre. Merry Hill in the West Midlands has recently been suggested as part of a strategic town centre in Phase One West Midlands RSS.</p> <p>Notwithstanding the suggestion to designate WRY as a centre, there should also be policy promoting diversification of the centre to reduce need to travel and improve quality of the public realm, to support specified forms of development providing they are linked to improvements eg public transport and public realm.</p>
0845	Leeds Initiative	But needs extending massively – creating sustainable communities, local amenities, services and jobs. Much more to go in about consultation with communities about how best to go about this.
0846	University of Leeds	<p>The "rim" should be included as a regeneration priority. It has land opportunities for new development and food growing. New links for walking and cycling are crucial to success.</p> <p>Public transport infrastructure investment is required to support town centres, but no further car parking should be provided.</p> <p>Additional retail and service provision should be allowed in the expanded city centre.</p>
0948	Yorkshire Water Services	Yorkshire Water would be happy to provide details on our infrastructure capacity to aid the regeneration of Leeds.
1780	Montpellier Estates	<p>The term regeneration should be qualified and defined as part of the Core Strategy. Regeneration should be considered in physical development terms - such as employment sites, residential development and redevelopment generally.</p> <p>Narrowing the gap agenda has a key role to play in delivering the social and economic regeneration of the poorest, most deprived areas. The LDF and the connectivity theme is key to ensure that the unemployed have access to new jobs in the city centre and other emerging employment locations (AVL).</p> <p>Vital that regeneration areas have access to the local shops and services required for sustainable communities. For example, there are approx 4,000 residential units planned in LS11 and this should have its own district shopping centre.</p>
1933	Metro	Suggest that office development doesn't take place in district centres unless car access can be adequately managed and restricted (see "Metro's Proposed Land Use Policies"). Consideration could also be given to having a supermarket policy, eg whether any more are needed, where they can locate, public transport accessibility (including site layout) and levels of parking required.
1960	Leeds City Council	Affordable housing - key consideration
1982	Sport England	no

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Rep No	Representor	Representor comments
2064	Keyland Developments Limited	Assessment of requirements needs to be considered against the very significant environmental benefits that regeneration projects are capable of delivering.
2068	Skelton Business Park Ltd (via Skelton Business Park)	The potential options should not be confined to meeting 'local needs and circumstances'. The strategy seeks to create an international profile to Leeds. More facilities of regional and national significance need to be provided.
2080	RSPB Northern England Region	Regeneration policies should aid to provide appropriate environmental facilities to allow residents the opportunity to live healthy and sustainable lifestyles.
2425	Leeds City Council	Regeneration must enhance work/life chances but not to exclusion of public buildings/ open spaces/environmental improvement and economic well being of Leeds.
2533	Ms Mary Kimble	What about park regeneration? Developing pocket parks in abandoned terrace housing areas. Street scapes with trees.
2544	Carter Jonas LLP	<p>Potential Options  Re.Deliver balanced and sustainable regeneration, which meets local needs and circumstances  Support this approach as accords with government guidance; should result in longer term regeneration; and best meet individual needs of local communities</p> <p>Re.Concentrate development on transport corridors and accessible locations  Support this approach as accords with government guidance (para.38 PPS3). The A6120 of the Ring Road is one of key road networks where there is capacity to accommodate further development, especially around Calverley and Farsley. This area is highly accessible by road and rail given close proximity to New Pudsey Railway Station and regular bus services from Leeds into Farsley. Guiseley also accessible by variety of modes and is already popular with commuters. Many of outlying settlements are accessible to Leeds City Centre, but residents choose to travel shorter distances to work and are employed locally eg Thorpe Arch and Boston Spa. This is a sustainable local opportunity that could be further developed to help balance the strong commuter draw of the City Centre.</p> <p>Re. Review and establish a 'hierarchy of centres'  Before making any decision on this approach LCC needs to explore a number of different options for accommodating growth. There may be particular local circumstances that warrant a particular approach, but the onus of the new planning system is on LCC to illustrate these and justify any decision to pursue one particular option over an other. When investigating potential options LCC should include the option to review and establish a 'hierarchy of settlements', and any other potential approaches such as a dispersed approach to development, a new settlement, concentration of development solely within the major conurbation or a hybrid of any option. A traditional settlement hierarchy approach is not suitable for Leeds and that a number of local approaches would be more appropriate given characteristics and issues facing a number of specific areas within the district.</p>
2612	Mr Martin Staniforth	<p>Paragraphs 6.6 &amp; 6.7 are mutually inconsistent.</p> <p>Options suggest transport corridors drive development patterns - should be the reverse</p> <p>Should refer to the role of cultural industries in regeneration.</p>
2671	Mr Kenneth Ward	no
2672	Leeds City Council	I disagree with the implied expansion of retail floor space in designated centres. A deeper analysis of future economic needs and wants should be entered into. The economy of 2050 will be quite different to that of 2006. We need to start seriously debating localised economies that are not just 'sustainable' but actually restorative.



Rep No	Representor	Representor comments
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**Question 1**

2663	Oulton Hall (IOM) Ltd (via Spawforths)	Yes, agree with objectives
2663	Miller Strategic Land (via Spawforths)	Yes, agree with objectives
2663	Spawforths	Yes, agree with objectives
2663	Taylor Woodrow Developments Ltd (via Spawforths)	Yes, agree with objectives

**Question 10 Does this section set out the right issues with regards to a well connected city?**

0012	Horsforth Civic Society	No
0020	Scholes Community Forum	No
0033	Miss Pauline Johnson	No
0042	The Oulton Society	Yes
0046	Environment Agency	Don't know
0052	Natural England	Yes - in addition to a range of alternative forms of transport needs to be encouraged for both the people of Leeds and people working or visiting Leeds to ensure that they use all available means of transport including cycling and walking as alternative to private motor vehicles.
0060	Highways Agency	Yes
0063	David Wilson Homes Northern	Yes
0083	Caddick Developments Ltd	yes
0210	CPRE Leeds District Group	Yes
0337	Aire and Calder Rivers Group	Yes
0480	East Leeds Extension consortium companies (via Dacre Son & Hartley)	<p>The problem of "tipping points" is not addressed in the Options or Scenarios.</p> <p>This section effectively offers only one option to focus development on accessible locations by public transport – the "nodal point option". This lacks evidence of land availability, deliverability, market assessment, infrastructure constraints and risk around these suggested nodal points. In particular, no assessment of land capacity has been made of locations around Pudsey, Bramley, Holt Park, Seacroft and Garforth. Other options should be considered. More analysis is needed of potential in the Growth Areas identified in emerging RSS.</p> <p>Account should be taken of the transport constraints and potential identified in "A Transport Vision for W. Yorks" (March 2006) and the LCR Development Programme. These documents suggest there is little scope for growth on the network, other than in the east and north east areas of Leeds district. Growth to the south, west and north-west will be highly constrained without further investment.</p>

Rep No	Representor	Representor comments
0787	Land Securities (via David Lock Associates)	Partially
0845	Leeds Initiative	Yes
0957	Pool Parish Council	Yes
1780	Montpellier Estates	Yes
1960	Leeds City Council	Yes
1982	Sport England	yes
2064	Keyland Developments Limited	Yes
2068	Skelton Business Park Ltd (via Skelton Business Park)	Yes
2080	RSPB Northern England Region	Yes. In addition to this, all major developments irrespective of location should be required to submit transport assessments and travel plans as part of planning applications
2373	Leeds Tenants Federation	yes
2425	Leeds City Council	Yes
2533	Ms Mary Kimble	No
2544	Carter Jonas LLP	Yes  Re. Can the current transport infrastructure network in Leeds continue to support the scale and pace of development in Leeds? Any strategy for development will need to take into account not only existing capacity to accommodate short term development but also infrastructure improvements that will help accommodate development in the longer term. Leeds has been identified as a City Region and acts as the central economic hub for the Region. Economic growth and population growth go hand in hand with this role and therefore any transport infrastructure issues will need to be addressed to ensure expected growth can be accommodated. To not make improvements to both rail and road is simply not an option.  Re. How can people in Leeds be encouraged to use alternative forms of transport to the private car? There needs to be investment in an integrated state of the art transport system which is affordable, reliable, efficient and clean and can take passengers to places they want to go and get them there when they want to be. Public transport plays an important role in serving certain journeys eg travelling to work or school, and some leisure activities. It also serves certain demographic groups of the population better than others, such as the elderly and young.
2612	Mr Martin Staniforth	No
2656	CPRE	Yes
2663	Taylor Woodrow Developments Ltd (via Spawforths)	Support "Well connected city" but needs an evidence base
2663	Spawforths	Support "Well connected city" but needs an evidence base

Rep No	Representor	Representor comments
2663	Oulton Hall (IOM) Ltd (via Spawforths)	Support "Well connected city" but needs an evidence base
2663	Miller Strategic Land (via Spawforths)	Support "Well connected city" but needs an evidence base
2668	Leeds City Council	Yes
2670	Federation of Small Businesses	yes
2671	Mr Kenneth Ward	yes
2672	Leeds City Council	No

**Question 11 Do you have any additional suggestions for potential options (transport)?**

0012	Horsforth Civic Society	This section needs to be central to all other elements of the Core Strategy. Scenarios 2 & 3 are dependent on great improvements to connectivity.
0020	Scholes Community Forum	Improved measures are required - not satisfactorily promoted in LTP1 e.g. park and ride and promote quality bus contracts
0033	Miss Pauline Johnson	Current transport is unable to cope with the present number of journeys at peak times. Buses and trains are dangerously overloaded. A lot of money has been wasted on Supertram, which would have caused more problems than it would have solved. Need longer trains on some routes. Bus only lanes and more buses.
0042	The Oulton Society	Employers of more than say 100 people should provide park and ride facilities to places of work. Over 150, employers to provide transport to work
0052	Natural England	Support the general principles of the options
0060	Highways Agency	Could put forward better sustainable connectivity
0063	David Wilson Homes Northern	Major infrastructure investment is required; the existing needs to be enhanced but relieved by reducing the need to travel particularly to/from City Centre. Employment opportunities should not be restricted to deprived communities.
0083	Caddick Developments Ltd	Whatever public transport measures are introduced it will be necessary to have policies and measures to address the inevitability of continued car use (hopefully running on greener fuels!). Options/measures such as (i) park and ride (particularly at stations and key locations where radial routes meet the outer ring road) (ii) cross city routes (iii) the urgent need to complete the missing or wrongly located sections of the Outer Ring Road at dual carriageway standard to divert and absorb traffic, which will minimise the need to rat run though the suburbs.
0092	Home Builders Federation	Prior to producing the issues and options paper LCC should produce a sound evidence base on transport constraints, growth areas and land availability up to 2025.
0210	CPRE Leeds District Group	Need to focus on residential/employment nodes. Unless future residential and employment development is focused, the transport situation in morning and evening rush hours will become untenable. Bus services must be integrated and simple technology - suggest white lines and traffic light control transponders - used to give buses priority, especially at key times. Employers should provide transport to work where practical.
0337	Aire and Calder Rivers Group	There is potential to open further railway stations - there are none in Leeds on the Aire Valley line out of Leeds.

Rep No	Representor	Representor comments
0480	East Leeds Extension consortium companies (via Dacre Son & Hartley)	<p>More evidence of transport constraints and land availability in growth areas is needed to underpin the Core Strategy options</p> <p>The Leeds Ring Road Study (Scott Wilson, Nov 05) should form part of the evidence base. The East Leeds Orbital Route should feature in the Key Diagram.</p>
0787	Land Securities (via David Lock Associates)	<p>A653: A Public Transport Corridor</p> <p>The objective of connecting employment opportunities, infrastructure and homes is critical to future sustainable economic growth of Leeds. Priority should be given to existing public transport corridors and routes with proposed investment and improvements to public transport, to act as catalyst in achieving sustainable economic development in deprived areas. Eg A653. Also potential as Quality Bus Corridor and new and improved rail stations along Leeds-Huddersfield line. It should be prioritised in CS and planned in integrated and coherent manner. Related to wider South of Leeds Regeneration Area (Section 6). Connectivity will be improved to help tackle 'wordlessness' and economic inactivity.</p>
0845	Leeds Initiative	<p>Add in about environmentally friendly options of transport and affordability. Needs more on getting across Leeds, not just in and out of the centre.</p>
0846	University of Leeds	<p>Agree that need to travel be minimised &amp; more sustainable forms of transport encouraged by i) promoting mixed use development, ii) promoting higher density development (but not over-dense) in areas of high accessibility, iii) frequent, reliable &amp; safe public transport, iv) safe walking &amp; cycle routes and v) use of travel plans</p> <p>Hard decisions are needed to restrain parking. Park &amp; ride should be explored in the "rim" and in neighbouring authorities on radial commuter routes.</p>
0957	Pool Parish Council	<p>More involvement of existing private sector employers in helping to develop transport policy and attractive plans to promote alternatives to private car commuting.</p>
1780	Montpellier Estates	<p>The current transport infrastructure cannot possibly support the future development of the city - major investment is required. People can be persuaded to use public transport if it is clean, safe, frequent, reliable and 24 hour. However, the carrot must come before the stick - i.e. demand management.</p> <p>Congestion charging without investment upfront in public transport will lead to a reduction in investment - will severely prejudice Leeds in the global/European economy.</p> <p>Fully support option to identify employment opportunities which are linked to infrastructure provision, within easy access of deprived neighbourhoods.</p>
1933	Metro	<p>Needs to be significant investment in high quality public transport infrastructure (eg rail infrastructure, Rapid Transit systems and fully segregated bus lanes) to support economic growth of Leeds. There is considerable scope to improve public transport routes within current infrastructure provision, eg reallocation of roadspace to bus lane, provision of bus priority measures at junctions and managing demand for car travel (eg car parking policies). Encouragement to use alternative forms of transport to private car by provision of infrastructure that offers viable alternative (eg fully segregated cycle ways, improved public transport and better and safer pedestrian facilities, particularly at busy road crossings).</p>
1982	Sport England	no
2064	Keyland Developments Limited	<p>Not clear how "job guarantee schemes" relate to well connected city - not explained in text nor appropriate as an option in its own right</p>
2068	Skelton Business Park Ltd (via Skelton Business Park)	<p>Identify leisure and retail opportunities within easy reach of communities</p>

Rep No	Representor	Representor comments
2080	RSPB Northern England Region	The CS should include policy to develop an integrated network of safe green corridors through urban areas to encourage residents to walk and cycle rather than use cars
2425	Leeds City Council	Not radical enough. We need to set up a structure that will serve Leeds into medium term future. Policy reads a little short term.
2533	Ms Mary Kimble	Make sure planning development is consistent with transport goals
2544	Carter Jonas LLP	Potential options Re. Develop policies and measures consistent with the Local Transport Plan The planning authority should develop policies and measures that are consistent with the LTP.
2612	Mr Martin Staniforth	This section is very thin and suggests a lack of commitment to transport issues. In particular the options are disconnected from the discussion. Very woolly.
2656	CPRE	Transport is a key here. All new development must have this as a background for approval.
2663	Spawforths	Alternative to supertram and new rail stations are required. Tram-train supported.
2663	Miller Strategic Land (via Spawforths)	Alternative to supertram and new rail stations are required. Tram-train supported.
2663	Oulton Hall (IOM) Ltd (via Spawforths)	Alternative to supertram and new rail stations are required. Tram-train supported.
2663	Taylor Woodrow Developments Ltd (via Spawforths)	Alternative to supertram and new rail stations are required. Tram-train supported.
2668	Leeds City Council	Should the city simply accept the levels of commuting from without it's borders? Should it seek to restrain it or provide for it?
2671	Mr Kenneth Ward	no
2672	Leeds City Council	Private car use and new road building needs to be discouraged very strongly. Public transportation systems need massive reinvestment and potentially re-nationalising. The symbology and externalities of the private car in social justice and pollution issues need for deeper debate.

**Question 12 Does this section set out the right issues with regards to providing for communities?**

0012	Horsforth Civic Society	Yes
0020	Scholes Community Forum	Yes (90%)
0033	Miss Pauline Johnson	Yes
0042	The Oulton Society	Yes
0046	Environment Agency	Don't know
0052	Natural England	Yes - fully support paragraph 8.4 and agree with para 8.5 that the green belt has a key role in maintaining environmental quality but would like to add and where necessary the green belt should be improved where it is not good quality. Para 8.10 needs to include green or sustainable tourism and means of transport and access to the area by visitors.
0063	David Wilson Homes Northern	Yes

Rep No	Representor	Representor comments
0083	Caddick Developments Ltd	yes
0092	Home Builders Federation	No
0099	English Heritage	Overall this section has identified the correct issues.
0210	CPRE Leeds District Group	Yes
0480	East Leeds Extension consortium companies (via Dacre Son & Hartley)	<p>The Core Strategy needs to determine which areas need more housing mix and which are inappropriate for mix (eg city centre).</p> <p>This should take account of HMA evidence of housing need and demand in order to meet requirements of PPS3 paras 9, 10 and 11. This should include the LCR as well as Leeds itself, and address alternatives to demand in environmentally constrained districts such as Harrogate and York. The HMA should assess how identified need and demand relates to recent and outstanding supply.</p> <p>It is not certain whether the needs of families are being met by current housing supply.</p>
0787	Land Securities (via David Lock Associates)	Yes
0845	Leeds Initiative	yes and no. Suggesting changing heading of Section 8 to "Assisting and working with communities".
0957	Pool Parish Council	Yes
1780	Montpellier Estates	No
1960	Leeds City Council	No
1982	Sport England	yes
2064	Keyland Developments Limited	No
2068	Skelton Business Park Ltd (via Skelton Business Park)	No
2080	RSPB Northern England Region	<p>Support creation of green infrastructure within Leeds and development of Framework to identify areas needing enhancement and the potential for linkages. Opportunities should be identified and taken to create green infrastructure in areas of low environmental quality, such as Aire Valley AAP. The framework should also identify existing biodiversity within current green spaces and opportunities to create new areas for wildlife and for people to explore natural environments.</p> <p>There should be policies to ensure the biodiversity value of the Green Belt is protected and enhanced, and connectivity to other natural habitats improved.</p>
2373	Leeds Tenants Federation	yes
2425	Leeds City Council	Yes
2533	Ms Mary Kimble	Yes

Rep No	Representor	Representor comments
2544	Carter Jonas LLP	<p>Yes</p> <p>Re. How can the city provide for the housing needs of all sections of the community?  Recommend that LCC provides Strategic Housing Market Assessment that should form part of the evidence base to develop the housing policy. In accordance with PPS3, LCC should plan for the full range of market housing. Recommend a number of spatial policy threads to deal with the need to accommodate growth in established and popular areas, and address the regeneration and social issues within some of the peripheral areas to the city centre. PPS3 (para.29) provides advice on how to address issues of housing need including housing for key workers, vulnerable people and those looking to make the first step towards home ownership. LCC should also ensure that the needs of local communities are not over-looked when formulating its CS.</p> <p>Further comments submitted Feb07</p> <p>Housing needs for both affordable and market housing in rural settlements should be addressed to help sustain their health &amp; vitality. Population growth needs to be accommodated locally so that households do not have to move away from friends &amp; family. Innovative policy should be used to capture the help that "traditional estates" can make to house those in need of affordable housing.</p> <p>Schools  The LDF should ensure that new residential development in Leeds has and will continue to generate need for additional capacity of schools, including faith schools as well as LEA schools. Also, some schools need to be improved, modernised and replaced. These needs and opportunities should be properly planned for.</p> <p>Leisure &amp; recreation needs  Housing sites can be masterplanned to deliver local recreation facilities as well as housing. Low Lane Horsforth provides particular opportunity for this.</p>
2612	Mr Martin Staniforth	Yes
2656	CPRE	Yes
2663	Taylor Woodrow Developments Ltd (via Spawforths)	Providing for communities must refer to the HMA
2663	Miller Strategic Land (via Spawforths)	Providing for communities must refer to the HMA
2663	Oulton Hall (IOM) Ltd (via Spawforths)	Providing for communities must refer to the HMA
2663	Spawforths	Providing for communities must refer to the HMA
2668	Leeds City Council	yes
2670	Federation of Small Businesses	yes
2671	Mr Kenneth Ward	yes
2672	Leeds City Council	Yes

**Question 13 Do you have any additional suggestions for potential options (providing for communities)?**

0012	Horsforth Civic Society	Options are clear and well stated.
0020	Scholes Community Forum	Sustainability related issues - infrastructure, accessibility, health and education
0033	Miss Pauline Johnson	<p>Troublemakers who have been evicted from their council houses move to other areas where they cause damage and mayhem. Perhaps it would be better to move them to one place where demolition is taking place and they can aggravate each other.</p> <p>Cultural facilities and health facilities are best provided in the city centre where everyone can access them, apart from doctors and dentists.</p> <p>There could be problems with siting gypsies.</p> <p>The council is doing some good work with open spaces.</p>
0042	The Oulton Society	The potential options look good, but land for setaside should be considered for trees or crops that can be used as biomass at Drax Power Station
0046	Environment Agency	Do not have any other options to suggest, however do support the discussion paper's proposal to support access to green spaces and the Leeds Forest Strategy. Also support the broadening the focus of regeneration to include the environment
0052	Natural England	Fully support the 4th point re green infrastructure framework.
0063	David Wilson Homes Northern	Sites should not be allocated for affordable only but encouragement should be given to provide homes for first time buyers.
0083	Caddick Developments Ltd	'Housing for All' and the 'Potential Options' should address the issue of provision for the ageing population, an ongoing trend with major implications for housing and ease of access to economic, social, transport and particularly healthcare facilities.
0092	Home Builders Federation	<p>Affordable housing - HBF are not opposed to delivering affordable housing to meet the Government's sustainable communities agenda, however concern that matters of policy should be in accordance with national advice in relation to affordable housing.</p> <p>HMA should form part of the published evidence base prior to issues and options consultation to help provide a greater understanding of where additional affordable housing is required and in what quantities.</p> <p>The threshold should be determined in negotiation with developers on a site by site basis taking into account the requirements of the site, financial and market considerations, the availability of grant funding/public subsidy and the type and extent of housing need in the locality as informed by a robust and up to date housing market assessment. Approach to affordable housing should be development without prescriptive percentages.</p>
0095	Government Office for Yorkshire and the Humber	<p>New Development &amp; Providing for Communities</p> <p>Decide whether additional land will be required or PAS will be sufficient, taking account of sustainability of location (eg relation to MUA, public transport, wider locational strategy). Link new jobs to education &amp; training to provide opportunities for Leeds residents, especially workless, &amp; avoid commuting from outside of Leeds.</p> <p>Locational criteria for G&amp;T sites is required (Circ.01/06 para 31). Use "suitable" rather than "favoured" in text.</p>
0099	English Heritage	Support the intention for a green infrastructure network. Also welcome the intention to protect and enhance the city's historic environment - key element in defining the distinct identity of the city.



Rep No	Representor	Representor comments
0210	CPRE Leeds District Group	The parks and green areas within the MDC boundaries are a most important feature of the city. It is, however, important that such places are properly managed. Rothwell Country Park is an example of a good concept which has been completely wasted by lack of proper management. The city should also demonstrate much more self respect. Much of the MDC looks scruffy, for example there is a proliferation of paving that needs repair or replacing in the city centre and elsewhere. The emphasis in the past has been on capital expenditure with little thought to subsequent management and maintenance; such factors need to form a part of any project budget.
0480	East Leeds Extension consortium companies (via Dacre Son & Hartley)	Identify broad areas of leeds where housing growth can be accommodated to 2025
0787	Land Securities (via David Lock Associates)	N/A
0845	Leeds Initiative	Have the priorities been developed through consultation with the public? I suspect not. I would strive to get views and opinions from communities, using local services and venues and accessible, creative and understandable language to come up with questions.
0846	University of Leeds	Agree with increasing affordable housing provision by increasing policy requirements for proportions on-site, lowering site thresholds, allocating land on the edge of villages for affordable housing and CPOs.  Agree that balanced development needs to be achieved through public transport, jobs, education etc, health and retail/local services.
0957	Pool Parish Council	As well as health and education facilities, policy to provide appropriate local retail and other services within communities.
1780	Montpellier Estates	The answer to the question "How can the city ensure that all neighbourhoods have access to quality...cultural facilities" is to clearly state in the Core Strategy that these facilities will be developed in the City Centre where there is good public transport connectivity.  PPS6 should be rigorously applied in Leeds - states that leisure, entertainment facilities, arts, culture and tourism are all designated town centre uses.  Notwithstanding the above, convenience retailing should be dispersed across the City Centre in order to cater for the expanding residential community as well as commercial occupiers. There needs to be sufficient flexibility in the planning policy as to ensure that ancillary retailing is sufficiently large enough to allow for the business models of retailers.  In order to provide housing for all sections of the community - there is a clear link between house prices and the supply of land. As a general principle, more residential land should be allocated which will ensure an adequate supply of houses and 'all things being equal' stem the rise in house prices.  However this may not alone deliver the affordable and sub-market housing required for key workers. Maybe the council could have a 2 tier residential allocation policy, whereby certain windfall sites could be allocated for key workers as oppose to open market residential. The landowners of these sites would rather have a key worker allocation, than no allocation, and this would deliver the key worker accommodation required in the city.
1933	Metro	In accordance with report commissioned by West Yorkshire Economic Partnership "Housing and Economic Growth in the Leeds City Region" consideration should be given to provision of housing for higher income groups, eg where can expensive housing be located that is easily accessible by public transport. Strongly support concentration of health and education facilities at locations that are highly accessible by sustainable transport.
1960	Leeds City Council	Right to rent and keeping families together - affordable homes earmarked for local people in all parts of Leeds MD, including rural areas.
2064	Keyland Developments Limited	As with other sections, the options are merely different policy strands requiring further development rather than the real alternatives implied by the word "options"

Rep No	Representor	Representor comments
2068	Skelton Business Park Ltd (via Skelton Business Park)	The potential options are not comprehensive to meet the needs for communities and should recognise the requirements for other development needs.
2080	RSPB Northern England Region	Identify the Lower Aire Valley as significant 'hub' in emerging green infrastructure. Refer to RSPB's vision.
2425	Leeds City Council	See early comments. With an aging population in our outer edge communities social care costs need to be planned into policy. Not enough here.
2533	Ms Mary Kimble	Street trees, especially in central city
2544	Carter Jonas LLP	<p>Potential Options  Re.Negotiate a percentage of dwellings as part of new housing developments to be affordable and allocate sites for affordable housing only  To accord with PPS3 it would be appropriate for LCC to set an overall target for the amount of affordable housing to be provided across the District and set individual targets for social-rented and intermediate housing. This must be based on evidence from Strategic Housing Market Assessment. LCC should negotiate on this basis but be mindful of need to consider likely economic viability of land (para.29 PPS3).</p> <p>In respect of allocating sites for affordable housing only, accept that allocation of rural exceptions sites may be appropriate means of addressing housing needs of rural areas. However concerned that to allocate sites solely for affordable housing would be contrary to overall objective of creating mixed and balanced communities. May also render a site unviable to develop or discourage landowners from releasing land for development. Public subsidy to develop sites for affordable housing is not guaranteed as Leeds will be competing with other areas with more acute housing issues (eg Bradford, Kirklees and Calderdale). This approach would not provide sustainable solution to housing needs of the district.</p>
2612	Mr Martin Staniforth	More emphasis is required on culture and sport.
2656	CPRE	Develop outside recreational facilities for "youth" in easily accessible places in towns and larger villages
2663	Taylor Woodrow Developments Ltd (via Spawforths)	Shouldn't allocate entire sites for affordable housing, as this won't create mixed communities.
2663	Miller Strategic Land (via Spawforths)	Shouldn't allocate entire sites for affordable housing, as this won't create mixed communities.
2663	Oulton Hall (IOM) Ltd (via Spawforths)	Shouldn't allocate entire sites for affordable housing, as this won't create mixed communities.
2663	Spawforths	Shouldn't allocate entire sites for affordable housing, as this won't create mixed communities.
2671	Mr Kenneth Ward	no
2672	Leeds City Council	Making lobbying pressure for sanity in housing prices. The next 'bust' in the cycle is sure to come. Housing is a human right and should not be left to the exigencies of the market which does not have a conscience.

**Question 14 Which scenario do you think best illustrates how Leeds should grow in the future?**

0012	Horsforth Civic Society	Scenario 2. Although possibly a combination of scenarios 2 & 3.
0020	Scholes Community Forum	Combination of scenario 1 and scenario 2

Rep No	Representor	Representor comments
0033	Miss Pauline Johnson	Scenario 1
0042	The Oulton Society	Scenario 2
0046	Environment Agency	Scenario 2
0063	David Wilson Homes Northern	None
0083	Caddick Developments Ltd	Scenario 2 but with the addition of some elements of scenario 3 as described in paragraphs 10.8 & 10.10.
0210	CPRE Leeds District Group	Scenario 2
0337	Aire and Calder Rivers Group	Scenario 2
0480	East Leeds Extension consortium companies (via Dacre Son & Hartley)	<p>None of the scenarios sets out how Leeds should grow. The UDP should be the starting point, with housing phases 1, 2 &amp; 3.</p> <p>"Business as Usual" fails to include the UDP Review phases. There's conflict between expectations for growth in AAP areas and concerns about lack of transport investment. It relies too much on the city centre apartment market at the expense of other areas, &amp; should draw on the findings of the HMA.</p> <p>"Focussed Regeneration &amp; Growth" has inconsistency by suggesting that more focussed investment on transport nodes will be achieved by less intense development in the city centre rim. There is lack of consideration of land availability and infrastructure capacity constraints.</p> <p>"Urban Regeneration &amp; Dispersed Expansion". As the UDP phased sites are only shown in this Scenario, it is a serious misrepresentation. It bears no resemblance to the UDP EIP, Inspector's report and adopted document. It is misleading to suggest that lower density development would be sought on all sites, implying that this would lead to major greenfield development and lack of public transport investment.</p>
0787	Land Securities (via David Lock Associates)	Scenario 2.
0845	Leeds Initiative	Don't know.
0846	University of Leeds	<p>The most realistic approach will be to start with a focus on Scenario 2 "concentrating development" - especially focussing development on the "rim" and at well-connected points, and to plan ahead for Scenario 4, when new infrastructure comes into play.</p> <p>Development in the "Rim" should be focussed on areas that are best connected. Focus on the Leeds/Bradford corridor should be on improving quality of infrastructure, open spaces and providing additional/replacement housing at most accessible points.</p>
0957	Pool Parish Council	Scenario 3
1780	Montpellier Estates	Scenario 2
1960	Leeds City Council	Scenario 2
1982	Sport England	Scenario 2
2064	Keyland Developments Limited	Scenario 3

Rep No	Representor	Representor comments
2068	Skelton Business Park Ltd (via Skelton Business Park)	Scenario 3
2080	RSPB Northern England Region	Scenario 2. Support commitment to 'review LCC and large landowner holdings for creative, sustainable development of brown land, provided it contributes strongly to protection and enhancement of biodiversity within the District.
2373	Leeds Tenants Federation	Scenario 3
2425	Leeds City Council	Scenario 2
2533	Ms Mary Kimble	Scenario 2
2544	Carter Jonas LLP	<p>Scenario 3.</p> <p>Comments on Scenarios</p> <p>Scenario 1 - Not sufficiently forward thinking and unlikely to result in LCC being successful in terms of delivering its Strategic Vision. Relies too heavily on past policy approaches and will result in further intensification of development pressures within the city centre, creating more pressure on transport systems and other infrastructure. Will also exacerbate many of the problems currently faced in the city centre in terms of congestion, inadequate public transport and high concentration of flatted development. This is not a sustainable solution for the city.</p> <p>Scenario 2 - Would bring a much better environment for people living and working in the city and is likely to attract investment in the city. However, it does not provide a balanced approach to the distribution of development across the district and is likely to result in further pressure on existing infrastructure and schools within the city. Without further development to the north of Leeds the 'golden triangle' effect is likely to be exacerbated further. Important areas to the future growth of Leeds and that should receive a share of development as it can be easily accommodated is Calverley, Farsley, Adel, Garforth, Meanwood and Shadwell. Also Boston Spa, Collingham, Scholes, Ledsham and Thorp Arch, as these settlements are subject to different pressures from employment growth outside of the city centre.</p> <p>Scenario 3 - Provides more balanced approach in terms of spreading development across both urban and rural areas and could:-</p> <ul style="list-style-type: none"> <li>- bring much needed regeneration to the city centre</li> <li>- create less traffic congestion in the city centre</li> <li>- allow release of sites for development on periphery of city's built limits in areas such as Calverley, Farsley, Adel, Shadwell, Meanwood and Garforth</li> <li>- ensure that vitality of market towns such as Boston Spa are retained through growth</li> <li>- encourage retention of much needed facilities and services in villages such as Collingham, Scholes, Ledsham and Thorp Arch through measured growth</li> <li>- provide for development needs of rural communities</li> </ul> <p>It is likely that such an approach will need a spatial strategy with number of policy threads. A spatial plan based on identified growth and regeneration areas should be adopted.</p> <p>The 3 options are slightly contrived and it is considered that through the DPD process variations of these 3 basic options may be necessary. In relation to areas subject to growth it may be necessary to decide whether it will be appropriate to provide for a higher rate of growth to the north, east, south or west of the district in order to deliver specific and desired outcomes. Any future spatial options should be mindful of these more detailed issues.</p>
2612	Mr Martin Staniforth	Scenario 2
2656	CPRE	Scenarios 2 and 3

Rep No	Representor	Representor comments
2663	Taylor Woodrow Developments Ltd (via Spawforths)	Scenarios - they are not balanced & are too inflexible. They should all seek balanced growth. CS should identify a settlement hierarchy and distribute development accordingly
2663	Oulton Hall (IOM) Ltd (via Spawforths)	Scenarios - they are not balanced & are too inflexible. They should all seek balanced growth. CS should identify a settlement hierarchy and distribute development accordingly
2663	Miller Strategic Land (via Spawforths)	Scenarios - they are not balanced & are too inflexible. They should all seek balanced growth. CS should identify a settlement hierarchy and distribute development accordingly
2663	Spawforths	Scenarios - they are not balanced & are too inflexible. They should all seek balanced growth. CS should identify a settlement hierarchy and distribute development accordingly
2668	Leeds City Council	Scenario 1
2669	KPMG	Scenario 2
2670	Federation of Small Businesses	Scenario 2
2671	Mr Kenneth Ward	Scenario 2
2672	Leeds City Council	Scenario 2

**Question 15 Are there any additional scenarios which should be considered through the Core Strategy?**

0020	Scholes Community Forum	A combination of scenarios 1 & 2 - based on plan, monitor and manage. Setting a maximum 'overshoot' percentage against RSS requirement for restriction/release of housing land (annually). Engage RUDP policies.  Leeds have exceeded current target 1930 p/a year on year without addressing this issue.
0026	Leeds HMO Lobby	Would like to see additional scenarios proposed so that sustainability can be more precisely targeted.
0033	Miss Pauline Johnson	Maps were difficult to follow without place names. Concern re Beeston area regeneration and Middleton. More explanation required. Hope that regeneration doesn't cover the area I live as like the area - has a good community spirit.
0042	The Oulton Society	Capital projects and redevelopment are relatively easy to produce on paper but the maintenance of all projects should be clearly defined from the outset.
0052	Natural England	There is some merit on all of the scenarios. However we consider that 2 additional scenarios should be considered and at the final conclusion it may be that a combination of the scenarios is the ideal approach to sustainable growth for Leeds. Other options based on RSS options are: * To meet local needs locally which could be social, economic or environmental * To develop within the environmental capacity of the area and recognition of the significance of our environment is our future including our economic and social well-being
0063	David Wilson Homes Northern	The scenarios look at Leeds as a single place rather than a series of connected places within the context of the City region. Patterns of development should seek to avoid daily travel to/from city centre. Therefore the pattern of development should look at Leeds as say Wetherby, Otley, Aireborough, Leeds (old city), Morley, Rothwell, Garforth/Micklefield/Kippax and Pudsey. By seeking to retain travel within these areas more sustainable development will result.

Rep No	Representor	Representor comments
0083	Caddick Developments Ltd	Item 10.5 of Scenario 2 would exclude town such as Wetherby and Otley and major centres of population (economic activity such as Seacroft. Scenarios for these non rail served locations should be addressed. I have reservations about the very high densities envisaged under Scenario 2, which will not be appropriate in all locations. This factor, and the likely RSS outcome, are some of the reasons for suggesting the inclusion of some elements of Scenario 3.
0092	Home Builders Federation	HBF think that most appropriate approach is one based on robust and reliable evidence base used to produce the most realistic options. Must ensure the concept of promoting sustainable urban neighbourhoods where growth and regen are sought and where it could best serve existing communities. Also important to seek to meet market demands and provide housing to meet residential development levels of need.
0095	Government Office for Yorkshire and the Humber	The Scenarios Those likely to lead to dispersed development patterns would not reflect national guidance or RSS. This applies to Scenarios 1 & 3.  Public transport capacity, plans & programmes should be taken into account.  As work proceeds, the scenarios should deal with sufficiency to accommodate jobs & housing growth, which centres should grow & by how much, impacts on community well being & conformity with national & regional policy.
0099	English Heritage	It is not clear how the potential options have influenced the 3 scenarios. Would be clearer if each scenario outlined what the implications might be for each of the 5 key themes.  Explanation of terminology would also be useful e.g. what is meant by 'medium' or 'very high' densities.  A characterisation of the city would greatly assist in identifying the capacity for each part of the city to accommodate change.  Scenario 1: Increase in densities and greater development pressure on the rim could affect the setting and character of the city's Conservation Areas and listed buildings.  Scenario 2: Whilst reduced development pressures within the city centre, rim and existing urban areas might offer benefits to the historic environment, large scale interventions with extremely high density (esp if this means tall buildings) could have impact across large areas of the city. Additionally, there are few areas in the City Centre which has no conservation interest - so it's not clear where large scale intervention might take place.  Scenario 3 - reduced pressures within the City Centre, rim and urban areas might offer benefits to the historic environment. However the release of PAS sites may impact on existing historic cores.
0198	Leeds City Council	Leeds Bradford Corridor should not be part of the Business as usual (scenario 1) - it's not that far advanced. It should be included in scenario 2. A potential Leeds Bradford growth area (YH assembly thinking) needs to be included as part of scenario 3.  East rail corridor - propose that a Leeds Bradford rail corridor is included as part of scenario 3.  Growth of district centres should be mentioned e.g. Armley, Bramley, Pudsey, Farsley.
0210	CPRE Leeds District Group	The way this document is phrased it would be difficult not to agree with the various. This is a pity because it tends to invalidate this aspect of the consultation process. The additional suggestions are much more important. Perhaps the greatest failure of so many noble planning ventures over the last half century has been caused by concentrating on the capital expenditure and failing to consider and fund the subsequent management. This should be a core aspect of any core strategy.
0480	East Leeds Extension consortium companies (via Dacre Son & Hartley)	The scenarios should be recast based on a robust evidence base, on economic growth and on transport capacity.

Rep No	Representor	Representor comments
0787	Land Securities (via David Lock Associates)	<p>Scenario 1 likely to result in continuation of imbalances across the city. This was conclusion of Leeds and Environs Study, 2002 and draft Yorkshire and Humber Plan (2005) and would lead to lack of investment in transport and other needs in outer neighbourhoods and centres.</p> <p>Scenario 2 is most sustainable option because makes connection between areas of need, levels of development and growth and public transport. It is important that 'growth nodes' reflect current economic realities of where there is a high level of employment and activity (district and town centres and other retail and employment centres). A regeneration area of South Leeds would contribute to achieving these objectives, providing it extends to include nodes of economic activity rather than just areas of need.</p> <p>There is some merit in Scenario 3 as it recognises diverse needs of many towns and districts of polycentric city of Leeds. However its dispersed nature means investment and development is directed to too many areas and would fail to prioritise development in most sustainable and accessible locations.</p>
0845	Leeds Initiative	<p>Scenario 1 – Clearly isn't sustainable. Scenario 2 and 3 – Don't seem ideal either.</p>
0948	Yorkshire Water Services	These scenarios should take account of Yorkshire Water's Knostrop waste water treatment works. This is a strategic works that serves Leeds, it will remain in operational use indefinitely.
0960	Leeds Chamber Property Forum	Support the concept of creating a strong centre with high densities and redevelopment of the rim - whilst at the same time opening up potential areas which are well connected to improved public transport routes. Since the Core Strategy will last for more than a decade - it shouldn't rule out any of the scenarios.
1780	Montpellier Estates	<p>Important that the expansion of the City is controlled to ensure that vacant sites in the City Centre are developed first. Would consolidate the city centre and provide a positive image as a vibrant centre. The city centre should not be allowed to stagnate because development has leapfrogged to unsustainable sites on the edge of the city.</p> <p>There is a great deal of capacity in Holbeck Urban Village - the focus of the city's expansion should be here. The city should not be allowed to haemorrhage out long the unsustainable road corridors (e.g Kirkstall Valley).</p>

Rep No	Representor	Representor comments
1933	Metro	<p>Summary of how and where development should take place across the Leeds district -</p> <p>General Principles</p> <ul style="list-style-type: none"> <li>- Development should make the best use of existing infrastructure and services, ie using space capacity</li> <li>- For new development areas, infrastructure and services need to be in place and operation on first occupation of new site. This is to ensure that new occupants have use of good quality public transport service from the outset</li> <li>- New employment developments need adequate measures to limit car use over and above predefined "acceptable" limits, eg parking control, targets etc</li> </ul> <p>Land Uses</p> <p>Offices</p> <p>Most sustainable location for new development is in City Centre near to station, but outside retail core. Location best suited to providing viable public transport for expected additional 10,000 daily in-commuters. It has been suggested that should the city centre and edge of city centre continue to be developed the Highways Agency could start advising planning permissions be refused due to detrimental effect on strategic road network. Consideration should be given to Leeds office study. If further land is needed consideration should be given to expanding city centre around Emmanuel Trading Estate in Holbeck as within easy walking distance of railway station, although links need improving. If LCC chose to progress office development in other locations these should be highly accessible by public transport (railway stations and major interchanges (including park and ride subject to robust management).</p> <p>Residential</p> <p>New development should be at the rim of the city centre, on brownfield sites within Leeds urban area, close to suburban rail stations and within Area Action Plan areas. All sites should a minimum level of public transport accessibility and clear, safe walking and cycling routes to important locations (eg to city centre from rim).</p> <p>Industrial</p> <p>New development be situated within Aire Valley served by good quality public transport</p> <p>East Leeds</p> <p>For scenario 2 and 3, recommend concentrating development (residential and employment) on one location on York/Selby line. Leeds-Micklefield Rail Capacity Review advises most appropriate location for parkway station would be Thorpe Park-Garforth area. Developers of the ELE should provide significant contribution to new station.</p>
1982	Sport England	A mixture of scenario 2 & 3.
2064	Keyland Developments Limited	<p>Implementation and Monitoring is not covered on this form and only one option is listed: "To provide a clear policy which gives details of maximum contributions that the Council may wish to seek" the strategy must recognise that policy and its application must be evidence based and have regard to special circumstances of particular developments - particularly on previously developed and degraded land where remediation and environmental improvements will be costly and will, in themselves, deliver significant environmental benefits.</p> <p>The seeking of contributions is not necessarily a 'one size fits all' policy. The seeking of contributions must be properly evaluated with underlying objective to secure delivery of new development, particularly in the Aire Valley where growth is sought for regeneration and rejuvenation of the wider Leeds economy. In order to secure development there may be a requirement for sources of funding other than the private sector in order to procure the delivery of new infrastructure.</p> <p>A balance needs to be struck between the request for financial contributions (and the timing thereof) and the need to ensure that the development is viable and has a reasonable prospect of being delivered.</p>
2080	RSPB Northern England Region	Include environmental regeneration of the Lower Aire Valley within CS Preferred Options and any mapping or key diagram contained with it, irrespective of which scenario is taken forward.
2373	Leeds Tenants Federation	Make more use of buildings, that already exist! (i.e. Shaftesbury House Beeston)



Rep No	Representor	Representor comments
2612	Mr Martin Staniforth	Section 9 seems to suggest that public realm contributions affect the City Centre only. Surely this should be more widespread. The policy should indicate minimum as well as maximum contributions.  Criteria are plural - references to 'a criteria' should be a 'criterion'.
2613	North Yorkshire County Council	Each scenario has its own merits and drawbacks. A strategy which incorporates the PAS sites for development (scenario 3) would provide a greater range of sites to meet the demand for housing generated within Leeds.
2656	CPRE	Monitor and control. If not done effectively, the whole process will largely fail and be a waste of resources.
2663	Spawforths	An alternative scenario should be created which maximises the development value of land in Oulton Estates' ownership. This is to comply with RSS and the Barker Report proposals.
2663	Oulton Hall (IOM) Ltd (via Spawforths)	An alternative scenario should be created which maximises the development value of land in Oulton Estates' ownership. This is to comply with RSS and the Barker Report proposals.
2663	Taylor Woodrow Developments Ltd (via Spawforths)	An alternative scenario should be created which maximises the development value of land in Oulton Estates' ownership. This is to comply with RSS and the Barker Report proposals.
2663	Miller Strategic Land (via Spawforths)	An alternative scenario should be created which maximises the development value of land in Oulton Estates' ownership. This is to comply with RSS and the Barker Report proposals.
2669	KPMG	Add attracting new business, investment and people to the city and its region to support and push the regeneration and growth. New 'blood' and drive existing 'blood'.
2671	Mr Kenneth Ward	Sections 4,5,6,7,8,10. These scenarios appear to me to be correctly balanced at present, for regeneration and growth. They will need to be reviewed on a constant basis.
2672	Leeds City Council	An urban development model which has ecological imperatives at its core, which recognises that not all growth is desirable or necessary – and focuses on a restorative model. The next regeneration and community development will occur when the economy is attuned with carrying capacity limits, industrial symbiosis and intergenerational equity. In essence a slower paced society with social and environmental capital considered more robustly and carefully than what it is now. Our current path is unsustainable and creates more environmental problems, public health problems and social atomisation than it will ever seek or be able to solve.

## Question 2

2663	Miller Strategic Land (via Spawforths)	No. Don't agree with themes. Should reflect vision. Housing is divided between themes. Not good to segregate the debate. New housing should be in "Providing for communities"; New employment should be in "The Economy".. Need separate "Economy" section because Leeds is the engine of growth of the region. Regeneration overlaps with other themes.
2663	Oulton Hall (IOM) Ltd (via Spawforths)	No. Don't agree with themes. Should reflect vision. Housing is divided between themes. Not good to segregate the debate. New housing should be in "Providing for communities"; New employment should be in "The Economy".. Need separate "Economy" section because Leeds is the engine of growth of the region. Regeneration overlaps with other themes.
2663	Taylor Woodrow Developments Ltd (via Spawforths)	No. Don't agree with themes. Should reflect vision. Housing is divided between themes. Not good to segregate the debate. New housing should be in "Providing for communities"; New employment should be in "The Economy".. Need separate "Economy" section because Leeds is the engine of growth of the region. Regeneration overlaps with other themes.
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**Question 3**

2663	Taylor Woodrow Developments Ltd (via Spawforths)	Other themes. LCR Development Programme should be referred to.
2663	Miller Strategic Land (via Spawforths)	Other themes. LCR Development Programme should be referred to.
2663	Oulton Hall (IOM) Ltd (via Spawforths)	Other themes. LCR Development Programme should be referred to.
2663	Spawforths	Other themes. LCR Development Programme should be referred to.

**Question 4**

2663	Oulton Hall (IOM) Ltd (via Spawforths)	Yes. Happy with environment issues
2663	Taylor Woodrow Developments Ltd (via Spawforths)	Yes. Happy with environment issues
2663	Spawforths	Yes. Happy with environment issues
2663	Miller Strategic Land (via Spawforths)	Yes. Happy with environment issues

**Question 5**

2663	Spawforths	Energy efficiency should be dealt with by building regulations
2663	Taylor Woodrow Developments Ltd (via Spawforths)	Energy efficiency should be dealt with by building regulations
2663	Oulton Hall (IOM) Ltd (via Spawforths)	Energy efficiency should be dealt with by building regulations
2663	Miller Strategic Land (via Spawforths)	Energy efficiency should be dealt with by building regulations

**Question 6**

2663	Oulton Hall (IOM) Ltd (via Spawforths)	Urban capacity not measured. Nodal points are not justified.
2663	Taylor Woodrow Developments Ltd (via Spawforths)	Urban capacity not measured. Nodal points are not justified.
2663	Spawforths	Urban capacity not measured. Nodal points are not justified.
2663	Miller Strategic Land (via Spawforths)	Urban capacity not measured. Nodal points are not justified.

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**Question 7**

2663	Taylor Woodrow Developments Ltd (via Spawforths)	<p>Shouldn't identify sequential approach to land development, ie. Brownfield first, because not transposed into PPS3. The CS shouldn't have a sequential approach.</p> <p>PPS3 has a target of 60% new housing on brownfield land; therefore some greenfield sites in sustainable locations will be suitable for development.</p> <p>PPS3 says "windfall" development can't be counted; therefore the parameter should be deliverability. Also, the CS should say more about the types of housing needed (according to HMA)</p>
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**Question 8**

2663	Taylor Woodrow Developments Ltd (via Spawforths)	Regeneration section is vague and aimless
2663	Spawforths	Regeneration section is vague and aimless. There is no mention of the need to generate energy from waste. Also, housing renewal must be backed by an evidence base that will show deliverability of sites.
2663	Miller Strategic Land (via Spawforths)	Regeneration section is vague and aimless
2663	Oulton Hall (IOM) Ltd (via Spawforths)	Regeneration section is vague and aimless

**Question 9**

2663	Miller Strategic Land (via Spawforths)	Regeneration section should be deleted
2663	Oulton Hall (IOM) Ltd (via Spawforths)	Regeneration section should be deleted
2663	Spawforths	Regeneration section should be deleted
2663	Taylor Woodrow Developments Ltd (via Spawforths)	Regeneration section should be deleted

**Question G                      General comments**

0026	Leeds HMO Lobby	Much attention is given to meeting housing requirements - but there is no recognition that a major contribution to housing shortage is the appropriation of family housing as 2nd homes in NW Leeds by student landlords. Needs to be addressed by CS.
0026	Leeds HMO Lobby	CS is inflexible in terms of the actions it proposes - 1. Promote economic growth, but at the same time there is a real problem of affordable housing in the district (e.g. golden triangle) 2. Protect the environment - yet it's also noted that Leeds-Bradford airport passenger numbers are projected to double by 2020. 3. Higher education provision - yet no acknowledgement is made of the way the 2 unis in Inner NW Leeds have entirely undermined the sustainability of this area
0026	Leeds HMO Lobby	CS is inflexible in terms of time - states that regeneration is focussed on the AAP areas. No indication that the LDF itself might development, and further AAPS be added to the portfolio.
0026	Leeds HMO Lobby	Inflexible in terms of space - particular concerns of small towns and villages and the suburban areas are not considered
0026	Leeds HMO Lobby	Introduction states that LDF approach is intended to allow greater flexibility - but the CS itself appears to lack flexibility.
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Rep No	Representor	Representor comments
0046	Environment Agency	<p><b>Topic Papers</b></p> <p><b>Biodiversity</b> Fragmentation of habitats and loss of links between isolated populations of species are major threats to biodiversity. Major green corridor along River Aire and Leeds to Liverpool canal; wetland habitats in Lower Aire Valley, Fairburn Ings is exceptional example. The potential for enhancement and the threat of further fragmentation and decline is why biodiversity is an important issue for the CS. Reference to strategies and information - RSPB Lower Aire Valley Strategy; BAP Leeds Biodiversity Action Plan; The River Aire Fish Pass Action Plan 2005.</p> <p><b>Contaminated Land</b> Significant problem of contaminated land poses threat to public health and the environment. Support continuation of redevelopment of brownfield rather than greenfield sites as protects and enhances soil resources.</p> <p><b>Flood Risk</b> Flooding in Leeds shown in Map 2 (provided with representation). Flood risk in the city is classified by EA as high (meaning it has a medium probability of flooding but very high consequences). Current flood protection in Leeds is limited to privately owned structure which act as informal defences. There are no flood defence structures in Leeds. Aware of the ongoing work on Leeds Strategic Flood Risk Assessment. The CS should be informed by the Aire Catchment Flood Management Plan and help to facilitate the Leeds Flood Alleviation Scheme. Reference to further strategies and information - Aire Catchment Flood Management Plan; The draft Aire CFMP published for consultation.</p> <p><b>Water Quality/Resources</b> Water quality has improved significantly in Leeds over past 50 years. This improved quality needs to be protected and in some areas enhanced further. In line with the Water Framework Directive, local authorities will be required to assist in delivery of River Basin Management Plans (statutory plans). The CS should be informed by the general aims of Water Framework Directive. One area in Leeds falls within a Source Protection Zone, designated to protect ground water that is being abstracted for consumption from pollution (shown in Map 4). Further strategies and information - Aire and Calder Catchment Abstraction Management Plan.</p> <p><b>Waste</b> Significant issue for Leeds. Although the CS may not be used to address this issue it should set policy direction line with the waste hierarchy.</p>
0046	Environment Agency	<p><b>Options</b> Spatial options not covered in the discussion paper but should be considered as part of any CS formulation</p> <p><b>Green Infrastructure</b> An emphasis on green infrastructure should form one element of one or all of the options. The areas marked in green on Map 3 (with representation) should be designated as areas of green infrastructure, either as existing green infrastructure or as areas for growth in green infrastructure. In areas where high quality green spaces exist they should be protected, however there are areas where green infrastructure can be accommodated alongside other uses. To create this mix, necessary to require creation of habitat buffer strips, cycle and walkways, native planting and habitat protection and enhancement.</p> <p><b>Focused Growth</b> More sustainable growth strategy than dispersed growth. Will encourage brownfield site development, lead to more sustainable transport patterns and can facilitate alternate uses on greenfield sites such as flood alleviation schemes and habitat creation.</p>

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0046	Environment Agency	<p><b>Key Issues</b>  <b>Sustainable Development</b>  The overall aim of the CS should be to set framework for sustainable development.</p> <p><b>Climate Change</b>  Spatial planning can play important role in adaptation to climate change and reducing greenhouse gases (as set out in PPS1). Have specific policies regarding sustainable transport, renewable energy contributions and sustainable energy use in housing and industry etc. Flexibility needs to be built into the CS to respond to climate change eg flooding. Elements of adaptation and prevention measures are essential and broad approaches outlined in proposed option of CS.</p> <p><b>Watercourses</b>  The CS should recognise and capitalise upon benefit that its watercourses offer. Reference to Map 1 and 2 provided with representation. The CS should be informed by the Strategic Flood Risk Assessment and PPS25.</p> <p><b>Green Infrastructure</b>  Recognising valuable greenspaces and corridors, many of which include watercourses. The CS needs to set out a clear policy for protecting and enhancing green networks and spaces referred to as green infrastructure.</p> <p>Climate change, watercourses and green infrastructure are integral elements of any aim to create a sustainable city and should be considered seriously in any CS.</p>

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0046	Environment Agency	<p>Key Issues Sustainable Development The overall aim of the CS should be to set framework for sustainable development.</p> <p>Climate Change Spatial planning can play important role in adaptation to climate change and reducing greenhouse gases (as set out in PPS1). Have specific policies regarding sustainable transport, renewable energy contributions and sustainable energy use in housing and industry etc. Flexibility needs to be built into the CS to respond to climate change eg flooding. Elements of adaptation and prevention measures are essential and broad approaches outlined in proposed option of CS.</p> <p>Watercourses The CS should recognise and capitalise upon benefit that its watercourses offer. Reference to Map 1 and 2 provided with representation. The CS should be informed by the Strategic Flood Risk Assessment and PPS25.</p> <p>Green Infrastructure Recognising valuable greenspaces and corridors, many of which include watercourses. The CS needs to set out a clear policy for protecting and enhancing green networks and spaces referred to as green infrastructure.</p> <p>Climate change, watercourses and green infrastructure are integral elements of any aim to create a sustainable city and should be considered seriously in any CS.</p>
0057	Ashdale Land & Property Company Ltd (via Barton Willmore Planning Partnership-Northern)	<p>Summary: Firm has interests in Micklefield and Allerton Bywater. Questionnaire answered but with reference to their report, don't know if they agree with the key objectives and seek clarification of what these are, agree to 5 Themes, agree environment section deals with, disagree with new development issues, disagree with regeneration issues, disagree with well connected city issues, agree with community issues, favour Scenarios 2 &amp; 3. Micklefield is promoted as a well connected settlement by rail. Renewable energy and climate change targets should not damp development. Development at Micklefield would strengthen it's role and utilise it's links (bus and rail) and services. Consider Council should review Green Belt informed by Housing Market Assessment and PAS prioritising sites with good public transport links ie Micklefield. Support higher housing numbers, review of Green Belt, development could help problematic areas like Micklefield and develop their facilities more. Regeneration should be spread out from City Centre to other settlements, ie those served by existing infrastructure (the East Leeds Rail Line and Micklefield). Support for integrated transport and regeneration. Development could assist in theregeneration of Micklefield. Planning obligations should be considered on a case by case basis with a clear understanding of the mechanisms involved. Scenarios – 1- benefits of regeneration should be spread to outlying settlements such as Micklefield and E Leeds rail Line. Scenario 2 – needs clarification on approach to Green Belt and PAS. Scenario 3 – consider that a balance of 1,2 &amp; 3 would be the best mix ie Regeneration Areas plus outlying areas such as Micklefield which are well served by rail. A balanced approach is needed.</p>

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0092	Home Builders Federation	<p>Conformity with current policy - CS issues paper has little regard to the recently adopted UDP review land allocations. Any substantive change in direction from the UDP would raise issues of soundness. There has been no major shift in national policy since adoption of UDP review to justify this.</p> <p>PPS3 - 15 year supply of housing - will require CS to plan for the period 2010-2025. How can the CS run until 2025 and exclude adopted phase 2 and phase 3 UDP allocations.</p>
0092	Home Builders Federation	<p>Evidence base -PPS12 para 4.24 sets out 9 tests of soundness to be considered in preparation of DPDs. Following docs should be taken into account as part of the evidence base:</p> <ul style="list-style-type: none"> <li>* AMR with realistic housing trajectory based upon information supplied through the Sept 2006 Housing Land Monitor</li> <li>* Leeds HMA</li> <li>* Strategic FRA</li> <li>* Leeds City Region Transport Strategy</li> <li>* Leeds City Region Development Programme</li> </ul>

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0095	Government Office for Yorkshire and the Humber	<p>Implementation</p> <p>A monitoring and implementation framework will be required (PPS12 para 2.9). Options must be deliverable &amp; credible in terms of resources to deliver them (Companion Guide, sec 8.4), even though implementation may be through other DPDs. Where possible, there should be "buy-in" by appropriate stakeholders, and where implementation relies upon organisations other than the Council, evidence of necessary commitment must be documented.</p> <p>Relationships with AAPs &amp; UDP - inter-relationships need to be fully explained, including programming &amp; timing.</p> <p>Leeds City Region – the C.S. needs to explain the role of Leeds vis-à-vis strategies of the 10 neighbouring authorities, especially those with large city/town centres. Relationships with the LCR Development Programme &amp; Transport Vision should be spelt out.</p>
0198	Leeds City Council	<p>What about alternative expansion levels at the airport? Uncertain how the Metro proposals for the Leeds -Harrogate and M621 corridor fits with these proposals</p>
0210	CPRE Leeds District Group	<p>Section 9: Implementation and Monitoring</p> <p>This Section has been missed out of the response form. This is most unfortunate because monitoring and control is crucial. If this is not done effectively the whole process will fail and the exercise will be nothing other than a well intentionally but pointless waste of money</p>
0414	Revera (via Scott Wilson)	<p>Summary:</p> <p>Agrees with all the questions and favours Option 3.</p> <p>Considers City Centre needs to expand to become successful on a European level.</p> <p>Car commuting could increase as a result of additional jobs - non sustainable.</p> <p>Green Belt boundaries (particularly to the East), should be reviewed to meet strategic development requirements ie Leeds Arena as this side is well connected to national highway network. Quotes much of Barker Report which recommends relaxation of Green Belt to allow for environmental improvements, public access, leisure and tourism.</p> <p>Family houses promoted.</p> <p>Affordable housing delivery could make unacceptable sites ok i.e. 'rural exception' sites.</p> <p>Surrounding settlements should be allowed to expand and become more self reliant.</p> <p>New development should be concentrated around public transport particularly East Leeds and Garforth.</p> <p>Option 3 favoured and reallocation of Aire Valley employment sites to residential and leisure uses.</p> <p>Development should be masterplanned rather than happening on a piecemeal basis.</p> <p>Buses should be segregated from traffic and development concentrated on rail stations.</p> <p>Access to and within the Green Belt needs to be reassessed and improved.</p> <p>Option 1 rejected as it will not deliver aspirations of stepping up a league or development promoted by RSS.</p> <p>Option 2 capacity of infrastructure and community facilities and transport may not support high density developments.</p> <p>Option 3 support East Leeds growth and develop PAS here first as rail infrastructure is there already.</p>

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0480	East Leeds Extension consortium companies (via Dacre Son & Hartley)	<p>Tests of soundness</p> <p>Evidence base – the Alternative Options should not be advanced until the following are digested: AMR 2006 with housing trajectories, HMA, SFRA, LCR Transport Strategy, LCR Development Programme, PPS3 and PPS25</p> <p>Test iv requires conformity with the Development Plan unless out of step with new national guidance or changes of circumstances. Since adoption of UDP Review, there have been no substantive shifts in national or regional policy to require a shift in policy direction.</p> <p>Whilst the text of the Key Issues paper acknowledges the importance of the UDP, not all of the six figures do. Figure 2 does, by including all of the land allocations. All scenarios should treat the UDP allocations as the starting point. The challenge is to extend the spatial approach to 2025.</p> <p>Scenario 3 offers no locations for displaced employment uses which would be displaced by mixed use developments in regeneration areas in a context of significant employment growth.</p> <p>Conformity is also necessary with PPS3 which requires a 15 year time horizon. Para 38 requires a housing strategy to be set out for the sustainable location of housing. To be in conformity, if any Scenarios don't include the UDP phase 2 &amp; 3 sites, a significant assessment of the alternative sites is required.</p> <p>Leeds does not have local circumstances that prevent identification of specific housing sites, so cannot rely upon windfall provision (paras 58 &amp; 59).</p> <p>Procedurally, (soundness test vii), consultation on Alternative Options should not take place until the RSS Panel Report is published as such AOs would generate a false set of unjustified Issues and Options and constrain proper consultation. Also, the Alternative Options should consider the significant development possibilities being generated by the AAPs, particularly Aire Valley and EASEL. These AAPs should not be treated as a fait accompli.</p> <p>Section 9: Implementation &amp; Monitoring This is mis-labeled. The section actually deals predominantly with developer contributions. This should have been a distinct part of the options section. It also needs to take account of the Government's emerging proposals for a Planning Gain Supplement. Proposals are needed for implementation and monitoring which can be drawn from the DCLG paper "Preparing Core Strategies" including the setting of realistic &amp; recordable targets according to timescales.</p>
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0837	Leeds City Council	Health and education - reference access to quality greenspace, allotments, green links is welcomed. Could be enhanced by further reference to outdoor sport provision.
0837	Leeds City Council	Cultural facilities - Should be recognised that the DCMS definition of culture includes 'park, open space, wildlife habitats, water environments and countryside recreation' as well as 'children's play, playgrounds and play activities' - it is therefore important that parks and greenspaces are seen as part of cultural provision within the city. Many European cities market their city around major parks alongside their cultural/art facilities. This is what we should be doing in Leeds with Roundhay Park, Otley Chevin, Golden Acre, Temple Newsam and Lotherton.
0837	Leeds City Council	Greenspace and forestry - parks and greenspace would be a better title for this section. Given issues over burial space, cemetery provision should be included as part of the CS. There are also strategies for fixed play provision and the playing pitch strategy - should make reference to these.

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0948	Yorkshire Water Services	The use of Sustainable Drainage Systems (SUDS) is encouraged by Yorkshire Water whenever practicable.
0948	Yorkshire Water Services	<p>PPS12(para B3) recognises importance of infrastructure provision in all major new developments and the need for additional facilities be taken into account in all LLDs. The CS should look forward over a reasonable length of time to enable infrastructure bodies to get a clear picture of future shape of the community. This will allow greater certainty in terms of the investment programmes (para.B5).</p> <p>PPS12(para.B7) sets out specific requirements for water and sewerage providers, identifying need for additional infrastructure such as reservoirs, pipelines or treatment works.</p> <p>Section 83 of Water Act 2003 require all public authorities to take into account desirability of conserving water supplied to premises. This applies to their actual use of water and where their functions might have impact on water use</p>
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1933	Metro	Consideration needs to be given to Leeds City Region Transport Vision and "Housing and economic growth in the Leeds City Region" reports
1933	Metro	<p>Re. Implementation and Monitoring</p> <p>Developer contributions to public transport needs to incorporate Residential Metrocards, infrastructure and new services. Consideration should also be given to seeking planning obligations from developers to Sustainable Transport.</p>
1933	Metro	<p>Re. A Well Connected City</p> <p>Integrating transport and spatial planning - Crucial that relationship between development and transport is considered in a co-ordinated and comprehensive approach to ensure Leeds' continued economic success. Within context of LTP2 and Leeds City Region Transport Vision, need to secure the promotion and delivery of a fully integrated public transport system for Leeds. Should not only address issues caused by cancellation of Leeds Supertram, but ensure 3 main aims of Vision for Leeds are realised.</p> <p>Access to (and links between) homes and jobs - Ensure Leeds' long term competitiveness, management of environmental resources and promotion of quality of life, need to secure sustainable forms of transport and minimise need to travel by ensuring appropriate location and layout housing, employment and other uses. A key issue is need to promote appropriate forms of high density development, in particular intensive employment uses in areas of highest accessibility to ensure as many people as possible have access to jobs. In terms of access to jobs, need to ensure the benefits of economic growth are enjoyed by the City's most disadvantaged inhabitants through adequate education and training and through improving connectivity between City Centre, other Town and District Centres and these communities.</p>



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2068	Skelton Business Park Ltd (via Skelton Business Park)	Implementation and Monitoring The discussion paper does not pay sufficient regard to the issue of deliverability. Reference to policy giving details of maximum contributions the Council may seek. The CS should recognise that the seeking of contributions is not necessarily a 'one size fits all' policy. The seeking of financial contributions must be properly evaluated with underlying objective to secure delivery of new development particularly in the Aire Valley. To secure development there may be a requirement for sources of funding other than private sector to procure delivery of new infrastructure. A balance needs to be struck between request for financial contributions and timing thereof and need to ensure that development is viable and has reasonable prospect of being delivered.  The CS should acknowledge that issues relating to 'implementation' will need to be considered in detail within AAPs. The CS should not therefore prescribe the 'details of maximum contributions' in circumstances such as Aire Valley where no credible and robust evidence base is available as to level of infrastructure requirements and financial implications arising therefrom.

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2080	RSPB Northern England Region	<p>Reference to Habitats Directive has significant implications for preparation of Local Development Frameworks.</p> <p>All development plans with Natural 2000 sites in or adjacent to their area must be screened to decide whether likely to be significant effect on the site. If so, an Appropriate Assessment will be required. South Pennine Moors SPA and SAC lie within LCC. The Council should obtain screening opinion from Natural England on whether the CS will require an Appropriate Assessment. If so, LCC will need to provide the Planning Inspector with the relevant information to enable the Appropriate Assessment to be made and to comply with subsequent tests set out within Habitats Directive.</p>
2544	Carter Jonas LLP	<p><b>Implementation and Monitoring</b>  Re. How can the Council insist on necessary levels of contribution but still enable contributions to remain viable and ensure that Leeds continues to attract investment?  LCC should formulate a policy in Development Policies DPD supported in more detail in an SPD, based on advice in Circular 05/2005 and consult widely with key stakeholders. Delivery of these contributions should be via a S106 Agreement.</p> <p>Re. What criteria should be applied so that developers know which obligations they are expected to contribute to?  Detailed criteria are welcome as they bring certainty to developers and ensure that developers can bid for sites on a level playing field. Accept principle of inclusion of certain basis criteria provided obligations are negotiable and subject to site specific matters. Would welcome definition of what is meant by 'Public Real Contributions for the City Centre'. If this term includes items such as public art then would be opposed to its inclusion. Do not consider that it is necessary in mitigating or compensating for development and is not essential infrastructure required as result of development.</p> <p><b>Potential Options</b>  Re. Provide a clear policy which gives details of the maximum contributions that the Council may wish to seek  Generally support this approach which will provide certainty to developers, but must accord with Circular 05/2005. Object to inclusion of training and skills development, as well as public art. These matters are not relevant to planning and cannot be said to be necessary in mitigating or compensating for development. To require planning obligations relating to such matters would be unreasonable and more akin to the 'betterment levy' discussed in para.B7 of Circular 05/2005.</p>
2544	Carter Jonas LLP	<p><b>Leeds in Context</b></p> <ul style="list-style-type: none"> <li>- Provide more detailed explanation of role of Leeds as a City Region; its strategic positioning within Yorkshire and the Humber; and how this impacts in terms of issues that the CS needs to address, including housing, employment, shopping, transport, education and leisure</li> <li>- Make reference to emerging RSS and regional planning context within which Leeds sits</li> <li>- Provide fuller description of character of the District including indication of range of settlements, their differing sizes, characteristics, inter-relationships and settlement hierarchy. May best be presented in diagrammatic or tabular format</li> <li>- Provide more detail in respect of protective land designations that affect a large percentage of the district</li> <li>- Include reference to other key Council Strategies such as Community Strategy, Northern Way, City Regions, and set out how the CS is to be developed to take account of other relevant strategies</li> </ul>

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2574	Yorkshire and Humber Assembly	Core Strategy should make reference to the urban transformation agenda set out in the Core Approach of the new RSS. Extensive urban area of Leeds will make a significant contribution to delivering this agenda.
2574	Yorkshire and Humber Assembly	Core Strategy should examine the spatial implications of policies set out in the approved Regional Transport Strategy.
2574	Yorkshire and Humber Assembly	Approved RSS is now quite dated but the following should be considered: 1. Pattern of development policies - provide starting point for considering the distribution of development in the Core Strategy 2. Welcome reference to RSS housing provision rates and likelihood of higher provision rates 3. Climate change policy addresses both mitigation and adaption - same consideration should be given in the Core Strategy
2574	Yorkshire and Humber Assembly	The beginning of the Core Strategy should set out the need for conformity and make the link between the LDF and RSS. Having set out the need for general conformity, the Core Strategy should then address the relevant policy matters from the approved and emerging RSS.

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2574	Yorkshire and Humber Assembly	Para 4.9 - should be presented as opportunities arising from the management of industrial, commercial and domestic waste
2574	Yorkshire and Humber Assembly	Revise para 5.13 - stress importance of sustainable patterns of employment opportunities
2574	Yorkshire and Humber Assembly	RSS and RHS has shown there is need for accommodation for gypsies and travellers throughout the region. In W Yorks there is a shortfall of 86 pitches - local assessment is required to evidence shortfall in individual districts. West Yorks housing partnership actively considering commissioning work on this. Outcome of this work needs to be reflected in the CS.
2574	Yorkshire and Humber Assembly	'Whole stock' approach to understanding housing issues is helpful. Relationship between Core Strategy's higher economic growth rates and the increase in number of households should be explored more fully. Emerging RSS will help address future mix of housing and work commissioned by Northern Way on the residential offer will provide useful supporting analysis.
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2613	North Yorkshire County Council	Principal concerns from N Yorks perspective is how Leeds will accommodate new development over the plan period, in terms of scale, type and distribution.
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2653	Mr John Griffiths	"Green strategies" must be very high on the agenda. However, recycling activities seem to be patchy and not very convincing at present. How do you establish what is happening to recycled material at present and what will happen in the future? Scepticism about the Council ticking the box to keep the government happy
2653	Mr John Griffiths	Low cost (or "affordable") family housing is one of the greatest priorities. Developers have far too much freedom to impose their will, for purely financial gain, on many different areas of the city, which distorts the social structure. Headingley is an obvious area that has suffered with regard to student residence and also expensive apartments, but there are others that have different (but equally important) distortions.
2653	Mr John Griffiths	Infrastructure for public transportation is in total disarray in the city and there seems to be no plans to alleviate the crippling traffic issues. "Supertram" is history, but this blinkered and seriously misguided proposal has cost the city very dear in loss of 15-20 years development. That lost ground must be made up as quickly as possible if at all possible.
2653	Mr John Griffiths	The questionnaire is only issued as a pdf. If this is the case it hardly reflects a useful way of obtaining feedback.
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2655	Weetwood Residents Association	Ref to Implementation and Monitoring This section concentrates solely on S106 agreements and funding. It omits any reference to monitoring in terms of the monitoring system that is required, and the particular aspects of housing, employment, transport etc that need to be monitored. If the CS makes no mention of provision for monitoring the impact of planning policies, and does not identify the key indicators to be used, it is difficult to see how the next phase of policy review can be fully effective.
2655	Weetwood Residents Association	The CS makes no reference to the impact of student housing on the balance of communities, and on the sustainability of communities. This is simply not an issue for Headingley. The UDP Review policies specifically recognise the need for student housing provision to be more dispersed across the city than at present. The CS makes reference to gypsies and travellers. This is an important and sensitive issue, but the issue of how to manage provision of student housing is much greater in scale, and has a much more widespread impact. Reference to this issue and need to aim for a suitable mix/balance of housing provision, would be most appropriate in 'Providing for Communities' section
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2657	DLP Planning Ltd	<p>Summary: General comments made re procedure and regard to PPS3 – Housing; PPS12 – LDF's; Draft RSS12 - 2006; UDP – 2006; also refer to; Housing Market Assessment and Flood Risk Assessment.</p> <p>View held that development levels in Leeds remain too low quoting re runs of DCLG, Scenario A and Scenario C from RSS.</p> <p>Don't agree with key objectives as fails to recognise the impact of demographic changes linked to growth in employment and housing demand. Should meet demands of residents for housing, first objective should read: To meet the housing demands and needs of the future population of the City in attractive environments which will endure in the long term. Environmental Objective should be reworded in order that development needs can be met: "Where appropriate, to protect, enhance and manage the environment"...</p> <p>A timespan of 2010 to 2025 should be made explicit with an end date of 2031. Disagree with 5 Themes, Regeneration not needed as implicit in other themes. New development should be linked more closely to community provision given the scale of development. A major theme should include reference to the Northern Way objectives and Leeds City Region Development Plan Document also firm evidence base of housing need with flexibility to cope with a range of demands. Impact of meeting development needs on the environment needs fully assessing with full reference to a range of documents, (listed) relating to environmental constraints. Bio Diversity, Agricultural Land, Contaminated land, Flood Risk, Air Quality and Conservation Areas. 2 Potential Options are put forward; firstly promote sustainable locations for development; secondly promote environmental enhancements within new developments. Sustainability Appraisal and Flood Risk Assessment particularly referred to. New Development, a full range of spatial options should be considered informed by PPS3, RSS and a Housing Market Assessment. Continued concentration on flats development not favoured. An additional option could be confirmation of the release of UDP sites particularly those to the East of Leeds. Regeneration should be applied to all environments and not be considered as a separate issue. Need to address problem of increased commuting development should be informed by transport investment proposals, flood risk and other constraints. Communities; Affordable Housing is an important component in housing supply. Consider E Leeds could be a sustainable location for development. Scenarios; Scenario 1 should include UDP allocations and planned transport investments. Scenario 2 omits E Leeds when transport improvements would make this viable. Fails to have a firm evidence base to ensure deliverability, suitability and viability against PPS3 criteria. Scenario 3 why are UDP allocations considered only in this Scenario and not the other two? Additional Scenario suggested using the East Leeds Extension and UDP 2006 allocations. Various figures quoted re jobs, commuting, housing and affordability.</p>
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