

Report of the Chief Planning Officer

Report to Development Plan Panel

Date: 1st March 2016

Subject: Aire Valley Leeds Area Action Plan

Are specific electoral Wards affected? If relevant, name(s) of Ward(s): Burmantofts & Richmond Hill, City & Hunslet, Garforth & Swillington, Middleton Park, Rothwell, Temple Newsam	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Summary of main issues

1. This report provides a summary of the responses received to the publication consultation on the Aire Valley Leeds Area Action Plan (AVLAAP). The main issues raised in the representations to the plan are discussed in detail, with options for consideration in determining how the council should respond.

Recommendation

2. Development Plan Panel is invited to:
 - i) Note the representations to the publication draft Aire Valley Leeds Area Action Plan consultation, as set out in Schedules 1 and 2 in Appendix A; and
 - ii) Consider the issues set out in Section 3 of the report and provide guidance on the initial officer responses to the representations.

1.0 Purpose of this Report

- 1.1 At the Development Plan Panel meeting on the 19th January 2016, members considered the report, 'Site Allocations Plan (SAP) and Aire Valley Leeds Area Action Plan (AVLAAP) – Emerging Issues and Next Steps'. This report provided an initial and interim assessment of the consultation responses received to the SAP and AVLAAP consultation. As part of the report, members received information on the overall scale of the consultation response, together with an explanation on emerging key issues. With regard to the AVLAAP, it was noted that 61 submissions had been received, in relation to a range of technical, site specific, as well as wider strategic issues.
- 1.2 Based on the report, the overall nature and level of response and subsequent discussion, members were minded to proceed with the AVLAAP, in advance of the SAP (whilst not seeking for the SAP to be held up), subject to further work being undertaken into the issues raised through consultation and the implications for the plan. The rationale for this approach was the desire to move the AVLAAP through the submission process as quickly as practicable, in parallel to the analysis and further consideration of the SAP submissions.
- 1.3 The purpose of this report is to provide members with further analysis of the AVLAAP submissions and options for the way forward in relation to the issues raised. It should be emphasised that overall there is considerable support for the AVLAAP and the benefits this brings to Leeds and the city region as a whole. The key issues identified in the DPP report of the 19th January and in this report, relate to matters where potential options have been developed and members guidance is sought. This will allow officers to prepare a schedule of proposed modifications to the draft AVLAAP to return to a future DPP meeting.

2.0 Background Information

Context

- 2.1 On the 15th July 2015, Executive Board approved the Publication draft AVLAAP for consultation. An eight week period of consultation was subsequently undertaken between the 22nd September and 16th November 2015. This followed on from the consideration of the material by the Development Plan Panel on the 20th May and earlier stages of public consultation on the emerging plan. The plan is being taken forward within the strategic context of the Core Strategy (adopted 14th November 2014), which sets out the overall scale and distribution of housing and economic growth. The Core Strategy also reflects the city council's aspirations as part of the Best Council Plan and Vision for Leeds (Community Strategy).
- 2.2 As indicated in the DPP report of the 19th January, the level of consultation response to the AVLAAP cannot be fully verified until all the responses to the SAP have been processed (over 70% have been processed at the time of writing). At the deadline of submission of this report, the number of responses to the AVLAAP was as follows:

On line:	30
Email:	36
Paper:	2
Total:	68

3.0 Main Issues

Schedule of representations to the draft AVLAAP consultation

- 3.1 The schedules in Appendix A set out more details on the representations received to the AVLAAP consultation. The general issue raised by the representation is indicated, with further columns relating to plan soundness, legal compliance and changes sought to the plan where relevant. There are two schedules; Schedule 1 relates to site specific representations (published in site reference order) and Schedule 2 general issues, including strategic policies and background documents such as the sustainability appraisal. **For the avoidance of doubt, all views set out in the schedules are those of the submitter. It is important to note that the schedules do not contain the full comments of the submitters, but instead focus on their changes sought to the plan.**
- 3.2 The following section sets out more details on some of the key issues contained in the representations and discusses potential options for the council's response. The focus is on those representations which relate to requested amendments to boundaries of housing or employment allocations and/or site capacities and representations submitted by statutory consultees requesting changes to make the plan sound.
- 3.3 It is expected the other representations in the Appendix A schedules not detailed in this report can be resolved by minor changes to the plan or that officers will recommend that no change should be made. A full schedule of officer responses to the representations and recommended modifications to the plan will be reported to a future DPP.

Housing sites

- 3.4 A number of representations have been submitted relating to the housing allocations proposed in the draft AVLAAP which could have a significant impact on the housing capacities identified in the plan. These are discussed in more detail below.

Skelton Gate (AV111, 99.3 hectares, East HMCA)

- 3.5 The Skelton Gate site is proposed as a major housing allocation (2,619 dwellings) located to the east of M1 Junction 45. The draft AVLAAP allocation included a food store in a local centre, through school (2FE primary schools and 4 FE secondary school) and allows for up to 10,000 sqm of offices.
- 3.5 70.8 hectares of the site is allocated for employment in the UDP (referred to as the "existing development site") with a further 28.5 hectares of land to the south

currently designated as Green Belt (“the Green Belt land”). The existing development site has two separate land owners. Templegate Developments control the majority of the site including all the Green Belt land. Extra MSA have a 100+ year lease on a parcel of land to the west of the existing development site (10.5 hectares lies within the proposed allocation). Plan 1 (Appendix B) shows the designations and ownership information in more detail.

3.6 The promoters of both parcels of land have submitted separate representations to the draft AAP, highlighting that the stated scale of housing is not deliverable, as follows:

- Templegate support the housing allocation but state the 2,619 dwelling site capacity is unrealistic given physical site constraints which prevent housing development on parts of their land. They estimate 1,700 – 1,800 dwellings on their landholding. The higher figure is based on a primary school (with lower land take) rather than a through school being developed on the site.
- Extra MSA object to the housing allocation including their land. They maintain the allocation is not available for housing and should be allocated for a Motorway Service Area (MSA). They also argue that even if the land were to be made available for housing, its maximum capacity would be 168 dwellings after taking into account known physical constraints to housing development on the land.

3.7 Members should note that a planning application has been submitted by Templegate for their part of the housing allocation (excluding Green Belt land) for up to 1,100 dwellings, food store, local centre, green space and primary school (with land safeguarded for a secondary school which would reduce the housing capacity). Extra MSA are pursuing a proposal for a MSA on their land and expect to submit a planning application in April. Both developers made pre-application presentations to City Plans Panel on 17 December 2015. Panel supported both schemes in principle, subject to further consideration of detailed matters, including design and access, and on the basis that the two developers work together on these matters.

Initial officer response

3.8 The methodology underpinning the draft AVLAAP site capacity estimate of 2,619 dwellings for Skelton Gate was set out in the report to the 13 January 2015 Development Plan Panel. A net density of 40 dwellings per hectare (dph) was assumed for the existing development site and 35 dph for the Green Belt land, consistent with the methodology used for the Leeds SHLAA. Within this calculation, allowance was made for the inclusion of non-residential uses (through school, local centre, food store and a small area for office development), before a standard discount of 25% to convert the density to a gross figure (allowing for provision of green space, distributor roads etc). The split in capacity between the three parcels of land, using this methodology is estimated as follows:

Templegate land (existing development site)	1,594 dwellings
Templegate land (Green Belt land)	747 dwellings
Extra MSA land (existing development site)	278 dwellings ¹
Total site capacity	2,619 dwellings

3.9 It is known that this land has a number of development constraints which result in parts of the site not being suitable for housing development. These include motorway noise, ground conditions associated with previous open casting activities, electricity pylons and lines and a small area of land at higher risk of flooding. These constraints are recognised in the draft AVLAAP which sets out a series of site requirements to address constraints and ensure that a suitable housing development can be delivered at the site.

3.10 The two developers have submitted further information on the constraints through their submission to the plan consultation. Templegate have also submitted detailed masterplanning work in support of their planning application. It is the view of both developers that the physical site constraints, alongside requirements to deliver other uses that support the housing (school, local centre, green space) dictate that a lower proportion of the site is suitable for housing development, than the draft AVLAAP estimate of capacity.

Templegate land (existing development site)

3.11 The masterplan supporting Templegate's planning application concerns a total area of 26.34 hectares to be developed for housing within the existing development site. This allows for provision of a food store, local centre, through school and supporting infrastructure. The remainder of the land is identified as formal green space, green infrastructure and set aside as flood plain and/or utilised for sustainable drainage systems. For comparison, the draft AVLAAP capacity estimate assumed about 40 hectares of developable land for this part of the site. It is the extent of green areas in the masterplan which differs most significantly from the assumptions made in the draft AVLAAP, but this is a response to the site-specific constraints particularly ground conditions, flood plain area, land beneath power lines and important ecological habitats reducing the land area suitable for housing. Given the detailed masterplanning and site assessment (including Sustainable Environmental Assessment) work undertaken by the developer, it is accepted that their general view that the site capacity should be reduced to reflect site-specific constraints is valid.

3.12 Within the Templegate part of the existing development site, the developer estimates the capacity to be approximately 1,000 dwellings, assuming land is safeguarded to provide a through school. The planning application refers to 1,100 dwellings but this would be on the basis of providing only a primary school. Children's Services have provided further evidence that there is a forecast shortage of secondary school places by 2020 before the new development is taken into account.

¹ The 13 January 2015 Panel Report suggested that a maximum of 344 dwellings could be developed on the MSA land but this did not account for development of other uses. This has been assumed on a pro-rata basis across the two sites.

3.13 Whilst the argument for a lower site capacity is broadly accepted, the development is still required to comply with Core Strategy policies H3 (Housing Mix) and H4 (Density). At around 38 dph (assuming capacity of 1,000) the current scheme falls marginally below the Core Strategy minimum density of 40 dph and the proposed mix of units in the outline application provides less than the minimum number of two bed units and zero one bed units. With only a minor change in the mix (which for example could include smaller units suitable for older people), it is considered the standard density is appropriate to apply to all parts of the site which are suitable for housing. A capacity of 1,054 dwellings is derived using the developer's assessment and calculations on the area's suitable for housing development (26.34 ha) and applying the standard density multiplier:

Capacity for Templegate land in the existing development site: 26.34 ha x 40 dph = 1,054 dwellings

3.14 This represents a **reduction of 540 dwellings** compared to the capacity used in the draft AVLAAP, but **54 more dwellings** than the capacity implied by the developer.

Extra MSA land (existing development site)

3.15 If the principle of the MSA proposal is accepted, then any housing capacity attributed to that part of site AV111 will need to be removed. A notional **reduction in capacity of 278 dwellings**, compared to the existing capacity calculation.

3.16 Extra MSA's submission also argues that were the site to come forward for housing (which they don't support), the actual capacity realised would be lower than the above estimate. Again, this is because of the need to take into account site constraints (ground conditions and power lines in this case). In the submitter's opinion this reduces the developable area suitable for housing development to 4.75 ha and their estimate of the site capacity is **168 dwellings** (density of 35 dph).

3.17 If the standard SHLAA density multiplier of 40 dph is applied to the net developable area indicated by the submitter, the capacity calculation would be as follows: 4.75 ha x 40 dph = **190 dwellings**

3.18 It is considered that the Extra MSA land remains suitable for housing development, but also accepted that any capacity attributed to the land should be reduced to take account of site constraints and areas of land that cannot be developed for housing.

3.19 However, it is clear from the Extra MSA submission that the land is not available for housing development whilst they are pursuing the MSA proposal through the planning process. As stated previously City Plans Panel gave a favourable reception to the pre-application presentation in December 2015. Construction of an MSA would remove any potential housing capacity from this part of the site.

3.20 The housing capacity apportioned to this site should be either **zero** (if an MSA is constructed) or **190 dwellings**. Based on the outcome of the City Plans Panel pre-application presentation and evidence presented that the land is not

available for housing, the initial view is to assume a housing capacity of zero for the land.

MSA allocation

- 3.21 It does not automatically follow that the AAP should make an allocation for an MSA on the land. There is no strategic planning requirement for the council to identify a MSA site in Leeds. No other options for an MSA have been considered by the council as part of the plan preparation process nor has there been a call for sites exercise to identify alternative locations. Proposing an allocation could significantly delay the progress of plan preparation and require further consultation before plan submission. As alternative options for MSA sites may lie outside the AAP boundary there would need to be further consideration whether the allocation would fall within the scope of the AVLAAP. A MSA proposal would also lie outside the scope of the SAP. It is for the developer to justify the proposal through submission of a planning application where the proposal can be considered against relevant national and development plan policies.
- 3.22 Draft Policy SG1 of the AAP allows for non-housing uses within the allocation to support delivery of the main housing use, something Extra MSA argue their scheme will contribute towards. The key is to achieve a holistic development across the site which delivers a new community in this location. Subject to removal of the current wording in the supporting text (para 4.6.37) explicitly ruling out an MSA, it is considered that the developer could justify their proposal satisfies the criteria in Policy SG1 for an acceptable non housing use supporting the main housing development (see Appendix C for extract of Policy SG1 and supporting text). The housing allocation could be retained, with its capacity estimate amended to reflect the reduced number of houses that could be developed. Alternatively, a housing and mixed use allocation may be more appropriate, reflecting the potential for non-housing uses on the site.
- 3.23 It may also be appropriate to delete specific reference to an allowance for office uses up to 10,000 sq m (criterion 2 of Policy SG1) as this was inserted as a potential buffer between housing uses and the motorway (which could in effect be replaced by an MSA). This may have a positive benefit in terms of transport impacts and is not required to meet the Core Strategy office development target. Any proposals for a small element of office use could be assessed against criterion 3 of Policy SG1.

Templegate site (Green Belt land)

- 3.24 No further evidence has been provided to justify a change in the capacity of the Green Belt part of the land, although the submission of Templegate implies a figure of about **700 dwellings**. It is proposed that this remains at **747 dwellings** consistent with the standard density multiplier used in the Leeds SHLAA. This represents no change in the assumptions made in the draft AVLAAP.

Summary of options for revising the housing capacity at Skelton Gate

- 3.25 Table 1 below provides a comparison between the housing capacity estimates. Option 1 represents the current position set out in the draft AAP. Option 2 provides a revised capacity based on the developable area and includes the

Extra MSA land within the housing allocation. Option 3 is the same as Option 2, except it is assumed that the Extra MSA land will provide no housing.

Table 1: Summary of options for Site AV111 – Skelton Gate

Options	Existing development site (Templegate) with through school ²	Existing development site (Extra MSA)	Green Belt land (Templegate)	AV111 total capacity	Change from Draft AVLAAP
1. Draft AVLAAP (Sept 2015)	1,594	278	747	2,619	-
2. Revised capacity based on submitter's developable area and SHLAA densities (including Extra MSA land)	1,054	190	747	1,991	-628
3. Revised capacity based on submitter's developable area and SHLAA densities (excluding Extra. MSA land)	1,054	0	747	1,801	-818

3.26 Given the additional evidence presented by the submitters and set out in this report, the initial officer recommendation is that the site capacity is amended to reflect Option 3. This will give a revised capacity of 1,801 dwellings (a reduction of 818 dwellings from the draft AVLAAP). Member's view are sought.

Suggested increases in housing capacity on two sites

3.27 The developers of two sites proposed as allocations for housing and mixed use in the Publication draft AVLAAP have indicated that the standard housing capacities for their sites are likely to be too low and have sought further consideration by the council. These are:

- Bridgewater Road (Site AV40, capacity 425) - suggested increase to 600 units
- Former Tetley Brewery Site (Part of Site AV94, current capacity 830) – no capacity indicated, but a suggestion that it could be substantially higher)

² Providing a primary school rather than a through school would increase the site capacity by 88 dwellings under each option. This is not supported by Children's Services so has been excluded from the options.

Bridgewater Road North (Site AV40, 11.2 hectares, East HMCA)

- 3.28 Bridgewater Road North is a brownfield site lying between the Cross Green Industrial Estate and the River Aire. It is proposed as a housing allocation in the draft AVLAAP.
- 3.29 Representations received from the site leaseholder DB Schenker support the housing allocation, but seek removal of the buffer shown between this allocation and the Natural Resources & Waste Local Plan (NRWLP) rail freight allocation on land to the south (see Plan 2, Appendix B). They argue the buffer will be delivered within the adjacent NRWLP allocation. The buffer is a specified requirement in the NRWLP. Consequently, a buffer on the AVLAAP allocation is unnecessary. They suggest this change could result in an increase in the housing capacity of the site (estimated as 425 dwellings) to 600 dwellings.
- 3.30 Officers agree that the required buffer between housing and rail freight uses can be provided on the NRWLP allocation land, but consideration also needs to be given to a buffer from existing industrial activities in the area if the housing use is developed before the rail uses. The capacity of the site has been reassessed using the standard multiplier approach (the site falls partly in the edge of centre and urban area density zones³) set out in the SHLAA methodology and was assessed to be broadly consistent. The capacity had not been reduced to take account of the buffer.
- 3.31 However, noting the submitter argues the capacity could be increased, officers have identified a potential option to base the capacity based solely on the edge of centre density multiplier (65 dwelling per hectare net or around 49 per hectare gross when provision of open space is taken into account). This density is considered appropriate for a site in this location within walking distance of the city centre. It could deliver a range of dwelling types and sizes consistent with Core Strategy policies. For comparison, the Yarn Street development on the opposite bank of the river to the site was developed at 61 dwellings per hectare gross. This includes a mix of houses/flats and unit sizes, but no public green space.
- 3.32 Using the higher density multiplier the capacity of the site would be 546 dwellings. This is lower than the submitter has suggested, but as yet the council has not been provided with any supporting evidence (such as a masterplan) to justify the unusually high capacity for the site's location. Without such information it is not possible to assess whether that capacity can be delivered consistent with the Core Strategy policies on housing mix and other site requirements such as provision of green space and avoidance of the small areas of the site at higher risk of flooding. *Officers have sought further information from the submitter.*
- 3.33 The initial officer recommendation is to increase the housing capacity of site AV40 to 546 dwellings (an increase of 121 dwellings) in response to**

³ The standard density multiplier is 65 dwellings per hectare (dph) in edge of centre locations and 40 dph in the urban area. The capacity is then discounted by 25% on sites over 2 hectares to allow for provision of green space and other uses supporting the housing.

this representation. Member's guidance on adopting this approach is sought.

Former Tetley Brewery sites, Part of the South Bank Planning Statement Area (Site AV94, 11 hectares (former brewery site only))

- 3.34 This area is identified in the draft AVLAAP as a broad location with an opportunity to deliver new homes, office development, a new city centre park and other commercial uses. The area includes the former Tetleys Brewery site, Asda House and the site at New Lane (see Plan 3 in Appendix B). It represents one of the most significant growth and development opportunities in the city, but there are uncertainties associated with the availability, timing and future uses, principally related to the location of the HS2 route and station. At the time of publication of the draft AAP, the consultation document (published January 2013) showed the HS2 station at New Lane. Assessment of the capacity of the area for housing and office development was estimated on land within the area likely to be available for development within the plan period.
- 3.35 Under draft AVLAAP Policy AVL7, the housing capacity of the site was estimated at **825 dwellings**. This comprised of:
- **730 dwellings** on SHLAA site 2009 (Former Tetley Brewery site, 11 hectares)
 - **95 dwellings** on the about 1 ha of SHLAA site 2011 (New Lane) which lies outside the operational area of HS2 shown on the 2013 consultation material.

Capacity for 73,500 sq m of office development on the site is also identified in the area under Policy AVL3.

- 3.36 Vastint (part of the Ikea group) are the new owners of the former Tetley's Brewery site. Their representation questions the housing capacity for the South Bank Planning Statement Area (AV94) stating: "*initial work undertaken by Vastint indicates that the capacity of the Brewery site alone could significantly exceed (particularly for housing) that quoted in the draft AVLAAP*". They contend that the sustainable and accessible location of the site justify higher density development. They compare the site to other schemes such as Brewery Wharf and Leeds Dock in the vicinity of the site.
- 3.37 The current capacity assumption on the former Tetley Brewery land is 730 dwellings and 66,000 sq m of office floorspace and a contribution of land towards the development of the City Park. The housing capacity calculation made an assumption that the area of land assumed for housing would be developed at a density of 175 dph. This is 50% of the standard SHLAA density multiplier for the city centre (350 dph), and is based on the capacity approach to larger sites (over 2 hectares) outside the traditional core of the city centre. This was a figure based on the type of development that was expected to come forward in fringe city centre locations at the time the SHLAA methodology was devised in 2008/09.

3.38 However, with the site now in the hands of a developer who has undertaken further analysis of the site's potential to deliver residential development and on the basis of their representations asserting that the site's capacity is too low, it may be appropriate to apply the standard SHLAA density multiplier for the city centre (350 dph) on this site. The council approved a housing scheme at the Dandarra site (Ref 14/04641) in Holbeck Urban Village for 744 dwellings on a 1.9 hectares site representing a gross density of 392 dph which provides evidence of the density of an acceptable development on a site in a similar location in the south of the city centre. It should be noted that the density is only to be applied to the housing part (assumed to be 4.4 hectares, half of the developable area) of a much wider site area of 11 hectares, which will make a contribution to the City Park. A scheme could come forward which takes up a larger area of land at a lower density within the wider mix of uses. The revised housing capacity is recalculated as follows: 4.4 ha x 350 dph = 1,540 dwellings

3.39 **This would represent an increase of 810 dwellings on the estimated housing capacity of the Tetley Brewery site in the draft AVLAAP and would increase the overall capacity of the Site AV94 to 1,635 dwellings. Member's guidance on adopting this approach is sought.**

Alternative sites for housing submitted in consultation

3.40 There have been no new housing sites submitted to the AVLAAP consultation. However, a further submission has been made by Towngate who own the Haigh Park Road site in Stourton. Site AV100 was previously rejected as a potential housing site in the Publication Draft AVL AAP for a wide range of reasons. Using the standard density multiplier, the capacity of the site is calculated as 1,144. The site lies within the East HMCA.

3.41 The 38.1 hectares site (see Plan 4 in Appendix B) encompasses an industrial area which contains three sites allocated/safeguarded in the council's adopted Natural Resources and Waste Local Plan. This includes two canal wharf designations (covering a total area of 6.9 hectares) which were adopted by the council under revised policy Minerals 13 in September 2015. The site also includes five employment sites identified and proposed in the draft AVLAAP, covering a total area of approximately 6.8 hectares on vacant plots. The remaining land is in use for a range of industrial and storage uses.

3.42 The submitter argues that the site should be considered as a longer term housing opportunity which could start to deliver housing later in the Core Strategy plan period and into the next plan period beyond 2028. Towngate suggested a figure of around 100-200 units could be delivered in the latter part of the plan period. The site is not available in the short to medium term due to existing lease arrangements.

3.43 In order to count any contribution from the site within the plan period, the council need to be satisfied that the site is suitable, available and deliverable within the timescales stated. However, there are a number of concerns regarding the suitability and deliverability of this site.

- 3.44 The site lies in Flood Zone 3 (1:100 year risk or greater of flooding) according to the Environment Agency's published maps. Housing development in Flood Zone 3 must satisfy a flood risk sequential and exception test in order to be considered suitable for allocation in a development plan. The council's Flood Risk Sequential and Exception Test, published as part of the evidence base supporting the Publication Draft AAP, assessed the site as failing the Exception Test because the sustainability benefits of the development (as demonstrated in the Sustainability Appraisal) were not considered to outweigh flood risk. This was in comparison to other sites in Flood Zone 3 in and on the edge of the city centre offering highly accessible locations, close to existing facilities and services.
- 3.45 In response to the previous rejection of the site for housing, the submitter has undertaken a flood risk assessment. They have obtained revised flood risk mapping data from the EA, modelled on the position post construction of the first phase of the Leeds Flood Alleviation Scheme between Hol Beck and Knostrop weir (which includes removal of Knostrop Cut and construction of moveable weirs and some walls in the city centre). This shows the site within the lower risk Flood Zone 2 (between 1:100 and 1:1000 year risk).
- 3.46 However, in discussions with the EA they have been clear that they do not support the use of preliminary flood maps yet to be checked and endorsed. The EA will only accept evidence based on the validated published version for planning purposes. New data needs to be fully verified by their engineers. Furthermore, the EA have confirmed the draft data used in the submitter's flood risk assessment is to be reviewed following the December 2015 flood event in Leeds, which affected this site. It is uncertain whether the flood zone will be revised in relation to this and other sites. The new flood maps may not be released until Summer.
- 3.47 In view of the current location of the site in Flood Zone 3 there is a strong likelihood that the EA will object to a housing allocation on this land, given it would increase the amount of housing proposed in the highest flood risk zone when the housing target of 6,500 has already been met through identified sites and allocations on other land. Members should note that the EA have not raised an objection to the soundness of the draft AVLAAP.
- 3.48 In addition to flood risk, there are a number of other suitability and deliverability issues in relation to this site:
- There are significant conflicts between the submitted site and the NRWLP sites/allocations e.g:
 - The site includes two canal wharf designations recently adopted in August 2015
 - The site is located in close proximity to a NRWLP strategic waste allocation on the opposite side of the river corridor (see site 200 on plan 4). This allocation is currently located an acceptable distance from existing residential uses
 - The area is identified within an area of search for intermodal freight.

As the NRWLP was recently adopted and the evidence base has not been reviewed, there is no basis for the AVLAAP to reconsider allocations and designation made through the NRWLP.

- The site is close to the Knostrop Waste Water Treatment Works. Yorkshire Water previously raised concerns about housing options in proximity to the sewage works due to likely complaints relating to odour.
- Including the NRWLP canal freight allocation, the reallocation of land for housing would result in the loss of 9.6 hectares of land allocated for employment and a further loss of over 20 hectares of land in existing employment use. This would prejudice delivery of the Core Strategy target for AVL to identify 250 hectares of land for employment as well as the district wide target to identify 493 hectares. The draft AVLAAP identified a surplus of only 6.2 hectares.

3.49 Based upon the above considerations, the initial view of officers is that the AVLAAP should be not revised to include a housing allocation or reference to potential for housing at Haigh Park Road, Stourton. The site is considered unsuitable for housing on flood risk grounds using the EA's published and validated maps. A housing allocation undermines the council's recently adopted NRWLP which identifies strategic waste and sustainable freight transport sites within and in close proximity to this site. There is a demonstrable need for the site to make a contribution to the Core Strategy employment target. According to the submitter, the site could only make a relatively small contribution, if any, to housing delivery within the plan period.

Summary of initial officer recommendations on revised housing site capacities

3.50 Table 2 summarises the suggested revisions in housing site capacities referred to in this report. This includes a potential reduction in capacity on Skelton Gate (Site AV111) and increases in capacity on two sites; Bridgewater Road North (Site AV40) and the South Bank Planning Statement Area (Site AV94). All suggested revisions are based on further technical analysis of the site capacities based on representations received to the draft AVLAAP.

Table 2: Summary of initial officer recommendations on revised housing site capacities

AAP Site Ref	HMCA	Allocation	Publication Draft AVL AAP Capacity	Suggested officer capacity revisions in response to representations	Difference
AV40	East	Housing	425	546	+121
AV94	City Centre	Mixed use	825	1,635	+810
AV111	East	Housing	2,619	1,801	-818

3.51 Table 3 summarises the overall change in housing capacity that would be identified in the draft AVLAAP by HMCA and in total resulting from the above revisions.

Table 3: Overall changes in housing capacity in AVL by HMCA based on initial officer recommendations

HCMA	Publication Draft AVL AAP capacity	Suggested officer capacity revisions in response to representations	Difference
City Centre	2,459	3,269	+810
Inner Area	2,043	2,043	0
East Leeds	3,328	2,631	-697
Total	7,830	7,943	+113

3.52 There is an overall reduction in housing capacity in the East HMCA of 697 dwellings. This reflects a reduction in capacity at Skelton Gate (AV111) which is only partially addressed by a smaller increase in capacity at the Bridgewater Road North site (AV40) within the same HMCA. There are not considered to be any suitable housing opportunities within the East HMCA in the AVLAAP area. This includes the Haigh Park Road site at Stourton which is discussed in detail above.

3.53 The option to increase the capacity (by 810 dwellings) at the former Tetley Brewery site within the South Bank Planning Statement Area based on the representation received from the site owner would broadly compensate for the

loss of capacity at Skelton Gate. Over the plan area the suggested revisions would increase the total housing capacity by 113 dwellings.

- 3.54 Members will note that the difference is not being fully made up in the same HMCA. There will be an increase in housing numbers in the City Centre HMCA and a reduction in the East HMCA. This was a concern raised at the 19 January panel meeting. However, with the revisions, the capacity more accurately reflects the quantity of housing likely to be delivered on all three sites taking into account site-specific constraints and opportunities.

Employment sites

- 3.55 A number of representations have been submitted relating to the employment allocations proposed in the draft AVLAAP. These are discussed in more detail below:

Former Skelton Grange power station sites (NRWLP Site 200, AVLAAP Sites AV67 and AV68)

- 3.56 A response has been submitted by the new owners of the site, Harworth Estates, promoting a rail freight depot at the site served by a new rail spur provided from the Leeds-Castleford railway line, south of Skelton Lake. They request that the plan identifies the site as suitable for rail freight uses, amends the strategic waste allocation (Site 200) made under the Natural Resources and Waste Plan to allow greater flexibility of uses and that a minor amendment be made to the boundary of the AAP (along the River Aire corridor) to incorporate the entire proposal. The representation also requests a small extension of identified general employment site AV68, to include all the developable part of the site.
- 3.57 In response, the initial officer view is that the extension to site AV68 should be incorporated in the plan. This will increase the site area of the allocation by 1.87 hectares to a total of 9.17 hectares (the suggested change is shown on Plan 5 in Appendix B). This additional land will make a small additional contribution to meeting the Core Strategy employment land target. The revised boundary will retain a green buffer along the north bank of the river.
- 3.58 As the NRWLP was recently adopted and the evidence base has not been reviewed, there is no basis for the AVLAAP to reconsider allocations and designations made through the NRWLP. Any future rail freight proposal on the former Power Station land will be considered against relevant planning policies and in principle such as use is not inconsistent with a general employment allocation. The criteria set out under Policy WASTE 6 of the NRWLP would need to be satisfied before release of a strategic waste site for non-waste related purposes. There is no need to extend the boundaries of the AAP to reflect the ownership of the submitter. The rail spur is already safeguarded under Policy Minerals 13 of the NRWLP.

Skelton Grange Road East site (Site AV83)

- 3.59 The Canals & River Trust have identified an inconsistency between the draft AVLAAP and the NRWLP in that part of Site AV83 is included within the boundary of a canal wharf allocation (Site 20) in the adopted NRWLP. Officers agree that this inconsistency should be resolved by redrawing the boundary of site AV83 to exclude any land within NRWLP Site 20 (as illustrated in Plan 6). This inconsistency occurred because the extension to NRWLP Site 20 was only adopted by the council in September 2015 (to reflect a planning permission that had been granted for a wharf on the land) after the consultation material for the draft AVLAAP had been prepared. This does not affect the overall quantity of employment land identified in AVL because the canal wharf allocation contributes toward the overall requirement.

Haigh Park Road, Stourton (Site AV100)

- 3.60 In addition to their submission supporting a housing proposal (see paras 3.40 to 3.49 and Plan 4), Towngate have indicated there may be potential to redevelop parts of the land for employment uses as another option. This would be supported in principle, except on land allocated for specific purposes in the NRWLP. The draft AVLAAP identified the parcels of land on the site which are currently vacant, but officers are in discussion with the developer to identify the potential for redevelopment and whether the site can make a further contribution to meeting employment land targets. It would be unusual to allocate occupied buildings unless supported by specific proposals and evidence. Any positive outcomes from further discussions will be reported back to a future DPP.

Potential revisions to employment sites

3.61 The initial officer recommendation is to:

- **Extend the boundary of general employment allocation AV68 to the revised boundary (as shown on Plan 5 in Appendix B)**
- **Amend the boundary of general employment allocation AV83 to remove overlap with NRWLP site 20 (as shown on Plan 6 in Appendix B).**

Members are asked for the views on adopting these suggested changes.

Representations from statutory consultees

- 3.62 Detailed representations from a number of statutory consultees, including Highways England, Historic England, the Coal Authority and the Environment Agency, have been received. These raise a number of soundness and technical issues which require further consideration.

Historic England

- 3.63 Historic England made a number of representations to the plan, some supportive, but others seeking changes. The requested changes can be summarised as follows:

- Changes to the wording of site requirements on sites where development may have an impact on the setting of heritage assets. This relates to a number of proposed site specific allocations;
- Inclusion of statements relating to heritage assets in the plan vision and objectives;
- Suggested changes to consideration of heritage assets in the sustainability appraisal.

3.64 Officers agree with the changes Historic England have requested on site requirements and making these changes would make the AVLAAP consistent with the wording used in SAP. Officers support the suggested additions to vision statements and objectives, unless this would lead to unnecessary repetition in the plan, and are reviewing the sustainability appraisal methodology to ensure it is consistent with legal requirements and fully addresses heritage assets.

Coal Authority

3.65 The Coal Authority objected on the grounds the council did not give adequate consideration to land stability issues in assessing and proposing sites for allocation.

3.66 In responding to the issues raised, officers have created a new sustainability appraisal objective to acknowledge the high risk coal areas and the presence of mining shafts. The highlighted risk at relevant sites will in turn trigger the need for a site requirement in relation to the stability issue. If agreed, this change will also apply to the Site Allocations Plan. It is considered that as a result of the proposed change none of the proposed allocations will need to be removed from the Plan.

Highways England

3.67 Highways England objected to several sites on the basis of the additional trips the specific sites will generate on the national highway network. As a result of requests from Highways England, officers have provided further clarification in relation to the delivery of specific sites, including a housing trajectory to verify and assist with Highways England's modelling work. This also follows on from previous detailed discussions held in October 2015. A meeting to discuss the refined highways modelling work, specifically in regard to allocated and potential land uses, trigger points, junction improvement capacities and possible site specific requirements is to take place on 22 February 2016. Officers will report back verbally on relevant outcomes of the meeting. It is considered unlikely that the changes requested will result in sites being removed from the Plan.

Environment Agency

3.68 The Environment Agency confirmed in their response that the AVLAAP and supporting evidence in the Flood Risk Sequential and Exceptions Test did not raise any soundness issues. They did however, object in reference to the draft flood maps illustrating the likely changes to the flood zones post implementation

of the Leeds Flood Alleviation Scheme. As the exception test did not rely on the draft plans as evidence or justification for the proposed allocations, the reference can be removed without any impact on the outcomes of the exceptions test.

4.0 Other considerations:

- 4.1 Based on the representations considered to date, there is nothing to indicate that a major change to the plan will be necessary. If major changes are necessary the council would need a further round of public consultation prior to submission of the plan to the Secretary of State.
- 4.2 Until all the SAP responses have been logged into the system and checked, there remains a chance that further representations to the AVLAAP are hidden within SAP representations and have not yet been reviewed.

5.0 Corporate Considerations

5.1 Consultation and Engagement

- 5.1.1 The focus of this report has been to provide a summary of the representations received to the formal publication draft consultation. A comprehensive Report of Consultation will be finalised to accompany submission of the plan. The consultation and engagement activity undertaken has been set within the context of the LDF Regulations and the city council's Statement of Community Involvement.

5.2. Equality and Diversity / Cohesion and Integration

- 5.2.1 In the preparation of the AVLAAP, due regard has been given to Equality, Diversity, Cohesion and Integration issues. This has included the completion of EDCI Screening of the AVLAAP and meeting the requirements of the Strategic Environmental Assessment Directive, which has meant that these Plans are subject to the preparation of a Sustainability Appraisal. The purpose of such Appraisals is to assess (and where appropriate strengthen) the document's policies, in relation to a series of social (and health), environmental and economic objectives. As part of this process, issues of Equality, Diversity, Cohesion and Integration, are embedded as part of the Appraisal's objectives. The AVLAAP material follows on and reflects the approach set out in the Core Strategy, which has also had the same regard to these issues.

5.3. Council Policies and City Priorities

- 5.3.1 The Core Strategy, the Publication Draft AVLAAP, play a key strategic role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to be the 'the Best City in the UK'. Related to this overarching approach and in addressing a range of social, environmental and economic objectives, these Plans seek to implement key City Council priorities. These include the Best Council Plan (2013-17) (in particular Objective 2: to 'promote sustainable and inclusive economic growth') and Leeds Joint Health and Wellbeing Strategy (2013-2015).

5.4 Resources and value for money

5.4.1 The preparation of statutory Development Plan Documents or the Local Plan is a necessary, but resource intensive process. This is due to the time and cost of document preparation (relating to public consultation and engagement), the preparation and monitoring of an extensive evidence base, legal advice and Independent Examination. These challenges are compounded by the financial constraints upon the public sector and resourcing levels, concurrent with new technical and planning policy pressures arising from more recent legislation (including the Community Infrastructure Levy and Localism Act). There are considerable demands for officers, members and the community in progressing the council's Local Plan.

5.4.2 For the Local Development Framework ('Local Plan') to be as up to date as possible, the council needs to produce the AVLAAP as quickly as practicable, following adoption of its Core Strategy. This will provide value for money in that the council, through the plan, will influence and direct where development occurs. Without an up to date plan the 'presumption in favour of sustainable development' by the Government means that any development in conformity with national policy will be acceptable, regardless of any previous positions of the authority, which could have implications in terms of resources and value for money.

5.5 Legal Implications, Access to Information and Call In

5.5.1 The AVLAAP will follow the statutory Development Plan process. The report is not eligible for call-in as no decision is being taken.

5.6 Risk Management

5.6.1 Without up-to-date allocation plans, aspects of the existing UDP allocations will become out of date and will not reflect or deliver the Core Strategy policies and proposals (including district wide requirements for housing and general employment land) or the requirements of national planning guidance. Early delivery is essential to enable the council to demonstrate that sufficient land will be available when needed to meet the Core Strategy targets. Without an up to date plan, the 'presumption in favour of sustainable development' by the Government means that any development or Neighbourhood Plan in conformity with national policy will be acceptable, regardless of any previous positions of the authority. The more the work progresses, the more material weight can be given to it.

6.0 Conclusion

6.1 This report provided a summary of the responses received to the publication consultation on the AVLAAP. The main issues raised in the representations to the plan have been discussed in detail, with options for consideration in determining how the council should respond.

7.0 Recommendation

7.1 Development Plan Panel is invited to:

- i) Note the summary representations to the draft Aire Valley Leeds Area Action Plan consultation as set out in Schedules 1 and 2 in Appendix A.
- ii) Consider the issues set out in Section 3 of the report and provide guidance on the initial officer responses to the representations.

Appendix A – Schedule 1 Summary of Site Specific Responses

Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
AV9 - Hunslet Lane, Evans Halshaw Garage	Mixed use allocation	Historic England, National Planning & Conservation	Unspecified	Policy omission/ Site requirements - Not supportive	No	Policy AVL7, Site AV9 site requirements add an additional bullet-point along the following lines:- “Consideration should be had to the setting of the undesignated heritage assets to the north and south of this site which are shown on the Area Map.”	Unspecified	n/a
AV9 - Hunslet Lane, Evans Halshaw Garage	Mixed use allocation	Pendragon PLC	Support	Other - Supportive	Yes	n/a	Yes	n/a
AV9 - Hunslet Lane, Evans Halshaw Garage	Mixed use allocation	Historic England, National Planning & Conservation	Unspecified	Policy omission/ Site requirements - Not supportive	No	Policy AVL7, Site AV7 site requirements fifth bullet-point amend to read:- “There are a number of Listed Buildings adjacent to this site. Any development should preserve the special architectural interest or setting of these buildings.	Unspecified	n/a
AV17 - Braime Pressings, Hunslet Lane	Mixed use allocation	Historic England, National Planning & Conservation	Unspecified	Policy omission/ Site requirements - Not supportive	No	Policy AVL7, Site AV17 site requirements second bullet-point amend to read:- “The site includes a Listed Building. Any development should preserve the special architectural interest or setting of this building”.	Unspecified	n/a

Appendix A - Schedule 1 Summary of Site Specific changes sought by the respondent
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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
AV18 - Marsh Lane	Mixed use allocation	Leeds Civic Trust	Neutral	Site boundary - Not supportive Phasing - Not supportive	No	While four-tracking is mentioned with regard to site HG2-120 (Vickers), this comment should be applied to all the East of Leeds sites in the table. We have no argument with the allocation of these site for residential or mixed use as appropriate but feel that their precise boundaries and/or the phasing of their development should be reviewed given on-going discussions with regard to the enhancement of rail services to and through Leeds. The plans should acknowledge the potential for widening of the rail corridor and for short/long term access to the tracks to facilitate construction and maintenance. Appropriate statements to this effect within the SAP and AVLAAP would ensure that the Plans would be made sound with regard to this issue.	Unspecified	n/a

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
AV20 - Yorkshire Ambulance Station, Saxton Lane	Housing allocation	David Mackie	Object	Ecology/Landscape/Trees - Not supportive Local services - Not supportive Highways and transport - Not supportive Other - Unspecified Greenspace/Green infrastructure - Unspecified	No	The wording of the documentation should state that the site *may* become available subject to rigorous consultation about the future of the service, and that consultation over alternative uses has been proposed. Additionally, the wording should reflect the possibility that it may be secured as a community asset, and hence not suitable for older/assisted living. I was told that the process to ask for an area to be designated as a park/garden would be via this consultation. I would like to ask for this for part of this land which has traditionally had some planting on it, to be allocated as a green space. I would like to ask for consideration for allotment space/garden/green space in the lot adjacent to the ambulance station, and for a consultation about this, particularly as part of the local vision/neighbourhood plan. There should be a proper allocation of allotment space, especially on land such as this which is unlikely to support a large building.	Don't know	n/a
AV20 - Yorkshire Ambulance Station, Saxton Lane	Housing allocation	David Mackie	Object	Local services - Unspecified	No	There isn't a change of use to residential, and the area is zoned as a public/community facility.	Don't know	n/a

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
AV21 - The Parade & The Drive	Identified housing	David Mackie	Support	Other - Unspecified	Yes	n/a	Don't know	n/a
AV28 - Bow Street and East Street	Housing allocation	Historic England, National Planning & Conservation	Unspecified	Conservation and heritage - Supportive	Yes	n/a	Unspecified	n/a
AV29 - Ellerby Road and Bow Street	Housing allocation	Historic England, National Planning & Conservation	Unspecified	Conservation and heritage - Supportive	Yes	n/a	Unspecified	n/a
AV29 - Ellerby Road and Bow Street	Housing allocation	Historic England, National Planning & Conservation	Unspecified	Policy omission/ Site requirements - Not supportive	No	Policy AVL7, Site AV28 and AV29 site requirements fifth bulletpoint amend to read:- "Site AV29 is adjacent to the Grade I Listed St Saviour Church and other Listed Buildings. Any development should preserve the special architectural interest or setting of these buildings."	Unspecified	n/a

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
AV38 - Former Copperfields College site	Housing allocation	Historic England, National Planning & Conservation	Unspecified	Policy omission/ Site requirements - Not supportive	No	Policy AVL7, Site AV38 site requirements fourth bullet-point amend to read:- "The site is adjacent to two Listed Buildings. Any development should preserve the special architectural interest or setting of these buildings."	Unspecified	n/a
AV40 - Bridgewater Road North	Housing allocation	Frank Daltrey	Support	Other - Supportive	Yes	n/a	Yes	n/a
AV40 - Bridgewater Road North	Housing allocation	Historic England, National Planning & Conservation	Unspecified	Policy omission/ Site requirements - Not supportive	No	Policy AVL7, Site AV40 site requirements eighth bullet-point amend to read:- "The site is lies opposite the Listed Buildings at Hunslet Mill/Victoria Mill. Any development should preserve the special architectural interest or setting of these buildings."	Unspecified	n/a
AV40 - Bridgewater Road North	Housing allocation	DB Schenker	Support	Ownership/ Delivery - Not supportive Policy omission/ Site requirements - Not supportive	No	Increase site delivery number from 425 to 600. Remove requirement to provide buffer as this is provided for within site 13 of the NRWLP.	Unspecified	n/a
AV43 - Yarn Street	Identified housing	Chris Renton	Support	Local services - Neutral	No	Upgrade of broadband/fibre services to residents.	Yes	n/a

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
AV43 - Yarn Street	Identified housing	Park Chua	Support	Ecology/Landscape/Trees - Unspecified Conservation and heritage - Unspecified Greenbelt - Unspecified Local services - Unspecified Highways and transport - Unspecified Site boundary - Unspecified Other - Unspecified	Yes	n/a	Don't know	n/a
AV46 - Tetleys Motor Services, 76	Housing allocation	Historic England, National Planning & Conservation	Unspecified	Policy omission/ Site requirements - Not	No	Policy AVL7, Site AV46 site requirements fourth bullet-point amend to read:- "The site is lies opposite the Listed Buildings at Hunslet Mill/Victoria Mill. Any development should preserve the special architectural interest or	Unspecified	n/a

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
Goodman Street, Hunslet		on		supportive		setting of these buildings.”		
AV63 - Logic Leeds (Skelton Moor Farm)	Identified general employment	Muse Developments Ltd	Unspecified	Employment/economy - Not supportive	No	The policy wording for the allocation (AV63) should be explicit and clearly reflect the current Planning Approval which is in the process of being implemented. The current Primary Policy wording, which is a little at odds with the extant outline planning approval on the Site, has the potential to create a degree of market uncertainty for both the landowner and a future developer. The Policy wording should be amended and made more explicit accordingly.	Unspecified	n/a
AV63 - Logic Leeds (Skelton Moor Farm)	Identified general employment	Muse Developments Ltd	Unspecified	Employment/economy - Not supportive	No	Despite the cross reference to AVL4 the Site is not listed in the Table in Policy AVL4. We assume the Policy relates to new allocations rather than the identified sites in Table 2 related to AVL2. It should be noted that the Site has planning permission for all the uses set out in AVL4 plus B2 use. It is unclear why B2 is specifically excluded from AVL4. We request clarification of these points accordingly.	Unspecified	n/a

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
AV72 - North of Haigh Park Road	General employment allocation	Towngate Plc	Unspecified	Policy omission/ Site requirements - Not supportive	No	designated as safeguarded wharf by LNRWLP policy 13(2). The south west area of the site is identified as site AV72 where emerging policy AVL4 supports general employment development (B1(b), B1(c), B2 and B8 uses). Support the proposed allocation, but consider the allocation should cover the site as a whole, ie. both the wharf policy area and remaining land. This way, should wharf development not come forward, the site can be delivered for employment uses in line with the wider development in Stourton.	No	n/a
AV74 - Former Playing fields, Skelton Grange Road	General employment allocation	canal & river trust	Support	Ecology/Landscape/Trees - Not supportive Other - Unspecified	No	We note that there is no explanation within the Plan for the reason to include a buffer and we consider it is not required as the proposed and adjacent existing uses will not conflict in terms of land use and amenity considerations to the south-east of the site as the site is set within an existing industrial area. Furthermore, we note that a 'green corridor' proposed along Skelton Grange Road significantly overlaps site AV74. Having discussed this matter with the City Council, we understand that the green corridor is not intended to overlap the site and for the sake of accuracy, we recommend that the Plan is amended so that the green corridor does not overlap the site. These proposed amendments would help to ensure that the Plan is sound by meeting the effective test in accordance with paragraph 182 of the National Planning Policy Framework.	Yes	n/a

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
AV76 - Haigh Park Road	General employment allocation	Towngate Plc	Support	Policy omission/ Site requirements - Not supportive	No	ref Former Vulcan Works - support the proposed allocation, but consider the allocation should cover the site as a whole, ie. both the vacant and developed areas of the site. This way, should Towngate wish to progress a wholesale redevelopment of their land they could do so with policy support from the AVLAAP.	No	n/a
AV78 -	Identified general employment	Towngate Plc	Support	Policy omission/ Site requirements - Not supportive	No	We support the allocation of the site for development, but consider the allocation should include flexibility which allows a range of employment generating uses, ie. both B class and non B-Class uses. The emerging policy wording should be developed which is supportive of non B-Class uses. Such uses could include small retail and food units, a petrol filling station, trade counter and leisure options (eg. hotel and restaurant).	No	n/a
AV81 - Leeds Valley Park	Identified office employment	Highways England	Support	Highways and transport - Unspecified Other - Unspecified	No	The statement in Policy AVL4 should include an indication of the floor space of general employment use that could be substituted for office use.	Don't know	n/a
AV82 - Stourton Park & Ride site	Identified transport infrastructure	West Yorkshire Combined Authority	Support	Highways and transport - Not supportive	Unspecified	Have a couple of minor comments regarding including mention of NGT within for example the opening paragraph 1.1.2.	Unspecified	n/a

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
AV82 - Stourton Park & Ride site	Identified transport infrastructure	Ineke Jackson	Neutral	Highways and transport - Not supportive	No	More information on decisions made available for consultations or decisions reviewed in the light of answers to the questions in the numbered comments in email.	Don't know	n/a
AV83 - Off Skelton Grange Road, East site.	General employment allocation	Towngate Plc	Support	Site boundary - Not supportive	No	Support the proposed allocation, but consider the allocation should cover the site as a whole, ie. both the wharf policy area and remaining land. This way, should wharf development not come forward, the site can be delivered for employment uses in line with the wider development in Stourton. This way, should wharf development not come forward, the site can be delivered for employment uses in line with the wider development in Stourton. The suggested allocation will ensure the site has a flexible allocation which maximises the prospects of redevelopment, as supported by the Framework and adopted Leeds Core Strategy. Without the future flexibility, should the wharf options fail to progress the site would, in essence, be sterilised for future development. This clearly goes against the prevailing local policy position and that contained in the adopted Leeds Core Strategy.	No	n/a
AV83 - Off Skelton Grange Road, East	General employment allocation	canal & river trust	Support	Ecology/Landscape/Trees - Unspecified Other - Unspecified	No	As such, we recommend that the requirement for the buffers is removed from the 'site requirements' for site AV83, in order that the AVLAAP is consistent with the NRWLP. This will help to ensure consistency between the AVLAAP and NRWLP and thereby assist with	Yes	n/a

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
site.				d		meeting the 'soundness' test of effectiveness.		
AV94 - South Bank Planning Statement Area	South Bank PSA	Saxton Hill Community Group (non-constituted)	Neutral	Local services - Not supportive	Unspecified	Requesting that the Tetley site, the building, and city park/South Bank is designated as suitable for cultural venue - That another arts space is made available if the Tetley is no longer an arts space. - That it is recognised as an important community facility. - That formal consultation happens before any change to the current use of the site.	Unspecified	n/a
AV94 - South Bank Planning Statement Area	South Bank PSA	National Grid	Object	Site boundary - Not supportive	No	Extension of Draft Allocation AV94 to include the client's landholdings (site 1267) to allow for the flexible, mixed use development of the site.	No	n/a
AV94 - South Bank Planning Statement Area	South Bank PSA	Vastint Leeds B.V.	Support	Other - Not supportive	No	Policy AVL3 refers to the South Bank as having an estimated capacity for office uses equating to 73,500 sqm, with Policy AVL7 identifying an estimated dwelling capacity of 825 units. Neither policy directly imposes a limit on development, but nor do they explicitly confirm that the figures are elastic and/or could be treated as minimum requirements, where appropriate. Reference to specific figures without relevant clarification	Unspecified	n/a

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						<p>could be read as some form of restriction, particularly where there does not appear to be any clear and transparent approach to calculating capacity. Initial work undertaken by Vastint indicates that the capacity of the Brewery site alone could significantly exceed (particularly for housing) that quoted in the draft AVLAAP. When considering the scale of the site this is not surprising. The accessibility credentials of the site by noncar modes – to be further enhanced by NGT and new pedestrian routes – support a high density scheme. For example, adopting Transport for London’s PTAL (Public Transport Accessibility Level) criteria, or Greater Manchester’s Accessibility Level (GMAL) approach, the site has excellent access by public transport which would, in turn, support a high density of development. Notwithstanding the land-take requirements of the City Park, adopting a development density anywhere near that of modern schemes in the surrounding area (e.g. Brewery Wharf, New Dock, Velocity, etc) would generate a quantum of floorspace/unit count far in excess of that suggested within the draft policies. Therefore, to be consistent with the Core Strategy (and the Framework) spatial approach to directing new development to the City Centre, and subject to normal development control considerations, clarification should be added to each Policy (AV3 and AV7) confirming that the figures are quoted for indicative</p>		

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
						purposes , and are to be considered as the minimum quantum of development that could be accommodated in the South Bank area. This is a positive and justified approach to these policies.		
AV94 - South Bank Planning Statement Area	South Bank PSA	Vastint Leeds B.V.	Neutral	Policy omission/ Site requirements - Neutral Factual correction required - Neutral	Unspecified	The status of the bold text in the box is not clear. It appears to summarise other policies in the AVLAAP relevant to the site/area, but also adds more detail. In this respect it may be clearer if it was a policy in its own right. There is a presumed typographical error in the text where it refers to Policy SB1 rather than SB4.	Unspecified	n/a
AV94 - South Bank Planning Statement Area	South Bank PSA	Historic England, National Planning & Conservation	Unspecified	Policy omission/ Site requirements - Not supportive	No	SBPSA, Policy AVL7, Site AV94 site requirements add the following to the end of the sixth bullet-point :- “Where possible, opportunities should be taken to improve the setting of these buildings.” site requirements fifth bullet-point amend to read:- “There are a number of Listed Buildings both within the site and on its periphery. Any development should preserve the special architectural interest or setting of these buildings. Proposals will also be expected to provide a sustainable future for those Listed Buildings which are currently vacant or at risk. Where possible, opportunities should be taken to improve the setting of these buildings.”	Unspecified	n/a
AV94 - South Bank	South Bank	Historic England,	Unspecified	Conservation and	Yes	n/a	Unspecified	n/a

Appendix A - Schedule 1 Summary of Site Specific changes sought by the respondent
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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
Bank Planning Statement Area	PSA	National Planning & Conservation		heritage - Supportive				
AV94 - South Bank Planning Statement Area	South Bank PSA	Leeds Civic Trust	Neutral	Schools - Not supportive	Unspecified	We believe there should be a commitment to a primary school as early as possible to allow existing residents to stay in the area if they wish as they start families. The critical mass may never be achieved if there is no primary school to attract younger families. AV94 should therefore include provision for a primary school.	Unspecified	n/a
AV94 - South Bank Planning Statement Area	South Bank PSA	David Mackie	Object	Ecology/Landscape/Trees - Unspecified Local services - Unspecified	No	The site is allocated as zonable for cultural uses. The continuing arts space is secured. There are guarantees about having successful mixed communities in this space, and having people of different incomes spread fairly evenly throughout the buildings. There are guarantees in relation to the park-like feel of this area.	Don't know	n/a
AV98 - Atkinson Street	Mixed use allocation	Historic England, National Planning & Conservation	Unspecified	Policy omission/ Site requirements - Not supportive	No	Policy AVL7, Site AV98 site requirements second bullet-point amend to read:- "The site is adjacent to the Listed Buildings at Hunslet Mill/Victoria Mill. Any development should preserve the special architectural interest or setting of these buildings."	Unspecified	n/a

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
AV111 - Skelton Gate	Housing allocation	Extra MSA Group	Object	Ownership/Delivery - Not supportive Noise/Air quality - Not supportive Ground conditions - Not supportive Site boundary - Not supportive Other - Not supportive	No	In order to ensure that the draft AVLAAP is sound, the 11.41 hectares of land within Extra MSA Group's contractual control and identified on the enclosed plan (2015/Skelton 001), needs to be removed from draft residential Allocation AV111 as identified on draft Proposals Maps 3, 12, 13 and 14. The site area and estimated number of dwellings (capacity) set out in draft policy AVL7 also need to be adjusted accordingly to reflect the fact that this part of the site has to be omitted from the allocation. These figures also need to be amended throughout the AVLAAP Publication Draft Document in its entirety. The first point to make is that since the site is not available for housing development no reliance should be made that the site could accommodate any residential development. Even if it was available to accommodate housing there are significant site constraints that would constrain its development potential. These constraints include buffer zones to address noise, air quality and electricity pylons and no build zones resulting from the site's historic use, along with SUDS and greenspace requirements and existing landscape and water features. Once these significant site constraints have been taken into account a net developable area of 4.75 hectares (11.74 acres) would remain and hence the potential of the site for residential development would be extremely restricted. If we assume a market facing	No	n/a

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
						<p>residential coverage of 15,000 sq. ft. / acre upon the net developable area (11.74 acres) that would deliver a total 176,058 sq. ft. of residential floorspace. Should we assume a typical residential development comprising dwellings ranging between 750 sq. ft. and 1,300 sq. ft. with an average dwelling size of 1,050 sq. ft. that would realise development at an average density of 35 dwellings / hectare or 14.3 dwellings / acre. Based on the aforementioned assumptions, no more than 168 dwellings could be delivered on the site even if it were available for housing development. Consequently, removal of this land from the residential allocation AV111 would have a negligible impact upon the City Council's ability to deliver the homes required to meet its overall housing requirement.</p>		

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
AV111 - Skelton Gate	Housing allocation	Highways England	Object	Highways and transport - Unspecified	No	<p>The Plan needs to recognise that development of the Skelton Gate site and implementation of the development proposals in the remainder of Aire Valley Leeds and in other parts of the city will require major investment in highway infrastructure. The following schemes on the Strategic Road Network need to be referred to in the section of the Plan relating to Skelton Gate:</p> <ul style="list-style-type: none"> • The RIS M1 junction 45 improvement scheme. • The potential need for additional mainline capacity in each direction on the M1 between junctions 45 and 46 identified by the initial outputs from the West Yorkshire Infrastructure Study. Where committed schemes do not provide sufficient capacity or where Highways England does not have committed investment, sites may need to deliver or contribute to schemes identified in the Infrastructure Delivery Plan. This may well apply to Site AV111. The proposed housing and office development should be phased to begin after completion of the RIS M1 junction 45 improvement and should take account of the timing any additional capacity enhancements on the M1 in the vicinity of junction 45. Knowsthorpe Lane should be confirmed as a secondary route for general traffic into Skelton Gate from the west. It should connect with the access road network within the site to avoid imposing any extra traffic circulating around the gyratory at M1 junction 45. The proposed eastern secondary access to/from 	Don't know	n/a

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						<p>Bullerthorpe Lane should not be open to general traffic as it risks creating a rat run through Skelton gate and M1 junction 45. However, it does have potential for use as a public transport route to accommodate a bus service from the Colton area through the Aire Valley Leeds to the city centre. It could also have a role in addressing the missing public transport link between the central; area of Aire Valley Leeds and the Five Towns area of Wakefield District.</p>		

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
AV111 - Skelton Gate	Housing allocation	Joel Kaufman	Object	Greenbelt - Not supportive	No	Remove from housing allocation.	No	inadequate legal compliance of the Public Consultation to be raised for consideration and response: 1. There must be a simple and transparent method for identifying green belt sites up for development within the SAP; however the Council documents do not contain any clear lists that provide information of green belt. In place, the details of green belt sites are hidden amongst the thousands of other types of sites identified for analysis. 2. There should be a simple method for making

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
								objection of multiple sites, such as outlined above – within the councils' website (their primary method of requesting feedback). In place, it requires responders to place their comments on an individual basis, site by site – which is unfairly obstructive and divisive.
AV111 - Skelton Gate	Housing allocation	Christopher Coyle	Object	Other - Not supportive	No	The houses being built here are being credited to Leeds East HMCA. The credit should have been allocated to Outer South East HMCA. This development should be put on hold until the decision making process has been scrutinised and this issue has been resolved.	Unspecified	n/a

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
AV111 - Skelton Gate	Housing allocation	Templegate Developments Ltd	Support	Other - Not supportive Policy omission/ Site requirements - Not supportive Policy omission/ Site requirements - Not supportive Policy omission/ Site requirements - Not supportive	No	[Capacity]: Policy AVL7 and Table 6(5) suggest 2,619 units can be delivered on the Skelton Gate site. Clearly we support the inclusion but our master planning and extensive technical work suggests that figure is over stated and that 2,000 would be more realistic. We therefore object to that figure being included in the AAP going forward. [Site requirements - local centre]: The wording needs to have a degree of flexibility. We cannot guarantee financial & professional services or cafes/restaurants at this stage. Furthermore there has been no firm feedback from the relevant health authorities, local GP's or dental surgeries so it is not prudent or possible to say it will include health services. It would be more sensible to say may or could include. Until such time as this amendment is made we maintain an objection. [Site requirements - second primary access]: should be less definitive and focus more on 'future options for alternative access points, particularly for emergency vehicles and public transport'. We do not currently believe we need to deliver a secondary access and the matter of access will be resolved in detail during the application process. Hence, such an assertion is premature. [Site requirements - landfill site]: Distance has not been discussed or agreed and should be set following due consideration of a planning application accompanied by EIA and other assessments.	Unspecified	n/a

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
AV111 - Skelton Gate	Housing allocation	Historic England, National Planning & Conservation	Unspecified	Policy omission/ Site requirements - Not supportive	No	Policy AVL7, Site AV111 site requirements add the following additional bullet-point:- "The development will be required to safeguard key views from the Historic Park and Garden at Temple Newsam"	Unspecified	n/a
AV111 - Skelton Gate	Housing allocation	Commercial Development Projects Limited	Object	Ownership/ Delivery - Not supportive	Unspecified	The long leasehold interest in that part of Skelton Gate site on which Extra have submitted comment is currently vested in CDP and subject to a long-term contractual control by Extra as the future new owner of the site. The term of that ground lease is 125 years from 23rd Jan 2004. Refers to separate Extra MSA submission. The site is not available or deliverable for residential development.	Unspecified	n/a

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
AV100 - Haigh Park Road, Stourton	Not allocated for housing	Towngate Plc	Unspecified	Policy omission/ Site requirements - Not supportive	No	Notwithstanding our above representations to the AVLAAP employment policies and designations, there is potential for the entire holdings (and adjacent land) to come forward for housing development (as previously considered in the AVLAAP 2009 Draft). The site is suitable for housing given it is: • Located within the Leeds urban area; • In a location which could deliver significant improvements to pedestrian access to the Aire & Calder Navigation, particularly along the line of the river; • In single ownership and could be available for development in the plan period; • Easily accessible via road transport. • Within walking distance of local bus services, and a ten minute drive from the proposed Park and Ride site; • Well located for pedestrian and cycle access points; • Not subject to ecological constraints; • In a location where suitable access can be achieved; • Likely to benefit from proposed infrastructure improvements in the area (such as the Pontefract Road / A63 link and Leeds Flood Alleviation Scheme) and • Not subject to other further significant constraints (i.e. air quality, noise). Allocate the site for housing.	No	n/a
AV114 - Skelton MSA	Not allocated for other uses	Commercial Development Projects Limited	Unspecified	Policy omission/ Site requirements - Not supportive	Unspecified	Allocate the site as a MSA. Refer to Extra MSA submission.	Unspecified	n/a

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
AV114 - Skelton MSA	Not allocated for other uses	Extra MSA Group	Unspecified	Policy omission/ Site requirements - Not supportive	No	<p>Extra MSA Group therefore proposes that this site is allocated to provide a new Motorway Service Area (MSA) for the benefit of the Leeds City Region and all users of this important part of the National Strategic Road Network, where there is a clear identified road safety related 'need' for a new MSA facility in accordance with Department for Transport Circular 02/13 and National Planning Policy. The Strategic Road Network plays a key role in the movement of goods and people around the county and is critical to the performance of the economy. Driver fatigue is a recognised cause of road accidents and the resulting impact and costs of delay on the Road Network can be significant and widespread. Motorway Service Areas provide a key function in ensuring the safety and welfare of drivers and their passengers. Government policy set out in Department for Transport Circular 02/2013 'The Strategic Road Network and the Delivery of Sustainable Development' advises that motorists should stop and take a break of at least 15 minutes every two hours. Commercial and public service drivers are also required to take statutory breaks and are subject to working time limits. Motorway Service Areas create opportunities and facilities for motorists and commercial drivers to take such breaks, refresh and relax. Highways England's objective and clear recommendation (as set out in Circular 02/2013) is that MSAs</p>	No	n/a

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						<p>should be located at a maximum of 30 minutes travelling time. This can typically be a maximum distance of 28 miles but on similarly busy and congested sections of the Motorway Network, is an average of 15 to 20 miles. The M1, M62 and A1M Motorways are amongst the busiest and most important in the UK. The distances between existing MSA facilities in this area significantly exceed the maximum 30 minute travelling time separation requirement and the needs of motorists, commercial drivers and their passengers are not been adequately met within the Leeds City Region. There is therefore a 'clear need' for a new MSA at J45 of the M1 Motorway (M1 J45) to fill this gap in provision, at this key strategic location. Extra MSA Group's 11.41 ha site is available and suitable to accommodate this use and development would be fully achievable within the early part of the plan period. Such a scheme would provide a bespoke and high profile, gateway development at the entrance to both the Aire Valley and Skelton Gate and would fully integrate with the remainder of the draft Skelton Gate allocation. In order to reflect these changes, the AVLAAP Publication Draft Document will need to be amended throughout to remove reference to the residential allocation of this 11.41 hectare site and to incorporate an allocation to provide a Motorway Service Area instead. An associated MSA policy may also be appropriate. In addition,</p>		

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Site	Allocation	Submitter	Agree	Issues	Sound	Respondent comments	Legal	Respondent Legal comments
						<p>the draft text at paragraph 4.6.37 which states that 'Proposals which would lead to the creation of a destination serving a wide catchment such as a retail/leisure park, motorway service area or other format which provides large areas of car parking and attracts significant trips to the site from the motorway network would not be consistent with this approach' should also be omitted.</p>		

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Appendix A – Schedule 2 Summary of General Comments

Document	Policy	Para	Diagram	Submitter	Agree	Sound	Respondent changes sought	Legal	Respondent Legal comments
				Environment Agency	Unspecified	Unspecified	n/a	Unspecified	There are no outstanding strategic issues that fall within our remit and area of interest raised by the Leeds publication Site Allocations Plan & Aire Valley Leeds Area Action Plan documents which necessitate attention under the duty to co-operate.
				National Grid	Unspecified	Unspecified	National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. Because of the scale, bulk and cost of the transmission equipment required to operate at 400kV National Grid only supports proposals for the	Unspecified	n/a

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Document	Policy	Para	Diagram	Submitter	Agree	Sound	Respondent changes sought	Legal	Respondent Legal comments
							<p>relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore we advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments.</p> <p>National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines. The following site are affected by this approach AV64, AV67, AV68, AV111.</p>		

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							National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government.		
				Roger Shaw	Unspecified	Yes	n/a	Don't know	n/a
				Brian Holmes	Unspecified	Unspecified	n/a	Yes	n/a
AVLAAP Flood Risk Sequential and Exceptions Test Background Paper				Environment Agency	Unspecified	Unspecified	n/a	Unspecified	n/a

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Document	Policy	Para	Diagram	Submitter	Agree	Sound	Respondent changes sought	Legal	Respondent Legal comments
AVLAAP Flood Risk Sequential and Exceptions Test Background Paper				Environment Agency	Unspecifi ed	Unspecifi ed	<p>Some of the exceptions test tables (such as AV15 and AV16) include the following:</p> <p>‘Only ‘Highly Vulnerable’ uses within FZ2 are required to pass the Exception Test and ‘More Vulnerable’ uses, such as dwelling houses are ‘Appropriate’ for siting within this zone, subject to a Flood Risk Assessment, which should include the following measures:’. We are confused with the inclusion of this bullet point.</p> <p>We note that for some of the central HMCA’s the allocations for housing has exceeded the Core Strategy targets. A vast number of sites are located in flood zone 3, therefore we would need some more clarity on the LPAs views on how this has impacted the Sequential Test approach and if phasing will be introduced to deliver lower flood risk sites first, i.e. will flood zone 1 sites take precedent over flood zone 3 sites?</p>	Unspe cified	n/a

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Document	Policy	Para	Diagram	Submitter	Agree	Sound	Respondent changes sought	Legal	Respondent Legal comments
AVLAAP Greenspace (Green space Assessment) Background Paper				New, East and South Leeds Community Body (non-constituted)	Unspecified	No	<p>1. All playing fields, (public, school, community and private), to be designated as a form of green space on the plans.</p> <p>2. All green areas that have never been built on in Leeds, larger than 0.2 ha, and not otherwise referenced in these plans, are designated as some form of green space on the maps. (This includes gardens that were part of developers' plans, such as Saxton's gardens. Small gardens in areas of high density housing are particularly important, so some beautiful gardens smaller than 0.2ha should be designated as a form of green space. For every new development, on completion, any agreed green/garden area should be highlighted as such on Council mapping going forward).</p> <p>3. All areas where it's been accepted that they were covenanted never to be built on, or to be used for public benefit, they should be allocated as a form of green space/community facility on the maps.</p> <p>4. The Council commits to a full</p>	No	<p>Site allocations not consistent with the core strategy. Site allocations not consistent with sustainable development. WWF indicates British environmental footprint per capita is roughly three times the amount that the planet can sustain. Forests and animal species globally in great decline. No adequate budgets for dealing with climate change. Site allocations not consistent with compliance with UK and European air quality legislation</p>

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							<p>consultation with a range of local people and community leadership teams before any playing fields or parks are redesignated for other uses.</p> <p>5. The Council has a full consultation with a range of local people before any open green spaces (including its parks and gardens or other green sites it owns) are redesignated for other uses.</p> <p>6. That the Council views the green sites that it owns as potentially of value to the community, and any sites on a list for sale by the Council should be designated as potentially a community asset, and offered to the local community first. This should be reflected in the spacial allocation plans.</p> <p>7. It may be concerning relating to the planning process if it's ambiguous whether there is an overallocation of green space in a certain geographic area, as developers may use this as grounds against Council decisions.</p>		<p>and other environmental legislation. Lack of consultation with community and the public about the above matters - Burmantofts and Richmond Hill Community Leadership Team did not find out about this whole planning process including the core strategy until three weeks before the deadline. I've been involved for really quite some time. There's been really limited consultation with community leaders about these matters, and it has felt very rushed. The</p>

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							<p>My view is that the word "overallocation" should not be used, it should be made clear that overallocation is a value judgement, as many stakeholders would agree that a good supply of green spaces and quality green spaces are key to ensuring that Leeds is a good city to live in or the best city to live in. Additionally Leeds as a garden city may be key to it having the chance to be the best city to live in in the UK. Finally, if the word overallocation has to be used, it should be specified at a very local level, in consultation with the Councillors for each area. A starting point for the information to make some of these things happen might be the Parks and Gardens group, and also satellite imagery of Leeds.</p> <p>8. Need to look at a combined green space/and effective or potential community facility designation. You also need to have a low-level designation for green space that is not beautiful, and for community facilities, a designation for sites where there has been a successful application for</p>		<p>process has meant that some green spaces and quality spaces that the Council is aware of/should be aware of, will have slipped through the net, and the same with community facilities/facilities that are public owned and may be of value as community facilities.</p>

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							<p>a community facility, and a low-level designation where the site is likely to be of benefit to all of the community, or has the potential for this (e.g. because the building is publicly owned, and may be being disposed of). If any of the above did not happen in relation to this process, then this body would have an objection.</p> <p>The plans allocate all publicly owned green space, and all playing fields regardless of ownership, as such, and that the Council commits to consulting fully with local people and with community leadership teams and community leaders before any change of use in the future, including this to be stated in the plans. Note that my definition of "green space" may have a lower bar than an official definition in relation to the size of the area, and the criteria for what is a green space, which for me would be a natural green or brown coloured area that has never been built on, or has been returned to garden/natural form. Some hard landscaping such as tennis courts could be included - their colour is not relevant.</p>		

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Document	Policy	Para	Diagram	Submitter	Agree	Sound	Respondent changes sought	Legal	Respondent Legal comments
AVLAAP Infrastructure Delivery Plan Background Paper				Highways England	Unspecified	Unspecified	Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, sites may need to deliver or contribute to schemes identified in the Infrastructure Delivery Plan.	Unspecified	n/a
AVLAAP Infrastructure Delivery Plan Background Paper				Highways England	Unspecified	No	The schedule in the IDP needs to be amended to take account of the current schemes identified in the government's Road Investment Strategy and the need for additional capacity identified by recent modelling undertaken by Highways England.	Don't know	n/a
AVLAAP Plan Document - Publication Draft				Selby District Council	Unspecified	Unspecified	n/a	Unspecified	n/a
AVLAAP Plan Document - Publication Draft				Leeds Civic Trust	Unspecified	Yes	n/a	Unspecified	n/a

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Document	Policy	Para	Diagram	Submitter	Agree	Sound	Respondent changes sought	Legal	Respondent Legal comments
AVLAAP Plan Document - Publication Draft			Map 2	Harworth Estates	Unspecified	No	<p>The proposed change constitutes a minor extension to the Aire Valley Leeds area to incorporate adjacent land required to connect the rail spur with the main line. It is proposed to include the land located south of the existing boundary and north of the existing railway, predominantly east of the M1 motorway and extending approximately to the western boundary of the adjacent Rothwell Country Park.</p> <p>This tract of land would enable a siding to be provided adjacent to the main line, thereby allowing freight trains serving Aire Valley Leeds (i.e. site AV68) to access/egress the main line in both east and west bound directions of travel. Inclusion of this land within the AAP area would serve to clearly demonstrate the nature of the interface between the rail spur and the main line which is required.</p>	Yes	n/a
AVLAAP Plan Document - Publication Draft				Stuart Gilchrist	Unspecified	Unspecified	n/a	Unspecified	n/a

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AVLAAP Plan Document - Publication Draft				Environment Agency	Unspecified	Unspecified	<p>Some of the exceptions test tables (such as AV15 and AV16) include the following:</p> <p>'Only 'Highly Vulnerable' uses within FZ2 are required to pass the Exception Test and 'More Vulnerable' uses, such as dwelling houses are 'Appropriate' for siting within this zone, subject to a Flood Risk Assessment, which should include the following measures:'. We are confused with the inclusion of this bullet point.</p> <p>We note that for some of the central HMCA's the allocations for housing has exceeded the Core Strategy targets. A vast number of sites are located in flood zone 3, therefore we would need some more clarity on the LPAs views on how this has impacted the Sequential Test approach and if phasing will be introduced to deliver lower flood risk sites first, i.e. will flood zone 1 sites take precedent over flood zone 3aii sites?</p>	Unspecified	n/a

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AVLAAP Plan Document - Publication Draft				New, East and South Leeds Community Body (non-constituted)	Unspecified	Unspecified	<p>All public buildings providing a service,</p> <p>All buildings formally recognised as community facilities,</p> <p>All sites that the Council may wish to dispose of, which the community could apply to acquire as community facilities</p> <p>All parks and gardens, playing fields, beautiful green spaces, green spaces</p> <p>Any other facilities whose owners wish to be acknowledged as community facilities operating for the benefit of the community.</p> <p>Be designated on the spacial allocations and its mapping as a community facility, or a currently public site for which the community may apply for it to be a community facility, and the result is hence currently unknown and the Council would consult fully with local residents and community organisations before a change of use of these sites, or before selling these sites.</p>	Unspecified	n/a

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AVLAAP Plan Document - Publication Draft				Leeds Civic Trust	Unspecified	Unspecified	n/a	No	<p>The Trust feels that the SAP and AVLAAP are not legally compliant in that the consultation processes carried out have been unsatisfactory and do not comply with the published Statement of Community Involvement (SCI):</p> <ul style="list-style-type: none"> · the SCI states that there is low access to electronic resources in Leeds and yet this is almost exclusively the means by which comments were sought/submitted · given its importance to the

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									<p>city, 'marketing' of the SAP has been poor, with independent resident groups publicising events and delivering advice to individuals</p> <p>· the SCI has not been updated since 2007 and there has been no annual review of its effectiveness (as stated in the SCI would be the case)</p> <p>· the SCI refers to methods of consultation which are no longer in use eg the About Leeds civic newspaper which was delivered to all homes in the city.</p>

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AVLAAP Plan Document - Publication Draft				Leeds Local Access Forum	Unspecifi ed	Unspecifi ed	<p>In addition to the definitive PROW network, there are many non-definitive routes over which public rights may exist. These non-definitive routes are marked in green on the LCC on-line definitive map with definitive routes shown in black. (https://cms.esriuk.com/leedscs/Sites/LCCPROW/#)</p> <p>We recommend that any non-definitive routes on allocated sites be identified in the site assessment in a similar manner to the definitive PROW.</p> <p>We also recommend the inclusion of appropriate text that asks developers of allocated sites to consult the Definitive Map and have regard to both definitive and non-definitive routes, and furthermore have regard to the Rights of Way Improvement Plan by also identifying any aspirational routes.</p>	Unspe cified	n/a

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AVLAAP Plan Document - Publication Draft				Wakefield Metropolitan District Council	Unspecified	Yes	n/a	Yes	With regard to the duty to cooperate the Council can confirm that it considers the plan to have been positively prepared giving due regard to strategic cross boundary issues and that no strategic issues have been identified. Wakefield Council supports the plan proceeding to examination.
AVLAAP Plan Document - Publication Draft				The Coal Authority	Unspecified	No	The site allocation methodology and assessment process needs to be revised and undertaken again taking into account unstable land as a relevant consideration.	Yes	n/a
AVLAAP Plan Document - Publication Draft				William Birch & Sons Ltd	Unspecified	Unspecified	n/a	Unspecified	n/a

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AVLAAP Plan Document - Publication Draft				The Coal Authority	Unspecified	No	<p>The AAP should contain a policy within the Resilient and Safe Development section that sets out a policy framework for addressing unstable land. The policy could read as follows:</p> <p>“Proposals for development of land which may be unstable must incorporate appropriate investigation into the quality of the land. Where there is evidence of instability, remedial measures must be identified to ensure that the development will not pose a risk to human health, public safety and the environment. Investigation of land conditions must be carried out in accordance with the principles of best practice.”</p>	Yes	n/a
AVLAAP Plan Document - Publication Draft				Office of Rail and Road	Unspecified	Unspecified	n/a	Unspecified	n/a
AVLAAP Plan Document - Publication Draft				Historic England, National Planning & Conservation	Unspecified	No	Insert an additional Policy which sets out the considerations that need to be taken into account in determining development proposals in their vicinity of the identified Landmark Buildings.	Unspecified	n/a

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AVLAAP Plan Document - Publication Draft				Helen Roberts	Unspecifi ed	Unspecifi ed	n/a	Unspe cified	n/a
AVLAAP Plan Document - Publication Draft				Harrogate Borough Council	Unspecifi ed	Unspecifi ed	n/a	Unspe cified	n/a
AVLAAP Plan Document - Publication Draft		Para 1.3.4		Templegate Developme nts Ltd	Unspecifi ed	No	n/a	Unspe cified	n/a

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Document	Policy	Para	Diagram	Submitter	Agree	Sound	Respondent changes sought	Legal	Respondent Legal comments
AVLAAP Plan Document - Publication Draft		Para 2.1 - Urban Eco Settlement Vision		Templegate Developments Ltd	Unspecified	No	At paragraph 2.1, under the heading 'Urban Eco-Settlement Vision', there is reference to creating a 'low carbon environment'. Whilst we understand the aspiration, it is important that this is balanced with other considerations and the context of the various sub-areas / sites. Our focus is upon delivering jobs at Temple Green and homes with appropriate amenities / services around the lake and Beck at Skelton Gate. Whilst the design of each set of proposals (or phase) will be carefully considered in line with prevailing regulations and landscaping, open space and SUDS incorporated, there is a need to balance such aspirations for 'low carbon' with viability and deliverability. Our assumption is that energy and waste facilities will be or have been provided elsewhere in the AAP boundary, as evidenced by the ongoing EfW and recent wind turbine projects. We therefore reserve the right to engage in further discussions on this topic, including at the EiP.	Unspecified	n/a
AVLAAP Plan Document - Publication		Para 2.1, AVL - Urban Eco		Historic England, National Planning &	Unspecified	Yes	n/a	Unspecified	n/a

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Draft		Settleme nt Vision		Conservatio n					
AVLAAP Plan Document - Publication Draft		Para 2.2, Principle 6		Historic England, National Planning & Conservatio n	Unspecifi ed	No	Paragraph 2.2, Principle 6 amend to read:- “To preserve, enhance and ensure a sustainable future for its heritage assets and enhance its natural assets linked to a wider network ... etc”	Unspe cified	n/a
AVLAAP Plan Document - Publication Draft		Para 3.2.12		Highways England	Unspecifi ed	Yes	n/a	Yes	n/a
AVLAAP Plan Document - Publication Draft		Para 3.2.18, Table 3		Burberry	Unspecifi ed	Unspecifi ed	Consider it necessary to examine the deliverability of the AAP allocations given the significant amount of land allocated for employment use (232 ha), equating to 47% of the land supply identified. Land which is already or has previously been in use for industrial uses should be assessed to ensure all potential sites across the district are being reviewed. Currently, it is anticipated that employment uses will	Unspe cified	n/a

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							be accommodated predominately within the Aire Valley which should be widened by identifying the potential for employment in city centre sites as part of mixed-use allocations.		
AVLAAP Plan Document - Publication Draft		Para 3.3.20		New, East and South Leeds Community Body (non-constituted)	Unspecified	No	<p>These issues would have to be fully considered and summarised in the plans. It will be clear what will happen to outcomes in relation to decent, affordable housing for younger people, people in the social group C2DE, homeless people, migrants, those living in new HMOs and shared housing. There should be a discernable impact on spacial allocations, particularly residential allocations. There are a range of zone types here that I can't see in the plans, including live and work spaces, self-build zones with</p> <p>small packages of land, and movable accommodation. There should be a stated general caveat from the Council that residential development will be permitted subject to appropriate</p> <p>community facilities, green space and infrastructure, and subject to affordability, mixed communities, high</p>	No	<p>Allocations do not reflect the core strategy. Not all relevant sites for this strategy have been identified and allocated. Allocations are not consistent with sustainable development Allocations are not consistent with Social Value Act</p> <p>and Human Rights Act The process did not give consideration to</p> <p>the Social Value Act and Human Rights Act in a way that has</p>

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							<p>quality housing and liveable high density housing in built-up areas, being allocated at a spacial level lower than is zoned here, including in some areas primarily designated for other purposes. And subject to neighbourhood plans and masterplanning/local design visions. This will give the planning committees some ammunition in relation to appeals which it looks externally as if they sorely need. Requirements in terms of active frontage in high density residential areas need to be understood. Areas with Council tenants may benefit from sharing gyms in new developments on a charged basis, such as though the Motiv8 brand. This needs to systematically be considered in the planning system, and free/low cost onsite gyms encouraged on health grounds.</p>		<p>been referenced in the documents.</p>

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AVLAAP Plan Document - Publication Draft		Para 3.5.38		Harworth Estates	Unspecified	No	To make the plan sound, an additional paragraph to follow paragraph 3.5.38 should be included to state that: “Sites north of the Aire and Calder Navigation also have the potential to accommodate new development of rail and water freight infrastructure and interchange facilities, subject to assessment of technical feasibility and economic viability.”	Yes	n/a
AVLAAP Plan Document - Publication Draft		Para 3.5.4		Ineke Jackson	Unspecified	No	More information on decisions made available for consultations or decisions reviewed in the light of answers to the questions in the numbered comments in email.	Don't know	n/a
AVLAAP Plan Document - Publication Draft		Para 3.6.4		Historic England, National Planning & Conservation	Unspecified	Yes	n/a	Unspecified	n/a
AVLAAP Plan Document - Publication Draft		Para 4.2.1, Spatial Vision		Historic England, National Planning & Conservation	Unspecified	No	Paragraph 4.2.1, Spatial Vision third Paragraph along the following lines:- “... redevelopment of brownfield site, the reuse and adaptation of its legacy of historic buildings, and reinvention of existing areas such as Leeds Dock.”	Unspecified	n/a

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AVLAAP Plan Document - Publication Draft		Para 4.2.20		Vastint Leeds B.V.	Unspecified	Unspecified	Until such time as the HS2 station alignment is confirmed it could be premature to proceed towards submission of the draft plan. If the AVLAAP is to proceed to EiP based on the current programme then some contingency needs to be introduced to account for the fact that the HS2 alignment could be changed and/or that further delays could be experienced in defining this alignment. This would represent a positive approach to preparation of the Plan.	Unspecified	n/a
AVLAAP Plan Document - Publication Draft		Para 4.2.3, Objectives		Historic England, National Planning & Conservation	Unspecified	No	Objectives – insert an additional objective along the following lines:- “Encourage the conservation and reuse of the area’s heritage assets to create an attractive distinctive gateway to the Aire Valley Leeds area from the City Centre.”	Unspecified	n/a
AVLAAP Plan Document - Publication Draft		Para 4.2.6		Historic England, National Planning & Conservation	Unspecified	Unspecified	n/a	Unspecified	n/a
AVLAAP Plan Document - Publication		Para 4.3.1, Objectives		Historic England, National Planning &	Unspecified	No	Paragraph 4.3.1, Objectives – insert an additional Objective along the following lines:-	Unspecified	n/a

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Draft				Conservation			“Conserve the area’s heritage assets and ensure that those that are vacant or at risk have a sustainable future”		
AVLAAP Plan Document - Publication Draft		Para 4.31, Spatial Vision		Historic England, National Planning & Conservation	Unspecified	Yes	n/a	Unspecified	n/a
AVLAAP Plan Document - Publication Draft		Para 4.4.1, Objective 7		Historic England, National Planning & Conservation	Unspecified	Yes	n/a	Unspecified	n/a
AVLAAP Plan Document - Publication Draft		Para 4.4.1, Spatial Vision		Historic England, National Planning & Conservation	Unspecified	No	Paragraph 4.1.1, Spatial Vision add an additional Paragraph along the following lines:- “Hunslet Mill and Victoria Mill will have been brought back into use and will have become key landmark buildings which have helped in increasing the attractiveness of the waterfront area as a place to live and visit”.	Unspecified	n/a
AVLAAP Plan Document - Publication Draft		Para 4.4.21		Historic England, National Planning & Conservation	Unspecified	Yes	n/a	Unspecified	n/a

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AVLAAP Plan Document - Publication Draft		Para 4.4.4		Historic England, National Planning & Conservation	Unspecified	Yes	n/a	Unspecified	n/a
AVLAAP Plan Document - Publication Draft		Para 4.5.1, Objective 5		Historic England, National Planning & Conservation	Unspecified	No	Paragraph 4.5.1, Objective 5 amend to read:- “Ensure that the river corridor and the heritage assets at Thwaites Mill are recognised for the attractive environment they provide, and are widely used ... etc”	Unspecified	n/a
AVLAAP Plan Document - Publication Draft		Para 4.5.1, Spatial Vision		Historic England, National Planning & Conservation	Unspecified	Yes	n/a	Unspecified	n/a
AVLAAP Plan Document - Publication Draft		Para 4.5.56		Harworth Estates	Unspecified	No	To make the plan sound in this regard, text should be included to confirm the acceptability of temporary and informal uses provided that these can operate with existing infrastructure and do not prejudice the ultimate development aspirations. An additional paragraph should therefore be added after paragraph 4.5.56 to include further details as follows:	Yes	n/a

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							<p>“Given the location of these sites and the cost and scale of infrastructure requirement to facilitate development, it is likely that an interim period may occur before the ultimate employment development proposals are deliverable. During this interim period, the sites present an opportunity for temporary or informal uses such as outdoor storage, energy generation and construction/demolition material recycling etc. Such uses will be supported provided that they do not prejudice the ultimate development aspirations. The sites are well suited to these uses given the location is remote from any sensitive uses such as residential areas, and that existing infrastructure provides access via Knowsthorpe Lane and Skelton Grange Road.”</p>		
AVLAAP Plan Document - Publication Draft		Para 4.6.1 - Spatial Vision		Templegate Developments Ltd	Unspecified	No	<p>The policy and table referred to above, as well as this section, talk about ‘potential for 2,619 new homes’. We have set out our reasons for objecting to such a high figure, given the detailed master planning and assessment work now completed suggest a lower capacity at reasonable density. There are 1,800 units likely to come forward within the</p>	Unspecified	n/a

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							<p>boundary of the land under our control theoretically leaving 889 units to be accommodated within the remainder of the Site Allocation. The reality is that site could not deliver more than about 180 units, if it were deliverable and available, hence other sites will need to be found in the sub-area to deliver the balance of 639 units.</p> <p>Once again we draw attention to the comments made earlier in respect of Section 2 of the AAP and note the statement:</p> <p>‘Will maximise opportunities to generate and distribute low carbon energy to new homes and businesses’. Whilst the reasoning is understood, this needs to be balanced against viability and deliverability, plus viewed on an area wide basis.</p>		
AVLAAP Plan Document - Publication Draft		Para 4.6.1, Spatial Vision		Historic England, National Planning & Conservation	Unspecified	No	<p>Paragraph 4.6.1, Spatial Vision, add the following to the end of the first Paragraph:-</p> <p>“ ... green spaces. The development will have been designed in a manner which safeguards key views from the Historic Park and Garden at Temple Newsam”</p>	Unspecified	n/a

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AVLAAP Plan Document - Publication Draft		Para 4.6.1. Objectives		Historic England, National Planning & Conservation	Unspecified	No	Paragraph 4.6.1, Spatial Vision, add the following to the end of the third Objective:- “ ... wider network. The development will have been designed to safeguard key views from the Historic Park and Garden at Temple Newsam”	Unspecified	n/a
AVLAAP Plan Document - Publication Draft		Para 4.6.20 (4)		Templegate Developments Ltd	Unspecified	No	At 4.6.20 (4) ‘locate key facilities such as school, local centre and park centrally within the development’ but we question who defines what ‘centrally’ means? Our master plan tabled at a recent meeting with Council officers shows what we consider to be the appropriate location. We respectfully suggest this is deleted and that the key criteria relate to accessibility and responsiveness to context, other uses etc.	Unspecified	n/a
AVLAAP Plan Document - Publication Draft		Para 4.6.20, Key Principles for Design		Historic England, National Planning & Conservation	Unspecified	No	Paragraph 4.6.20, Key Principles for Design add the following: “The development will be required to safeguard key views from the Historic Park and Garden at Temple Newsam”	Unspecified	n/a
AVLAAP Plan Document - Publication		Para 4.6.29		Templegate Developments Ltd	Unspecified	Unspecified	n/a	Unspecified	n/a

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Draft									
AVLAAP Plan Document - Publication Draft		Para 4.6.38		Templegate Developments Ltd	Unspecified	Unspecified	n/a	Unspecified	n/a
AVLAAP Plan Document - Publication Draft		Para 4.6.43		Templegate Developments Ltd	Unspecified	No	'The area map identifies important green infrastructure corridors...' but our clients have indicated they would like some of the woodland adjacent to the junction to be removed and replanted in order to facilitate a better overall development, it would therefore be helpful to have some flexibility around the wording in this paragraph.	Unspecified	n/a

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AVLAAP Plan Document - Publication Draft		Para 4.6.47		Templegate Developments Ltd	Unspecified	No	At 4.6.47 it states that 'Most of the green space should be provided in the form of a community park'. This is not entirely consistent with the proposals being formulated which will incorporate generous and varied open space provision, but not all on one park as such. For example there will be some provision on the western flank of our site to meet some of the key LCC open space categories. The central location of this park as indicated in the second sentence of this paragraph could, subject to scale, mean we lose development parcels on some of the best unconstrained land which is not sensible given the overall reduction in capacity. Again, flexibility is needed and other performance criteria used to define the location as suggested under 4.6.20 above. Until such time as this amendment is made we maintain an objection.	Unspecified	n/a

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AVLAAP Plan Document - Publication Draft		Paras 3.2.15 (Table 2), 3.2.16 & 4.5.50		Harworth Estates	Unspecified	No	<p>To make the plan sound in this regard, NRW Site 200 should be indicated on the plan as an employment site (overlaid with the waste treatment designation) as shown on plan ref.</p> <p>A3\LE\BUS\001_A. Corresponding text in the AAP document should be amended within table 2 and at paragraph 3.2.16 and 4.5.50 as suggested below.</p> <p>Table 2: Schedule of Identified General Employment Sites</p> <table border="1"> <thead> <tr> <th>Site No.</th> <th>Site Name</th> </tr> </thead> <tbody> <tr> <td>NRW 200</td> <td>Skelton Grange (West)</td> </tr> <tr> <td>11</td> <td></td> </tr> </tbody> </table> <p>The text at paragraph 3.2.16 should be amended to include further details as follows:</p> <p>“...Development for energy generation or general employment at NRW Site 200 is allowed provided that it is demonstrated that there is no requirement for or feasible</p>	Site No.	Site Name	NRW 200	Skelton Grange (West)	11		Yes	n/a
Site No.	Site Name														
NRW 200	Skelton Grange (West)														
11															

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							<p>development for waste treatment use for all or part of the site.”</p> <p>The text at paragraph 4.5.50 should be amended to include further details as follows:</p> <p>“...Should this development not come forward, then alternative development of the site for waste treatment and/or energy generation and/or general employment will be allowed provided it is demonstrated that there is no requirement for or feasible development for waste treatment use for all or part of the site.”</p>		

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AVLAAP Plan Document - Publication Draft		Paras 3.7.10 & 3.7.18		Harworth Estates	Unspecifi ed	No	<p>To make the plan sound in this regard, the following sections should be amended to facilitate development of a wider range of energy generation facilities.</p> <p>Paragraph 3.7.10 should be amended to include further details as follows:</p> <p>“Solar energy is collected through either photovoltaic (generating electricity) or solar thermal panels. AVL is identified as an area with significant potential for installation of solar panels on existing buildings, [and] within new developments and with standalone installations, including, for example, the park & ride facility at Temple Green, [and] on commercial buildings with large roof areas and solar farm installations.”</p> <p>An additional sub-heading and paragraph should be added after paragraph 3.7.17 to include further details as follows:</p> <p>“Flexible Energy Supply</p> <p>Appropriate sites within AVL may be suitable for energy generation</p>	Yes	n/a

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							<p>facilities additional to the range of renewable and energy-from-waste infrastructure, potentially including STOR (short term operating reserve) generating facilities. This flexible generation of electricity responds to increased demand at peak times.”</p> <p>Please also note that the publication draft AAP is numbered incorrectly between paragraphs 3.7.17 and 3.7.20.</p>		
AVLAAP Plan Document - Publication Draft		Paras 4.2.32 to 4.2.46		Historic England, National Planning & Conservatio	Unspecifi ed	No	Insert an additional Policy which includes the requirements of Paragraphs 4.2.32 to 4.2.46.	Unspe cified	n/a

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				n					
AVLAAP Plan Document - Publication Draft		Paras 4.4.23 to 4.4.29		Historic England, National Planning & Conservation	Unspecified	Yes	n/a	Unspecified	n/a
AVLAAP Plan Document - Publication Draft		Paras 4.5.51 to 4.5.52		Harworth Estates	Unspecified	No	<p>To make the plan sound in this regard, the alignment of the former rail spur and its interface with the main line should be indicated and safeguarded for potential rail freight access to serve site AV68 and the wider employment area as shown on plan ref. A3\LE\BUS\001_A. In particular, key existing infrastructure should be specifically referenced and safeguarded for this purpose, including the bridges over the river/canal, the motorway underpass and the main line interface strip south of the river/canal.</p> <p>Notwithstanding its basis in the NRWLP (policy Mineral 13(5)), the indicated intermodal freight area of search south of the river should be extended to include site AV68 and the land to the southeast of this around</p>	Yes	n/a

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							<p>the rail spur as shown on plan ref. A3\LE\BUS\001_A.</p> <p>The text at paragraph 4.5.51 should be amended to include further details as follows:</p> <p>“...alongside construction of the ERF. This site benefits from a position which may incorporate the alignment of a rail spur to accommodate rail served development or interchange. To preserve the opportunity for rail served development the site included within the intermodal freight area of search.”</p> <p>The text at paragraph 4.5.52 should be amended to include further details as follows:</p> <p>“A further 7.8 hectares of land to the south (AV68) is also carried forward from the UDP and identified as a general employment site. This site benefits from a position that incorporates the alignment of the rail spur which served the former power station and which may potentially be reinstated to accommodate rail served development or interchange. To</p>		

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							preserve the opportunity for rail served development, the alignment of the rail spur and its interface with existing line is safeguarded, and the site included within the intermodal freight area of search. As delivery of rail served development will depend upon a viable proposition given prevailing demand and the cost of development, its inclusion is not a condition of development of this site.”		
AVLAAP Plan Document - Publication Draft		Paras 4.6.27 - 4.6.29		Templegate Developments Ltd	Unspecified	No	<p>At 4.6.27 ‘provision of supporting facilities within early phases’ again we would welcome a definition of ‘early’. Our suggestion is this is linked to trigger points, probably housing completions.</p> <p>At 4.6.28 and in Policy AVL7 we again question the requirement for a through school, given the case for a secondary school has not yet been made or properly explained.</p> <p>At paragraph 4.6.29 highway access is discussed and we make clear later in these representations that we favour a single main point of access direct off the M1 interchange.</p>	Unspecified	n/a

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AVLAAP Plan Document - Publication Draft		Section 1		New, East and South Leeds Community Body	Unspecified	No	<p>Plan introduction and overview to be strengthened in the light of comments from partners, including these. Better information on qualitative outcomes and quantitative metrics</p> <p>resulting from the spacial allocations, including housing affordability, CO2 emissions etc. You look at what you can do in terms of allocating green space, civic space, community facilities,</p> <p>community infrastructure, self-build housing, affordable housing, moveable affordable housing. You look at what must happen in relation to legal compliance in relation to the Social Value Act and Human rights act.</p>	No	Not consistent with sustainable development. Not consistent with social value act.
AVLAAP Plan Document - Publication Draft		Section 4.2		Leeds Civic Trust	Unspecified	Unspecified	Many of the aims for the South Bank area should be applied to the whole of city centre south.	Unspecified	n/a

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AVLAAP Plan Document - Publication Draft		Section 4.2 - South Bank Area Plan		Vastint Leeds B.V.	Unspecified	Unspecified	<p>A concentration of relevant policies and details within the AVLAAP/Site Allocations Plan, complimented by the masterplan, would enable the SBPS to be withdrawn. This would simplify the basis against which investment and planning decisions are made, and reduce the risk of confusion and contradiction. Relevant matters covered by the SBPS, not currently addressed within either the AVLAAP or SAP are as follows:</p> <p>§ The principle of fair apportionment of the City Centre Park (approximately 3.5has in total) between development sites; and</p> <p>§ Confirmation that the City Centre Park does not need to be one contiguous area, but can be a series of inter-linked spaces.</p>	Unspecified	n/a

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AVLAAP Plan Document - Publication Draft		Section 4.5; Paras 4.5.34 & 4.5.47		Templegate Developments Ltd	Unspecified	Unspecified	<p>For information: Paragraph 4.5.47 refers to the potential to link to the Skelton Gate site to the east of the M1, along Knowsthorpe Lane via an existing underpass beneath the motorway. This may be a longer term option for a bus route, but only if it becomes available given third party land interests. In the meantime the primary access to the A63 will be utilised for all vehicles including Park & Ride buses.</p> <p>For information: It is noted below that paragraph 4.5.34 outlines the Council's aspiration to green the industrial areas. We have taken into account the aspiration to naturalise Wyke Beck, retain green links and incorporate some tree planting in bringing forward detailed proposals. The relevant schemes can be found on the LCC planning applications portal.</p>	Unspecified	n/a
AVLAAP Plan Document - Publication Draft	AV11			West Yorkshire Fire & Rescue Service	Unspecified	Yes	n/a	Don't know	n/a

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AVLAAP Plan Document - Publication Draft	AVL12			Highways England	Unspecified	No	<p>It needs to be made clear that a comprehensive package of improvement schemes on the Strategic Road Network including schemes additional to those in the RIS is necessary to cater for the increased demand for road travel generated by the development proposals in Aire Valley Leeds and in the wider area of Leeds District.</p> <p>More detail needs to be provided in the Draft Plan than is included in paragraphs 3.5.11 - 3.5.13 and Policy AVL12 based on the information provided earlier in this response form. The supporting information in the Infrastructure Schedules in the Infrastructure Delivery Plans for Aire Valley Leeds will need to be modified and expanded in accordance with the detailed information provided in other parts of the Highways England responses to consultation on both Local Plan Publication Drafts.</p> <p>Construction of sites with the greatest individual traffic impact should also be phased to take place following completion of the committed RIS improvements</p>	Don't know	n/a

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AVLAAP Plan Document - Publication Draft	AVL12			Highways England	Unspecified	No	Inclusion in the section on public transport of a reference to providing any infrastructure necessary to facilitate the operation of a bus service between the Five Towns and Leeds through Aire Valley Leeds.	Don't know	n/a
AVLAAP Plan Document - Publication Draft	Policy AVL10			Vastint Leeds B.V.	Unspecified	Unspecified	<p>Linked in part to a larger than anticipated planned population on the Brewery site, and across the wider South Bank, and the definition of an 'Education Hub' directly adjoining the area, it would appear logical to at least plan for the possibility of the Education Hub accommodating a primary school presence; i.e. to compliment the secondary school and higher education uses on the site.</p> <p>Future-proofing the scope for school provision in this manner would support the objectives of encouraging a greater housing mix in the City Centre, representing a positive and effective approach to supporting the strategic planning context.</p>	Unspecified	n/a
AVLAAP Plan Document - Publication Draft	Policy AVL10 (2)			Templegate Developments Ltd	Unspecified	No	There may be other more sensible solutions available off site. That said we are well aware of the CIL contributions applicable, but the balance of funding is far from clear.	Unspecified	n/a
AVLAAP	Policy			Historic	Unspecified	Yes	n/a	Unspe	n/a

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Plan Document - Publication Draft	AVL11			England, National Planning & Conservation	Agreed			Legal	
AVLAAP Plan Document - Publication Draft	Policy AVL11			Vastint Leeds B.V.	Unspecified	No	Policy P11 of the Core Strategy, to which AVL11 references, includes detail on the approach adopted (reflecting national guidance) in instances where it may be necessary to demolish an undesignated asset. It would be helpful to clarify within Policy AVL11 itself that there may be instances where assets cannot be conserved, and that proposals in such circumstances will be assessed against the measures outlined elsewhere within the Development Plan.	Unspecified	n/a
AVLAAP Plan Document - Publication Draft	Policy AVL11			Leeds Civic Trust	Unspecified	Unspecified	We welcome the inclusion of Policy AVL11 – Locally Significant Undesignated Heritage Assets, but in addition to marking them on a map, the urban design assessment referred to should be included in the Plan. or an appendix, specifically itemising each by address, together with a description of their significance using the methodology set out in Historic England’s guidance. There is otherwise a danger that the aim to	Unspecified	n/a

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Document	Policy	Para	Diagram	Submitter	Agree	Sound	Respondent changes sought	Legal	Respondent Legal comments
							conserve them could be undermined on appeal, through lack of evidence.		
AVLAAP Plan Document - Publication Draft	Policy AVL11			Historic England, National Planning & Conservation	Unspecified	No	Policy AVL11 amend to read:- “ In accordance with Core Strategy Policy P11, the locally significant undesignated heritage assets shown on the area maps and their settings will be conserved.”	Unspecified	n/a
AVLAAP Plan Document - Publication Draft	Policy AVL12			Aviva Investors & The Crown Estate	Unspecified	No	In the absence of such clarification the policy could be read as granting deemed approval for a series of works without further detailed consultation and consideration. The owners would not anticipate LCC adopting such an approach, but in order to be sound – effective and justified – the policy should be clear on this point.	Unspecified	n/a

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Document	Policy	Para	Diagram	Submitter	Agree	Sound	Respondent changes sought	Legal	Respondent Legal comments
AVLAAP Plan Document - Publication Draft	Policy AVL12			Vastint Leeds B.V.	Unspecified	Unspecified	<p>Vastint support objectives surrounding the introduction of measures to 'reduce the physical and visual impact of vehicular traffic infrastructure' in the South Bank area (Highway Network, point 3), but linked to the strategic importance of the Brewery site, it is essential that Vastint are consulted over the consideration of any consequent changes to road layouts, their priorities and purpose. They are, and should be recognised as a key stakeholder in this process.</p> <p>We would be grateful if this could be noted and addressed as the process moves forward.</p>	Unspecified	n/a
AVLAAP Plan Document - Publication Draft	Policy AVL12	Para 3.5.18		Harworth Estates	Unspecified	No	<p>To make the plan sound, policy AVL12 should be amended to reflect paragraph 3.5.18 as follows:</p> <p>"Highway Network</p> <p>2. Upgrade and adoption of Knowsthorpe Lane and/or the construction of a link road, including improvements to the junction at Skelton Grange Road and Pontefract Road and new river bridge at Skelton Grange, to connect the A63 to Pontefract Road to the A63/M1</p>	Yes	n/a

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Document	Policy	Para	Diagram	Submitter	Agree	Sound	Respondent changes sought	Legal	Respondent Legal comments
							<p>junction 45 to enable better road access to employment development sites and to allow traffic including public transport and the cycle/pedestrian network to cross the river.”</p> <p>The central area map should also be amended to indicate the alignment of Knowsthorpe Lane as a potential primary route for vehicular traffic as shown on plan ref. A3\LE\BUS\001_A, not just for pedestrian/cycle and public transport use.</p>		
AVLAAP Plan Document - Publication Draft	Policy AVL13			Natural England, Yorkshire and Northern Lincolnshire	Unspecified	Yes	n/a	Yes	n/a
AVLAAP Plan Document - Publication Draft	Policy AVL13		Map 5	Towngate Plc	Unspecified	No	Object to various land holdings being included as green infrastructure at Haigh Park Road including the lakes - The sites should be excluded from the green infrastructure plan and included within the adjacent employment allocations. This better reflects the nature of the sites (ie.they are poor quality landscaping within a wider industrial and commercial area).	No	n/a

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AVLAAP Plan Document - Publication Draft	Policy AVL14		Map 5, 13 & 14	Towngate Plc	Unspecified	No	We object to the inclusion of various pieces of land within the green infrastructure and open space allocation. sites should be excluded from the green infrastructure plan and included within the adjacent employment allocations. This better reflects the nature of the sites (ie. they are poor quality landscaping within a wider industrial and commercial area).	No	n/a
AVLAAP Plan Document - Publication Draft	Policy AVL14			Natural England, Yorkshire and Northern Lincolnshire	Unspecified	Yes	n/a	Yes	n/a
AVLAAP Plan Document - Publication Draft	Policy AVL15			Historic England, National Planning & Conservation	Unspecified	Yes	n/a	Unspecified	n/a
AVLAAP Plan Document - Publication Draft	Policy AVL16			Historic England, National Planning & Conservation	Unspecified	No	Policy AVL16 add an additional sentence along the following lines:- "Where retrofitting works are proposed to a Listed Building, these should safeguard the special historic character of that building"	Unspecified	n/a

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AVLAAP Plan Document - Publication Draft	Policy AVL17			Leeds Civic Trust	Unspecified	Unspecified	It is not entirely clear how the network will be accommodated and funded in the locations between participating sites which might be highway land or existing operational sites. No doubt this will be dealt with in the guidance.	Unspecified	n/a
AVLAAP Plan Document - Publication Draft	Policy AVL17		Map 6	Muse Developments Ltd	Unspecified	No	The proposed connection to the Heating Network, and the alignment of the connection, is not suitable, available or deliverable. In this context we request that the notation on Map 6 is removed in relation to the Site and any requirements under Policy AVL17.	Unspecified	n/a

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AVLAAP Plan Document - Publication Draft	Policy AVL2			Towngate Plc	Unspecified	No	<p>To ensure consistency and legibility of the plan the two policies should be merged with AVL4. For the reasons above (duplication of policy) policy AVL2 is superfluous. We therefore</p> <p>object to the inclusion of AVL2 in the emerging plan. The key policy matters and associated allocations covered by AVL2 should be transferred to policy AVL4 to ensure the emerging plan is clear, consistent and concise. We suggest the following changes to policy AVL4. The changes are shown within the structure of the current draft for ease of reference.</p> <p>1. New development for research & development (Use Class B1b), light industry (Use Class B1c), general industry (Use Class B1c) and storage & distribution (Use Class B8) uses, along with ancillary office (Use Class B1a) and other uses (subject to part 2 below), will be promoted and concentrated in the following locations as defined on area maps:</p> <ul style="list-style-type: none"> • Leeds City Region Enterprise Zone 	No	n/a

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Document	Policy	Para	Diagram	Submitter	Agree	Sound	Respondent changes sought	Legal	Respondent Legal comments
							<ul style="list-style-type: none"> • Cross Green Industrial Estate • Hunslet (defined employment areas) <p>Stourton Skelton Grange</p> <p>2. Alternative uses will be supported where there is no prospect of the site being brought forward for general employment uses, or the proposed use will support the function of the area</p> <p>3. The South Bank area and the Marsh Lane site are identified as suitable locations for research & development uses subject to the provisions of Policy AVL7 and site requirements set out in area plans.</p> <p>4. Leeds Valley Park (Site AV81) is identified as a suitable location for general employment uses.</p> <p>5. The following sites are allocated for general employment use, with other uses supported where ancillary to the main general employment function (as per part 2 of this policy), in accordance with Core Strategy Spatial Policy 9.</p>		

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Document	Policy	Para	Diagram	Submitter	Agree	Sound	Respondent changes sought	Legal	Respondent Legal comments
							<p>These sites are shown on the Policies Map and are subject to site requirements set out in area plans...</p> <p>[Then contained is the list of sites, which should include those transferred from Policy AVL2]</p>		

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AVLAAP Plan Document - Publication Draft	Policy AVL2			Harworth Estates	Unspecifi ed	No	<p>The publication draft AAP is considered not to be sound on the basis that it does not make effective use of the land and infrastructure available for employment development.</p> <p>To make the plan sound in this regard, the boundary of site AV68 should be extended to the south as shown on plan ref. A3\LE\BUS\001_A with a consequential increase in its stated area from 7.33ha.</p>	Yes	n/a

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AVLAAP Plan Document - Publication Draft	Policy AVL4			Towngate Plc	Unspecified	No	<p>To ensure consistency and legibility of the plan the two policies should be merged with AVL4. For the reasons above (duplication of policy) policy AVL2 is superfluous. We therefore</p> <p>object to the inclusion of AVL2 in the emerging plan. The key policy matters and associated allocations covered by AVL2 should be transferred to policy AVL4 to ensure the emerging plan is clear, consistent and concise. We suggest the following changes to policy AVL4. The changes are shown within the structure of the current draft for ease of reference.</p> <p>1. New development for research & development (Use Class B1b), light industry (Use Class B1c), general industry (Use Class B1c) and storage & distribution (Use Class B8) uses, along with ancillary office (Use Class B1a) and other uses (subject to part 2 below), will be promoted and concentrated in the following locations as defined on area maps:</p> <ul style="list-style-type: none"> • Leeds City Region Enterprise Zone 	No	n/a

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Document	Policy	Para	Diagram	Submitter	Agree	Sound	Respondent changes sought	Legal	Respondent Legal comments
							<ul style="list-style-type: none"> • Cross Green Industrial Estate • Hunslet (defined employment areas) <p>Stourton Skelton Grange</p> <p>2. Alternative uses will be supported where there is no prospect of the site being brought forward for general employment uses, or the proposed use will support the function of the area</p> <p>3. The South Bank area and the Marsh Lane site are identified as suitable locations for research & development uses subject to the provisions of Policy AVL7 and site requirements set out in area plans.</p> <p>4. Leeds Valley Park (Site AV81) is identified as a suitable location for general employment uses.</p> <p>5. The following sites are allocated for general employment use, with other uses supported where ancillary to the main general employment function (as per part 2 of this policy), in accordance with Core Strategy Spatial Policy 9.</p>		

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							<p>These sites are shown on the Policies Map and are subject to site requirements set out in area plans...</p> <p>[Then contained is the list of sites, which should include those transferred from Policy AVL2]</p>		

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AVLAAP Plan Document - Publication Draft	Policy AVL7			Vastint Leeds B.V.	Support	No	<p>Policy AVL3 refers to the South Bank as having an estimated capacity for office uses equating to 73,500 sqm, with Policy AVL7 identifying an estimated dwelling capacity of 825 units. Neither policy directly imposes a limit on development, but nor do they explicitly confirm that the figures are elastic and/or could be treated as minimum requirements, where appropriate.</p> <p>Reference to specific figures without relevant clarification could be read as some form of restriction, particularly where there does not appear to be any clear and transparent approach to calculating capacity.</p> <p>Initial work undertaken by Vastint indicates that the capacity of the Brewery site alone could significantly exceed (particularly for housing) that quoted in the draft AVLAAP.</p> <p>When considering the scale of the site this is not surprising. The accessibility credentials of the site by noncar modes – to be further enhanced by NGT and new pedestrian routes – support a high density scheme. For</p>	Unspecified	n/a

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							<p>example, adopting Transport for London's PTAL (Public Transport Accessibility Level) criteria, or Greater Manchester's Accessibility Level (GMAL) approach, the site has excellent access by public transport which would, in turn, support a high density of development.</p> <p>Notwithstanding the land-take requirements of the City Park, adopting a development density anywhere near that of modern schemes in the surrounding area (e.g. Brewery Wharf, New Dock, Velocity, etc) would generate a quantum of floorspace/unit count far in excess of that suggested within the draft policies.</p> <p>Therefore, to be consistent with the Core Strategy (and the Framework) spatial approach to directing new development to the City Centre, and subject to normal development control considerations, clarification should be added to each Policy (AV3 and AV7) confirming that the figures are quoted for indicative purposes only, and are to be considered as the minimum quantum of development that could be</p>		

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							accommodated in the South Bank area. This is a positive and justified approach to these policies.		
AVLAAP Plan Document - Publication Draft	Policy AVL7			Historic England, National Planning & Conservatio n	Unspecifi ed	Yes	n/a	Unspe cified	n/a

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AVLAAP Plan Document - Publication Draft	Policy AVL7	Para 3.3.18		Indigo Planning	Unspecified	No	A dialogue with housing developers and their agents representing the whole industry is needed. However, the comments of the Chief Planning Officer that "It may take some time before we are in a position to convene a group to inform this work and to consult on initial thoughts." (we have attached the relevant email) are not reassuring.	Don't know	n/a
AVLAAP Plan Document - Publication Draft	Policy AVL9 (4)			Templegate Developments Ltd	Unspecified	Unspecified	We support this policy.	Unspecified	n/a
AVLAAP Plan Document - Publication Draft	Policy CAV1			Historic England, National Planning & Conservation	Unspecified	No	Policy CAV1, insert the site requirements which would need to be taken into account should proposals for redevelopment of this area come forward during the plan period. These should include a bullet-point along the following lines:- "This site lies adjacent to a Registered Historic Park and Garden. Development proposals should safeguard those elements which contribute to its significance including its setting".	Unspecified	n/a

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Document	Policy	Para	Diagram	Submitter	Agree	Sound	Respondent changes sought	Legal	Respondent Legal comments
AVLAAP Plan Document - Publication Draft	Policy CAV1	Paras 3.2.2 & 3.5.7		West Yorkshire Combined Authority	Support	Unspecified	The AAP could include mention of the potential NGT extension including paragraph para 3.2.2 and 3.5.7 and Map 4	Unspecified	n/a
AVLAAP Plan Document - Publication Draft	Policy CAV3	Para 4.5.33		Harworth Estates	Unspecified	No	To make the plan sound in this regard, paragraph 4.5.33 should be amended to include further details as follows: “A significant opportunity is identified on the northern bank of the river. This area of land is allocated for employment use in the UDP, but is not considered to be deliverable for development during the plan period due to the high costs of remediating contaminated land. The land includes former sludge lagoons associated with the Knostrop works and adjoining land to the south covering a total area of over 20 hectares. [Vegetation on the land is naturally re-growing and] The land provides an opportunity for enhancement to create a mix of natural habitats including community woodland, grassland and semipermanent wetlands, as well as the potential to accommodate drainage features (SUDS) and to grow	Yes	n/a

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							<p>crops for energy generation. To realise this potential, ground improvement works are required including the import and removal of material to treat the ground and create sustainable growing conditions.”</p> <p>Policy CAV3 should be amended to include further details as follows:</p> <p>“POLICY CAV3 – GREEN INSTRUCTURE IN THE CENTRAL AIRE VALLEY</p> <p>...1. Integration and improvement of 20 hectares of previously developed, former employment land, to the north of the River Aire and west of the M1 motorway into the wider green infrastructure network, with the potential to include drainage features (SUDS) and energy crops as well as natural habitats.”</p>		
AVLAAP Plan Document - Publication Draft	Policy EB4			Historic England, National Planning & Conservation	Unspecified	No	<p>Policy EB4, first Paragraph amend the end to read:-</p> <p>“ ... where it supports the guiding principles of the area set out in this plan and would not result in the loss of buildings which make a positive contribution to the character of the</p>	Unspecified	n/a

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Document	Policy	Para	Diagram	Submitter	Agree	Sound	Respondent changes sought	Legal	Respondent Legal comments
							area.”		
AVLAAP Plan Document - Publication Draft	Policy HU2			Historic England, National Planning & Conservation	Unspecified	Yes	n/a	Unspecified	n/a
AVLAAP Plan Document - Publication Draft	Policy SB1		Maps 3 & 4	Commercial Estates Group on behalf of ASE II Developments Ltd	Unspecified	No	Nothing specified	Yes	n/a

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AVLAAP Plan Document - Publication Draft	Policy SB1			Vastint Leeds B.V.	Unspecified	No	<p>A positive and effective approach to promotion of pedestrian/cycle links would recognise the importance of both the new southern access to the train station and the existing entrance points onto an improved City Square for any new office (and residential) development on the Brewery site (and elsewhere within the South Bank). Recognising these clear desire lines in the consideration of applications, and the following masterplan work, will be essential irrespective of the decision regarding location of the HS2 station.</p> <p>The link with the southern access is referenced within the 'Site Allocations and Requirements' text (see below), but not reflected in the policy or on the Proposals Map. A greater focus on this and the link with City Square would also encourage footfall and public realm improvements across a wide area of the City Centre core.</p>	Unspecified	n/a
AVLAAP Plan Document - Publication Draft	Policy SB2			Historic England, National Planning & Conservation	Unspecified	No	<p>Policy SB2 add the following additional design principle:-</p> <p>"Create opportunities to improve the setting of the Listed Buildings and Locally Significant Undesignated</p>	Unspecified	n/a

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							Assets in the area”		
AVLAAP Plan Document - Publication Draft	Policy SB2			Vastint Leeds B.V.	Unspecifi ed	No	<p>Delivery of a high quality park clearly has a significant financial impact on a development related to the cost of the works themselves and the fact that it reduces the overall developable area of the site.</p> <p>It is, therefore, important that this burden is spread fairly across the wider area so as not to frustrate investment and development. The SBPS is very clear in stating that each development site will contribute 20% of their site area to delivery of the Park.</p> <p>Without such clarification being added to Policy SB2 it provides an uncertain context for development. The SBPS is also clear in stating that the overall concept of the Park will reflect a series of linked spaces, as opposed to one contiguous area. This enables a more flexible approach to be adopted to delivery of both the Park and associated development, and should be incorporated within Policy SB2.</p>	Unspe cified	n/a

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							<p>An effective solution would be to revise Policy SB2 to incorporate reference to the 20% threshold, and the concept of a series of linked green spaces, currently included in the SBPS. This is particularly important in the event that the SBPS is consequently withdrawn.</p>		

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AVLAAP Plan Document - Publication Draft	Policy SB3			Vastint Leeds B.V.	Unspecifi ed	No	<p>In light of the fact that a significant proportion of the site will be dedicated to the City Park, the Policy should specifically recognise the fact that there will be no double-counting of the open space requirements under Core Strategy Policy GP5.</p> <p>The Policy needs to ensure that developers are not unduly burdened by the combined requirements to provide the City Park and further open space beyond that which would ordinarily be deemed appropriate through the design process.</p> <p>We recommend that the policy is revised to state that provision of the City Centre Park (in accordance with a revised Policy SB2) will be taken into account when calculating the green space requirements of a development under Core Strategy Policy GP5.</p>	Unspe cified	n/a

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AVLAAP Plan Document - Publication Draft	Policy SB4			Vastint Leeds B.V.	Unspecifi ed	No	<p>Vastint's vision for the Brewery site currently incorporates the majority, if not all of the 'appropriate' uses listed in the policy.</p> <p>However, it also includes uses beyond this list including 'creative industries' clusters, and small scale comparison goods retail, for example. By definition, these uses would be considered 'inappropriate' as drafted.</p> <p>A more positive approach would be to maximize the scope of 'appropriate' uses, subject to relevant controls.</p> <p>Creative industrial uses reflect the overall objective for the South Bank as a place where people can live and work in a sustainable community. They would typically comprise 'B1' uses, being complimentary to a residential context, but are not a 'B1(a) office' use. Other B1 uses should be specifically referenced as appropriate within the policy.</p> <p>It is acknowledged that the approach to considering proposals for new retail uses outside of defined shopping centres is set out in the Core Strategy,</p>	Unspe cified	n/a

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							but this does not state that such development would be 'inappropriate'. Therefore, it is recommended that a further criterion should be added to the policy confirming that other alternative uses will be deemed appropriate, subject to consideration against the relevant policies of the Development Plan.		
AVLAAP Plan Document - Publication Draft	Policy SG1			Templegate Developments Ltd	Unspecified	Unspecified	n/a	Unspecified	n/a

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AVLAAP Plan Document - Publication Draft	Policy SG2 (4)		Map 12	Harworth Estates	Unspecifi ed	No	<p>The publication draft AAP is considered not to be sound as it does not present a deliverable and compatible provision for the rail spur and pedestrian/cycle route enhancement.</p> <p>To make the plan sound in this regard, the map should be amended to remove the indication of pedestrian/cycle route from the safeguarded alignment of the rail spur and, in particular, the bridge infrastructure as shown on plan ref. A3\LE\BUS\001_A (see attached plan).</p> <p>See also Harworth Estates' representation HE_2 regarding the boundary of Aire Valley Leeds in this location and the interface between the rail spur and the main line.</p> <p>See also Harworth Estates' representation HE_7 regarding road infrastructure, which states that Knowsthorpe Lane should not be identified as a route solely for pedestrian/cycle and public transport use, but should be upgraded to also provide vehicular access to the</p>	Yes	n/a

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Document	Policy	Para	Diagram	Submitter	Agree	Sound	Respondent changes sought	Legal	Respondent Legal comments
							employment development sites including the former Skelton Grange power station site.		
AVLAAP Plan Document - Publication Draft	Policy SG4			Templegate Developments Ltd	Unspecified	No	n/a	Unspecified	n/a
AVLAAP Sustainability Appraisal				Historic England, National Planning & Conservation	Unspecified	Unspecified	n/a	Unspecified	n/a

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				n					
AVLAAP Sustainability Appraisal				The Coal Authority	Unspecified	No	The Sustainability Appraisal methodology and assessment process needs to be revised and undertaken again taking into account unstable land as a relevant consideration.	Yes	n/a
AVLAAP Sustainability Appraisal		Appendix 7, SA Objective 7		Historic England, National Planning & Conservation	Unspecified	Unspecified	n/a	Unspecified	n/a
AVLAAP Sustainability Appraisal		Appendix 9, SA Objective 21, Policy AVL16		Historic England, National Planning & Conservation	Unspecified	Unspecified	n/a	Unspecified	n/a
AVLAAP Sustainability Appraisal		Appendix 9, SA Objective 21, Policy CAV1		Historic England, National Planning & Conservation	Unspecified	Unspecified	n/a	Unspecified	n/a
AVLAAP Sustainability Appraisal		Appendix 9, SA Objective 21, Policy EB4		Historic England, National Planning & Conservation	Unspecified	Unspecified	n/a	Unspecified	n/a

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AVLAAP Sustainability Appraisal		Appendix 9, SA Objective 21, Policy SB2		Historic England, National Planning & Conservation	Unspecified	Unspecified	n/a	Unspecified	n/a
AVLAAP Sustainability Appraisal		Para 3.2.27		Leeds City Council	Unspecified	No	n/a	Don't know	n/a
AVLAAP Sustainability Appraisal - Non Technical Summary	SA15	Para 2.7		Leeds City Council	Unspecified	No	(1) a review and improvement of the bus services that currently serve the Aire Valley area, especially Cross Green Industrial Estate, so they are upgraded and allow workers to leave their cars at home and use public transport. (2) a public transport strategy for the Aire Valley development area - to ensure that good public transport is provided , to encourage less car usage from the staff of the new businesses and residents of the new homes.	Don't know	n/a

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AVLAAP Sustainability Appraisal - Non Technical Summary	SA18			Leeds City Council	Unspecified	No	Address the lack of public transport especially from railway station to Arie Valley region - avoid cars using the M62 commuter route which is already overcrowded.	Don't know	n/a
Employment Background Paper		Para 5.7		Leeds City Council	Unspecified	No	n/a	Don't know	n/a
South Bank Masterplan				Vastint Leeds B.V.	Unspecified	Unspecified	<p>In light of matters raised under (a) and the strategic importance of the Brewery site to the City Centre and Aire Valley regeneration objectives, it is essential that</p> <p>Vastint are heavily involved in the masterplan process from the earliest possible stage. They are, and should be recognised as a key stakeholder in this process.</p> <p>We would be grateful if this could be noted and addressed as the process</p>	Unspecified	n/a

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							moves forward.		

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Appendix C - Potential option to accommodate changes to SG1 and associated preamble in relation to submission from Extra MSA

- 4.6.36 Due to constraints, some parts of the site are not be suitable or viable for housing. Some of these areas can be incorporated within the green infrastructure requirements of the development, or incorporate specific commercial uses where this would be consistent with and help to facilitate housing development. Accommodating other uses could assist viability, thereby funding new infrastructure and facilities required in the early development phases.
- 4.6.37 Proposals for other uses would need to be incorporated within the overall masterplan for the site, help facilitate the delivery of the housing scheme and be phased alongside new housing. Proposals which would lead to the creation of a destination serving a wide catchment area, such as a retail/leisure park, ~~and motorway service area or other formats~~ which ~~provides large areas of car parking and attracts significant trips to the site from~~ would attract an unacceptably high number of additional trips utilising the motorway network would not be consistent with this approach.
- 4.6.38 A food store is an acceptable use providing the scale is limited to that normally permitted within a local centre (up to 2,000 sqm gross floorspace). The location of the store should be linked into the local centre to allow people to walk between the two along a safe and direct route. This size of store would help to serve the weekly shopping needs of future residents of Skelton Gate, but it should not be of a scale which would attract trips to the site from long distances.
- 4.6.39 Office or other business units could also act as a buffer between the motorway and housing development along the western boundary of the site within the area indicated on the area map and could also help sustain local employment.

POLICY SG1: SKELTON GATE – NON-HOUSING USES

Within the framework established in the overall masterplan, the following additional uses will be permitted with preference given to locations within the site which have been identified as most constrained for housing development and subject to compatibility with the following requirements:

- 1. A food store up to a maximum gross internal floorspace of 2,000 sq. m. to be located within or integrated with the local centre and connected to the rest of the centre by safe and direct pedestrian routes.**
- 2. Offices and/or other business uses (Class B1) along the western boundary of the site within the broad area indicated on the area plan, up to maximum total gross internal floorspace of 10,000 square metres.**
- 3. Other commercial uses not specified above or by other policies in this plan, providing they can be integrated with the wider housing site and would enhance the viability and deliverability of the overall development**

and help to deliver a sustainable housing development in accordance with Policy AVL7.

4. Contribute towards initiatives and requirements stated in policies SG2, SG3 and SG4.

The development of the alternative commercial uses should be phased alongside delivery of new housing and other facilities.