

AV9 - Hunslet Lane, Evans Halshaw Garage

Mixed use allocation

Submission ref [PDE00418_19](#)

Submitter Historic England, National Planning & Conservation

Position Unspecified

Issues

Policy omission/Site requirements - Not supportive

Sound No

Respondent comments

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."

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Agree with suggested change.

Modification

Amend Policy AVL7, Site AV9 site requirements. Add an additional bullet-point:- "Consideration should be had to the setting of the undesignated heritage assets in proximity to this site, as shown on the area map."

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AV9 - Hunslet Lane, Evans Halshaw Garage

Mixed use allocation

Submission ref [PDE00418_18](#)

Submitter Historic England, National Planning & Conservation

Position Unspecified

Issues

Policy omission/Site requirements - Not supportive

Sound No

Respondent comments

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.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Submitted as site AV7 but have clarified with Historic England that this relates to Site AV9. Agree with suggested change.

Modification

Amend Policy AVL7, Site AV9 "There are a number of Listed Buildings adjacent to this site. Any development should preserve the special architectural interest or setting of these buildings".

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Submission ref [PDW02200_1](#)

Submitter Sebastian Prince

Position Support

Issues

Other - Supportive

Sound Yes

Respondent comments

n/a

Legal Yes

Respondent legal comments

n/a

Officer comments

Noted. No change.

Modification

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AV17 - Braime Pressings, Hunslet Lane

Mixed use allocation

Submission ref [PDE00418_20](#)

Submitter Historic England, National Planning & Conservation

Position Unspecified

Issues

Policy omission/Site requirements - Not supportive

Sound No

Respondent comments

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".

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Agree with suggested change.

Modification

Amend Policy AVL7, Site AV17 site requirements second bullet-point:- "The site includes a listed building. Any development should preserve the special architectural interest or setting of this building".

-

AV18 - Marsh Lane

Mixed use allocation

Submission ref [PDE02253_1](#)

Submitter Leeds Civic Trust

Position Neutral

Issues

Site boundary - Not supportive
Phasing - Not supportive

Sound No

Respondent comments

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.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

The site is phased for immediate release in Phase 1 of the plan period in accordance with Core Strategy Policy H1. The plans referred to are not sufficiently advanced, nor is there evidence or plans which would justify a change to the boundary which could effectively blight sites and development areas. No change.

Modification

-

AV20 - Yorkshire Ambulance Station, Saxton Lane

Housing allocation

Submission ref

Submitter

Position

Issues

Sound

Respondent comments

Legal

Respondent legal comments

Officer comments

Modification

•

AV20 - Yorkshire Ambulance Station, Saxton Lane

Housing allocation

Submission ref [PDW02495_1](#)

Submitter David Mackie

Position Object

Issues

Ecology/Landscape/Trees - Not supportive
Local services - Not supportive
Highways and transport - Not supportive
Other - Unspecified
Greenspace/Green infrastructure - Unspecified

Sound No

Respondent comments

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.

Legal Don't know

Respondent legal comments

n/a

Officer comments

The area of grass/landscaping referred to is smaller than the 0.2 hectare threshold for identifying and protecting green space. New green space provision will be a requirement of the development of Site AV20 and there may be an opportunity to provide new green space next to this area of land and incorporate in within the site. This is a detailed matter to be dealt with through a planning application.

The site has been submitted to the SHLAA process by the landowner. As the site is suitable for residential uses it has been allocated within the plan.

No change.

Modification

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AV21 - The Parade & The Drive

Identified housing

Submission ref [PDW02492_1](#)

Submitter David Mackie

Position Support

Issues

Other - Unspecified

Sound Yes

Respondent comments

n/a

Legal Don't know

Respondent legal comments

n/a

Officer comments

Noted. The plan only identified & protects green space sites of the size of 0.2 ha and above. The area suggested falls below this size threshold. AV21 will remain identified on the proposals map to clarify that the housing completions within the plan period at site AV21 contribute towards delivery of the plan's housing requirement. No change.

Modification

-

AV28 - Bow Street and East Street

Housing allocation

Submission ref [PDE00418_24](#)

Submitter Historic England, National Planning & Conservation

Position Unspecified

Issues

Conservation and heritage - Supportive

Sound Yes

Respondent comments

n/a

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Support noted.

Modification

-

AV29 - Ellerby Road and Bow Street

Housing allocation

Submission ref [PDE00418_26](#)

Submitter Historic England, National Planning & Conservation

Position Unspecified

Issues

Policy omission/Site requirements - Not supportive

Sound No

Respondent comments

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."

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Agree with suggested change.

Modification

Amend Policy AVL7, Site AV28 and AV29 site requirements fifth bullet point 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."

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Submission ref [PDE00418_25](#)

Submitter Historic England, National Planning & Conservation

Position Unspecified

Issues

Conservation and heritage - Supportive

Sound Yes

Respondent comments

n/a

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Support noted

Modification

•

AV38 - Former Copperfields College site

Housing allocation

Submission ref [PDE00418_27](#)

Submitter Historic England, National Planning & Conservation

Position Unspecified

Issues

Policy omission/Site requirements - Not supportive

Sound No

Respondent comments

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.”

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Agree with suggested change.

Modification

Amend Policy AVL7, Site AV38 site requirements fourth bullet-point to read:- “The site is adjacent to two Listed Buildings. Any development should preserve the special architectural interest or setting of these buildings.”

-

AV40 - Bridgewater Road North

Housing allocation

Submission ref [PDE00418_35](#)

Submitter Historic England, National Planning & Conservation

Position Unspecified

Issues

Policy omission/Site requirements - Not supportive

Sound No

Respondent comments

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.”

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Agree with suggested change.

Modification

Change Policy AVL7, Site AV40 site requirements eighth bullet-point 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.”

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Submission ref [PDW00841_1](#)

Submitter Frank Daltrey

Position Support

Issues

Other - Supportive

Sound Yes

Respondent comments

n/a

Legal Yes

Respondent legal comments

n/a

Officer comments

Support noted.

Modification

•

AV40 - Bridgewater Road North

Housing allocation

Submission ref [PDE00836_1](#)

Submitter DB Schenker

Position Support

Issues

Ownership/Delivery - Not supportive
Policy omission/Site requirements - Not supportive

Sound No

Respondent comments

Increase site delivery number from 425 to 600
Remove requirement to provide buffer as this is provided for within site 13 of the NRWLP.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Agree that the requirement for a buffer to screen proposed residential and minerals rail freight uses should not be additional to that already required in relation to the minerals rail freight allocation made under Policy Minerals 13 (3) of the adopted Natural Resource & Waste Local Plan. A cross reference to this requirement in the supporting text and deletion of the indicative buffer shown on Map 9 between site AV40 and NRWLP site 21 will help clarify this. Reference to the need for a buffer in the site requirements remains important but this does not specify that it needs to be provided within the site.

The capacity of the site was assessed using the standard multiplier approach (the site falls partly in the edge of centre and urban area density zones) set out in the SHLAA methodology. The capacity was not specifically reduced to take account of the buffer. However, noting the submitter's request for the capacity to be increased, it is considered appropriate to apply the edge of centre density multiplier (65 dph) across the entire site. This is a slightly lower density than built out at the Yarn Street site opposite. When the standard SHLAA allowance for 25% of the site for other uses including green space is applied the capacity of the site is recalculated as 546 dwellings. The 600 dwelling capacity estimate provided is not appropriate to use without substantial further evidence that the capacity can be delivered in accordance with site requirements and other planning policy requirements.

Modification

1. Add following sentence to end of para 4.4.35: "This allocation requires a landscape buffer to be provided between rail freight and residential uses under Policy Mineral 13 (3).
2. Remove text and symbol on Map 9 referring to an indicative buffer.
3. Amend capacity stated in Policy AVL7 , site AV40 and in para 4.4.36 from 425 to 546 new homes [This modification was agreed by members at the 1st March 2016 DPP]

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AV43 - Yarn Street

Identified housing

Submission ref [PDW03074_1](#)

Submitter Chris Renton

Position Support

Issues

Local services - Neutral

Sound No

Respondent comments

Upgrade of broadband/fibre services to residents.

Legal Yes

Respondent legal comments

n/a

Officer comments

The plan is supportive of infrastructure improvement in the area but broadband speed is not a matter that can be addressed in planning documents. LCC have supported the Superfast West Yorkshire project that has now completed the first phase of its rollout to bring fibre broadband to 97% of West Yorkshire.

Modification

-

AV43 - Yarn Street

Identified housing

Submission ref [PDW03374_1](#)

Submitter Park Chua

Position Support

Issues

Ecology/Landscape/Trees - Unspecified
Conservation and heritage - Unspecified
Greenbelt - Unspecified
Local services - Unspecified
Highways and transport - Unspecified
Site boundary - Unspecified
Other - Unspecified

Sound Yes

Respondent comments

n/a

Legal Don't know

Respondent legal comments

n/a

Officer comments

The area along with the rest of the river and canal corridor is identified as green infrastructure in the plan. The canal is managed by the Canal & Rivers Trust.

The council does not have the resources to implement or maintain an eco- wetland in this location. Such schemes would need to come forward as part of development proposals with the support of the landowner. Victoria Quay is a private space for residents of that development, delivered by the development of that site at no cost to the council.

Options for the redevelopment of Hunslet Mill continue to be explored with the landowners. Site AV41 through Policy HU2 provides for a flexible approach towards reuse of the building. A heritage centre would be an acceptable end use. Sport facilities are an acceptable use within the city centre. Policy P9 of the Core Strategy sets out accessibility for sports, leisure and community facilities and there is flexible provision within the AVLAAP to allow such uses to come forward.

New link opportunities and improvements to the TPT are identified on Maps 7 & 9, supported by polices SB1 & AVL12. One river/canal crossing is shown further downstream. The provision of two crossings in proximity may not be justified or viable, but the matter will need further consideration as individual proposals emerge. There is a specific issue in relation to landing points of a bridge crossing at Goodman Street in relation to the listed building.

Modification

-

AV46 - Tetleys Motor Services, 76 Goodman Street, Hunslet

Housing allocation

Submission ref [PDE00418_36](#)

Submitter Historic England, National Planning & Conservation

Position Unspecified

Issues

Policy omission/Site requirements - Not supportive

Sound No

Respondent comments

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 setting of these buildings.”

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Agree with suggested change.

Modification

Amend Policy AVL7, Site AV46 site requirements fourth bullet-point 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.”

-

AV63 - Logic Leeds (Skelton Moor Farm)

Identified general employment

Submission ref [PDE00829_1](#)

Submitter Muse Developments Ltd

Position Unspecified

Issues

Employment/economy - Not supportive

Sound No

Respondent comments

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.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

The plan reflects the current planning permissions at site AV63 i.e. in para 4.5.42. The extant outline permission allows the site to be fully developed for general employment uses (contributing to meeting the Core Strategy target for this use) and therefore it is most appropriate for the site to be identified in this category.

Modification

-

AV63 - Logic Leeds (Skelton Moor Farm)

Identified general employment

Submission ref [PDE00829_2](#)

Submitter Muse Developments Ltd

Position Unspecified

Issues

Employment/economy - Not supportive

Sound No

Respondent comments

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.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

AVL4 relates to new allocations. Site AV63 has an extant planning permission. Error noted in criterion 1 should be general industry (Use Class B2 not B1c)

Modification

Amend criterion 1 of Policy AVL4 to clarify that general industry in Class B2.

-

AV72 - North of Haigh Park Road

General employment allocation

Submission ref [PDE00835_6](#)

Submitter Towngate Plc

Position Unspecified

Issues

Policy omission/Site requirements - Not supportive

Sound No

Respondent comments

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.

Legal No

Respondent legal comments

n/a

Officer comments

Allocation of the wider area would create inconsistency with the NRWLP, with the later plan taking precedence. This would be contrary to the Council's view that the identified land should be safeguarded for a wharf during the plan period. No change.

Modification

-

AV74 - Former Playing fields, Skelton Grange Road

General employment allocation

Submission ref [PDW02421_1](#)

Submitter Canal & River Trust

Position Support

Issues

Ecology/Landscape/Trees - Not supportive
Other - Unspecified

Sound No

Respondent comments

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.

Legal Yes

Respondent legal comments

n/a

Officer comments

The reason for the ecological "buffer" is based on the updated 2014 Leeds Habitat Network (which is part of a document in the evidence base to the plan) which shows a linear physical link of vegetation between the canal/river and the Stourton Works Lagoon. The red line on the extract from the Leeds Habitat Network – is largely made up of a line of trees. The south-eastern boundary of both AV74 and NRW site 20 has a number of shrubs/trees that should be retained and enhanced as part of a "buffer" – which will continue to provide a flight path for bats. Enhancement of the corridor is required to comply with Core Strategy policy G1.

The green corridor is indicative and the illustration of the corridor on the plan is to inform development of the site in relation to G1 of the Core Strategy.

The DHN shown on the AAP maps is indicative of the route of greatest potential for a heat network in the area given heat sources and potential users. Viability of individual planning application proposals will be assessed consistent with core strategy policy EN4 which considers viability and the requirements of the NPPF. No change.

Modification

-

AV76 - Haigh Park Road

General employment allocation

Submission ref [PDE00835_5](#)

Submitter Towngate Plc

Position Support

Issues

Policy omission/Site requirements - Not supportive

Sound No

Respondent comments

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.

Legal No

Respondent legal comments

n/a

Officer comments

As the developed parts of the site do not form part of the employment land supply. ie the sites are not available at this time, site AV76 cannot include the wider developed area. Site AV76 reflects land available for development within the plan period. The lack of information concerning wholesale redevelopment in the representation confirms that wider consideration of already developed land is not appropriate within the context of policy AVL4.

Modification

-

AV78 - Haigh Park Road, Stourton Lagoon

Identified general employment

Submission ref [PDE00835_2](#)

Submitter Towngate Plc

Position Support

Issues

Policy omission/Site requirements - Not supportive

Sound No

Respondent comments

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).

Legal No

Respondent legal comments

n/a

Officer comments

The site is out of centre and does not accord with the Core Strategy approach to the location of town centre uses such as retail and leisure uses. Future proposals for town centre uses would be considered against relevant Core Strategy policies consistent with the approach across the district. There is no justification to support a flexible allocation at this employment site

Modification

-

AV81 - Leeds Valley Park

Identified office employment

Submission ref [PDW03419_1](#)

Submitter Highways England

Position Support

Issues

Highways and transport - Unspecified
Other - Unspecified

Sound No

Respondent comments

The statement in Policy AVL4 should include an indication of the floor space of general employment use that could be substituted for office use.

Legal Don't know

Respondent legal comments

n/a

Officer comments

As the site has planning permission for B1a offices that is the current forecast use. The plan states that this site in its entirety could come forward for other employment uses which would be consistent with current national guidance. As trip generation rates are lower for general employment uses up to 100% of the site could come forward for other general employment uses in preference to offices. A new application for any of the acceptable uses in the plan will need to take account of the location and demonstrate access by alternate modes of transport.

Modification

-

AV82 - Stourton Park & Ride site

Identified transport infrastructure

Submission ref [PDE02255_2](#) Submitter Ineke Jackson Position Neutral

Issues
Highways and transport - Not supportive

Sound No

Respondent comments
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.

Legal Don't know

Respondent legal comments
n/a

Officer comments
Include reference to NGT in the list of infrastructure projects at 1.1.2

Modification
Add the following to the final sentence of para 1.1.2: "and the NGT trolleybus scheme"

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Submission ref [PDE00832_1](#) Submitter West Yorkshire Combined Authority Position Support

Issues
Highways and transport - Not supportive

Sound Unspecified

Respondent comments
Have a couple of minor comments regarding including mention of NGT within for example the opening paragraph 1.1.2.

Legal Unspecified

Respondent legal comments
n/a

Officer comments
Allocation of the wider area would create inconsistency with the adopted NRWLP, with the later plan taking precedence. This would be contrary to the NPPF (creating inconsistency between plans) and the Council's view that the identified land should be safeguarded for a wharf for the plan period. No change.

Modification

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AV83 - Off Skelton Grange Road, East site.

General employment allocation

Submission ref [PDE00835_1](#)

Submitter Towngate Plc

Position Support

Issues

Site boundary - Not supportive

Sound No

Respondent comments

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.

Legal No

Respondent legal comments

n/a

Officer comments

Allocation of the wider area would create inconsistency with the NRWLP, with the later plan taking precedence. This would be contrary to the NPPF (creating inconsistency between plans) and the council's view that the identified land should be safeguarded for a wharf for the plan period. No change.

Modification

-

AV83 - Off Skelton Grange Road, East site.

General employment allocation

Submission ref [PDW04467_1](#)

Submitter Canal & River Trust

Position Support

Issues

Ecology/Landscape/Trees - Unspecified
Other - Unspecified

Sound No

Respondent comments

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 meeting the 'soundness' test of effectiveness.

Legal Yes

Respondent legal comments

n/a

Officer comments

Site AV83 will no longer be identified with the AVLAAP following adoption on 16th September 2015 of policies Minerals 13 and 14 within the NRWLP which identify this enlarged site for a wharf (site 20 within the NRWLP). This ensures consistency between the two development plans. All reference and cross reference to AV83 will need to be removed from the plan. If necessary and still appropriate there may need to be reference to site 20 in the NRWLP. As such AV83 will no longer have site requirements for a ecological buffer along the waterfront.

The heat network on map 6 is indicative. The routing through AV74 may need diversion to ensure efficient development of the site. Policy EN4 already ensures incorporation of heat network infrastructure are considered within the scope of site deliverability.

Modification

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AV94 - South Bank Planning Statement Area

South Bank PSA

Submission ref [PDE00418_15](#)

Submitter Historic England, National Planning & Conservation

Position Unspecified

Issues

Conservation and heritage - Supportive

Sound Yes

Respondent comments

n/a

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Noted.

Modification

-

AV94 - South Bank Planning Statement Area

South Bank PSA

Submission ref [PDE00842_10](#)

Submitter Vastint Leeds B.V.

Position Neutral

Issues

Policy omission/Site requirements - Neutral
Factual correction required - Neutral

Sound Unspecified

Respondent comments

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.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Correction noted at bullet 5, reference SB1, should read SB4. The bold text in the box is an extension of the relevant policy referenced in the opening text.

Modification

1. Amend policy number reference in bullet 5 of site requirements to Site AV94 to from SB1 to SB4.

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AV94 - South Bank Planning Statement Area

South Bank PSA

Submission ref [PDE00842_4](#)

Submitter Vastint Leeds B.V.

Position Support

Issues

Other - Not supportive

Sound No

Respondent comments

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 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 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.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

A re-assessment of the site's capacity has been undertaken given the information presented in the representation that the site's capacity estimate (for the Brewery site) is too low taking into account the density of neighbouring development and the accessibility of the site.

To assess housing capacity it is considered appropriate to use the standard SHLAA city centre multiplier (350 dwellings per hectares) rather than the previous assumption of 175 dph. This is considered to be a clear and transparent approach to estimating the site capacity. The density multiplier is applied to a 4.4 hectare area of the 11 hectares of the Brewery site, half the developable area, allowing for provision of the new city park as well. The revised housing capacity for the Brewery site is recalculated as follows: 4.4 ha x 350 dph = 1,540 dwellings (increased from an assumed capacity of 730 for the Brewery site). The overall revised estimate of capacity on Site AV94 (The South Bank Planning Statement Area) is 1,635 including a further contribution of 95 dwellings at New Lane in the SBPSA which was also previously assumed. This revised figure is considered to be a reasonable estimate of the potential capacity of this area to deliver housing over the plan period. A higher level of housing or greater proportion of housing may be acceptable subject to other development plan policies and detailed design matters. In this respect para 3.3.10 should be amended to make this clearer along the lines of the text in para 3.3.9 which relates to other housing and mixed use sites.

The capacity estimate for offices is indicative and assumes that half the developable area at the Brewery site and New Lane site is developed for offices in mixed use development. A higher (or lower) quantum of office development may be acceptable subject to other development plan policies and detailed design matters providing this does not prejudice delivery of the quantum of housing development envisaged in the AAP. It is therefore not considered necessary to increase the estimate of office delivery.

Modification

1. Revise housing capacity of Site AV94 in Policy AVL7 (5) to 1,635 dwellings. [Agreed by member at 1 March 2016 DPP]

AV94 - South Bank Planning Statement Area

South Bank PSA

2. Additional sentence after third sentence of para 3.3.10 as follows: "A higher number or proportion of dwellings may be appropriate in the area subject to other development plan policies and detailed design matters".

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Submission ref	PDE02250_2	Submitter	Saxton Hill Community Group (non-constituted)	Position	Neutral
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Issues

Local services - Not supportive

Sound	Unspecified
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Respondent comments

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.

Legal	Unspecified
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Respondent legal comments

n/a

Officer comments

The land and buildings are privately owned. Applicants for planning permission are already required to consult the public on proposals prior to submission of major planning application. It is not necessary for the AAP to duplicate these requirements. A new cultural venue could already come forward as part of a mixed use development of the site and is indicated as an acceptable use under Policy SB4. It is also proposed to identify the building within the list of local undesignated heritage assets to be protected under AAP Policy AVL11 and Core Strategy Policy P11.

Modification

•

AV94 - South Bank Planning Statement Area

South Bank PSA

Submission ref [PDE00418_16](#)

Submitter Historic England, National Planning & Conservation

Position Unspecified

Issues

Policy omission/Site requirements - Not supportive

Sound No

Respondent comments

SBPSA, Policy AVL7, Site AV94, 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."

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Agree with suggested change:

Modification

Amend SBPSA, Policy AVL7, Site AV94, site requirements fifth bullet-point 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."

-

AV94 - South Bank Planning Statement Area

South Bank PSA

Submission ref [PDE00838_3](#)

Submitter Leeds Civic Trust

Position Neutral

Issues

Schools - Not supportive

Sound Unspecified

Respondent comments

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.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

The Council are continuing to monitor the situation regarding the need for primary school provision in the South Bank area and are considering a number of potential sites in the area. The South Bank Area Plan does allow for provision of communities facilities within the area but it is appropriate to make specific reference to the potential for a primary school in the supporting text to Policy AVL10.

Modification

Add the following sentence to para 3.4.25 "There may also be a need to identify a site for a new primary school in the South Bank area subject to further masterplanning work and the chosen delivery route"

-

AV94 - South Bank Planning Statement Area

South Bank PSA

Submission ref [PDW03422_1](#)

Submitter Highways England

Position Support

Issues

Highways and transport - Not supportive

Sound No

Respondent comments

More detail is needed in the Leeds South Bank Area Plan (and the East Bank, Richmond Hill and Cross Green Area Plan) on the potential or research and development uses and whether they are accommodated instead of or in addition to office floor space.

Legal Don't know

Respondent legal comments

n/a

Officer comments

Reference to the acceptability of research & development within the South Bank and Marsh Lane is made under Policy AVL4 (2) and is subject to the provisions of Policy AVL7 and site requirements in area plans. Policy AVL7 allocates specific sites including sites AV94 and AV18 for housing and mixed use development. The range of acceptable uses within the mix is set out in Policy SB4 and EB3 respectively. These could also reference research and development uses for consistency with Policy AVL4. Where R&D uses are proposed, this would generally be seen as replacing or reducing the assumed B1a office component of the site. As para 3.3.9 explains, delivery of a significant proportion of new housing is expected on mixed use allocations made under Policy AVL7, guided by the housing capacities indicated in the policy.

Modification

-

AV94 - South Bank Planning Statement Area

South Bank PSA

Submission ref [PDE03306_1](#)

Submitter National Grid

Position Object

Issues

Site boundary - Not supportive

Sound No

Respondent comments

Extension of Draft Allocation AV94 to include the client's landholdings (site 1267) to allow for the flexible, mixed use development of the site.

Legal No

Respondent legal comments

n/a

Officer comments

The land referred to in the representation lies outside the defined boundary of the AAP which has been subject to earlier consultation. It is not possible to extend proposed AAP allocations beyond the plan boundary. Other issues set out in the representations will be considered as part of the SAP.

Modification

-

AV94 - South Bank Planning Statement Area

South Bank PSA

Submission ref [PDE00418_17](#)

Submitter Historic England, National Planning & Conservation

Position Unspecified

Issues

Policy omission/Site requirements - Not supportive

Sound No

Respondent comments

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”

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Agree with suggested change.

Modification

Amend 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”

-

AV94 - South Bank Planning Statement Area

South Bank PSA

Submission ref [PDW04862_1](#)

Submitter David Mackie

Position Object

Issues

Ecology/Landscape/Trees - Unspecified
Local services - Unspecified

Sound No

Respondent comments

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.

Legal Don't know

Respondent legal comments

n/a

Officer comments

The impact of climate change is considered in the preparation of the plan, its policies and the assessment of the proposals through the sustainability appraisal process. Delivery of the city park and a mix of house types are both objectives throughout the plan. Ensuring a mix of incomes is generally beyond the scope of the planning system, but the application of Core Strategy Policies H4 and H5 covering housing mix and affordable housing respectively should ensure a reasonable mix of incomes. The plan allows for cultural uses on site AV94 at Policy SB4.

Modification

-

AV98 - Atkinson Street

Mixed use allocation

Submission ref [PDE00418_34](#)

Submitter Historic England, National Planning & Conservation

Position Unspecified

Issues

Policy omission/Site requirements - Not supportive

Sound No

Respondent comments

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.”

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Agree with suggested change.

Modification

Amend Policy AVL7, Site AV98 site requirements second bullet-point 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.”

-

AV100 - Haigh Park Road, Stourton

Not allocated for housing

Submission ref [PDE00835_9](#)

Submitter Towngate Plc

Position Unspecified

Issues

Policy omission/Site requirements - Not supportive

Sound No

Respondent comments

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

Legal No

Respondent legal comments

n/a

Officer comments

The site has been assessed as a potential housing allocation. The site is unsuitable for housing as the following grounds:

- The site is located in Flood Zone 3Aii in the Leeds Strategic Flood Risk Assessment and Zone 3 on the Environment Agency's flood map. The site fails the flood risk exception test
- There are several conflicts between proposed use and Natural Resources & Waste Local Plan designations
- Potential odour issues in relation to Knostrop Waste Water Treatment Works
- Preference for employment allocation on the site to delivery Core Strategy target.

The representation does not raise any new issues that have not already been considered in assessing this site's suitability for housing using the sustainability appraisal within the AAP preparation process. No change.

[This position was agreed by members at the 1St March 2016 DPP].

Modification

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AV111 - Skelton Gate

Housing allocation

Submission ref [PDE00418_43](#)

Submitter Historic England, National Planning & Conservation

Position Unspecified

Issues

Policy omission/Site requirements - Not supportive

Sound No

Respondent comments

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”

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Agree with suggested change.

Modification

Change Policy AVL7, Site AV111 site requirements. Add the following bullet-point:- “The development will be required to safeguard key views from the Historic Park and Garden at Temple Newsam”

-

AV111 - Skelton Gate

Housing allocation

Submission ref [PDE00834_1](#)

Submitter Extra MSA Group

Position Object

Issues

Ownership/Delivery - Not supportive
Noise/Air quality - Not supportive
Ground conditions - Not supportive
Site boundary - Not supportive
Other - Not supportive

Sound No

Respondent comments

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 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.

Legal No

Respondent legal comments

n/a

Officer comments

It is considered that 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. However, it is accepted that the site is unavailable at this time for residential use given the current lease holder has stated as such in their representation to the plan.

Modification

Change site capacity of AV111 to reflect that this part of site is not available to deliver residential development (see also Templegate representation on capacity of site). [Agreed by members at 1st March 2016 DPP]

AV111 - Skelton Gate

Housing allocation

Submission ref [PDE00841_1](#)

Submitter Commercial Development Projects Limited

Position Object

Issues

Ownership/Delivery - Not supportive

Sound Unspecified

Respondent comments

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.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

It is considered that 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. However, it is accepted that the site is unavailable at this time for residential use given the current lease holder has stated as such in their representation to the plan.

Modification

Change site capacity of AV111 to reflect that this part of site is not available to deliver residential development (see also Templegate representation on capacity of site). [Agreed by members at the 1St March 2016 DPP].

-

AV111 - Skelton Gate

Housing allocation

Submission ref [PDE02257_1](#)

Submitter Christopher Coyle

Position Object

Issues

Other - Not supportive

Sound No

Respondent comments

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.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

The boundaries of the HMCAs are defined in the adopted Leeds Core strategy. This plan must be in conformity with that plan. No change.

Modification

•

AV111 - Skelton Gate

Housing allocation

Submission ref [PDE02260_1](#)

Submitter Joel Kaufman

Position Object

Issues

Greenbelt - Not supportive

Sound No

Respondent comments

Remove from housing allocation.

Legal No

Respondent legal comments

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 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.

Officer comments

The evidence to support the inclusion of current Green Belt land within the allocation is contained in the supporting documents to the plan, including the Green Belt Review Background Paper. All the issues highlighted in the response have been considered in the identification of AV111. No change.

Modification

-

AV111 - Skelton Gate

Housing allocation

Submission ref [PDE03311_1](#)

Submitter Alec Shelbrooke MP

Position Object

Issues

Housing target - Not supportive

Sound Unspecified

Respondent comments

Land should be excluded from the Leeds East HMCA and re-introduced to the Outer South East HMCA.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

The boundaries of the HMCAs are defined in the adopted Leeds Core Strategy. This plan must be in conformity with that plan. No change.

Modification

-

AV111 - Skelton Gate

Housing allocation

Submission ref [PDW03424_1](#)

Submitter Highways England

Position Object

Issues

Highways and transport - Unspecified

Sound No

Respondent comments

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:

- 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 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.

Legal Don't know

Respondent legal comments

n/a

Officer comments

It is understood the RIS M1 J45 project will begin in 2017 & complete in 2018. It is unlikely any significant residential trips will be generated prior to 2018 due to the development programme of AV111. An outline planning application was submitted for this site in Dec 2015, with all matters reserved, except highway access.

Agree that the route through to Bullerthorpe Lane should be restricted to public transport & access only to avoid rat running. This approach is referenced in the AAP (para 4.6.32)

Agree that Knowsthorpe Lane should be indicated as a secondary route for general traffic into Skelton Gate from the west. Para 3.5.18 refers to links potentially being open for traffic and this should also be clear within Policy AVL12 transport improvements and on relevant maps.

The Council needs to discuss the detailed results of the West Yorkshire Infrastructure Study with HE to understand the trigger for a requirement for a fourth lane on the M1 between junctions 45 and 46. The relevant detail will be included in the Infrastructure Study.

The reference in the plan to promoting public transport options support routing of public transport services from Colton or Five Towns through the site &/or using Bullerthorpe Lane.

The reserved matters application/s will need to demonstrate how the site is accessible by public transport, including the new facilities and services required and in accordance with the site requirements.

AV111 - Skelton Gate

Housing allocation

Modification

1. New highway network improvement listed under Policy AVL12 to read: Upgrade and adoption of Knowsthorpe Lane to provide a link to M1 Junction 45 and improve access to the Skelton Gate development and employment sites west of the M1.
2. Show the Knowsthorpe Lane link on the relevant maps including Maps 4, 11, 12, 13 & 14.
3. Amend Infrastructure Study to include up to date list of schemes from the West Yorkshire Infrastructure Study.



AV111 - Skelton Gate

Housing allocation

Submission ref [PDE00837_3](#)

Submitter Templegate Developments Ltd

Position Support

Issues

Other - Not supportive
Policy omission/Site requirements - Not supportive
Policy omission/Site requirements - Not supportive
Policy omission/Site requirements - Not supportive

Sound No

Respondent comments

[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.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

[Capacity] Reduce capacity figure based on latest information provided by the respondent demonstrating that less of the land area of the site is developable for housing than was assumed in the assessment of site capacity made using the standard SHLAA density multiplier. Using the developer assumptions on developable land the revised capacity of the site is calculated as follows:

Existing development site - 26.34 ha x 40dph = 1,054 dwellings

Green Belt land – assumption is unaltered and remains at 747 dwellings. Overall capacity of the site is therefore 1,801 dwellings, reduced from the assumption of 2,619 dwellings in the Publication Draft plan.

[Site requirements: local centre] - The range of facilities required is a key factor to mitigate the site's relatively poor accessibility to existing local facilities and service as demonstrated by the sustainability appraisal. However, it is accepted that provision of the some of the specified uses (such as financial & professional serves and café/restaurants) will depend on securing interest from an operator. The site requirement wording should therefore make a distinction between those uses that will need to be provided and those which will depend on market interest or securing a provider and which are acceptable and desirable to include within the centre.

[Site requirements: secondary primary access]: The requirement for a second primary access is considered to be fully justified. The Council's Street Design Guide SPD requires roads serving in excess of 300 dwellings need more than one point of access. A development serving up to 1,800 houses requires multiple points of access yet the illustrative masterplan directs all routes back through one roundabout and proposes unnecessarily long cul-de-sacs which are inconvenient for residents and provide busy residential street environments. Highways England's representation to this consultation supports the view that a second access to the site is required. No change

AV111 - Skelton Gate

Housing allocation

[Site requirements – landfill site]: The issue is of sufficient importance that warrants appropriate inclusion within a local plan and not wholly delegated to a planning application. The SA identified the issue in relation to the neighbouring use and the most appropriate mitigation is included within the site requirements. The Council has to be satisfied that the development can be delivered in a manner which takes account of the potential 'bad neighbour' land uses which potentially impact on residential amenity. The Council have experience of dealing with the resulting issues that residential uses in proximity to operational waste sites create and use a 250m buffer zone to assess neighbouring applications following agreement with the inspector in the NRWLP examination. This is consistently applied to all planning applications adjacent to existing waste sites. No change.

Modification

1. Reduce capacity of housing allocation AV111 in Policy AVL7 from 2,619 dwelling to 1,801 dwellings. (see also Extra MSA representation on capacity of site). [Agreed by member at 1st March 2016 DPP]

2. Revise AV111 site requirement second bullet local centre bullet to read:

A local centre to include the following:

- Local shops (500 – 1,000 sq. m total floorspace)
- Financial & professional services, cafes/restaurants, a pub (up to a maximum of 1,000 sq, m total floorspace and subject to securing operators)
- Provision of space for health services including GPs, pharmacy and dentists, as appropriate
- Other community facilities including provision for older people (subject to securing operators)

•

AV114 - Skelton MSA

Not allocated for other uses

Submission ref [PDE00834_2](#)

Submitter Extra MSA Group

Position Unspecified

Issues

Policy omission/Site requirements - Not supportive

Sound No

Respondent comments

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 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, 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.

Legal No

Respondent legal comments

n/a

Officer comments

Although the submitter's position on the availability of the site for housing is accepted (see separate representation), it does not automatically follow that the AAP should make an allocation for an MSA on the land. There has not been a wider assessment of the alternative sites or options for a new MSA to fulfil the quoted 'significant' excess travel time between existing MSA provision on both the M1 & M62. The council cannot allocate this site without wider evidence or assessment of other potential options which may exist. Throughout the plan making process the statutory consultee in regard to motorway safety has never stated the need for additional MSA provision within this area. The evidence of need presented by the respondent relates to changes implemented to Department for Transport Circular 02/13 and National Planning Policy. Government policy set out in the circular is that MSAs should be located at a maximum of 30 minutes travelling time. Should this need be accepted this would establish an area of search beyond the AAP boundary; including neighbouring planning authorities. On this basis, the AAP

AV114 - Skelton MSA

Not allocated for other uses

cannot identify the site as suitable or appropriate for a MSA.

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. The housing allocation should be retained, with its capacity estimate amended to reflect the reduced number of houses that could be developed.

As a consequence it is also appropriate to delete specific reference to an allowance for office uses up to 10,000 sq m (criterion 2 of Policy SG1, para 3.2.20 and Policy AVL3) 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 uses could be assessed against criterion 3 of Policy SG1.

Modification

1. Change wording in second sentence of para 4.6.37 to read: "Proposals which would lead to the creation of a destination serving a wide catchment area, such a retail/leisure park and other formats which would attract an unacceptably high number of additional trips utilising the motorway network would not be consistent with this approach."
2. Delete criterion 2 of Policy SG1.
3. Delete final bullet point of para 3.2.20.
4. Delete Skelton Gate from list of office locations set out in Policy AVL3.
5. Remove office and business uses symbol from Map 11 and replace with a symbol with following notation: Policy SG1 other uses (indicative).
6. Change policy SG1 by adding an addition point 4 to read: "4. Contribute towards initiatives and requirements stated in policies SG2, SG3 and SG4."
7. Revise final paragraph of Policy SG1 to read: "The development of the alternative commercial uses should not prejudice delivery of the scale of housing on the site set out in this plan."

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AV114 - Skelton MSA

Not allocated for other uses

Submission ref [PDE00841_2](#)

Submitter Commercial Development Projects Limited

Position Unspecified

Issues

Policy omission/Site requirements - Not supportive

Sound Unspecified

Respondent comments

Allocate the site as a MSA. Refer to Extra MSA submission.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Although the submitter's position on the availability of the site for housing is accepted (see separate representation), it does not automatically follow that the AAP should make an allocation for an MSA on the land. There has not been a wider assessment of the alternative sites or options for a new MSA to fulfil the quoted 'significant' excess travel time between existing MSA provision on both the M1 & M62. The council cannot allocate this site without wider evidence or assessment of other potential options which may exist. Throughout the plan making process the statutory consultee in regard to motorway safety has never stated the need for additional MSA provision within this area. The evidence of need presented by the respondent relates to changes implemented to Department for Transport Circular 02/13 and National Planning Policy. Government policy set out in the circular is that MSAs should be located at a maximum of 30 minutes travelling time. Should this need be accepted this would establish an area of search beyond the AAP boundary; including neighbouring planning authorities. On this basis, the AAP cannot identify the site as suitable or appropriate for a MSA.

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. The housing allocation should be retained, with its capacity estimate amended to reflect the reduced number of houses that could be developed.

As a consequence it is also appropriate to delete specific reference to an allowance for office uses up to 10,000 sq m (criterion 2 of Policy SG1, para 3.2.20 and Policy AVL3) 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 uses could be assessed against criterion 3 of Policy SG1.

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CPK01 - New City Park

New City Park

Submission ref [PDW00125_1](#)

Submitter Ian Bewick

Position Support

Issues

Local services - Supportive

Sound Yes

Respondent comments

n/a

Legal Don't know

Respondent legal comments

n/a

Officer comments

Noted. No change.

Modification

-

CPK01 - New City Park

New City Park

Submission ref [PDW01116_1](#)

Submitter Christopher Foren

Position Object

Issues

Other - Not supportive
Greenbelt - Not supportive
Housing target - Not supportive
Other - Not supportive

Sound No

Respondent comments

1. Revise the total number of housing units needed over the period to 2028.
2. Establish a plan that does not designate any green belt land for housing.
3. Confine housing to sites which already have strong public transport links to the city centre in order to prevent additional car journeys and associated congestion and air pollution.

Legal No

Respondent legal comments

Not consistent with National Planning Policy Framework.

Officer comments

The housing target is established within the Leeds Core Strategy; an adopted development plan. There is one Green Belt site allocated for residential use within the AVLAAP. Avoiding Green Belt release is not an option if the council is to meet its housing requirement set out in the Core Strategy. Sites within the urban area, with good access to frequent public transport have been allocated within the plan. Deliverable, accessible and sustainable additional sites submitted during the consultation period will be assessed on their individual merits. Those sites satisfying the selection criteria could be added to the list of allocated sites. The response does not contain any details of additional brownfield urban land the council could assess. No change.

Modification

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OPA02 - Opportunity Area: Marsh Lane

Opportunity Area: Marsh Lane

Submission ref [PDW02719_1](#)

Submitter Leeds Civic Trust

Position Support

Issues

Highways and transport - Not supportive
Site boundary - Not supportive

Sound No

Respondent comments

The plan should acknowledge the potential for widening of the rail corridor and for short/long term access to the tracks to facilitate construction and maintenance.

Legal No

Respondent legal comments

The overall consultation process for the SAP is has been unsatisfactory and not in line with the SCI:

- the SCI states that there is low access to electronic resources in Leeds and yet this is almost exclusively the means by which comments are sought/submitted
- given its importance to the city, 'marketing' of the SAP has been poor, with independent resident groups publicising events and delivering advice to individuals
- 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)
- 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

Officer comments

The plans are not sufficiently advanced, nor is there evidence or plans which would justify a change to the boundary to effectively blight sites and development areas. There were alternative opportunities to comment on the plan with information available in the libraries and one stop centres, numerous advertised drop-in sessions and paper response forms and postal addresses. The council took advantage of electronic communication for those who find it easier to submit comments by those means. This is more efficient for response processing and required by the regulations.

Modification

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