

AVLAAP Plan Document - Publication Draft

Submission ref [PDE00416_1](#)

Submitter The Coal Authority

Position Unspecified

Policy

Para

Diagram

Issues

Ground conditions - Not supportive

Sound No

Respondent comments

The site allocation methodology and assessment process needs to be revised and undertaken again taking into account unstable land as a relevant consideration.

Legal Yes

Respondent legal comments

n/a

Officer comments

It is accepted that the plan needs to address issues relating to unstable land through taking into account coal mining 'development high risk area' and former mine shafts in sustainability appraisal, site assessment & site requirements.

Further data has been obtained from the Coal Authority which allows the Council to identify where site lies within or partly within development high risk area and where former mine shafts are located within the site. For sites where this applies it is proposed to include a new site requirement (see below). This will affect a number of sites in the AVL area which has a significant legacy of historic coal mining activity. These issues are already fully considered when planning applications are determined and developers are required to submit a coal mining assessment as part of the validation criteria for the application.

An additional objective needs to be added to the sustainability appraisal under SA objective 18 to assess land instability including coal mining development high risk areas and mine shafts. See comments on Coal Authority rep PDE00416_2 for details of proposed modification.

Modification

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00416_3	Submitter	The Coal Authority	Position	Unspecified
Policy		Para		Diagram	
Issues	Policy omission/Site requirements - Not supportive				
Sound	No				
Respondent comments	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: “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.”				
Legal	Yes				
Respondent legal comments	n/a				
Officer comments	<p>The Council has carried out further work on the sustainability appraisal to re-assess the proposed allocation sites in light of data supplied by the Coal Authority. Policy Minerals 3 of the Leeds Natural Resources and Waste Local Plan 2013 covers all forms of development within the Coal Mining Safeguarding Area except minor householder development. It is a policy which applies to all sites in the Aire Valley Area Action Plan within the Coal Authority High Risk Area. This Policy is intended to address coal mining legacy problems by requiring the prior-extraction of any surface coal as part of site preparation.</p> <p>Coal Mining Risk Assessments are clearly marked as a requirement in the list of planning application validation criteria.</p> <p>Leeds also has a saved policy (Policy GP5) in the Leeds Unitary Development Plan Review which requires all applications for development to resolve stability problems.</p> <p>The Council therefore does not think there is a policy omission regarding land stability, however as this is an issue of particular relevance to the Aire Valley area, the Council agrees that the Plan should make greater reference to it and this would also help to mitigate any negative scores that have come up against sites through the additional sustainability appraisal work that has been done.</p>				
Modification	Add the following text to the Resilient and Safe Development section after para 3.4.34:				
	<p>Land Stability</p> <p>Parts of the AVL are in the former coal mining area where there is a legacy of problems such as land instability and combustion. These factors have been taken into account in the sustainability appraisal of sites allocated in this Plan. Under Saved UDPR Policy GP5 all applications for development are required to resolve stability problems. Furthermore, in the Development High Risk Area defined by the Coal Authority, applications for development are required to include a Coal Mining Risk Assessment.</p> <p>Policy Minerals 3 of the Leeds Natural Resources and Waste Local Plan 2013 covers all forms of development within the Coal Mining Safeguarding Area except minor householder development. It is a policy which applies to all sites in the Aire Valley Area Action Plan within the Coal Authority High Risk Area. This Policy is intended to address coal mining legacy problems by requiring the prior-extraction of any surface coal as part of site preparation.</p> <p>Any problems of coal mining legacy must be addressed to ensure that the development is safe. The Coal Mining Risk Assessment also needs to identify where mine shaft entries are present on the site, these will need to be treated to be made safe. Mine entries and their zone of influence need to be kept free from built development.</p>				

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00417_1	Submitter	Office of Rail and Road	Position	Unspecified
Policy		Para		Diagram	
Issues	General approach/methodology - Neutral				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	No comments made.				
Modification					

•

Submission ref	PDE00418_1	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para		Diagram	
Issues	Policy omission/Site requirements - Not supportive				
Sound	No				
Respondent comments	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.				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Identification of these buildings on the maps has led to confusion as they are a mix of old and new buildings. Landmark buildings are not referenced as a group in the text or policies of the plan and so the category has no specific meaning. Where buildings are listed or non-designated heritage assets they will continue to be shown under those designations.				
Modification	1. Remove identification of landmark buildings from relevant plans to aid clarity.				

•

AVLAAP Plan Document - Publication Draft

Submission ref

Submitter

Position

Policy

Para

Diagram

Issues

Conservation and heritage - Not supportive

Sound

Respondent comments

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.”

Legal

Respondent legal comments

n/a

Officer comments

Agree with suggested change.

Modification

Amend paragraph 4.2.3, Spatial Vision third paragraph to:
“... redevelopment of brownfield sites, the reuse and adaptation of its legacy of historic buildings, and reinvention of existing areas such as Leeds Dock.”

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00418_11	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Para 4.2.3, Objectives	Diagram	
Issues	Conservation and heritage - Not supportive				
Sound	No				
Respondent comments	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.”				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Agree with suggested change.				
Modification	Amend para 4.2.3 Objectives – insert an additional objective:- “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.”				

•

Submission ref	PDE00418_12	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Para 4.2.6	Diagram	
Issues	Factual correction required - Neutral				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Correction noted. Salem Church is Grade II Listed, not II*.				
Modification	Amend text at para 4.2.6 to remove *				

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00418_13	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy	Policy SB2	Para		Diagram	
Issues	Conservation and heritage - Not supportive				
Sound	No				
Respondent comments	Policy SB2 add the following additional design principle:- “Create opportunities to improve the setting of the Listed Buildings and Locally Significant Undesignated Assets in the area”				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Agree with suggested change.				
Modification	Amend Policy SB2 by adding the following additional design principle:- “Create opportunities to improve the setting of the Listed Buildings and Locally Significant Undesignated Assets in the area.”				

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00418_14	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Paras 4.2.32 to 4.2.46	Diagram	
Issues	Policy omission/Site requirements - Not supportive				
Sound	No				
Respondent comments	Insert an additional Policy which includes the requirements of Paragraphs 4.2.32 to 4.2.46.				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	A new policy is unnecessary as the relevant policy is contained in the Core Strategy at Policy P11 Conservation. Paragraphs 4.2.32 to 4.2.46 provide local advice to comply with Policy P11. Where specifically appropriate to an allocated site, appropriate site requirements are included. No change.				
Modification					

•

Submission ref	PDE00418_2	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Para 2.1, AVL - Urban Eco Settlement Vision	Diagram	
Issues	Conservation and heritage - Supportive				
Sound	Yes				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Comment noted.				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00418_21	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Para 4.31, Spatial Vision	Diagram	
Issues	Conservation and heritage - Supportive				
Sound	Yes				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Support noted.				
Modification					

•

Submission ref	PDE00418_22	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Para 4.3.1, Objectives	Diagram	
Issues	Conservation and heritage - Not supportive				
Sound	No				
Respondent comments	Paragraph 4.3.1, Objectives – insert an additional Objective along the following lines:- “Conserve the area’s heritage assets and ensure that those that are vacant or at risk have a sustainable future”				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Agreed.				
Modification	Amend Paragraph 4.3.1, Objectives – insert an additional Objective:- “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

Submission ref [PDE00418_23](#)

Submitter Historic England, National Planning & Conservation

Position Unspecified

Policy Policy EB4

Para

Diagram

Issues

Policy omission/Site requirements - Not supportive

Sound No

Respondent comments

Policy EB4, first Paragraph amend the end to read:-
“ ... 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 area.”

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Reference is made in the guiding principles for the area relating to the need for new development to preserve and enhances the Eastern Riverside Conservation Area, listed buildings and non-designated heritage assets. It is considered unnecessary to reflect this in the policy particularly as there are other policies such as Core Strategy P11 which address these issues.

Modification

•

AVLAAP Plan Document - Publication Draft

Submission ref [PDE00418_28](#)

Submitter Historic England, National Planning & Conservation

Position Unspecified

Policy

Para Para 4.4.1, Spatial Vision

Diagram

Issues

Conservation and heritage - Not supportive

Sound No

Respondent comments

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”.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Agree with suggested change.

Modification

Amend paragraph 4.4.1, Spatial Vision, add an additional paragraph:
“Hunslet Mill and Victoria Mill 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”.

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00418_29	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Para 4.4.1, Objective 7	Diagram	
Issues	Conservation and heritage - Supportive				
Sound	Yes				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Support noted. .				
Modification					

•

Submission ref	PDE00418_3	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Para 2.2, Principle 6	Diagram	
Issues	Conservation and heritage - Not supportive				
Sound	No				
Respondent comments	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"				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Agree with proposed change.				
Modification	Amend paragraph 2.2, Principle 6: "To preserve, enhance and ensure a sustainable future for heritage assets and enhance its natural assets within a wider network ... etc"				

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00418_30	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Para 4.4.4	Diagram	
Issues	Conservation and heritage - Supportive				
Sound	Yes				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Support noted				
Modification					

•

Submission ref	PDE00418_31	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Para 4.4.21	Diagram	
Issues	Conservation and heritage - Supportive				
Sound	Yes				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Support noted.				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00418_32	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Paras 4.4.23 to 4.4.29	Diagram	
Issues	Conservation and heritage - Supportive				
Sound	Yes				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Support noted				
Modification					

•

Submission ref	PDE00418_33	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy	Policy HU2	Para		Diagram	
Issues	Conservation and heritage - Supportive				
Sound	Yes				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Support noted.				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00418_37	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Para 4.5.1, Spatial Vision	Diagram	
Issues	Conservation and heritage - Supportive				
Sound	Yes				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Support noted.				
Modification					

•

Submission ref	PDE00418_38	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Para 4.5.1, Objective 5	Diagram	
Issues	Conservation and heritage - Not supportive				
Sound	No				
Respondent comments	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"				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Agreed.				
Modification	Amend 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"				

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00418_39	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy	Policy CAV1	Para		Diagram	
Issues	Policy omission/Site requirements - Not supportive				
Sound	No				
Respondent comments	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”.				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Agree that this consideration is important but this proposed to be listed in the site requirements for Site AV111 in response to another Historic England representation. A cross reference to site requirements for site AV111 being applicable to development permitted under Policy SG1 (which include reference to the Registered Historic Park and Garden) is considered to achieve the result				
Modification	Additional sentence to the end of Policy SG1 to read: 'Site requirements for Site AV111 will apply to any development permitted under this policy where relevant to the specific use.'				

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00418_4	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy	Policy AVL7	Para		Diagram	
Issues	Conservation and heritage - Supportive				
Sound	Yes				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Comment noted.				
Modification					

•

Submission ref	PDE00418_40	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Para 4.6.1, Spatial Vision	Diagram	
Issues	Conservation and heritage - Not supportive				
Sound	No				
Respondent comments	Paragraph 4.6.1, Spatial Vision, add the following to the end of the first Paragraph:- “ ... green spaces. The development will have been designed in a manner which safeguards 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	Paragraph 4.6.1, Spatial Vision, add the following to the end of the first Paragraph:- “The development will have been designed in a manner which safeguards key views from the Historic Park and Garden at Temple Newsam.”				

•

AVLAAP Plan Document - Publication Draft

Submission ref

Submitter

Position

Policy

Para

Diagram

Issues

Conservation and heritage - Not supportive

Sound

Respondent comments

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”

Legal

Respondent legal comments

n/a

Officer comments

Agree with principle of change but would be clearer to create as a new objective.

Modification

Paragraph 4.6.1, Objectives, add the following to the new objective:-
“The design of new development should safeguard key views from the Historic Park and Garden at Temple Newsam.”

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00418_42	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Para 4.6.20, Key Principles for Design	Diagram	
Issues	Conservation and heritage - Not supportive				
Sound	No				
Respondent comments	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”				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Agree with principle of change with minor re-wording of the submitter’s suggested wording proposed.				
Modification	Paragraph 4.6.20, Key Principles for Design add the following: “Ensure key views from the Historic Park and Garden at Temple Newsam are safeguarded.”				

•

Submission ref	PDE00418_5	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy	Policy AVL11	Para		Diagram	
Issues	Conservation and heritage - Supportive				
Sound	Yes				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Comment noted.				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00418_6	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy	Policy AVL11	Para		Diagram	
Issues	Policy omission/Site requirements - Not supportive				
Sound	No				
Respondent comments	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.”				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Agree.				
Modification	Amend Policy AVL11 to read: ‘In accordance with Core Strategy Policy P11, the locally significant undesignated heritage assets shown on the area maps and their setting will be conserved.				

•

Submission ref	PDE00418_7	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Para 3.6.4	Diagram	
Issues	Conservation and heritage - Supportive				
Sound	Yes				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Support noted.				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00418_8	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy	Policy AVL15	Para		Diagram	
Issues	Conservation and heritage - Supportive				
Sound	Yes				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Comment noted.				
Modification					

•

Submission ref	PDE00418_9	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy	Policy AVL16	Para		Diagram	
Issues	Conservation and heritage - Not supportive				
Sound	No				
Respondent comments	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"				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Agreed.				
Modification	Amend Policy AVL16 by adding an additional sentence: "Where retrofitting works are proposed to a Listed Building, these should safeguard the special historic character of that building."				

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00419_1	Submitter	Stuart Gilchrist	Position	Unspecified
Policy		Para		Diagram	
Issues	Highways and transport - Neutral				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Refers to location of HS2 station which is outside the scope of AAP.				
Modification					

•

Submission ref	PDE00829_3	Submitter	Muse Developments Ltd	Position	Unspecified
Policy	Policy AVL17	Para		Diagram	Map 6
Issues	Other - Not supportive				
Sound	No				
Respondent comments	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.				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Core Strategy EN4 takes account of deliverability/viability issues in relation to site specific circumstances. Map 6 is indicative as stated in the title. No change.				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00830_1	Submitter	Harworth Estates	Position	Unspecified
Policy		Para	Paras 4.5.51 to 4.5.52	Diagram	
Issues	Highways and transport - Not supportive				
Sound	No				
Respondent comments	<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 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: “...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: “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 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.”</p>				
Legal	Yes				
Respondent legal comments	n/a				
Officer comments	<p>Rail freight designations are a matter that was considered as part of the now adopted Natural Resources and Waste Local Plan. The rail spur referred to is safeguarded under Policy Minerals 13 (6) of the Natural Resources and Waste Local Plan. Site AV68 does not fall within the area designated as intermodal freight area of search but this does not preclude the development of the land for rail freight uses. Within this context it is considered appropriate to mention the potential of Sites AV67 and AV68 for rail freight uses given the rail spur has been safeguarded.</p>				
Modification	<p>Add the following sentence to the end of merged paras 4.5.51 and 4.5.52: "These sites benefit from a position which may incorporate the alignment of a rail served development or interchange."</p>				

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00830_10	Submitter	Harworth Estates	Position	Unspecified
Policy		Para	Paras 3.7.10 & 3.7.18	Diagram	
Issues	Other - Not supportive				
Sound	No				
Respondent comments	<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. Paragraph 3.7.10 should be amended to include further details as follows: “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: “Flexible Energy Supply Appropriate sites within AVL may be suitable for energy generation 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>				
Legal	Yes				
Respondent legal comments	n/a				
Officer comments	Agree with the sentiment, but the suggested additional wording is unnecessary given the positively worded policies in the Natural Resource and Waste Local Plan and Core Strategy. No change.				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref [PDE00830_2](#)

Submitter Harworth Estates

Position Unspecified

Policy

Para

Diagram Map 2

Issues

General approach/methodology - Not supportive

Sound No

Respondent comments

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.

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.

Legal Yes

Respondent legal comments

n/a

Officer comments

The existing plan boundaries do not prejudice delivery of the submitter's ambitions. The AAP does not contain any rail freight designations or policies. These designations are within the purview of the adopted Natural Resources and Waste Local Plan. No change

Modification

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00830_3	Submitter	Harworth Estates	Position	Unspecified
Policy		Para	Para 3.5.38	Diagram	
Issues	Highways and transport - Not supportive				
Sound	No				
Respondent comments	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.”				
Legal	Yes				
Respondent legal comments	n/a				
Officer comments	Whilst the Council support further investigations into additional freight interchange facilities and the site does appear to offer genuine opportunities in this regard, the plan is not considered unsound simply because one possible option at the site is not detailed. The current wording does not prejudice development of the land in question as an interchange, but until the evidence is available it would be premature to include such details as requested. However, it should be noted the rail freight spur is safeguarded in the NRWLP and additional text could be inserted to establish this clear cross reference.				
Modification	Change second sentence of para 3.5.38 to read: “It also identifies a safeguarded rail spur to the Skelton Grange area and an area of search...”				

-

AVLAAP Plan Document - Publication Draft

Submission ref

Submitter

Position

Policy

Para

Diagram

Issues

Site boundary - Not supportive

Sound

Respondent comments

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.

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\LLE\BUS\001_A with a consequential increase in its stated area from 7.33ha.

Legal

Respondent legal comments

n/a

Officer comments

Agreed. Amend site AV68 boundary to the south as indicated in submission documents.

Modification

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00830_5	Submitter	Harworth Estates	Position	Unspecified						
Policy		Para	Paras 3.2.15 (Table 2), 3.2.16 & 4.5.50	Diagram							
Issues	Employment/economy - Not supportive										
Sound	No										
Respondent comments	<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. 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><th>Area (ha)</th></tr></thead><tbody><tr><td>NRW 200</td><td>Skelton Grange (West)</td><td>11</td></tr></tbody></table> <p>The text at paragraph 3.2.16 should be amended to include further details as follows: “...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 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: “...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>					Site No.	Site Name	Area (ha)	NRW 200	Skelton Grange (West)	11
Site No.	Site Name	Area (ha)									
NRW 200	Skelton Grange (West)	11									
Legal	Yes										
Respondent legal comments	n/a										
Officer comments	This would create inconsistency between the Council's development plans, contrary to the NPPF. Policy Waste 6 in the Natural Resources and Waste Local Plan allows for flexible development of the site for general employment uses if it can be demonstrated that the site is no longer required to meet strategic waste management needs of the council's area. No change.										
Modification											

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00830_6	Submitter	Harworth Estates	Position	Unspecified
Policy		Para	Para 4.5.56	Diagram	
Issues	Other - Not supportive				
Sound	No				
Respondent comments	<p>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: “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>				
Legal	Yes				
Respondent legal comments	n/a				
Officer comments	<p>Temporary uses are not discouraged within this location, nor will the Council positively promote temporary uses in this location. It would be for a planning application to demonstrate the case for a temporary land use. To positively promote temporary uses devalues the allocations within the plan. No change.</p>				
Modification					

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00830_7	Submitter	Harworth Estates	Position	Unspecified
Policy	Policy AVL12	Para	Para 3.5.18	Diagram	
Issues	Highways and transport - Not supportive				
Sound	No				
Respondent comments	<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 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\LLE\BUS\001_A, not just for pedestrian/cycle and public transport use.</p>				
Legal	Yes				
Respondent legal comments	n/a				
Officer comments	<p>Agree that the potential to upgrade Knowsthorpe Lane , referred to in paragraph 3.5.18, needs to be reflected the list of transport improvements set out Policy AVL12 . This should be inserted as a separate improvement rather than being joined with the A63 / Pontefract Road link road as suggested by the submitter. Amend wording of policy AVL12 to reflect paragraph 3.5.18.</p>				
Modification	<p>Amend Policy AVL12 to insert additional strategic transport infrastructure improvement under the highway network heading as follows:</p> <p>'2a 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. '</p>				

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00830_8	Submitter	Harworth Estates	Position	Unspecified
Policy	Policy CAV3	Para	Para 4.5.33	Diagram	
Issues	Greenspace/Green infrastructure - Not supportive				

Sound	No
-------	----

Respondent comments

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 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.”

Policy CAV3 should be amended to include further details as follows:
“POLICY CAV3 – GREEN INSTRUCTURE IN THE CENTRAL AIRE VALLEY
...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.”

Legal	Yes
-------	-----

Respondent legal comments

n/a

Officer comments

Agree in part with the representation and propose modifications where this helps improve the clarify of the policy and supporting text.

In respect to growing of energy crops and SUDs, the GI designation does not prejudice delivery of the proposals and may be complimentary. However, this will depend on the specific proposals contained within the details of a full planning application. In this context the proposed changes are considered to be too detailed to include within a development plan document.

Modification

1. Delete the following from the final sentence of para 4.5.33 'Vegetation on the land is naturally re-growing' and amend sentence to read:
'The land provides an opportunity for enhancement to create a mix of natural habitats including community woodland, grassland and semi-permanent wetlands.
2. Amend first proposal of Policy CAV3 to read: 'Integration and improvement of 20 hectares....

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00830_9	Submitter	Harworth Estates	Position	Unspecified
Policy	Policy SG2 (4)	Para		Diagram	Map 12
Issues	Site boundary - Not supportive				
Sound	No				
Respondent comments	<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. 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 employment development sites including the former Skelton Grange power station site.</p>				
Legal	Yes				
Respondent legal comments	n/a				
Officer comments	<p>The link between the north and south banks is seen as crucial to improvement of the pedestrian/ cycle network in the area. The north south link can be delivered at the alternative location as shown on the plans. It is accepted that the pedestrian / cycle route shown crossing the bridges which form part of the safeguarded rail spur is inconsistent with the Natural Resources & Waste Plan and should therefore be deleted.</p>				
Modification	Delete the pedestrian / cycle route shown on Maps 4 and 12 across the bridge south of Skelton Lake which forms part of the safeguarded rail spur to the former Skelton Grange power station site.				

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00831_1	Submitter	Commercial Estates Group on behalf of ASE II Developments Ltd	Position	Unspecified
Policy	Policy SB1	Para		Diagram	Maps 3 & 4
Issues	Highways and transport - Not supportive				
Sound	No				
Respondent comments	Nothing specified				
Legal	Yes				
Respondent legal comments	n/a				
Officer comments	Improved east / west connections from the AAP area into Holbeck Urban Village are shown on Map 3, Map 4 & Map 7. Agree these proposals should be more explicitly referred to in the plan text.				
Modification	<ol style="list-style-type: none">1. Para 4.2.3 Spatial Vision, second para. Insert Holbeck Urban Village into the list of places linked by green pedestrian and cycle routes2. Para 4.2.3 objective 8. Insert Holbeck Urban Village into list of key destinations linked by pedestrian / cycle routes.3. Amend Policy SB1, first sentence to refer to Holbeck Urban Village and to read: "The following measures are proposed to improve pedestrian and cycle connections within the area, to the traditional core of the city centre, the waterfront, Holbeck Urban Village and surrounding communities and to reduce the physical and visual impact of vehicular traffic infrastructure"4. Amend Policy SB1, Point 6 to read: "Provision of other north-south and east-west green pedestrian / cycle links through development sites...."5. Amend first sentence of para 4.2.31 to read: "The proposed network will contribute to improving north-south and east-west connectivity, with for example a green corridor connections to Sovereign Square and the north bank of the river; to the waterfront; the new City Park; to Holbeck policy SB3 to promote and explain importance of east west connectivity".				

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00832_2	Submitter	West Yorkshire Combined Authority	Position	Support
Policy	Policy CAV1	Para	Paras 3.2.2 & 3.5.7	Diagram	
Issues	Highways and transport - Neutral Highways and transport - Neutral				
Sound	Unspecified				
Respondent comments	The AAP could include mention of the potential NGT extension including paragraph para 3.2.2 and 3.5.7 and Map 4				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Agree that mention of the NGT extension is relevant to include within the text at paras 3.2.2 and 3.5.10. Map 4 already shows the NGT extension as an indicative symbol.				
Modification	Add additional sentence to the end of fourth bullet point of para 3.2.2 and to the end of para 3.5.10: 'An expansion of the network into the east of the AVL area is a future option subject to feasibility and funding'.				

•

Submission ref	PDE00833_1	Submitter	Natural England, Yorkshire and Northern Lincolnshire	Position	Unspecified
Policy	Policy AVL13	Para		Diagram	
Issues	Greenspace/Green infrastructure - Supportive				
Sound	Yes				
Respondent comments	n/a				
Legal	Yes				
Respondent legal comments	n/a				
Officer comments	Comment noted				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref [PDE00833_2](#)

Submitter Natural England, Yorkshire and Northern Lincolnshire

Position Unspecified

Policy Policy AVL14

Para

Diagram

Issues

Greenspace/Green infrastructure - Supportive

Sound Yes

Respondent comments

n/a

Legal Yes

Respondent legal comments

n/a

Officer comments

Comment noted

Modification

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00835_10	Submitter	Towngate Plc	Position	Unspecified
Policy	Policy AVL2	Para		Diagram	
Issues	Employment/economy - Not supportive				
Sound	No				
Respondent comments	<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 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• 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. These sites are shown on the Policies Map and are subject to site requirements set out in area plans... [Then contained is the list of sites, which should include those transferred from Policy AVL2]</p>				
Legal	No				
Respondent legal comments	n/a				
Officer comments	<p>Policies AVL2 & AVL4 serve two different purposes. The sites do not emanate from the same source. Policy AVL2 identifies sites with planning permission or allocations carried forward from the UDP, where these remain suitable and deliverable. In both cases the principle of the use has been previously established.</p> <p>The general employment sites listed in Policy AVL4 are new allocations without the benefit planning permission as at the base date of 31 March 2015. This approach is consistent with that proposed in the Leeds Site Allocations Plan.</p>				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00835_11	Submitter	Towngate Plc	Position	Unspecified
Policy	Policy AVL4	Para		Diagram	
Issues	Employment/economy - Not supportive				
Sound	No				
Respondent comments	<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 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• 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. 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>				
Legal	No				
Respondent legal comments	n/a				
Officer comments	<p>Agreed. As the land within the boundary extension proposed is already allocated employment land in the UDP, and is considered to be deliverable within the plan period, it is appropriate to extend the boundaries of identified general employment AV68.</p>				
Modification	<p>1. Amend site AV68 boundary to the south as indicated in submission documents.</p> <p>2. Revise site area for Site AV68 in Table 2 from 7.33 ha to 9.17 ha</p> <p>[These modifications was agreed at the 1st March 2016 DPP]</p>				

•

AVLAAP Plan Document - Publication Draft

Submission ref [PDE00835_3](#)

Submitter Towngate Plc

Position Unspecified

Policy Policy AVL13

Para

Diagram Map 5

Issues

Ecology/Landscape/Trees - Not supportive

Sound No

Respondent comments

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).

Legal No

Respondent legal comments

n/a

Officer comments

The identified green infrastructure reflects the outcomes of the evidence presented in the background paper entitled Aire Valley Leeds AAP Green Infrastructure & Green Space Background Paper. The overall approach to green infrastructure reflects Core Strategy Policies SP13 and G1. No change.

Modification

•

AVLAAP Plan Document - Publication Draft

Submission ref [PDE00835_4](#)

Submitter Towngate Plc

Position Unspecified

Policy Policy AVL14

Para

Diagram Map 5, 13 & 14

Issues

Greenspace/Green infrastructure - Not supportive

Sound No

Respondent comments

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).

Legal No

Respondent legal comments

n/a

Officer comments

No green space is identified on the land identified within the representation. Green infrastructure is identified, which the submitter has also objected to in a separate representation (PDE00835_3 – see separate response). No change.

Modification

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00837_1	Submitter	Templegate Developments Ltd	Position	Unspecified
Policy		Para	Para 1.3.4	Diagram	
Issues	General approach/methodology - Not supportive				
Sound	No				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	The representation does not include which soundness test, use of the urban eco-settlement vision term fails nor is there direction on which changes would make the plan sound in relation to the use of the term. Notwithstanding the absence of detail, this vision is an important objective of the plan and is referred to specifically in Core Strategy Spatial Policy 5. The use of the term does not add any additional requirements over and above those policies and allocations within the Core Strategy and this plan. No change.				
Modification					

•

Submission ref	PDE00837_10	Submitter	Templegate Developments Ltd	Position	Unspecified
Policy		Para	Para 4.6.38	Diagram	
Issues	Local services - Supportive				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Support noted.				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00837_11	Submitter	Templegate Developments Ltd	Position	Unspecified
Policy	Policy SG1	Para		Diagram	
Issues	Employment/economy - Supportive				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Support noted.				
Modification					

•

Submission ref	PDE00837_12	Submitter	Templegate Developments Ltd	Position	Unspecified
Policy		Para	Para 4.6.43	Diagram	
Issues	Greenspace/Green infrastructure - Not supportive				
Sound	No				
Respondent comments	'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.				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	The wording already includes flexibility 'wherever possible.' at para 4.6.26. No change.				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00837_13	Submitter	Templegate Developments Ltd	Position	Unspecified
Policy		Para	Para 4.6.47	Diagram	
Issues	Greenspace/Green infrastructure - Not supportive				
Sound	No				
Respondent comments	<p>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.</p>				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	<p>A development of this scale needs a green space which is recognisable as such by its potential users. The Council is seeking to avoid provision of small fragmented green spaces on the least developable parts of the site which do not serve the wide variety of open space functions that can be offered by a contiguous area of open space laid out as a 'community park'. However, it is agreed use of the term 'most', may not fully appreciate the issues created by the historic uses at the site therefore change to read 'A community park should be provided (as set out in the site requirement)..... Delete the following wording 'Most of the green space should be provided in the form of a'</p> <p>Use of the term centrally located has been dealt with elsewhere. Delete 'centrally' and reword sentence to read 'This should be conveniently located within easy walking distance of all occupiers of the site.'</p>				
Modification	<ol style="list-style-type: none">1. Delete the following wording from the first sentence of para 4.6.47 'Most of the green space should be in the form of '2. Amend second sentence of para 4.6.47 to read: 'This should be conveniently located within easy walking distance of all occupiers of the site'				

•

AVLAAP Plan Document - Publication Draft

Submission ref [PDE00837_14](#)

Submitter Templegate Developments Ltd

Position Unspecified

Policy Policy SG4

Para

Diagram

Issues

Other - Not supportive

Sound No

Respondent comments

n/a

Legal Unspecified

Respondent legal comments

n/a

Officer comments

This land is partly within the same ownership of the proposed housing site and should be seen as part of the package of bringing forward the site for comprehensive development. The lake is an excellent recreational and ecological asset and should be fully integrated into the plans particularly as proposed development in the area will significantly increase the population using the lake for recreational purposes. It is for the applicant to suggest how the requirement can be addressed as part of the overall development of the site. To specify the size/function and funding at this stage would be unduly prescriptive for a local plan. No change.

Modification

•

AVLAAP Plan Document - Publication Draft

Submission ref [PDE00837_15](#)

Submitter Templegate Developments Ltd

Position Unspecified

Policy

Para Para 4.6.29

Diagram

Issues

Factual correction required - Neutral

Sound Unspecified

Respondent comments

n/a

Legal Unspecified

Respondent legal comments

n/a

Officer comments

J45 is correct, but agree that clarity could be improved.

Modification

Amend wording at para 6.6.29 by adding the word back as follows:
"...(which leads back to the M1, J45)"

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00837_2	Submitter	Templegate Developments Ltd	Position	Unspecified
Policy		Para	Para 2.1 - Urban Eco Settlement Vision	Diagram	
Issues	Ownership/Delivery - Not supportive				
Sound	No				
Respondent comments	<p>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.</p>				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	<p>The representation does not include which soundness test, use of the urban eco-settlement vision term fails nor is there direction on which changes would make the plan sound in relation to the use of the term. Notwithstanding the absence of detail, this vision is an important objective of the plan and is referred to specifically in Core Strategy Spatial Policy 5. The use of the term does not add any additional requirements over and above those policies and allocations within the Core Strategy and this plan.</p> <p>The use of the term does not add any additional requirements over and above those policies and allocations within the Core Strategy and this plan. Waste allocations are within the purview of the Natural Resources and Waste Local Plan see Policy Waste 6. No change.</p>				
Modification					

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00837_4	Submitter	Templegate Developments Ltd	Position	Unspecified
Policy	Policy AVL9 (4)	Para		Diagram	
Issues	Local services - Supportive				
Sound	Unspecified				
Respondent comments	We support this policy.				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Support noted				
Modification					

-

AVLAAP Plan Document - Publication Draft

Submission ref [PDE00837_5](#)

Submitter Templegate Developments Ltd

Position Unspecified

Policy Policy AVL10 (2)

Para

Diagram

Issues

Schools - Not supportive

Sound No

Respondent comments

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.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

The LEA have considered the opportunities of delivering education given the specific circumstances of the site. The optimum sustainable solution is for the site to provide for its own education needs. The education provision based on 1,800 units has been assessed by the LEA. The conclusion of the assessment is as follows: There are no nearby secondary schools local to this site and, therefore, a new secondary school would also be required as a part of any scheme.

180 children across 5 year groups = 36 per year group, plus an ongoing need to accommodate the 64 children per year coming through from the primary school (approx.)

A four form entry secondary school would be required to meet the need generated by the development based on the proposed number of units. No change.

Modification

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00837_6	Submitter	Templegate Developments Ltd	Position	Unspecified
Policy		Para	Section 4.5; Paras 4.5.34 & 4.5.47	Diagram	
Issues	Highways and transport - Neutral Greenspace/Green infrastructure - Neutral				
Sound	Unspecified				
Respondent comments	<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>				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	<p>The third party ownership of Knowsthorpe Lane is noted, however, delivery of the route is crucial to ensure the site is accessible by an attractive choice of different transport modes (not just public transport) in multiple directions. In addition, the current third party owner supports delivery of this route as do Highways England. The sustainability appraisal reaffirms that the site is not connected or accessible to services and facilities or alternative transport networks and highlights the need for considered and innovative solutions to ensure the site is sustainable and well connected. No change.</p>				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00837_7	Submitter	Templegate Developments Ltd	Position	Unspecified
Policy		Para	Para 4.6.1 - Spatial Vision	Diagram	
Issues	Other - Not supportive Other - Not supportive				
Sound	No				
Respondent comments	<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 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: '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>				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	<p>[Capacity] In response to representations by Templegate, Extra MSA and Commercial Development Project (see site representations schedule) it is proposed to reduce the capacity of site AV111 from 2,619 to 1,801. This capacity should be reflected in the figure quoted in the vision.</p> <p>[Low carbon energy] As stated in the comments to the submitter's representation to Section 2, reference to low carbon energy is made in relation to the potential of the AVL area to produce and distribute low carbon energy related to several specific opportunities. It does not impose specific requirements on new housing and business development over any policy requirements set out in the Core Strategy. Nevertheless the Council consider it important for the plan to identify where there may be opportunities to link new development with these low carbon production and distribution opportunities. No change.</p>				
Modification	<ol style="list-style-type: none">1. Amend new homes figure in the first paragraph of paragraph 4.1 Spatial Vision and Objective 1 from 2,619 to 1,801. [Consequential changes resulting from the modification agreed at 1 March 2016 DPP]				

•

AVLAAP Plan Document - Publication Draft

Submission ref

Submitter

Position

Policy

Para

Diagram

Issues

Local services - Not supportive

Sound

Respondent comments

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.

Legal

Respondent legal comments

n/a

Officer comments

Agree the term centrally should be replaced by reference to accessibility.

Modification

Amend para 4.6.20 (4) replace use of the words '...centrally within the development, within walking distance to all parts of the site.' with, 'in an accessible location to all occupiers of the site using sustainable transport options.'

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00837_9	Submitter	Templegate Developments Ltd	Position	Unspecified
Policy		Para	Paras 4.6.27 - 4.6.29	Diagram	
Issues	Local services - Not supportive Schools - Not supportive Highways and transport - Not supportive				
Sound	No				
Respondent comments	<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>				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	<p>[Local services] Until a detailed application is received and the nature of the proposals can be fully considered, it would be overly prescriptive of the Council to add further details at this stage. It is likely that the decision notice and/or S106 agreement would include trigger points linked to a number or proportion of total units, but that would be a matter for negotiation at that time. Use of the term early is appropriate as it is an important consideration to establish the facilities for those first residents to establish sustainable patterns of behaviour in relation to using and accessing services and facilities.</p> <p>[School] The justification for the through school has already been considered, and a response provided at the first representation to that issue.</p> <p>[Highway access] To ensure the site is accessible & integrated for public transport and to ensure more than one point of access for emergency services, two access points will be required. The exact location of the second access remains flexible pending further layout considerations, but is necessary to ensure issues highlighted in the sustainability appraisal are adequately addressed. No change.</p>				
Modification					

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00838_1	Submitter	Leeds Civic Trust	Position	Unspecified
Policy		Para		Diagram	
Issues	General approach/methodology - Supportive				
Sound	Yes				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Comment noted.				
Modification					

•

Submission ref	PDE00838_2	Submitter	Leeds Civic Trust	Position	Unspecified
Policy		Para	Section 4.2	Diagram	
Issues	General approach/methodology - Neutral				
Sound	Unspecified				
Respondent comments	Many of the aims for the South Bank area should be applied to the whole of city centre south.				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Whilst this could be the case, it is unclear what aspect makes the plan unsound or what changes would need to be made, to make the plan sound. No change.				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00838_4	Submitter	Leeds Civic Trust	Position	Unspecified
Policy	Policy AVL11	Para		Diagram	
Issues	Conservation and heritage - Neutral				
Sound	Unspecified				
Respondent comments	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 conserve them could be undermined on appeal, through lack of evidence.				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	A schedule of undesignated heritage assets shown on the Area Maps will be included in an appendix to the plan. As a result of further analysis it is proposed to remove some of the buildings identified at the publication stage Further work is being undertaken to prepare a background evidence base document to support the identified of the assets in the schedule. This will accompany the submission version of the plan.				
Modification	<ol style="list-style-type: none">1. Amend final sentence of para 3.4.33 to read: A schedule of the locally significant assets is set out in Appendix 2 and location shown on area maps.2. New appendix including schedule of locally significant undesignated heritage assets.				

-

AVLAAP Plan Document - Publication Draft

Submission ref [PDE00838_5](#)

Submitter Leeds Civic Trust

Position Unspecified

Policy Policy AVL17

Para

Diagram

Issues

Other - Neutral

Sound Unspecified

Respondent comments

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.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

The overall approach to the district heating network reflects the adopted Core Strategy and the opportunities related to heat sources and heat users in AVL. The Council has recently adopted a Local Development Order to the assist delivery of the early phases of a network based on the new Energy from Waste facility in Cross Green. Delivery and funding of subsequent phases will require more detailed consideration.

Modification

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00842_1	Submitter	Vastint Leeds B.V.	Position	Unspecified
Policy		Para	Section 4.2 - South Bank Area Plan	Diagram	
Issues	General approach/methodology - Not supportive				
Sound	Unspecified				
Respondent comments	<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> <ul style="list-style-type: none">_ The principle of fair apportionment of the City Centre Park (approximately 3.5has in total) between development sites; and_ Confirmation that the City Centre Park does not need to be one contiguous area, but can be a series of inter-linked spaces.				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	<p>Core Strategy Policy G5 sets out the level of open space provision expected to be provided within city centre development and this will be applied to developments which contribute towards the City Park. Therefore no development will be expected to make a contribution over and above their requirements under Policy G5. Additionally, land outside development site may also be included, such as current highway land. The principles for the design and delivery of the City Park are set out in AAP Policy SB2. This is considered to be a flexible approach which sets out the broad parameters without specifying the exact location of the City Park and whether it will be entirely contiguous or could include some inter-linked spaces.</p>				
Modification					

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00842_11	Submitter	Vastint Leeds B.V.	Position	Unspecified
Policy	Policy AVL10	Para		Diagram	
Issues	Schools - Not supportive				
Sound	Unspecified				
Respondent comments	<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>				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	<p>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.</p>				
Modification	<p>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"</p>				

-

AVLAAP Plan Document - Publication Draft

Submission ref [PDE00842_12](#)

Submitter Vastint Leeds B.V.

Position Unspecified

Policy Policy AVL11

Para

Diagram

Issues

Conservation and heritage - Not supportive

Sound No

Respondent comments

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.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

The Council are reviewing the undesignated heritage assets. As a result of further analysis it is proposed to remove some of the buildings identified at the publication stage. However, the issue of demolition where repair or restoration is not achievable is adequately addressed within the NPPF. Repetition of the national policy is unnecessary. See para 135 - 136 of the NPPF.

Modification

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00842_13	Submitter	Vastint Leeds B.V.	Position	Unspecified
Policy	Policy AVL12	Para		Diagram	
Issues	Highways and transport - Neutral				
Sound	Unspecified				
Respondent comments	<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>				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	<p>The highway authority consults with neighbouring landowners when affecting changes to the highway network within the vicinity of their site. This consultation requirement is set out in the various relevant highway acts. No change</p>				
Modification					

-

AVLAAP Plan Document - Publication Draft

Submission ref [PDE00842_2](#)

Submitter Vastint Leeds B.V.

Position Unspecified

Policy

Para Para 4.2.20

Diagram

Issues

Highways and transport - Not supportive

Sound Unspecified

Respondent comments

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.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

The plan incorporates sufficient flexibility to allow for realignment to occur, which is now more likely than before. It is not necessary to delay the progress of the AVLAAP given the timescales and separate legislation involved. No change.

Modification

•

AVLAAP Plan Document - Publication Draft

Submission ref [PDE00842_3](#)

Submitter Vastint Leeds B.V.

Position Unspecified

Policy South Bank Masterplan

Para

Diagram

Issues

Consultation process - Neutral

Sound Unspecified

Respondent comments

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 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. We would be grateful if this could be noted and addressed as the process moves forward.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

It would be unusual to specifically name a landowner in a development plan, as these details can change over the plan period and quickly date a plan. However, reference could be made to the ongoing materplanning process in relation to HS2 and the importance of involving the key landowners in the area. It should be noted the current masterplanning process is progressing in parallel to the preparation of the development plan and is informing the debate around HS2 and detailed integration of development sites with the opportunities of an expanded station to cater for HS2 trains and passengers.

Modification

Add new paragraph following para 3.5.5 and reword paragraph 4.2.20 and cross refereance to new para.
New paragraph to update on masterplan process and importance of involving key landowners.

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00842_5	Submitter	Vastint Leeds B.V.	Position	Support
Policy	Policy AVL7	Para		Diagram	
Issues	Other - Not supportive				
Sound	No				
Respondent comments	<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. 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. 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.</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 accommodated in the South Bank area. This is a positive and justified approach to these policies.</p>				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	<p>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.</p> <p>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. The density multiplier is applied to a 4.4 hectare 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 (increase 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.</p> <p>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.</p> <p>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.</p>				

AVLAAP Plan Document - Publication Draft

Modification

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

•

Submission ref [PDE00842_6](#)

Submitter Vastint Leeds B.V.

Position Unspecified

Policy Policy SB1

Para

Diagram

Issues

Highways and transport - Not supportive

Sound No

Respondent comments

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.

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.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Although all routes shown are indicative and subject to further masterplanning work it is agreed that the maps could be clearer in indicating the importance of link between the Brewery site and the Southern Station Entrance.

Modification

Show a more direct pedestrian/cycle link between the Brewery site and the Southern Station entrance on the relevant maps.

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00842_7	Submitter	Vastint Leeds B.V.	Position	Unspecified
Policy	Policy SB2	Para		Diagram	
Issues	Greenspace/Green infrastructure - Not supportive				
Sound	No				
Respondent comments	<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> <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>				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	<p>Core Strategy Policy G5 sets out the level of open space provision expected to be provided within city centre development and this will be applied to developments which contribute towards the City Park. Therefore no development will be expected to make a contribution over and above their requirements under Policy G5. Additionally, land outside development site may also be included, such as current highway land.</p> <p>The principles for the design and delivery of the City Park are set out in AAP Policy SB2. This is considered to be a flexible approach which sets out the broad parameters without specifying the exact location of the City Park and whether it will be entirely contiguous or could include some inter-linked spaces.</p> <p>The proposed modification to para 4.2.30 in response to the submitter's representation on Policy SB3 will help clarify that there will be no further need to provide greenspace where a development site has made a full contribution to the City Park.</p>				
Modification					

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00842_8	Submitter	Vastint Leeds B.V.	Position	Unspecified
Policy	Policy SB3	Para		Diagram	
Issues	Greenspace/Green infrastructure - Not supportive				
Sound	No				
Respondent comments	<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>				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Agreed. Amend text to clarify City Park contribution of land will be considered as contribution towards fulfilling a development's green space requirements under policy G5.				
Modification	<p>Add sentence to the end of para 4.2.31 to read: "Any contribution of land made towards the creation of the City Park will be taken into account when calculating the green space requirement of a development under Core Strategy Policy G5."</p> <ul style="list-style-type: none">				

AVLAAP Plan Document - Publication Draft

Submission ref	PDE00842_9	Submitter	Vastint Leeds B.V.	Position	Unspecified
Policy	Policy SB4	Para		Diagram	
Issues	Other - Not supportive				
Sound	No				
Respondent comments	<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, 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.</p>				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	<p>The list of uses set out under Policy SB4 is not intended to be an exhaustive list. However it would help clarify the policy if the reference to offices included all B1 uses and creative industries which are appropriate uses for the location. As a catch all it is also appropriate to refer to other appropriate land uses subject to consideration of the relevant policies of the development plan.</p>				
Modification	<ol style="list-style-type: none">1. Amend bullet 2 of Policy SB4 to read: "Employment uses complimentary to housing uses including: offices, research & development, light industry and creative industries.2. New bullet 9 to read: Other appropriate land uses, subject to consideration of relevant development plan policies				

•

AVLAAP Plan Document - Publication Draft

Submission ref

Submitter

Position

Policy

Para

Diagram

Issues

Highways and transport - Not supportive

Sound

Respondent comments

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.

Legal

Respondent legal comments

n/a

Officer comments

The highway authority consults with neighbouring landowners when affecting changes to the highway network within the vicinity of their site. This consultation requirement is set out in the various relevant highway acts. No change.

Modification

•

AVLAAP Plan Document - Publication Draft

Submission ref [PDE02218_1](#)

Submitter Dane Watson

Position Unspecified

Policy

Para

Diagram

Issues

Greenbelt - Unspecified
Ecology/Landscape/Trees - Unspecified
Conservation and heritage - Unspecified

Sound No

Respondent comments

n/a

Legal Don't know

Respondent legal comments

n/a

Officer comments

Form virtually empty - nothing to indicate which part of the plan they consider unsound. No change.

Modification

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE02250_5	Submitter	New, East and South Leeds Community Body (non-constituted)	Position	Unspecified
Policy		Para	Para 3.3.20	Diagram	
Issues	Affordable housing - Not supportive				
Sound	No				
Respondent comments	<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 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 community facilities, green space and infrastructure, and subject to affordability, mixed communities, high 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>				
Legal	No				
Respondent legal comments	<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 and Human Rights Act The process did not give consideration to the Social Value Act and Human Rights Act in a way that has been referenced in the documents.</p>				
Officer comments	<p>The Core Strategy provides the overall framework for the type and mix of housing via Policy H4. It also states that new housing development will be acceptable in principle on non-allocated land. The AAP cannot allocate small parcels of land in a city the size of Leeds. This would be unmanageable in a DPD. Nevertheless the city expects a smaller windfall site delivery of 500 homes per annum and a range of Council activities help encourage this: such as a self-build register, brownfield register of LCC assets and investment land strategy support the boosting of housing supply. Whilst in its early stages it is also expected that the Brownfield Land Register will also help stimulate the development of such sites as referred to in the representation. The Core Strategy residential housing target did not break down the requirement into the types of accommodation stated in the representation, but a mix of housing sizes and types is encouraged in line with the Framework. The AAP is consistent with the Core Strategy housing requirement. The critical issue of deliverability and viability are of major significance in relation to these issues. The existing affordable housing policy H5 sets out the existing requirements, however, recent Government publications on this topic will change how affordable housing is delivered in the future. It is not clear how the plan is inconsistent with the social values act as this would relate to procurement and tendering of services which are beyond the scope of this plan. No change.</p>				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE02250_6	Submitter	New, East and South Leeds Community Body (non-constituted)	Position	Unspecified
Policy		Para		Diagram	
Issues	Local services - Not supportive				
Sound	Unspecified				
Respondent comments	<p>All public buildings providing a service, All buildings formally recognised as community facilities, All sites that the Council may wish to dispose of, which the community could apply to acquire as community facilities All parks and gardens, playing fields, beautiful green spaces, green spaces Any other facilities whose owners wish to be acknowledged as community facilities operating for the benefit of the community. 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>				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	<p>Most of the changes sought relate to matters outside the planning system, and therefore beyond the scope of the AAP. It is not the purpose of the development plan to fulfil the role of a spatial community asset register. The majority of changes of land use or site redevelopment require planning permission, of which consultation is a required component. Core strategy Policy P9 protects existing community facilities and services where appropriate. No change.</p>				
Modification					

-

AVLAAP Plan Document - Publication Draft

Submission ref

Submitter

Position

Policy

Para

Diagram

Issues

Sound

Respondent comments

Legal

Respondent legal comments

Officer comments

Modification

•

AVLAAP Plan Document - Publication Draft

Submission ref [PDE02251_1](#)

Submitter Selby District Council

Position Unspecified

Policy

Para

Diagram

Issues

General approach/methodology - Neutral

Sound Unspecified

Respondent comments

n/a

Legal Unspecified

Respondent legal comments

n/a

Officer comments

Comments noted.

Modification

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDE02252_2	Submitter	Environment Agency	Position	Unspecified
Policy		Para		Diagram	
Issues	Flooding and drainage - Neutral				
Sound	Unspecified				
Respondent comments	<p>Some of the exceptions test tables (such as AV15 and AV16) include the following: '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>				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	<p>On checking this bullet only appears in the comprehensive district wide flood risk assessment & sequential test and the the Aire Valley flood risk evidence paper. Agreed the statement is incorrect and should be deleted. Delete bullet point.</p> <p>Whilst the city centre HMCA target has been met, the AVLAAP target (Core Strategy SP5) did not and both sequential tests needs to viewed together. The sequential test acknowledges that there are a number of sites in the city centre within zone 3Aii at risk of flooding.The evidence paper highlights that these sites are all brownfield within a defined regeneration area, insustainable locations, close to the city centre. Given all sites satisfy the criteria, there is no ratioale to choose between the sites. Each site was then subjected to the Exception Test and passed. The reasons that residential uses can not be delivered on alternative sites in lower flood risk zones are provided within the evidence.</p>				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE02252_4	Submitter	Environment Agency	Position	Unspecified
Policy		Para	Page 5; Duty to cooperate	Diagram	
Issues	Other - Neutral				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	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.				
Officer comments	<p>[Sites AV15 & AV16] On checking, this bullet only appears in the comprehensive district wide flood risk assessment & sequential test. Agreed the statement is incorrect and should be deleted.</p> <p>[Sequential test] Whilst the City Centre HMCA target has been met, the AVLAAP target (Core Strategy SP5) had not and both sequential tests need to be viewed together. The sequential test acknowledges that there are a number of sites in the city centre within zone 3Aii at a higher risk of flooding. The evidence paper highlights that these sites are all brownfield within a defined regeneration area, in sustainable locations, close to the city centre. Given all sites satisfy the criteria, there is no rationale to distinguish between the sites. Each site was then subjected to the Exception Test and passed. The reasons that residential uses cannot be delivered on alternative sites in lower flood risk zones are provided within the evidence.</p>				
Modification	Amend exception test bullet point referring to the sites AV15 and AV16 in the district wide flood risk assessment & sequential test.				

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDE02253_2	Submitter	Leeds Civic Trust	Position	Unspecified
Policy		Para		Diagram	
Issues	Consultation process - Not supportive				
Sound	Unspecified				
Respondent comments	n/a				
Legal	No				
Respondent legal comments	<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 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	<p>The Local Plan Regulations (2012) state that “a document is to be taken to be made available by a local planning authority when—(a) made available for inspection, at their principal office and at such other places within their area as the local planning authority consider appropriate, during normal office hours, and (b) published on the local planning authority’s website”. This was complied with. In addition, there were numerous 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 encouraged use of electronic communication to submit comments but did not limit responses to this format.</p>				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE02254_1	Submitter	Leeds Local Access Forum	Position	Unspecified
Policy		Para		Diagram	
Issues	Other - Not supportive				
Sound	Unspecified				
Respondent comments	<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/leedsc/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>				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	<p>Whilst this issue is dealt with at para 4.10.4 and Policy SP13 & G1 of the Core Strategy it would aid appreciation of the issue if the site assessments and Policy AVL12 made more detailed reference to the PROWIP and the existence of non-definitive routes and their retention or diversion as appropriate to the site.</p> <p>Need to add site assessment criteria (part of the evidence base) to note existence of non-definitive routes.</p>				
Modification	<ol style="list-style-type: none">1. Add site assessment criteria to note existence of non-definitive routes .2. Amend criterion 13 of Policy AVL12 to read: "Retain, and where appropriate, improve, existing rights of way (of any type) within development sites. If demonstrated through evidence, a diversion cannot be avoided, the proposed diversion should maintain the convenience, safety and visual amenity of the original route.3. Insert footnote to explain where the map of the routes can be viewed to aid understanding.				

•

AVLAAP Plan Document - Publication Draft

Submission ref [PDE02255_1](#)

Submitter Ineke Jackson

Position Unspecified

Policy

Para Para 3.5.4

Diagram

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

Within the AVL boundary the HS2 construction route lies within sites AV94 South Bank Planning Statement Area. Land under the track route will not be available for development and is not counted towards the Core Strategy targets. The plan allows for construction of HS2 using the latest information available. The plan provides flexibility on the delivery of the sites for other uses, should the route of HS2 change or not progress. See paragraphs, 3.5.4 - 3.5.5, 4.2.18, 4.2.20.

Modification

-

AVLAAP Plan Document - Publication Draft

Submission ref

Submitter

Position

Policy

Para

Diagram

Issues

General approach/methodology - Supportive

Sound

Respondent comments

n/a

Legal

Respondent legal comments

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.

Officer comments

Comments noted. .

Modification

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE02259_1	Submitter	National Grid	Position	Unspecified
Policy		Para		Diagram	
Issues	Other - Neutral Other - Neutral Other - Neutral				
Sound	Unspecified				
Respondent comments	<p>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 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. 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.</p>				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Comments noted.				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE03304_1	Submitter	Burberry	Position	Unspecified
Policy		Para	Para 3.2.18, Table 3	Diagram	
Issues	Employment/economy - Not supportive				
Sound	Unspecified				
Respondent comments	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 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.				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	The level of employment land provision in the AVL area (250 hectares) is set out in the Core Strategy. The AAP identifies existing employment sites and proposes new allocations to meet this strategic requirement to ensure the plan is in conformity with the Core Strategy. All the general employment sites identified and allocated in the AAP are considered to be deliverable within the plan period, providing a range of type and size of sites. Furthermore of the 232 ha of employment land in AVL shown in Table 3, 152 hectares (66%) benefits from an existing planning permission and a further 41 hectares (18%) is allocated in the adopted Natural Resources & Waste Local Plan for specialist waste and rail/canal freight uses.				
Modification					

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDE03305_1	Submitter	Harrogate Borough Council	Position	Unspecified
Policy		Para		Diagram	
Issues	General approach/methodology - Neutral				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	No comments on plan. No change.				
Modification					

•

Submission ref	PDE03307_1	Submitter	Helen Roberts	Position	Unspecified
Policy		Para		Diagram	
Issues	Greenbelt - Not supportive				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	General objection to Green Belt allocations. No specific issues raised in relation to site AV111. The Green Belt land incorporated within this allocation is required to help deliver the area specific housing target set out in Core Strategy Policies SP5 and SP7				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDE03310_1	Submitter	Gregory Adams	Position	Unspecified
Policy		Para		Diagram	
Issues	Greenbelt - Not supportive				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	General objection to Green Belt allocations. No specific issues raised in relation to site AV111. The Green Belt land incorporated within this allocation is required to help deliver the area specific housing target set out in Core Strategy Policies SP5 and SP7				
Modification					

•

Submission ref	PDH00031_1	Submitter	Paul Goyea	Position	Unspecified
Policy		Para		Diagram	
Issues	General approach/methodology - Neutral				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	No comments.				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref [PDH00556_2](#)

Submitter Roger Shaw

Position Unspecified

Policy

Para

Diagram

Issues

Consultation process - Supportive
Affordable housing - Neutral
Greenfield/brownfield - Neutral
Highways and transport - Neutral

Sound Yes

Respondent comments

n/a

Legal Don't know

Respondent legal comments

n/a

Officer comments

Comments noted.

Modification

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDH00683_2	Submitter	Brian Holmes	Position	Unspecified
Policy		Para		Diagram	
Issues	Highways and transport - Unspecified				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Yes				
Respondent legal comments	n/a				
Officer comments	Representation has no specific comments.				
Modification					

•

Submission ref	PDH02806_1	Submitter	Brian J. Whiteley	Position	Object
Policy		Para		Diagram	
Issues	Greenbelt - Not supportive				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	General objection to Green Belt allocations. No specific issues raised in relation to site AV111. The Green Belt land incorporated within this allocation is required to help deliver the area specific housing target set out in Core Strategy Policies SP5 and SP7				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDH02807_1	Submitter	John G Montgomery	Position	Object
Policy		Para		Diagram	
Issues	Greenbelt - Not supportive				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	General objection to Green Belt allocations. No specific issues raised in relation to site AV111. The Green Belt land incorporated within this allocation is required to help deliver the area specific housing target set out in Core Strategy Policies SP5 and SP7				
Modification					

•

Submission ref	PDH02808_1	Submitter	Anne Blackburn	Position	Object
Policy		Para		Diagram	
Issues	Greenbelt - Not supportive				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	General objection to Green Belt allocations. No specific issues raised in relation to site AV111. The Green Belt land incorporated within this allocation is required to help deliver the area specific housing target set out in Core Strategy Policies SP5 and SP7				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDH02809_1	Submitter	Robin Horsfall	Position	Object
Policy		Para		Diagram	
Issues	Greenbelt - Not supportive				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	General objection to Green Belt allocations. No specific issues raised in relation to site AV111. The Green Belt land incorporated within this allocation is required to help deliver the area specific housing target set out in Core Strategy Policies SP5 and SP7				
Modification					

•

Submission ref	PDH02810_1	Submitter	Derek Hudson	Position	Object
Policy		Para		Diagram	
Issues	Greenbelt - Not supportive				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	General objection to Green Belt allocations. No specific issues raised in relation to site AV111. The Green Belt land incorporated within this allocation is required to help deliver the area specific housing target set out in Core Strategy Policies SP5 and SP7				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref [PDW00023_1](#)

Submitter Beckie Walton

Position Unspecified

Policy AV11

Para

Diagram

Issues

General approach/methodology - Supportive

Sound Yes

Respondent comments

n/a

Legal Don't know

Respondent legal comments

n/a

Officer comments

Comment noted.

Modification

-

AVLAAP Plan Document - Publication Draft

Submission ref [PDW03418_1](#)

Submitter Highways England

Position Unspecified

Policy

Para Para 3.2.12

Diagram

Issues

Highways and transport - Neutral

Sound Yes

Respondent comments

n/a

Legal Yes

Respondent legal comments

n/a

Officer comments

Mixed use sites are limited to city centre, town centre or edge of centre locations. The uses permitted on mixed use sites are stated in policies and site requirements in the AAP. Generally an assumption has been made for potential office uses (shown in Table 1 and Table 4) and transport modelling carried out on this basis. All mixed use sites are expected to provide a significant proportion of housing guided by the capacity estimate set out in Policy AVL7 so this would limit the potential for the proportion of the site developed for office use to increase. There are no mixed housing and B2/B8 sites proposed in the plan so any change in end uses between these particular uses would not be consistent with policy. No change

Modification

-

AVLAAP Plan Document - Publication Draft

Submission ref

Submitter

Position

Policy

Para

Diagram

Issues

Highways and transport - Not supportive

Sound

Respondent comments

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.

Legal

Respondent legal comments

n/a

Officer comments

It is considered that the transport improvements set out in Policy AVL12 and other policies, such as a potential route along Pontefract Lane, offer potential help facilitate improvements to bus services between the Five Towns and Leeds. No change.

Modification

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDW03421_1	Submitter	Highways England	Position	Unspecified
Policy	AVL7	Para		Diagram	
Issues	Highways and transport - Not supportive				
Sound	No				
Respondent comments	<p>Provision of a more precise indication of the number of additional homes to be provided in Aire Valley Leeds in the Plan period closely corresponding to the figure given in Core Strategy Spatial Policy 5.</p> <p>Provision of a housing trajectory for house building in Aire Valley Leeds covering the three periods of five years in the Plan period and a clear statement of the number of additional homes on sites that are provided to give flexibility and ensure that the target number of homes for Aire Valley Leeds is delivered in the Plan period.</p> <p>These changes are needed to enable Highways England to understand more clearly the impact on the M1 and M621 motorways of traffic generated by and attracted to housing development in Aire Valley Leeds.</p>				
Legal	Don't know				
Respondent legal comments	n/a				
Officer comments	<p>The total number of additional homes in the Aire Valley is set out in Table 6 of the AAP. This exceeds the 6,500 dwellings stated in Core Strategy Spatial Policy 5 but that figure is defined as a minimum delivery target. Delivery trajectories for both housing (based on the SHLAA 2015 work) and employment have been shared with Highways England (January 2016) and a meeting is to be set up with HE to discuss traffic generation and impacts on the strategic highway network. The Core Strategy includes an allowance of 500 units per annum for windfall development. Any extra over and above the 6,500 minimum target would contribute towards delivery of this windfall allowance and cannot be identified at this time because the sites are not currently available. If they were available, they would be allocated within the plan.</p>				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDW03423_1	Submitter	Highways England	Position	Unspecified
Policy		Para	Para 3.5.40	Diagram	
Issues	Housing target - Neutral				
Sound	Yes				
Respondent comments	n/a				
Legal	Yes				
Respondent legal comments	n/a				
Officer comments	Comment noted.				
Modification					

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDW03425_1	Submitter	Highways England	Position	Unspecified
Policy	AVL12	Para		Diagram	
Issues	Highways and transport - Not supportive				
Sound	No				
Respondent comments	<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>				
Legal	Don't know				
Respondent legal comments	n/a				
Officer comments	<p>The Aire Valley Leeds Area Action Plan (AVLAAP) has been prepared within the context of the adopted Core Strategy, which promotes AVL for major growth supported by highways and other infrastructure. This approach is reflected in the preparation of the AVLAAP, which includes an Infrastructure Delivery Plan to support development proposals. This has been updated to capture Highway England's comments and will be kept under review and monitored to take into account any subsequent changes. As part of this approach the City Council will continue to undertake a positive and on-going dialogue with Highways England, to ensure that development aspirations and infrastructure provision are supported.</p>				
Modification					

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDW04471_1	Submitter	Canal & River Trust	Position	Unspecified
Policy	AVL17	Para		Diagram	
Issues	Other - Unspecified				
Sound	Yes				
Respondent comments	n/a				
Legal	Yes				
Respondent legal comments	n/a				
Officer comments	Noted. No change.				
Modification					

•

Submission ref	PDW04475_1	Submitter	Canal & River Trust	Position	Unspecified
Policy	AV15	Para		Diagram	
Issues	No issues specified				
Sound	Yes				
Respondent comments	n/a				
Legal	Yes				
Respondent legal comments	n/a				
Officer comments	Noted. No change.				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref [PDW04480_1](#)

Submitter Canal & River Trust

Position Unspecified

Policy Policy SG4

Para

Diagram

Issues

No issues specified

Sound Yes

Respondent comments

n/a

Legal Yes

Respondent legal comments

n/a

Officer comments

Noted. No change.

Modification

-

AVLAAP Plan Document - Publication Draft

Submission ref

Submitter

Position

Policy

Para

Diagram

Issues

No issues specified

Sound

Respondent comments

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.

Legal

Respondent legal comments

n/a

Officer comments

Para 3.3.18 cross references to Core Strategy policies H3 on housing density and H4 on housing mix with the aim of delivering sustainable and efficient use of land and development, consistent with the aims of NPPG. The policies in the AVLAAP already include flexibility to allow for changing circumstances and issues in relation to the sites. It is unclear how this relates to a dialogue with housing developers and their agents. The SHLAA Partnership can also be used to discuss issues of relevance between the council and the housebuilding industry. It should be noted that schemes can come forward at higher densities than those quoted in the plan and other sites may be lower based on the discovery of new site specific circumstances.

Modification

•

AVLAAP Plan Document - Publication Draft

Submission ref [PDW04877_1](#)

Submitter David Monies

Position Unspecified

Policy

Para

Diagram

Issues

Greenbelt - Not supportive

Sound Unspecified

Respondent comments

n/a

Legal Unspecified

Respondent legal comments

n/a

Officer comments

General objection to Green Belt allocations. No specific issues raised in relation to site AV111. The Green Belt land incorporated within this allocation is required to help deliver the area specific housing target set out in Core Strategy Policies SP5 and SP7

Modification

-

AVLAAP Plan Document - Publication Draft

Submission ref	PDW04878_1	Submitter	Hain Daniels Group	Position	Unspecified
Policy		Para		Diagram	
Issues	General approach/methodology - Not supportive				
Sound	Unspecified				
Respondent comments	Should allocate more gypsy sites				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	<p>The Council have undertaken a district wide assessment of potential sites for Gypsies and Travellers (including Travelling Showpeople provision) in accordance with Core Strategy Policy H7. A number of potential sites within the AVL AAP area were assessed as part of this exercise but none were considered to be suitable in accordance with the methodology. No Gypsy and Traveller landowner submissions have been received within the AVL AAP area through the consultation on the Publication Draft Plan.</p> <p>All the available and deliverable brownfield land in the AVL AAP has been identified or allocated for housing or employment uses to meet or other uses to support development in the area in accordance with the strategic priorities for the area set out in Core Strategy Spatial Policy 5.</p>				
Modification					

-

AVLAAP Plan Document - Publication Draft

Submission ref [PDW04879_1](#)

Submitter Neil Womersley

Position Unspecified

Policy

Para

Diagram

Issues

General approach/methodology - Not supportive

Sound Unspecified

Respondent comments

Should allocate more gypsy sites

Legal Unspecified

Respondent legal comments

n/a

Officer comments

The Council have undertaken a district wide assessment of potential sites for Gypsies and Travellers (including Travelling Showpeople provision) in accordance with Core Strategy Policy H7. A number of potential sites within the AVL AAP area were assessed as part of this exercise but none were considered to be suitable in accordance with the methodology. No Gypsy and Traveller landowner submissions have been received within the AVL AAP area through the consultation on the Publication Draft Plan.

All the available and deliverable brownfield land in the AVL AAP has been identified or allocated for housing or employment uses to meet or other uses to support development in the area in accordance with the strategic priorities for the area set out in Core Strategy Spatial Policy 5.

Modification

•

AVLAAP Plan Document - Publication Draft

Submission ref	PDW04880_1	Submitter	Elizabeth Henderson	Position	Unspecified
Policy		Para		Diagram	
Issues	General approach/methodology - Not supportive				
Sound	Unspecified				
Respondent comments	Should allocate more gypsy sites				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	<p>The Council have undertaken a district wide assessment of potential sites for Gypsies and Travellers (including Travelling Showpeople provision) in accordance with Core Strategy Policy H7. A number of potential sites within the AVL AAP area were assessed as part of this exercise but none were considered to be suitable in accordance with the methodology. No Gypsy and Traveller landowner submissions have been received within the AVL AAP area through the consultation on the Publication Draft Plan.</p> <p>All the available and deliverable brownfield land in the AVL AAP has been identified or allocated for housing or employment uses to meet or other uses to support development in the area in accordance with the strategic priorities for the area set out in Core Strategy Spatial Policy 5.</p>				
Modification					

•

AVLAAP Plan Document - Publication Draft

Submission ref

Submitter

Position

Policy

Para

Diagram

Issues

General approach/methodology - Not supportive

Sound

Respondent comments

Should allocate more gypsy sites

Legal

Respondent legal comments

n/a

Officer comments

The Council have undertaken a district wide assessment of potential sites for Gypsies and Travellers (including Travelling Showpeople provision) in accordance with Core Strategy Policy H7. A number of potential sites within the AVL AAP area were assessed as part of this exercise but none were considered to be suitable in accordance with the methodology. No Gypsy and Traveller landowner submissions have been received within the AVL AAP area through the consultation on the Publication Draft Plan.

All the available and deliverable brownfield land in the AVL AAP has been identified or allocated for housing or employment uses to meet or other uses to support development in the area in accordance with the strategic priorities for the area set out in Core Strategy Spatial Policy 5.

Modification

•

AVLAAP Sustainability Appraisal

Submission ref [PDE00416_2](#)

Submitter The Coal Authority

Position Unspecified

Policy

Para

Diagram

Issues

Sustainability appraisal - Not supportive

Sound No

Respondent comments

The Sustainability Appraisal methodology and assessment process needs to be revised and undertaken again taking into account unstable land as a relevant consideration.

Legal Yes

Respondent legal comments

n/a

Officer comments

The sustainability appraisal framework should be amended to include an additional new sub-objective under SA objective 18 to assess sites and policies against land instability including coal mining development high risk areas and mine shafts.

Modification

1. New SA sub-objective SA18D on land stability.
2. SA of all proposed allocations and identified UDP sites being carried forward against objective SA18D. According to the following scoring system:
 - O (neutral) = Less than 5% of the site is located within a Coal Authority Development High Risk Area
 - (minor negative) = More than 5% of the site is located within a Coal Authority Development High Risk Area
 - (major negative) = One or more mine entry and/or mine entry zone of influence located within the site boundary.
3. Proposed mitigation set out where sites score negatively.

•

AVLAAP Sustainability Appraisal

Submission ref	PDE00418_44	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para		Diagram	
Issues	Sustainability appraisal - Supportive				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Noted overall support for SA. No change.				
Modification					

•

Submission ref	PDE00418_45	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Appendix 7, SA Objective 7	Diagram	
Issues	Sustainability appraisal - Not supportive				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Agreed. The proposed amendments to the publication draft plan include additional and revised site requirements to deal with this issue.				
Modification					

•

AVLAAP Sustainability Appraisal

Submission ref	PDE00418_46	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Appendix 9, SA Objective 21, Policy AVL16	Diagram	
Issues	Sustainability appraisal - Not supportive				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Noted. Proposed changes to AVL16 are addressed at that comments, however, this needs to be linked back to the SA as HE have highlighted. This policy will be reassessed against the SA objectives to take account of this proposed modification.				
Modification					

•

Submission ref	PDE00418_47	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Appendix 9, SA Objective 21, Policy SB2	Diagram	
Issues	Conservation and heritage - Not supportive				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	SB2 already scores single positive when assessed against SA objective 21. No change.				
Modification					

•

AVLAAP Sustainability Appraisal

Submission ref	PDE00418_48	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Appendix 9, SA Objective 21, Policy EB4	Diagram	
Issues	Conservation and heritage - Not supportive				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Noted. Correct the SA score for EB4.				
Modification					

•

Submission ref	PDE00418_49	Submitter	Historic England, National Planning & Conservation	Position	Unspecified
Policy		Para	Appendix 9, SA Objective 21, Policy CAV1	Diagram	
Issues	Sustainability appraisal - Not supportive				
Sound	Unspecified				
Respondent comments	n/a				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	Site AV82 is recorded as 'uncertain' against the relevant scoring criteria SA21. Noted that this uncertain effect should also be reflected in the scoring of CAV1. Changes to Policy CAV1 to mitigate the possible impacts are dealt with under the response to that representation.				
Modification					

•

AVLAAP Sustainability Appraisal

Submission ref [PDW04641_1](#)

Submitter Saffron Tree

Position Unspecified

Policy

Para Para 3.2.27

Diagram

Issues

No issues specified

Sound No

Respondent comments

n/a

Legal Don't know

Respondent legal comments

n/a

Officer comments

Doc 5 AVLAAP SA does not have para 3.2.27. Presume comment relates to AVLAAP. This paragraph relates to addressing the challenges of creating improved access to employment opportunities for local people. Agree the area requires public transport improvements and the opening of the Temple Green Park & Ride service will improve the frequency of the services running adjacent to Cross Green. This is one of several public transport improvements identified under Policy AVL12.

Modification

-

AVLAAP Sustainability Appraisal - Non Technical Summary

Submission ref [PDW04676_1](#)

Submitter Janice Frost

Position Unspecified

Policy SA15

Para Para 2.7

Diagram

Issues

No issues specified

Sound No

Respondent comments

(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.

Legal Don't know

Respondent legal comments

n/a

Officer comments

The comment appears confused by the use of the SA15 objective and the factual reality of the unreliability of public transport services serving AVL; specifically Cross Green Industrial Estate which they maintain does not have good access to reliable public transport. Presumably this also overlaps with positive scoring of proposed allocations within the Cross Green area against the transport network provision in the area. Point one is already in hand with the provision of the new park & ride at Temple Green providing a new high frequency service between the P&R and Leeds City Centre. Point 2 is enshrined within the objectives of the AAP and the range improvements identified in AVL12.

Modification

-

AVLAAP Sustainability Appraisal - Non Technical Summary

Submission ref [PDW04714_1](#)

Submitter Janice Frost

Position Unspecified

Policy SA18

Para

Diagram

Issues

No issues specified

Sound No

Respondent comments

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.

Legal Don't know

Respondent legal comments

n/a

Officer comments

The comment appears confused by the use of the SA18 objective in relation to pollution and the lack of public transport between the railway station and Aire valley. The plan seeks to address the deficiencies in public transport penetration and service provision in the area which are seen as a barrier to accessing employment opportunities. For example the council and the WYCA is already developing the new park & ride at Temple Green, thereby providing a new high frequency service between the P&R and Leeds City Centre. Improvement of public transport in the AAP area is enshrined within the objectives of the AAP and set out in policy AVL12.. The council has no control over how the M62 is used but can locate new development to the most sustainable locations and require that those locations are developed in conjunction with public transport improvements to increase their sustainable accessibility and decrease the reliance upon private vehicles.

Modification

-

AVLAAP Greenspace (Green space Assessment) Background Paper

Submission ref	PDE02250_4	Submitter	New, East and South Leeds Community Body (non-constituted)	Position	Unspecified
Policy		Para		Diagram	
Issues	Greenspace/Green infrastructure - Not supportive				
Sound	No				
Respondent comments	<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 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. 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 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>				
Legal	No				
Respondent legal comments	<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 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 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>				
Officer comments	<p>Agreed that functional green spaces are of great public value, however, the purpose of the plan in relation to identifying and protecting green space is contained in the NPPF para 73 & 74. To provide the local context these paragraphs should be read in conjunction with the Leeds Open Spaces and Recreation Assessment and Core Strategy policies G3 and G6. The 0.2Ha</p>				

AVLAAP Greenspace (Green space Assessment) Background Paper

threshold has been used to ensure the process remains efficient and can identify and assess those spaces of greatest value and where evidence exists protect those required in the AAP. The representation seeks further actions which are beyond the scope of town planning and the statutory purposes of a development plan. No change.

Modification

-

AVLAAP Flood Risk Sequential and Exceptions Test Background Paper

Submission ref	PDE02252_1	Submitter	Environment Agency	Position	Unspecified
Policy		Para		Diagram	
Issues	Flooding and drainage - Not supportive				
Sound	Unspecified				
Respondent comments	<p>Some of the exceptions test tables (such as AV15 and AV16) include the following: '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>				
Legal	Unspecified				
Respondent legal comments	n/a				
Officer comments	<p>[Sites AV15 & AV16] On checking, this bullet only appears in the comprehensive district wide flood risk assessment & sequential test. Agreed the statement is incorrect and should be deleted.</p> <p>[Sequential test] Whilst the City Centre HMCA target has been met, the AVLAAP target (Core Strategy SP5) had not and both sequential tests need to be viewed together. The sequential test acknowledges that there are a number of sites in the city centre within zone 3Aii at a higher risk of flooding. The evidence paper highlights that these sites are all brownfield within a defined regeneration area, in sustainable locations, close to the city centre. Given all sites satisfy the criteria, there is no rationale to distinguish between the sites. Each site was then subjected to the Exception Test and passed. The reasons that residential uses cannot be delivered on alternative sites in lower flood risk zones are provided within the evidence.</p>				
Modification	Amend exception test bullet point referring to the sites AV15 and AV16 in the district wide flood risk assessment & sequential test.				

-

AVLAAP Flood Risk Sequential and Exceptions Test Background Paper

Submission ref [PDE02252_3](#)

Submitter Environment Agency

Position Unspecified

Policy

Para

Diagram

Issues

Factual correction required - Neutral
Flooding and drainage - Neutral

Sound Unspecified

Respondent comments

n/a

Legal Unspecified

Respondent legal comments

n/a

Officer comments

The Council can confirm that the EA base map data for 2014 & 2015 did not change so the reference to 2014 data can be amended to 2015 data and remain an accurate reflection of the data used to carry out the tests.

Accept the modelling data is still in draft and is being checked again prior to adoption. The exception tests do not rely on the modelling, the reference was purely for information. Reference to the latest modelling to be removed from all Exception Tests

Modification

1. Amend base date reference in AVLAAP Flood Risk Background Paper
2. Remove reference to latest unpublished modelling from the Exception Test mitigation requirements.

•

AVLAAP Infrastructure Delivery Plan Background Paper

Submission ref [PDE00840_2](#)

Submitter Highways England

Position Unspecified

Policy

Para

Diagram

Issues

Highways and transport - Not supportive

Sound Unspecified

Respondent comments

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.

Legal Unspecified

Respondent legal comments

n/a

Officer comments

It is recognised that these matters will need to be addressed through the planning application process. All schemes are identified in an up-to-date Infrastructure Delivery Plan and where relevant are identified in Policy AVL12 of the AAP and in individual site requirements.

Modification

-

AVLAAP Infrastructure Delivery Plan Background Paper

Submission ref

Submitter

Position

Policy

Para

Diagram

Issues

Highways and transport - Not supportive

Sound

Respondent comments

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.

Legal

Respondent legal comments

n/a

Officer comments

Agree with suggested change. IDP to be updated accordingly, but a more detailed discussion to be held with HE to understand the requirement triggers for some of the improvements and assumptions contained within the modelling.

Modification

IDP to update to reflect current scheme in the RIS and need for additional capacity by recent modelling undertaken by Highways England. A schedule has been provided by Highway England.

-

Employment Background Paper

Submission ref [PDW04573_1](#)

Submitter Saffron Tree

Position Unspecified

Policy

Para Para 5.7

Diagram

Issues

No issues specified

Sound No

Respondent comments

n/a

Legal Don't know

Respondent legal comments

n/a

Officer comments

Agree the area requires public transport improvements and the opening of the Temple Green Park & Ride service will improve the frequency of the services running adjacent to Cross Green. This is one of several public transport improvements identified under policy AVL12.

Modification

•