

### SUMMARY OF CONSULTATIONS

- Prior to the formal consultation commencing in March, informal consultation was undertaken with key stakeholders. These were primarily stakeholders with landholdings, or interests in landholdings that are not yet developed or subject to a recent planning application. The draft was issued to Burberry, Commercial Estates Group (CEG), representatives of the owners of Midland Mills, the Holbeck Neighbourhood Forum, Network Rail, and the Highways Authority. Representations from these key stakeholders were considered and where appropriate incorporated into the draft SPD before going out to formal consultation.
- Formal Consultation took place over six weeks during March to April 2016 . The promotion of the exercise was undertaken via statutory notice in the newspaper, press release, the Council’s website, Social Media, Talking Point, direct e-mail invitation to Ward Members and the MP for Leeds Central, direct e-mail/letter invitation to over 300 individuals or groups who have an interest in HUV or responded to consultations on the Core Strategy; and over 550 direct letter invitations to residents living in the Holbeck, South Bank SPD boundary.
- On request, officers met with interested parties to discuss the draft SPD and to clarify any matters relating to the document. This included CEG and representatives from the Holbeck Neighbourhood Forum Board. Both parties subsequently submitted a formal representation.
- The formal consultation exercise included four drop-in sessions at the Round Foundry Media Centre, located in the heart of Holbeck Urban Village. The drop-in’s were spread over the six week consultation period on varying days and times to encourage attendance from different stakeholder groups:
  - Wednesday 23<sup>rd</sup> March 2016 – 9 am to 1 pm;
  - Monday 4<sup>th</sup> April 2016 – 12 pm to 4 pm;
  - Thursday 21<sup>st</sup> April – 9 am to 1 pm;
  - Tuesday 26<sup>th</sup> April – 5.30 pm to 7.30 pm.
- Throughout the consultation period, the draft SPD was also available for inspection at the following locations:
  - Development Enquiry Centre, Leonardo Building, 2 Rossington Street, Leeds;
  - Leeds Central Library, Calverley Street, Leeds;
  - Dewsbury Road One Stop Centre, 190 Dewsbury Road, Leeds;
  - St Matthews Community Centre, St Matthews Street, Holbeck, Leeds;
  - Round Foundry Media Centre, Foundry Street, Leeds.

### CONSULTATION RESPONSE

- 36 written representations were received from a broad range of stakeholders including landowners, developers, statutory bodies, planning consultants and individuals such as local business owners and residents. These were considered by a multi-disciplinary, cross-service team within the council, which included Planning Services, Planning Policy, Design & Conservation, Economic Development, and Asset Management & Regeneration.
- The representations, and resultant changes that have been made to the draft SPD document, are organised under common themes in the table below.

No.	Stage	Consultee	Comment	LCC Comment and SPD Response
<b>AREA NAME – HOLBECK URBAN VILLAGE</b>				
1	Formal via e-mail and letter	CEG	The Council has proposed to rename the revised guidance ‘Holbeck Urban Village, South Bank SPD’, presumably to reflect the location of Holbeck within the southern half of Leeds City Centre, and the significant contribution that this area will make to wider regeneration of the South Bank. Indeed, the main title page of the SPD refers to ‘Holbeck, South Bank’.  ‘Holbeck, South Bank Leeds’ is considered to provide a more appropriate	<u>LCC Comment:</u> Comment noted. Primarily, this is not specifically a Planning matter and does not impact on the Planning Policy. However,

		<p>title for the revised SPD, recognising the crucial role that this area will play in regeneration of South Bank Leeds, as the area is increasingly termed. The term ‘urban village’ does not give weight to the Council’s aspiration to create a diverse, vibrant and high quality, sustainable mixed use community with a distinctive sense of place, which is effectively covered by the wider SPD guidance.</p> <p>The term ‘Holbeck Urban Village’ does retain some relevance in the area around the Round Foundry, which reflects the early regeneration success of the area in providing a new mixed use community at a predominantly domestic scale focused upon creative and digital industries, and in the revised Character Areas (Appendix 2), we suggest that the name is retained for this area. However, the term ‘urban village’ does not legitimately apply to the extended SPD area which comprises a number of distinct character areas; forms a strategic designation and a key connector to areas within the City Centre and prominent gateway for approaches by rail and road; and is an important part of the regeneration agenda for the wider South Bank Leeds.</p> <p>A review of the adopted Leeds Core Strategy with which the SPD is required to conform identifies only limited references to ‘Holbeck Urban Village’. The term appears in Spatial Policy 3, which identifies Holbeck Urban Village as a main focus for office development alongside the West End and South Bank. It is not considered that renaming the SPD would have any effect on the application of this policy, with this area defined as ‘Leeds City Centre – Southern Area’ on the Core Strategy Key Diagram in any event. All other references to Holbeck Urban Village are confined to the supporting text. There is no reference to the ‘Holbeck Urban Village SPG’ anywhere within the document.</p> <p>Whilst saved Policy CC31 of the Leeds Replacement Unitary Development Plan (RUDP) allocates part of the SPD area as a Strategic Housing and Mixed Use site, this policy will be replaced by the emerging Site Allocations Plan which is currently at Publication Draft stage.</p> <p>There are therefore no planning policy barriers to renaming the document as the ‘Holbeck, South Bank Leeds SPD’ as a more fitting title to reflect the aims and objectives of the updated guidance</p>	<p>changing the name of this document allows flexibility for the branding of the place moving forward whilst retaining the ‘Holbeck’ identity.</p> <p><u>SPD Response:</u> It is proposed that the SPD be renamed to ‘Holbeck, South Bank SPD’.</p>
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**SPD BOUNDARY**

2	Formal via e-mail and letter	Taylor Wimpey UK	<p>Relating to a site in Taylor Wimpey UK ownership on the north western fringe of the HUV SPD boundary.</p> <p><b>a) Executive Summary</b> Our representations, set out below, conclude that: 1. The Site’s inclusion within the HUV is anomalous given it is physically separated from this area. 2. It performs no planning role to be included within the HUV. 3. It is not appropriate or necessary for the Site to be included within the HUV boundary.</p> <p>We are therefore seeking its removal from the HUV to ensure that the SPD is based on the most appropriate planning strategy for future development.</p> <p><b>b) Site Description &amp; Background</b></p> <p>The Site comprises two components that together comprise the Green Bank Site. This lies to the west of Leeds City Centre. The smaller, eastern component lies within the north-west periphery of the HUV boundary. It is triangular in shape being bound by Globe Road to its south-west, the railway viaduct to its south-east and the Leeds and Liverpool Canal to its north.</p> <p>The larger, western component is sited on the opposite side of Globe Road to the west. This larger component falls outside of the HUV boundary.</p> <p>Collectively, the Green Bank Site is identified within Leeds City Council’s (“the Council”) emerging Site Allocations Plan (SAP) as mixed-use site reference MX1-12. Drawing upon several extant consents that have recently expired, the SAP notes that the Site has an indicative development capacity in the region of 609 residential units and 3,220sqm of ‘office’ floorspace.</p> <p>This is to be delivered across both components of the Green Bank Site. The</p>	<p><u>LCC Comment:</u> It is not considered that the site’s inclusion in the SPD impacts on the deliverability of this site, which has been included in the boundary for over ten years and has not hindered the site previously securing planning permission.</p> <p><u>SPD Response:</u> It is proposed that the SPD boundary in this location remains the same.</p>
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site area subject of these representations is therefore intrinsically linked to the wider delivery of this area. **Figure 1** below identifies the location of both components that collectively form the Green Bank Site:



Quod have previously made representations to the emerging SAP in November 2015, supporting the inclusion of the Site as an 'identified' site and to ensure that the correct site boundary was included in the SAP. This followed a meeting with Officers whereby it was agreed that both component areas were part of the Green Bank Site and that the site boundary should be reflected so.

### **c) Representations**

These representations demonstrate there are no sound planning reasons for including the Site in the HUV, and it should be excluded from the HUV Boundary for the following reasons:

1. The Site is part of a wider development site (the Green Bank Site) and is essential for its delivery as a comprehensive, mixed-use development. The vast majority of the Green Bank Site falls outside of the HUV Boundary and functions independently of this;
2. The existing railway viaduct, separating the Site from Holbeck is a fundamental physical barrier that demarcates two functionally independent areas; and
3. The SPD suggests that a footpath crossing is created across the Liverpool and Leeds Canal from the Site. It is neither necessary as part of the HUV objectives to create such a crossing in this area, nor would it be suitable in this peripheral location. Any crossing would be better located more centrally within the HUV to meet with the SPD's aim to improve north-south connections. Indeed, Officers have confirmed that such a crossing is not required for the HUV and that the Green Bank site is suitably accessible otherwise.

Each of the matters above is discussed in turn, below.

#### **Matter 1**

The Site forms part of the Green Bank Site, the majority of which is situated to the west of the Site beyond Globe Road. The Green Bank Site does not form part of the HUV, and forms part of the 'west end' of Leeds City Centre. The Site lies within the *Inner* Housing Market Characteristic Area (HMCA) identified within the SAP and has a functional relationship with this area. The HUV lies within the *City Centre* HMCA. The Site is therefore not part of the HUV and will complement it.

There have been three recent planning permissions for the major redevelopment of the Green Bank Site, each of which included both the eastern and western parts of the Site as an important part of the overall scheme:

- Planning permission reference 20/499/04/FU and extension of time approval reference 10/01670/EXT for 833 residential units and 3,220sqm of complementary commercial floorspace, to be delivered across the entirety of the Green Bank Site;
- Planning permission reference 07/00018/FU and extension of time approval reference 10/01666/EXT for a revised Plot A of the above scheme, taking the total number of residential units to 887; and
- Planning permission reference 12/03459/FU for 609 residential units and

1,065sqm of complementary commercial floorspace.

None of the consents have been implemented due to economic conditions, although the site will be brought forward for a major residential led scheme in the future when market conditions change.

The site area within the HUV boundary is intrinsically linked to the wider Green Bank Site and will assist in its delivery for a comprehensive, mixed-use scheme. It should therefore be read in this context, rather than as a peripheral location of the HUV that contributes little to the role or function of this area.

The inclusion of the Site within the HUV boundary is therefore unnecessary, does not fit within the overall framework set out by the HUV SPD and could place a constraint on the potential future development of the Green Bank Site.

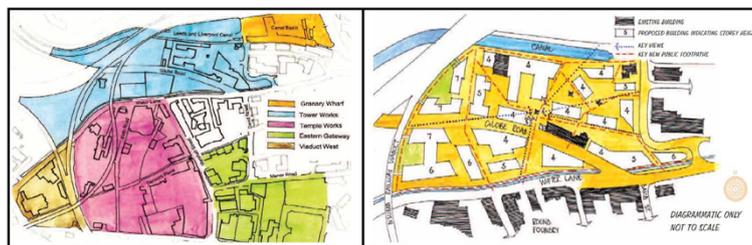
**Matter 2**

The Site is physically separated from the HUV by the existing railway viaduct. It is on the fringe of the HUV boundary and does not function as an intrinsic or rational part of the HUV itself. Indeed, the railway viaduct creates a significant separation between the HUV and the surrounding area that defines its maximum extent.

As discussed above, the Site is a key part of enabling development of the Green Bank Site, rather than the HUV. Its inclusion within the HUV boundary creates an unnecessary division between the two components that collectively form the Green Bank Site.

The existing HUV Revised Planning Framework (February 2006) includes the Site within its boundary. This Framework identifies five areas that make up the HUV, with the Site falling within the 'Tower Works' area. However, the detailed plan for the Tower Works area extends no further westwards than the existing railway viaduct (**Figure 2** below).

The Site continues to fall within the Tower Works area within the Consultation Draft.



Evidently the Site is not seen as a critical component to the role and function of the Tower Works area, or the HUV.

Pedestrian accessibility through the HUV, including to Leeds City Centre, will be eastwards from the viaduct via the existing (and proposed) connections. There are no evident benefits to pedestrians through creating a new crossing on the Site for those travelling from Holbeck. Those pedestrians linking between Holbeck and the Whitehall area have excellent access along Globe Road, through the Green Banks Site. Moreso, this environment will be improved once the Green Banks development takes place.

The eastern site component functions as part of the Green Bank Site and is functionally connected to the surrounding area via Whitehall Road to the north.

**Matter 3**

The SPD Consultation Draft suggests the eastern part of the Site should be reserved for a landing point for a proposed footbridge connecting the HUV with the Whitehall Riverside area to the north (P17). This is a continuation from the current HUV Framework (February 2006). In this context, each of the three planning permissions discussed above were accompanied by a Section 106 requirement to provide a footbridge contribution and the provision of land within the Site.

			<p>The Council have subsequently confirmed (at a meeting between CBRE and Leeds City Council on 20 March 2015) that Officers do not see the bridge as a necessary in this location, given the Green Bank Site is already accessible. The Green Bank Site already benefits from good connections to the Whitehall Riverside area via Globe Road and Whitehall Road. The latter also provides excellent connections between both sides of the Leeds and Liverpool Canal within a short walking distance.</p> <p>The Site is a peripheral location within the HUV. A footbridge would be physically separated from the HUV core and would not provide the most accessible north-south routes that the SPD requires. If a footbridge is deemed appropriate and necessary to link Holbeck with the Whitehall Riverside area, it would clearly be better suited and more commodious to create a route in to a more central location within the Tower Works area.</p> <p><b>c) Conclusions</b></p> <p>These representations are submitted on behalf of Taylor Wimpey UK in regards to Leeds City Council's Holbeck Urban Village (HUV) Supplementary Planning Document (SPD) Consultation Draft. They relate to land forming the eastern part of the 'Green Bank Site', situated within the north-west of the Holbeck Urban Village (HUV) boundary.</p> <p>As our representations have set out above, the Site does not fit within the overall framework for the HUV and is physically separated from this area. It is not appropriate to be included in the HUV boundary, nor does it serve any sound planning purpose for the following reasons:</p> <ol style="list-style-type: none"> <li>1. The Site functions as part of the wider Green Bank Site, rather than the HUV. The majority of the Green Bank Site falls outside of the HUV boundary, and the Site is essential to deliver its comprehensive, mixed-use development in the future;</li> <li>2. The Site is physically separated from the HUV by the existing viaduct;</li> <li>3. The SPD suggests the Site should accommodate a footpath crossing over the Liverpool and Leeds Canal. This would be unsuitable in this peripheral location, and would be better located more centrally within the HUV. Indeed, Officers have indicated that this is no longer required at the Site;</li> <li>4. There is a strong pedestrian link between the Whitehall area and Holbeck along Globe Road which provides an excellent access between the 2 areas, and there is no need for the pedestrian crossing.</li> </ol> <p>The removal of the Site from the HUV boundary would ensure that the SPD is based on the most appropriate strategy for future development. Its removal would not impact upon the vision or strategic objectives for the HUV area.</p> <p>We therefore suggest that the boundary is redefined in the north-west area to adopt the railway viaduct as its maximum extent.</p>	
<b>VISION &amp; OBJECTIVES</b>				
3	Formal via e-mail and letter	Burberry	<p>Page 3 – Section 1 Vision &amp; Objectives. We support the overall vision for the future of the area as outlined in Paragraph 1.5. We support the strategic objectives set out in Paragraph 1.6. In particular, we welcome the acknowledgement that there is a unique opportunity to secure the future of Temple Works. Burberry is and has undertaken extensive investigations into the condition and opportunities for the future of Temple Works which is ongoing. However, it is important to recognise that there will need to be a balance between the enabling development, introduction of viable uses and restoring the Temple Works and a conclusion has yet been reached. As such public access will need to be considered carefully depending on the nature of the uses introduced to the building. The objective to add employment opportunities for the existing and new residents is supported.</p>	<p><u>LCC Comment:</u> Comment noted. This is a site specific matter of detail which will be dealt with on a case by case basis through the planning process. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
4	Formal via e-mail and letter	CEG	<ol style="list-style-type: none"> <li>1 The need to broaden out the updated context for Holbeck South Bank Leeds to more appropriately reflect the change that has happened, as well as the scale of opportunity provided by its regeneration and the ambition afforded such locations in national investment and planning policy terms;</li> <li>2 Suggested changes to the SPD's vision and strategic objectives to ensure these are focused on the flexible delivery of lasting change;</li> </ol>	<p><u>LCC Comment:</u> Comment noted. The context for Holbeck, South Bank has been broadened and the Vision and Strategic Objectives sections amended and added to. <u>SPD Response:</u> Changes proposed in section (1) Introduction of the SPD in line with</p>

				the aforementioned comments.
5	Formal via Talking Point	R. Unsworth ID 6249131	Page 3/4 – Section 1 Vision & Objectives. A comprehensive approach to the development of a large area of Holbeck provides the best opportunity to safeguard heritage and deliver new jobs. YES. Welcome extension of area but a comprehensive approach to the WHOLE SOUTH BANK AREA would in addition provide the best opportunity to create a sustainable neighbourhood for the long term! Welcome the undertaking to use CPO if necessary.	<u>LCC Comment:</u> Comment noted. There is a wider South Bank Masterplan which will be consulted on shortly. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.
6	Formal via Talking Point	T. Reid ID 6249184	Page 2 – Section 1 Vision & Objectives. There is an appreciation for the interconnectedness of things within the SPD. This issue was discussed briefly at a recent seminar held at the Tetley Brewery venue. However, there was an obvious lack of an over-arching plan which would connect the disparate areas together, creating a comprehensive, coherent strategy for the area. While masterplans can be restrictive, and can also become quickly obsolete as development is planned and executed, the risks associated with continuing without a South Bank masterplan are numerous and the city runs the risk of missing both (i) an important investment opportunity and (ii) the connections which have proven to make really successful, vibrant urban communities. The HUV project needs to incorporate broader initiatives to be truly integrated. These include the HS2 rail link, Bath Road railway viaduct, daylighting the Hol Beck, creating a human-scale road network parallel with the river Aire, flood alleviation measures including the afforestation of Yorkshire Dales, an urban park strategy, etc.	<u>LCC Comment:</u> Comment noted. There is a wider South Bank Masterplan which will be consulted on shortly. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.
7	Formal via e-mail	West Yorkshire Combined Authority	Thank you for consulting with the West Yorkshire Combined Authority (WYCA) and the Leeds City Region Enterprise Partnership (LEP) on the Holbeck Urban Village (HUV), South Back Supplementary Planning Document (SPD). The Combined Authority and the LEP have a shared vision for economic growth throughout the Leeds City Region and work closely together to deliver our shared Strategic Economic Plan (SEP). In principal we welcome the draft HUV SPD which will support a range of our aspirations for the City Region and delivery of the SEP.	<u>LCC Comment:</u> Comment noted. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.
<b>NATIONAL PLANNING POLICY</b>				
8	Formal via e-mail	Royal Mail	The substantial increase in dwelling numbers proposed within the area may increase the demand for postal services to a degree which may not be accommodated by the existing Royal Mail facilities, thereby potentially requiring expansion or relocation of its premises to serve the additional dwellings. This should be accounted for in future decision making.  This approach accords with adopted Government guidance set out in the National Planning Policy Framework (NPPF) (March 2012) which advises that local planning authorities should help achieve economic growth by planning proactively to meet the development needs of business and support an economy fit for the 21st century. The NPPF also advises that local planning authorities should support existing business sectors, taking account of whether they are expanding or contracting. It also states that policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances (Paragraphs 20-21). In relation to sustainable transport, the NPPF advises that all developments which generate significant amounts of movement will need to take account of whether safe and suitable access to the site can be achieved for all people (paragraph 32), and that developments should be located and designed where practical to create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians (paragraph 35).	<u>LCC Comment:</u> The scale of growth – including dwelling numbers – is already agreed in Leeds’ Core Strategy, with 10,200 dwellings expected in Leeds City Centre 2012 – 2028. Planning infrastructure for this growth was a matter for the Core Strategy, and the Infrastructure Delivery Plan was agreed alongside the Core Strategy. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.
<b>LOCAL PLANNING POLICY</b>				
9	Formal via e-mail and letter	CEG	Removal of references to saved RUDP policy, which are out of date and will soon be replaced by adoption of the Leeds Site Allocations Plan.	<u>LCC Comment:</u> The only saved UDP that has been superseded is SA8 under Section (4) Urban Design of the SPD. All the other UDP policy references relate to saved policies which are part of the statutory development plan, so will stay in. <u>SPD Response:</u>

				Reference to saved RUDP Policy SA8 will be deleted from the SPD.
10	Formal via e-mail	Highways England	<p>Information in the Planning section of the City Council's web site indicates that it is anticipated that the SPD will be adopted in summer 2016.</p> <p>Given the scale of housing and office development proposed in the area and the need for further consultation before submission on both the Leeds Site Allocations DPD and the Aire Valley Area Action Plan before submission, summer 2016 adoption seems premature. In particular, it is understood that there may be changes to some proposals for new site allocations.</p> <p>There are some substantial housing and mixed use sites in the HUV SPD area that are classified as identified in the recent Sites DPD Publication Draft. The sites in question are as follows:</p> <ul style="list-style-type: none"> <li>• HG1-463 and HG1 464 Manor Road: 801 homes.</li> <li>• MX1-13 Globe Road / Water Lane: 263 homes, 18,720 sqm offices.</li> <li>• MX1-14 Globe Road – Tower Works: 134 homes.</li> <li>• MX1-17 Bath Road: 240 homes.</li> <li>• MX1-18 and MX1-19 Sweet Street West: 970 homes, 14,397 sqm offices.</li> <li>• MX1-20 Jack Lane / Sweet Street: 296 homes, 95,570 sqm offices.</li> <li>• EO1-34 Warehouse Sweet Street: 13,515 sqm offices.</li> </ul> <p>There are some substantial housing and mixed use sites in the HUV SPD area that are classified as new allocations in the recent Sites DPD Publication Draft. The sites in question are as follows:</p> <ul style="list-style-type: none"> <li>• HG2-194 and HG2-195 Silver Street: 265 homes.</li> <li>• HG2 196 and HG2-197 Bath Road West and East: 328 homes.</li> <li>• MX2-30 Water Lane Railway Triangle: 171 homes, 5,000 sqm offices.</li> <li>• MX2-31 Marshall Street 1953 building: 187 homes, 1,073 sqm offices.</li> <li>• MX2-32 Water Lane – Westbank: 288 homes, 20,790 sqm offices.</li> </ul> <p>In the Highways England response to the Leeds Site Allocations Publication Draft consultation, the following sites were identified as having individual major adverse impacts based on the numbers of trips generated on links on the motorway network:</p> <ul style="list-style-type: none"> <li>• MX1-13 Globe Road / Water Lane (identified site)</li> <li>• MX1-19 Sweet Street West (identified site)</li> <li>• MX1-20 Jack Lane / Sweet Street (identified site)</li> <li>• EO1-34 Warehouse Sweet Street (identified site)</li> <li>• MX2-32 Water Lane – Westbank (proposed new allocation)</li> </ul> <p>In addition, Site HG1-464 Manor Road (identified site) was identified as having a lesser but material impact on the operation of the motorway network in and around Leeds city centre.</p> <p>When the traffic impacts of all of the identified and proposed sites in the Holbeck Urban Village (HUV) are added together, the result is a considerable increase in the volume of traffic that already congested sections of the M621 and M1 motorways will need to handle.</p> <p>The Government's Road Investment Strategy (RIS) improvement scheme for the M621 motorway to be started in the current roads period (2015/16-2019/20) may provide some of the capacity needed to cater for growth in travel demand to and from the HUV along with proposed changes to the city centre road infrastructure being promoted as part of the West Yorkshire Plus Transport Fund (WY+TF).</p> <p>In the Highways England response to the Leeds Site Allocations Publication</p>	<p>Reference to saved RUDP Policy SA8 will be deleted from the SPD.</p> <p><u>LCC Comment:</u> The SPD has a role to provide guidance to new development coming forward in the SPD area, it is beyond the scope of the SPD to allocate sites. Therefore it is not considered premature to adopt this SPD in Summer 2016.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment:</u> It is beyond the scope of the SPD to allocate sites. The SPD has a role to provide guidance on the softer aspects of transportation having regard to local character, master-planning of sites and interrelationship with buildings.</p> <p>Issues of overall development growth, individual site capacities and phasing will be more appropriately considered through the Site Allocations Plans rather than the Holbeck, South Bank SPD. Traffic impact will be considered on a site by site basis as planning applications come forward.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>

			<p>Draft consultation, it was suggested that development of the six sites identified above be phased to take place following completion of the Government's committed Road Investment Strategy (RIS) improvement schemes for the M621 and M1 motorways. Following further discussions with the City Council it is however acknowledged that some of these sites already have planning consent and therefore imposing a phased start may not be practical.</p> <p>Highways England and the City Council are working closely to understand the impact of development proposals in the City Centre. Discussions with the City Council on the Highways England response to the Leeds Site Allocations Publication Draft consultation is continuing and the outputs of the City Councils traffic modelling will be shared with Highways England once available.</p> <p>The scope of the RIS and WY+TF schemes are currently being considered with forecast growth for the City Centre being one of the key considerations.</p>	
11	Formal via e-mail	West Yorkshire Combined Authority	<p><b>Spatial Priority Areas</b></p> <p>The South Bank, Leeds is identified as a Spatial Priority Area (SPA) within the Strategic Economic Plan (SEP). It was previously included in the SEP as part of one growth centre, Leeds City Centre. City and town centres have been identified a key hubs with significant potential for growth in Jobs, businesses and housing and the potential to make a significant contribution to the economic growth of the LCR.</p> <p>The South Bank has now been included as a distinct SPA from the City Centre, this is recognising that the area offers a significant mixed use growth opportunity which will enhance the city centre and offer the potential for 35,000 new jobs, 4,000 new homes and associated public realm improvements. Delivery of this quantum of new development will make a significant contribution to the SEP's aspirations to attract inward investment in the City Region, create new and better paid jobs and accelerate housing growth.</p> <p>We note that the draft Holbeck Urban Village (HUV) SPD updates the existing strategy for the area which has been in place since 1999. This recognises improving market conditions, evolving governance arrangements and the positive developments that have taken place within and near the area. This includes Granary Wharf, Leeds Station Southern Entrance, Tower Works and Marshall's Mill. The updated planning strategy for the area also reflects the existing policy framework for the City Region, and better reflects the aspirations of the SEP.</p>	<p><u>LCC Comment:</u> Comment noted.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
12	Formal via e-mail and letter	Environment Agency	<p><b>Part 1</b></p> <p>The SPD will need to be in conformity with the Core Strategy and also have regard to the Site Allocations Publication Draft and associated evidence base documents.</p>	<p><u>LCC Comment:</u> Comment noted. The SPD conforms and has regard to these documents.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
<b>LAND USES - HOUSING</b>				
13	Formal via e-mail and letter	CEG	<p>Providing further clarity and flexibility regarding uses appropriate to this strategic location in the creation of a vibrant and sustainable community;</p>	<p><u>LCC Comment:</u> Comment noted. Further clarity and flexibility regarding uses appropriate to this strategic location has been provided in the SPD.</p> <p><u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.</p>
14	Formal via Talking Point	G. Payne ID 6244566	<p>It's great to see the regeneration of Holbeck in the South of the city but within the area development can some purpose built affordable student accommodation be allowed for, this would bring added money into the area, give it more footfall and make it more vibrant in the bars and restaurants and it would be close to the city night life It would also help to balance out the concentration of student and numbers in the North of the</p>	<p><u>LCC Comment:</u> Student accommodation is already provided for in the wider South Bank area. Future applications submitted</p>

			city, Headingly etc.	for additional student accommodation in the area will be dealt with through the planning process. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.
15	Formal via e-mail	Holbeck Neighbourhood Forum Board	The document confirms that the aim is “to develop a balanced and stable residential community” and this should include provision for families (an essential ingredient of such a community) along with the facilities that go with it – places to play, for example – but there seems to be no encouragement of this. Such provision would help to break down barriers between the Urban Village and Holbeck itself as it would encourage shared use of facilities such as the school and the Holbeck Moor play area.	<u>LCC Comment:</u> Comment noted. Family housing to be referenced under section (3) Housing in the SPD. <u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.
16	Formal via e-mail	Landowner at 16-18 Manor Rd	Page 6 – Section 3.1 Affordable Housing. The delivery of Affordable Housing within HUV should be done in conjunction with affordable housing providers as they clearly have an input in terms of the tenure, mix and deliverability.	<u>LCC Comment:</u> Comment noted. It is normal practice for City Council negotiations regarding provision of affordable housing to involve Registered Providers as appropriate. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.
17	Formal via e-mail and letter	ID Planning	Page 6 – Section 3 Housing. The housing section starts by confirming the need to meet the housing needs of some of the people on lower incomes who cannot currently afford city centre living. This approach is supported but it is considered this section should make it clear that the housing mix sought by Core Strategy policy H4 can be flexibly applied in HUV. Page 6 – Section 3.1 Affordable Housing. Whereas the principle of suitable noise attenuation is supported, it is unclear why this comment has been included in the section that relates to affordable housing. This section should also include reference to working with affordable housing providers as they clearly have an input in terms of tenure, mix and whether the units can even be delivered on site. Section 3.1 should also include a commitment to flexible deliver affordable housing. Flexibility to the approach to affordable housing could include the ability to provide housing on-site, off-site or via a contribution to ensure the viability of such schemes, particularly enabling development that restores heritage assets, can be delivered without being encumbered with unviable affordable housing requirements.	<u>LCC Comment:</u> Core Strategy Policy H4 is not prescriptive. It specifically notes that regard should be taken of the nature of the development and the character of the area. With regard to the inclusion of references to noise attenuation in the section on affordable housing, this text will be re-structured. Core Strategy Policy H5 governs affordable housing requirements and already has some flexibility. The effect of viability and issues such as restoration of heritage assets on affordable housing can be considered through planning applications. <u>SPD Response:</u> Restructuring changes proposed under section (3) Housing in the SPD in line with the aforementioned comments.
18	Formal via Talking Point	P. Considine ID 6249118	Page 6, 3.1 - the construction of more family housing should be encouraged to ensure that the area is a sustainable and diverse residential area.	<u>LCC Comment:</u> Comment noted. Family housing to be referenced under

				section (3) Housing in the SPD. <u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.
19	Formal via e-mail	West Yorkshire Combined Authority	<p><b>Housing, Businesses and Skills</b></p> <p>We support section 3 (Housing) and 3.1 (Affordable Housing) which highlight that a range of residential types, including affordable housing, should be delivered as part of a vision for a mixed and stable residential community. This is consistent with SEP aspirations to deliver housing growth and affordable housing across the City Region.</p> <p>The SPD support delivery of existing sites allocated by the Leeds Core Strategy or saved Unitary Development Plan (UDP) policies. The development of these employment locations will enable private sector growth and encourage private sector investment which is consistent with the SEP.</p> <p>We support the measures to improve connectivity between residential communities and adjacent businesses, including provision to improve sustainable transport infrastructure. These measures will support SEP objectives relating to job creation and skills training by supporting people into work.</p>	<p><u>LCC Comment:</u> Comment noted.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
<b>LAND USES – RETAIL &amp; LEISURE</b>				
20	Formal via e-mail	Landowner at 16-18 Manor Rd	<p>Page 5 – Section 2.1, Mixed Uses. The aspiration to see ‘active frontage’ at Ground Floor to public footpaths and spaces is understood and supported. For smaller development sites, however, the requirement to introduce active Uses at Ground Floor can be extremely difficult to deliver in practice. The limited extent of the frontage to small sites, combined with a potential need to provide access to a number of different uses (incorporating ramps and stairs to lift entrances above the Flood Levels) will lead to cluttered frontages, and commercial spaces that are too small to be sustainable. We would suggest that the requirement to provide active (commercial) Uses be reduced for smaller sites, whilst maintaining the over-riding requirement to provide active frontages. For residential buildings the ‘active uses’ at Ground Floor could be a large attractive entrance space, a resident’s lounge area, a resident’s workspace, a gym space.</p>	<p><u>LCC Comment</u> The matters of practical delivery of activity to ground floor frontages on specific sites are picked up on a case by case basis through the planning application process. It is recognised that not all ground floor elevations will be able to have commercial uses. However the aspiration is sound and should be retained and an active frontage can often be provided at .5 storey heights or first floor using various devices. Active frontages do not always need to be ground floor windows and could be obtained through neighbouring buildings providing overlooking. Residential active frontages should also provide enough ‘defensible space’ to allow a safe distance between rooms and streets. The reference to ‘communal residential spaces’ is noted and will added under section (2.1) Mixed Uses of the SPD.</p> <p><u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.</p>
21	Formal via e-mail and letter	ID Planning	<p>Page 5 – Section 2.1, Mixed Uses. The aspiration to see ‘active frontages’ at ground floor to public footpaths and spaces is understood and supported. For smaller development sites, however, the requirement to introduce</p>	<p><u>LCC Comment</u> The matters of practical delivery of activity to</p>

			<p>active uses at ground floor can be extremely difficult to deliver in practice. The limited extent of the frontage to small sites, combined with a potential need to provide access to a number of different uses (incorporating ramps and stairs to lift entrances above the flood levels) will lead to cluttered frontages, and commercial spaces that are too small to be sustainable. We would suggest that the requirement to provide active (commercial) Uses be reduced for smaller sites, whilst maintaining the over-riding requirement to provide active frontages. For residential buildings the ‘active uses’ at Ground Floor could be a large attractive entrance space, a resident’s lounge area, a resident’s workspace, a gym space.</p> <p>Active frontages to all public footpaths and spaces also impact on the statement in 3.1 that requires high levels of sound attenuation to such commercial uses and public spaces.</p>	<p>ground floor frontages on specific sites are picked up on a case by case basis through the planning application process. It is recognised that not all ground floor elevations will be able to have commercial uses. However the aspiration is sound and should be retained and an active frontage can often be provided at .5 storey heights or first floor using various devices. Active frontages do not always need to be ground floor windows and could be obtained through neighbouring buildings providing overlooking. Residential active frontages should also provide enough ‘defensible space’ to allow a safe distance between rooms and streets. The reference to ‘communal residential spaces’ is noted and will added under section (2.1) Mixed Uses of the SPD.</p> <p><u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.</p>
22	Formal via e-mail and letter	Burberry	<p>Page 4/5 – Section 2 Land Use. The ambition for a mixed-use area with a focus on employment uses provided that they function in a mixed use environment and are designed to be compatible with residential is welcomed. We consider this to be consistent with the uses that historically exist within the area. We support the approach detailed in Paragraph 2.2, which considers existing and new manufacturing uses to be acceptable provided that the above criteria is achieved. Although, we would urge for reference to be incorporated to associated development with manufacturing including offices to be it be considered acceptable within this section. We welcome the recognition that LCC can:</p> <p><i>“...consider use of its powers to acquire property compulsorily to progress comprehensive development in the interest of the proper planning of the area to preserve and enhance the conservation area and he setting of the listed buildings.”</i></p>	<p><u>LCC Comment:</u> Comment noted. Reference within the SPD is made regarding ‘commercial and manufacturing uses being appropriate’ along with ‘employment uses are acceptable in the area providing they can operate in a manner that is consistent with a mixed use environment and are designed in order to be compatible with residential uses’. The role of the SPD is not to be too prescriptive.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
23	Formal via Talking Point	R. Unsworth ID 6249131	<p>Page 5 – Section 2 Land Uses. Active frontages to streets is an admirable aspiration. Thought should be given to proactively enabling meanwhile uses until the demand for support retail and other services in the area is of sufficient scale and intensity to support fully-fledged businesses. So temporary space for art/cultural activities of various kinds should be actively encouraged. Also welcome - creating extra streets to create frontages for new developments + for use by pedestrians and cyclists. -</p>	<p><u>LCC Comment:</u> Meanwhile uses can reinvigorate an area without the need for large investment and can have substantial public benefits.</p>

			opening up some railway arches to create permeability.	Provision of temporary uses on development sites that contribute to the amenities and attractiveness of the area should be encouraged. The character area studies detail opportunities for enhanced connectivity and place making. Wording referencing temporary space uses to be added under section (2.1) Mixed Uses. <u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.
<b>CONNECTIVITY &amp; MOVEMENT</b>				
24	Formal via e-mail and letter	CEG	Reinforcing the need for increased sustainable connectivity to, and within, Holbeck South Bank Leeds, and to existing communities to the south.  Providing a stronger commitment to reducing through traffic within Holbeck, and providing increased opportunities for pedestrians, cyclists and public transport compatible with wider transport initiatives for the city.	<u>LCC Comment:</u> Comment noted. Connectivity and Transport wording in the SPD has been amended under sections (4.3.2) Routes and Linkages, and (6.1) Transport to reflect this representation. <u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.
25	Formal via Talking Point	G. Brown ID 6244403	4.3.2 - Routes & Linkages page 8 Could a better use for the Holbeck Viaduct be as a guided busway or tram-train route? A ramp could be constructed at the end (or as part of the proposed adjacent MSCP), and the route could extend as far as the Elland Road Park & Ride site (but would need to cross M621)  6.1 Transport p10 Surely any street improvements should include cycleway provision to the same standard as the Leeds Cycle Superhighway currently under construction to Bradford? This must be the minimum standard? Presumably at some point when Leeds City Square is pedestrianised, the Leeds Loop road will need to take an alternative route - is this planned as part of the Masterplan?	<u>LCC Comment:</u> The SPD is not seeking to be prescriptive as it recognises both the potential future operational use of the viaduct; as well as the possibility of a future aspirational use should the viaduct no longer be required operationally. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.  <u>LCC Comment:</u> The SPD does not seek to set out the detailed specification for design or enhancements. These matters of detail will be picked up in the City Centre Transport Strategy. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.

26	Formal via e-mail	Holbeck Neighbourhood Forum Board	<p><b>Connections to Holbeck Village</b> The suggested Nineveh Parade to Marshall Street bridge direct route to the Holbeck Local Centre and Holbeck Moor should be added to the “Placemaking and Connections Plan”.</p> <p><b>The Viaduct</b> The unused viaduct is an important feature of Holbeck and it is intended to include the full length in the extension to the Holbeck Conservation Area. In the meantime, the draft Neighbourhood Plan proposes its inclusion in the Holbeck Industrial Heritage Area as an undesignated heritage asset. Whether it can be used as a green route to the city centre or it is brought back in use as a functioning railway, it is essential that it is not removed in the meantime but remains standing and is well maintained.</p> <p><b>“Connections and Placemaking Opportunities” map</b> This includes “important routes” and “routes in need of improvement” but does not identify whether these are primarily vehicular or pedestrian/cycling (it also begs the question “important for what?”). For example, the east-west route across the area by Temple Works is presently a footpath and it is to be hoped it remains as such (though improved). On the other hand, Marshall Street could be downgraded to either remove vehicular traffic or arranged so as to make vehicles the subordinate use. Alternative routes are available for access to other sites, given that the aim is to reduce through traffic.</p> <p>Just as the map shows the connections to the east of the area, it should also extend westward to show the routes through the Holbeck Neighbourhood Plan area and how they relate to HUV. In what sense are these important? They should not be considered as through routes, but purely as local connectors to and from the Neighbourhood Plan area. The Ninevah Road west-pointing arrow shows a connection onto Stocks Hill toward Domestic Street which the NP is proposing should be downgraded to exclude through traffic. The main route there turns north onto Bridge Street.</p> <p>There is a further opportunity for a “Placemaking Opportunity” near where</p>	<p><u>LCC Comment:</u> It is proposed that this link is not added to the plan as this could potentially be cost prohibitive to adjacent development which may be expected to fund or contribute to its delivery as part of a planning approval. It is also outside the SPD boundary. However, connectivity to Holbeck is a major priority of the SPD. As such it is proposed that wording in the SPD be strengthened around connections to the Holbeck Neighbourhood Plan area under section (4.3.2) Routes and Linkages including further reference to the Neighbourhood Plan area.</p> <p><u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.</p> <p><u>LCC Comment:</u> The SPD is not seeking to be prescriptive as it recognises both the potential future operational use of the viaduct; as well as the possibility of a future aspirational use should the viaduct no longer be required operationally.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment:</u> The plan does not specify as to pedestrian or vehicular routes but the intention is that such routes are pedestrian/cycle only. Where improved this means increasing natural surveillance, improving lighting, surface treatment and landscape as well as responding better to desire lines.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment:</u></p>
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			<p>Sweet Street and Water Lane converge. This is shown in the draft Neighbourhood Plan as a Local Greenspace, has historic significance as the route of the Hol Beck, with retained bridge parapets and is the setting for Low Hall Mills, an important heritage asset within the Holbeck Conservation Area. Although just outside the HUV boundary, it would be influential on any development facing it within the HUV.</p> <p><b>Servicing to Sweet Street West site</b> Any use of this site for manufacturing purposes is likely to require servicing by large vehicles. Arrangements for such a use should ensure that servicing is from Meadow Road and not through the Neighbourhood Plan area, i.e. along Sweet Street (east) and not Jack Lane/Marshall Street (which will be the primary pedestrian route from the south) and certainly not Sweet Street west. Servicing from Meadow Road will bring such vehicles across the junction of Sweet Street and Marshall Street which is, rightly, noted as a “Placemaking Opportunity” and this will need careful design to ensure it is predominantly pedestrian/cyclist friendly.</p>	<p>Comment noted. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment:</u> It is considered that this matter is best addressed through the Planning Application process to consider and mitigate any impacts on adjacent areas and pedestrian routes and shouldn't be a prescriptive matter in the SPD. Notwithstanding this, under section (6.1) Transport of the SPD wording to be added to reflect that the Council is to seek to facilitate the delivery of minimising traffic levels throughout the area. <u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.</p>
27	Formal via Talking Point	H. Darby ID 6248178	<p>The changes to Holbeck Urban Village so far are incredible. It's really brought a community feel and breath of fresh air to the area. I live just over the footbridge at Riverside Way and work over at City Walk so I live, work and spend a fair bit of my free time around this area. Obviously there is still more that can be done and that's why I'm writing to you to urge you to put the 'Holbeck Highline' plan into action. The disused viaduct really is beautiful piece of architecture that has just been neglected. By using this as a walk/cycle route (perhaps with small allotments or shrubbery either side) you would really bring the area together. It would encourage more commuters to cycle or walk to work or to go shopping and would add to the increasing aesthetic appeal of the Urban Village. I'm not actually involved at all in the project but I will be signing up as a volunteer if I can. Please support the project and transform the viaduct into a green space the people of Leeds can enjoy! <a href="http://holbeckhighline.org.uk/">http://holbeckhighline.org.uk/</a></p>	<p><u>LCC Comment:</u> The SPD is not seeking to be prescriptive as it recognises both the potential future operational use of the viaduct; as well as the possibility of a future aspirational use should the viaduct no longer be required operationally. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
28	Formal via e-mail	Landowner at 16-18 Manor Rd	<p>Page 8 – Section 4.3.2 Routes and Linkages. The aspiration to create a high level walkway along the redundant viaduct is supported, but the significance of the amenity is understated. The walkway could become a world class piece of public realm that not only improves the identity of HUV, but also Leeds as a whole. Leeds City Council should be more bold in their determination to deliver this for the city.</p> <p>Page 20/21 – Section 3.4 Movement. This section suggests that <i>'In addition, a new street should be built running eastwards from Marshall Street to connect with the western end of the square created between The Mint and Manor Mills. This street should also have a street running north south to connect into it (approximately halfway along its length) and extending northwards to connect with Manor Road. This would be for pedestrian and</i></p>	<p><u>LCC Comment:</u> The SPD is not seeking to be prescriptive as it recognises both the potential future operational use of the viaduct; as well as the possibility of a future aspirational use should the viaduct no longer be required operationally. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment:</u> Comment noted. The connection highlighted through the middle of a site at 16-18 Manor Rd is to be amended to</p>

			<p><i>cycle access only</i>'. The section fails to state where this street will be created, but the Diagram 'Connections and Place-making Opportunities' would suggest that this is to be provided by connecting the northern end of Siddall Street to Manor Road. This route is undeliverable as this would seriously affect the development potential of the 16-18 Manor Road site, and go against the established development footprint of the historic Planning Approval (ref: 20/545/05/FU). This also fails to reflect the fact that such a north-south connection has been created by the approved scheme to the east of Manor Mills.</p> <p>Page 26 – Diagram; Connections and Place-making opportunities. In relation to the site at 16-18 Manor Road, and the link through from Siddall Street to the south, the diagram is inaccurate, misleading and needs to be changed. The diagram identifies a route through the site as being 'important'. This suggests, wrongly, that such a link exists at present. The existing connection between Siddall Street and Manor Road is in fact a narrow footpath that runs around the southern and western boundaries of the site. The diagram also needs to reflect the established development footprint of the historic Planning Approval (ref: 20/545/FU).</p>	<p>reference it as a 'potential new route' rather than an 'important route'</p> <p><b>SPD Response:</b> Changes proposed to the SPD in line with the aforementioned comments.</p>
29	Formal via e-mail and letter	ID Planning	<p>Page 8 – Section 4.3.2 Routes and Linkages. The Council should make a statement that they will engage with Network Rail and actively encourage the high level walkway on the redundant viaduct.</p> <p>Page 26 – Connections and Placemaking Opportunities Map. In relation to the site at 16-18 Manor Road, and the link through from Siddall Street to the south, the diagram is inaccurate, misleading and needs to be changed. The diagram identifies a route through the site as being 'important'. This suggests, wrongly, that such a link exists at present. The existing connection between Siddall Street and Manor Road is in fact a narrow footpath that runs around the southern and western boundaries of the site. The diagram needs to reflect this existing situation, and identify the route (around the edge of the site boundary) as a 'route in need of improvement'. The diagram also needs to reflect the established development footprint of the historic Planning Approval (Ref: 20/545/05FU).</p>	<p><b>LCC Comment:</b> The SPD is not seeking to be prescriptive as it recognises both the potential future operational use of the viaduct; as well as the possibility of a future aspirational use should the viaduct no longer be required operationally.</p> <p><b>SPD Response:</b> No changes proposed to the SPD specific to this comment.</p> <p><b>LCC Comment:</b> Comment noted. The connection highlighted through the middle of a site at 16-18 Manor Rd is to be amended to reference it as a 'potential new route' rather than an 'important route'</p> <p><b>SPD Response:</b> Changes proposed to the SPD in line with the aforementioned comments.</p>
30	Formal via Talking Point	N. Woods ID 6248498	<p>The SPD includes lots of references to the currently unused Viaduct, but I think it should encourage/ensure that any developments in the HUV which are near the viaduct contain provisions which will enable people to access the viaduct should it be developed. It would be a shame if any developments near the viaduct lost this opportunity due to being completed before any Viaduct development project comes to fruition. I also think that it's important that the land in the area that is the proposed extension to the HUV is developed in such a manner as to include the wider Holbeck area and draw people from that area into the HUV. I think that it is important to include green space and public art and street level rather than high rise housing in order to do this.</p>	<p><b>LCC Comment:</b> The SPD is not seeking to be prescriptive as it recognises both the potential future operational use of the viaduct; as well as the possibility of a future aspirational use should the viaduct no longer be required operationally.</p> <p><b>SPD Response:</b> No changes proposed to the SPD specific to this comment.</p>

31	Formal via e-mail and letter	Historic England	<p>Page 26 – Connections and Placemaking Opportunities Map. It would be useful to identify which are the mainly pedestrian routes through the area since this has an impact on the different types of views and how the area is experienced.</p>	<p><u>LCC Comment:</u> The plan does not specify as to pedestrian or vehicular routes but the intention is that such routes are pedestrian/cycle only. Where improved this means increasing natural surveillance, improving lighting, surface treatment and landscape as well as responding better to desire lines.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
32	Formal via e-mail	Highways England	<p><b>Page 10</b> - The HS2 station and growth in employment in the wider Holbeck Urban Village (HUV) area is expected to lead to growth in traffic using the Globe Road / Water Lane and Jack Lane / Ninevah Road / Bridge Road routes.</p> <p>Highways England and the City Council are already working together to understand the traffic impact of city centre development proposals. Although HS2 is a long term project, it will need to be a material consideration in finalising proposals for traffic circulation in the area and in the context of the Government’s Road Investment Strategy (RIS) improvement scheme for the M621 motorway.</p> <p><b>Page 11</b> - There is a reference to seeking alternative routes to the motorway and West Leeds to minimise traffic passing through the area. Whilst there is no objection to the principle of minimising through traffic passing through the HUV area, the identification of potential alternative routes will need to take place in the context of the Government’s Road Investment Strategy (RIS) improvement scheme for the M621 motorway and the related West Yorkshire Plus Transport Fund (WY+TF) proposals for changes to the city centre road infrastructure.</p> <p>Highways England and the City Council are already working closely to understand the traffic impact of city centre development proposals. This includes a review of the scope of the RIS and WY+TF schemes. The outcome of that review will provide the basis for future proposals to minimise extraneous traffic using roads in the HUV area.</p>	<p><u>LCC Comment:</u> The SPD sets out broad design and movement principles and does not propose future changes to the network. The comments will be considered during implementation of future network changes in collaboration with Highways England. It is not felt that the SPD can be delayed whilst these complex matters are worked through in the next few years.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment</u> Comment noted.</p> <p><u>SPD Response</u> No changes proposed to the SPD specific to this comment.</p>
33	Formal via e-mail	Network Rail	<p>Our principal objection to the consultation SPD is in relation to the future of the currently disused viaduct (Farnley Viaduct) on the western side of the SPD area. Future predicted railway and passenger growth at Leeds station could require capacity to be released and the viaduct is seen as a valuable railway asset. It is considered premature to discuss options for the disused viaduct, including using arches for connectivity and the concept of an elevated walkway which may no longer exist during the lifetime of the SPD.</p> <p>As such the SPD needs revising to reflect the position as regards the viaduct, as follows:</p> <p>4.2 deletion of the reference to a high level walkway</p> <p>Part 2 area statements</p> <p>1.4 deletion of bullet point referring to access onto the viaduct walkway</p> <p>4.4 Reference to the viaduct walkway should be deleted</p> <p>In addition we would comment on other aspects of the SPD:</p>	<p><u>LCC Comment:</u> The SPD sets out what would be permissible, it is acknowledged that the delivery of an aspirational use other than for operational purposes will need the permission of the asset owner. Wording is to be strengthened to recognise the potential future operational use of the viaduct under Part 1 and Part 2 of the SPD.</p> <p><u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.</p>

			<p>Page 8 (4.3.1) Holbeck Triangle – this is used as a maintenance access point for the railway and given the close proximity of the electrified lines it is highly unlikely that we would wish to encourage public use of the site.</p> <p>Page 21 (4.2) - Arch infills – again, it is too early to identify particular arches that may remain and be retained either in their current use or to provide connectivity. Where such arches are identified they would be subject to agreement on terms and maintenance/closure issues to ensure NR can maintain the structure.</p>	
34	Formal via e-mail	Royal Mail	<p>Royal Mail wish to highlight the trip intensive operations currently carried out at the Holbeck Delivery Office and the Leeds City Delivery Office. The Holbeck Delivery Office lies adjacent to the site on the southern side, on the opposite side of the railway line, while the Leeds City Delivery Office is set away further on the north western side. The operations carried out from both properties could be impacted by increased levels of congestion, temporary road closures, and alterations to the transport network.</p> <p>It should be noted that at present the above sites are operational and Royal Mail currently have no plans to close or relocate them. The need to protect Royal Mail sites from development that may adversely affect mail services provided from them should be fully taken into account, given Royal Mail's obligation to provide a 'universal postal service' pursuant to the Postal Services Act 2000.</p> <p>Pages 10/11 Section 6.1; 'Transport', of the SPD states that the intention is to retain the existing road layout and in some cases add to it. Royal Mail supports proposals to improve connectivity between the areas surrounding Holbeck Urban Village, however road improvement schemes should be cognisant of, and sensitive to Royal Mail's operations, seeking to minimise disruption and inform Royal Mail of any necessary road closures as early as possible. With reference to section 6.1. 'Transport', proposals to create a pedestrian friendly environment, for traffic calming, and to minimise traffic levels throughout the site should be sensitive to Royal Mail's operations, and should allow Royal Mail to provide an efficient postal service to the homes proposed within the urban village site. Furthermore, the assessment of traffic generation from proposals within the urban village site and the need for associated highway improvements should account for the trip intensive nature of Royal Mail's operations.</p>	<p><u>LCC Comment:</u> Comment noted. As development comes forward each application will be dealt with on its own individual merits and this includes traffic impact.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
35	Formal via e-mail	Canal & River Trust	<p>Page 8 - Section 4.3.2 Routes and Linkages. We note that reference is made to bridges over the canal to improve connectivity. We are not sure if this this relates to providing a new bridge over the canal and we seek clarification on this matter. If a new bridge is proposed, we would welcome the opportunity to meet with the Council to discuss this matter further.</p>	<p><u>LCC Comment:</u> Comment noted. The SPD sets out what would be permissible. There is an aspiration for a bridge in the north west area of the SPD boundary. Any future implementation would be done in consultation with relevant stakeholders.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
36	Formal via e-mail and letter	CEG	<p>Page 26 – Connections and Placemaking Opportunities Map. With reference to the Connections and Placemaking Opportunities Plan contained in Appendix 3, it is unclear whether the routes identified refer to routes intended for vehicles, pedestrians or public transport. Labelling Globe Road and Water Lane as 'Important Routes' is at odds with the SPD's aims to reduce through traffic within the SPD area, and important aspirations to downgrade vehicular routes wherever possible to increase opportunities for pedestrians, cyclists and public transport.</p> <p>Whilst the overall connectivity as highlighted on the plan is welcomed, and will be required to ensure that sufficient consideration is given to improving connections within and throughout Holbeck South Bank Leeds as a strategic objective of the SPD, the plan should be updated to ensure that vehicular movements within the area do not continue to be prioritised at the expense</p>	<p><u>LCC Comment:</u> The plan does not specify as to pedestrian or vehicular routes. 'Important routes' is non specific to any mode of transport and these connections are undoubtedly important for east west, north south connectivity</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this</p>

			of other, more sustainable, road users.	comment.
37	Formal via Talking Point	R. Unsworth ID 6249131	<p>Good that publicly-accessed open space has been designated and identified on the five area statements.</p> <p>Page 8 – Section 4.3.2 Routes and Linkages. Good suggestions on connectivity and linkages + resource efficiency and biodiversity, though there is only one mention of climate change and no overt sense of generally incorporating climate resilience into all elements of regeneration. Suggestions for improving Hol Beck could be more ambitious. Overall, try to give more sense of not just following best practice but of welcoming innovation.</p>	<p><u>LCC Comment:</u> Comment noted. Reference to improving Hol Beck to be strengthened in the SPD.</p> <p><u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.</p>
38	Formal via e-mail	C. H. Ward	<p>I was going to submit my concerns regarding this fantastic project, specifically about the Leeds Highline (Viaduct) but on reading the SPD it is already there and adequately covered (See below) in this wonderfully written document.</p> <p>Well done to everyone concerned it looks like every conceivable angle has been covered and the rejuvenation of Holbeck is definitely in capable hands. Thank you!</p> <p><b>2.2 Continuity and Enclosure</b></p> <p>The two railway viaducts provide both visual continuity and enclosure to the area. This should be maintained as far as possible by careful siting of buildings in their vicinity to maintain views of them. This might best be achieved by siting buildings at right angles to the viaduct.</p> <p>The streets and alleyways originally had a feeling of enclosure due to buildings that formed near continuous frontages being sited at back of footpaths. Much demolition resulting in gap sites, for example on Marshall Street, has reduced this quality. New buildings should recreate this sense of enclosure by being similarly sited.</p> <p>Elsewhere, buildings should be sited to enclose a series of new spaces such as courtyards and alleyways that will be needed to serve the new developments.</p>	<p><u>LCC Comment:</u> Comment noted.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
39	Formal via e-mail	West Yorkshire Combined Authority	<p><b>Infrastructure and Transport</b></p> <p>The Holbeck Urban Village is a strategically significant development site in close proximity to the proposed HS2 hub at Leeds City Station. Therefore it is welcomed that section 6.1 (transport makes specific reference to this. We also support the provisions of this section which seek to mitigate potential increases in traffic that may result from HS2 proposals.</p> <p>Generally this section is consistent aspirations within the SEP to deliver the infrastructure to support sustainable economic growth and to capitalise on opportunities presented by HS2. The SPD will also assist in the Combined Authority's emerging work on the LCR Infrastructure Investment Framework. The Framework will support delivery of the HUV/South Bank area by identifying key strategic infrastructure requirements to support longer term growth and support delivery of HS2 and Northern Powerhouse Rail (formerly known as HS3).</p> <p>We also look forward to discussing potential enhancements to bus service provision through the HUV/South Bank area as noted in section 6.1 of the draft SPD.</p>	<p><u>LCC Comment:</u> Comment noted.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
40	Formal via e-mail and letter	Environment Agency	<p><b>Routes and connections</b></p> <p>We note that this is a key consideration of the SPD along with place making within HUV. 'Green Streets' is collaboration between West Yorkshire Combined Authority and the Yorkshire West Local Nature Partnership to integrate green and blue infrastructure into the designs of schemes to achieve multiple benefits and 'good growth'. The Leeds City Region Strategic Economic Plan is driven by a focus on 'good growth' – a radical uplift in growth, productivity and business success goes hand in hand with quality jobs that connect all people and places to opportunity and improved</p>	<p><u>LCC Comment:</u> Comment noted.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>

			<p>quality of life.</p> <p>Incorporating the principles of Green Streets in HUV will contribute to the vision of a 21st century city region by providing attractive green corridors connecting to areas of growth.</p>	
<b>PARKING</b>				
41	Formal via e-mail and letter	CEG	Adopting a shared and pragmatic approach to the delivery of car parking;	<p><u>LCC Comment:</u> Comment noted. Wording amended under section (6.2) Parking in the SPD. <u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.</p>
42	Formal via e-mail	Holbeck Neighbourhood Forum Board	A location between Bath Road and the viaduct for a car park would bring traffic from the south through the heart of Holbeck Neighbourhood (Top Moor Side, St Matthew's Street and Bridge Street). Any multi-storey car parking should be located close to Meadow Road by the major routes into Leeds and all signage should ensure that traffic is directed to and from there. Consideration should be given to incorporating underground parking in new developments where there is a requirement.	<p><u>LCC Comment:</u> Comment noted. References are to be removed from the SPD regarding the precise location of a multi-storey car park (MSCP) as this is seen as too prescriptive. Future proposals for a MSCP will be reviewed on a case by case basis regarding their appropriate location. <u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.</p>
43	Formal via Talking Point	E. Forster ID 6244401	Page 11 The reference to the 'minimum' quantity of parking is really disappointing. This area South of the river is desperately short of parking. Large numbers of the people who work here drive into the city. The choke hold on new parking sites is strangling the development of this area. Please consider increasing parking in line with need and not centralising parking into one car park which will then be allowed to charge extortionate rates. It may also be worth considering the high number of creative businesses located in this area. Wages in the creative industries are often lower than in other industries. Being able to drive to work and park affordably makes a big difference to workers from this background.	<p><u>LCC Comment:</u> To clarify, the term 'minimum' relates to the minimum amount of parking to support the viability of a development below the maximum figure stated in the Parking Policy SPD. Future development will also need to consider parking alongside other measures such as the shared use of parking spaces for mixed use schemes, travel plans for staff and residents, and the provision of car club / car share schemes. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
44	Formal via Talking Point	G. Brown ID 6244403	6.2 Parking page 11 The MSCP could become an award winning Nationally recognised structure if it were to be built in a style matching the existing red brick surrounds of the area, and not plastic clad panels? Almost a MSCP in the style of a redbrick mill/factory?	<p><u>LCC Comment:</u> The design aspirations are acknowledged and the wording under section (6.2) Parking has been amended to reflect this aspiration. <u>SPD Response:</u> Changes proposed to</p>

				the SPD in line with the aforementioned comments.
45	Formal via Talking Point	T. Powell ID 6248560	I live in HUV with my young family, noise would be a potential issue what will be done to ensure this isn't an issue, we already have various bars with late music licences-Also parking, how many flats to how many apartments etc? Inconvenience to local residents whilst building work is commencing- has this been considered? I am dyslexic and reading a 32 page document is not an option.	<p><u>LCC Comment:</u> Noise implications are considered as part of planning and licencing applications and mitigations are implemented accordingly. The final published SPD will be available in alternative formats with reasonable adjustments where required.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
46	Formal via Talking Point	A. Wynn ID 6248612	As the owner of a beauty salon within Granary Wharf I would like to ensure that there remains adequate parking around the site. A large majority of our clients drive to visit us and they would not attend if they had the added cost of parking in Trinity or another expensive NCP. Most of my staff also travel to work by car as it is cheaper than the train (from York & Bradford for example) and they would no longer be able to work in the city centre if the cheaper parking was no longer available. It is incredibly difficult as it is to entice low-paid workers into the city centre due to the rising cost of transport, within many preferring to work in salons closer to their home in small villages, this would make it even more difficult for us. As a resident of Candle House I would also request that parking is kept as it is or improved on. Not many people can afford the luxury of living in the city centre so most people that use the shops / restaurants / bars in Granary Wharf and Leeds city centre do indeed drive. You only have to look at how busy the carparks are in Granary Wharf to see that there is a huge demand for them. To get rid of anymore carparks would mean massively restricting the people visiting Granary Wharf.	<p><u>LCC Comment:</u> The strategy is to minimise general commuter car parking but to provide sufficient parking for residents and businesses of the area in line with the Council's adopted parking guidelines. The proposal to convert on street parking from long stay to short / medium stay will assist businesses by making space available on street for customers that is currently long stay and occupied by commuters throughout the day. A future potential MSCP would provide long stay parking for that displaced from the street, but the cost, as with on street will be set to meet the market.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
47	Formal via e-mail	Highways England	<p>Page 11 - There are references to the aim of reducing all-day on-street commuter parking in the area and the possibility of a new MSCP to provide alternative parking facilities.</p> <p>Paragraph 5.1.24 of the Adopted Core Strategy refers to Policy T1 Transport Management and the intention "to plan to restrain the provision of commuter car parking". The reduction of all-day on-street commuter parking complies with Policy T1. However, it is not clear whether the proposed MSCP is intended for long stay commuter parking. The purpose of the MSCP needs clarification and, if it is for commuter use, the rationale for its provision needs to be explained in the context of Policy T1.</p>	<p><u>LCC Comment:</u> The parking policy allows the transfer of long stay parking into a MSCP which would account for the transfer of on-street parking into the MSCP, otherwise long stay parking in the MSCP would be instead of what could be provided on site in new development and short stay, so in compliance with the Core Strategy and Parking Policy.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this</p>

				comment.
48	Formal via Talking Point	P. Balmforth ID 6249087	Hi, My comment is in relation to the number of car park spaces being allocated at this new development. I understand, and support, reducing the number of cars entering the city centre as I think this is the right thing for the environment. I don't, however, think it is right to build so many flats (on an existing car park used by so many people to visit Leeds and visit Granary Wharf area) with such limited facilities. I think that the proposal is not acceptable in its current form and is simply trying to maximise the number of flats that can be built on site. Thanks, Pete	<u>LCC Comment:</u> Future development needs to consider parking in line with the Parking Policy SPD alongside other measures such as the shared use of parking spaces for mixed use schemes, travel plans for staff and residents, and the provision of car club / car share schemes. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.
49	Formal via Talking Point	P. Considine ID 6249118	Page 7, Part 2, general comment on car parking - the public transport network around Leeds and the patterns of commuting in West Yorkshire are such that the majority of people living or working in the city centre will continue to own and use cars. To reduce the available parking spaces so drastically in the face of that seems like a recipe for chaos. Reductions in car use should be targeted, but in a more gradual and sensible way.	<u>LCC Comment:</u> The private cleared site car parks have only been provided on a temporary basis on the basis that the owners view the sites as redevelopment sites to provide new commercial and residential buildings. It is intended to reduce this provision in a managed way. Future development needs to consider parking in line with the Parking Policy SPD alongside other measures such as the shared use of parking spaces for mixed use schemes, travel plans for staff and residents, and the provision of car club / car share schemes. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.
50	Formal via e-mail and letter	Burberry	Page 10 – Section 6 Movement & Parking. Paragraph 6.2 considers parking. Whilst we acknowledge there is adopted planning policy and guidance in place regarding on site car parking, we would suggest that parking is considered on a case-by-case basis.  However, we understand the need to consider sustainable transport modes across all developments. Flexibility should be applied where high intensity employment uses are proposed which may exceed the Parking SPD guidelines.	<u>LCC Comment:</u> It is accepted that flexibility may be required for high intensity employment uses, however each development will be dealt with on a case by case basis through the planning process. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.
51	Formal via Talking Point	R. Unsworth ID 6249131	Pages 11/12 – Section 6.2 Parking. Car parking: good that there is a requirement for minimal car parking on street and on site, with preference and support for other modes. But too much of a concession to have multi-storey car parks within the area to replace the parking previously available on derelict sites. Needs to be beyond HUV altogether + P&R. Space can be	<u>LCC Comment:</u> The objective of the MSCP is not to replace the temporary surface car parks which were a

			used for more valuable purposes.	recent one off measure to deal with the impact of the recession and to allow delivery of alternatives such as enhanced park and ride facilities. Reference to be made to Park and Ride under section (6.2) Parking. <u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.
<b>HERITAGE ASSETS</b>				
52	Formal via e-mail	West Yorkshire Archaeology Advisory Service (WYAAS)	<p>WYAAS welcomes the emphasis in the document on the importance of preserving the heritage &amp; character of the area in the proposed SPD.</p> <p>Section 5.1 p.10 It may be helpful to would-be developers to include a statement that a number of unlisted buildings in the defined area also retain an archaeological interest &amp; that it may be helpful for them to consult the West Yorkshire Historic Environment Record (held &amp; maintained by WYAAS) at an early stage of any proposal so that they understand fully the potential impact of their proposal on significant heritage assets so that appropriate mitigation can be included in their proposals.</p>	<p><u>LCC Comment:</u> Planning applications on a site by site basis will consider the impact on the heritage and character of the area. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
53	Formal via e-mail and letter	Historic England	<p>The Holbeck Conservation Area Appraisal was produced over a decade ago. Since that time, the area has witnessed considerable change. There has never been an appraisal of the Canal Wharfe Conservation Area. It would greatly assist in understanding what the Council consider is important about this area and how its historic environment should be managed if, at the same time as this SPD is produced, the Conservation Area Appraisals were also updated and reviewed. These could also identify which buildings and structures are considered to be important to the character of this area (and, therefore, are the ones which this SPD seeks to retain).</p> <p>Page 3 – Section 1.5. We support the intention to preserve and enhance the area’s unique character. As the SPD notes, Holbeck has played a key role in the historic development of the City and contains an important legacy of industrial buildings and structures from the period when this area was one of the industrial powerhouses of the north.</p> <p>Page 4 – Section 1.6. We welcome the Strategic Objective of securing the future of the Grade I Listed Temple Works, a building which has been on the Historic England Building at Risk Register since its inception in 1999.</p> <p>Page 6 – Section 4.1. Other than the Listed Buildings, it is not clear how “the best buildings from the past” will be identified. We have suggested, above, that reviewing (or in the case of the Canal Wharfe Conservation Area producing) Conservation Area Appraisals for the two Conservation Areas would assist in identifying those buildings which are considered to make a positive contribution to their character and, therefore, ought to be retained.</p> <p>Page 9 – Section 5; Heading. It is not clear why listed buildings are singled out in the title. Given that this Section encompasses all heritage assets, it might be better if its Heading was simply retitled “<i>Historic Environment</i>”</p> <p>Page 9 – Section 5. This Section does not really capture what it is that is</p>	<p><u>LCC Comment:</u> Holbeck Conservation area is already being reviewed subject to officer workload. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment:</u> Comment noted. <u>SPD Response:</u> No changes proposed to the SPD in specific to this comment.</p> <p><u>LCC Comment:</u> Comment noted. Holbeck Conservation area is already being reviewed subject to officer workload. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment:</u> Comment noted. Section (5) to be renamed. <u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.</p> <p><u>LCC Comment:</u></p>

		<p>important about the historic character of this part of the City. There is no mention, for example, of the international importance of Holbeck to the industrial revolution, how and why it has developed in the form it has, or the things people love about the area. This Section also would benefit from a brief introduction, rather than going straight into a list of UPD policy references. References to how the heritage assets of the area have been successfully used as part of regeneration schemes (such as the Round Foundry and the plans for Tower Works) would be useful here.</p> <p>Page 10 – Section 5.1; Third Paragraph. All Listed Buildings are nationally important. Therefore it would be preferable to state:-  <i>“Temple Mill is recognised as being of exceptional interest in a national context. However, the building has been identified by Historic England as being ‘at Immediate risk ..etc’”</i></p> <p>Page 10 – Section 5.2; Heading. Whilst we would endorse the Aims for the historic environment which are set out in Section 5.2, the contents of this part of the SPD are a lot more encompassing than its heading suggests. Therefore, it might be more appropriate to amend the heading to read:-  <i>“Approach to the historic environment of Holbeck”</i></p> <p>Page 10 – Section 5.2; Aims. We support the aims for the historic environment which are set out in this Section. These will assist in helping to ensure that the distinctive character of this part of Leeds is reinforced and the specific elements which give it this character are retained.</p> <p>Page 10 – Section 5.2; Aims (First bullet point). Presumably, this bullet-point is also referring to non-designated heritage assets which make a positive contribution to the area (as set out in the first bullet-point of Section 4.1). Therefore, it would be better if this first bullet-point was amended to clarify that this is the case, perhaps along the following lines:-  <i>“Retain both Listed and non-Listed buildings and structures that contribute to the character of the Conservation Area”.</i></p> <p>Page 10 – Section 5.2; Aims (Additional bullet point). Reference might also be made to Hol Beck which is also a heritage asset.</p> <p>Page 12 – Section 6.2, Second paragraph. The proposals for the creation of a multi-storey car park adjacent to the disused viaduct in the north east corner of this area seem to run contrary to the requirement in Section 2.2 (page 18) to maintain views of this structure.</p>	<p>Comment noted. More historical context to be included under section (5) Historic Environment.  <u>SPD Response:</u>  Changes proposed to the SPD in line with the aforementioned comments.</p> <p><u>LCC Comment:</u>  Comment noted.  Amends proposed to section (5.1) as per representation.  <u>SPD Response:</u>  Changes proposed to the SPD in line with the aforementioned comments.</p> <p><u>LCC Comment:</u>  Comment noted.  Amends proposed to section heading (5.2) as per representation.  <u>SPD Response:</u>  Changes proposed to the SPD in line with the aforementioned comments.</p> <p><u>LCC Comment:</u>  Comment noted.  <u>SPD Response:</u>  No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment:</u>  Comment noted. Under section (5.2) reference to be made to retaining, where possible, significant buildings that contribute to the character of the conservation area.  <u>SPD Response:</u>  Changes proposed to the SPD in line with the aforementioned comments.</p> <p><u>LCC Comment:</u>  Comment noted.  Reference under section (5.2) to be included on the heritage importance of Hol Beck.  <u>SPD Response:</u>  Changes proposed to the SPD in line with the aforementioned comments.</p> <p><u>LCC Comment:</u>  Comment noted.  Reference to prescriptive locations of a possible multi-storey</p>
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				car park to be removed from the SPD. <u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.
54	Formal via e-mail and letter	CEG	Maintaining a strong focus on the need to maintain important heritage assets and the area's unique industrial heritage whilst recognising the need for flexible and expedient delivery to prevent further loss of degradation of at risk heritage assets;	<u>LCC Comment:</u> Comment noted. Wording amended under section (5) Historic Environment regarding prevention of further deterioration of heritage assets in the SPD area. <u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.
55	Formal via Talking Point	P. Considine ID 6249118	4.1 states (amongst other things) that: "developments should be at a scale, height, massing and alignment complementary to the part of the village they are in and in particular should preserve or enhance the character and the setting of the conservation area or of listed buildings... key views across and out of the village, as defined in the area statements should be retained." This policy is commendable, but I am at a loss to understand why this has been so flagrantly ignored in the case of the planning permission granted in respect of the Tower Works site. Page 15, Part 2, 1.1 - "new buildings in their immediate vicinity [referring to listed buildings on the Tower Works site] should generally respect their scale and heights so that they remain visually dominant. This suggests heights no greater than the ridge of the listed building on Globe Road... Buildings of this general height would also relate well in height terms with the Round Foundry area to the south with its similar historic character. It may be appropriate for new buildings to increase gradually in height away from the listed buildings." As above, this is absolutely what the policy should be, but why was this not followed in relation to the planning permission granted in respect of the Tower Works site? Once that site is developed, this policy becomes almost completely redundant.	<u>LCC Comment:</u> The former SPG and proposed SPD is not prescriptive and provides guidance which development should respond to. It is considered that the current Tower Works application is consistent with the principles considered in this SPD. A flexible approach to the management of heritage assets is taken as a matter of course. Height can sometimes be achieved but must be very carefully designed into any scheme and must be based upon a robust analysis of the harm that could be caused. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.
56	Formal via e-mail and letter	Burberry	Page 5 - Section 2.3 Public Open Spaces. Whilst we acknowledge that adopted LCC planning policy requires developers with sites over 0.5 ha to provide approximately 20% of their gross site area as publicly accessible open space, flexibility should be applied when considering heritage assets and existing buildings that occupy large footprints. We would recommend the following sentence be incorporated into this section: <i>"The policy shall not apply where buildings are to be retained, refurbished or extended."</i>	<u>LCC Comment:</u> This is a matter to consider during the planning process whether the amount of public space is appropriate. Provision of public open spaces is a necessary part of new development in order to make development attractive and able to meet needs of residents, workers and visitors. However, policy needs to be applied flexibly to deliver spaces in the right locations. Wording to be added under

			<p>Page 9 – Section 5 Conservation and Listed Buildings. Section 5 states the following in relation to conservation:</p> <p><i>“Policy P11 promotes conservation-led regeneration schemes, prioritising Regeneration Priority Programme Areas, including locations beyond the designated areas where historic environmental enhancement could provide a catalyst for wider regeneration of the area. Conservation led restoration of buildings such as Temple Mill would provide a catalyst for regeneration of the wider area. Furthermore this policy introduces the concept of enabling development in support of the refurbishment or repair of heritage assets. This is particularly relevant in terms of the potential for sites adjoining Temple Works to accommodate enabling development to support the restoration of this nationally important grade I listed building at risk, given what is known about the potential costs associated with its restoration and bringing it back into sustainable use.”</i></p> <p>We support this approach to consider conservation led regeneration of the works but further work is required to establish what is possible and cost of those works. This acknowledges a balance in terms of enabling development and restoring listed buildings. It also allows for a range of appropriate uses to be considered in the Temple Works in order to achieve the restoration.</p>	<p>section (2.3) Public Open Spaces referencing sensible masterplanning. <u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.</p> <p><u>LCC Comment:</u> Comment noted. Temple Works is a major priority. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
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**URBAN DESIGN & PUBLIC REALM**

57	Formal via e-mail	Holbeck Neighbourhood Forum Board	<p><b>Green Infrastructure Map</b></p> <p>There is also a need for a map showing the green infrastructure within Holbeck Urban Village. Of particular concern to the Neighbourhood Forum is the green corridor along the south side of Sweet Street which is mentioned in the text but should be shown on a map to make it clear and to ensure conformity with the Neighbourhood Plan.</p>	<p><u>LCC Comment</u> Green Infrastructure (GI) will be considered and encouraged as part of future development through the planning process. Reference to be made under section (7.9) Biodiversity regarding linking in with the Neighbourhood Plan’s strategic GI and Green Corridors. <u>SPD Response</u> Changes proposed to the SPD in line with the aforementioned comments.</p>
58	Formal via Talking Point	M. Wharton ID 6245456	<p>Page 9 – Section 4.3.3 Public Art. This is a fantastic opportunity to bring the full size 'Leeds Brick Man' to the city. It was cancelled many years ago, but it would be a fantastic symbol for the city and would be Leeds' Angel of the North. It would fit in well into this project and would become an attraction in itself.</p>	<p><u>LCC Comment:</u> The introduction of public art should always be encouraged and this is a matter of detail dealt with through the planning process. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
59	Formal via e-mail	The Coal Authority	<p>The Coal Authority has no objection to any of the proposals within the SPD. In relation to the two proposed placemaking opportunities illustrated where potential civic space opportunities exist, if these were to proceed then it would be necessary to locate and treat the recorded mine entries. Both of these proposed areas contain a recorded mine entry which would need to be treated to protect public safety. <b>Change Requested</b> – The SPD should include reference to the above in order to highlight this locally specific issue. <b>Reason</b> – In order to meet the requirements of paragraphs 109, 120 and</p>	<p><u>LCC Comment:</u> Comment noted. This is considered a matter of detail dealt with through the planning process with the Coal Authority as a statutory consultee. <u>SPD Response:</u></p>

			<p>121 of the NPPF</p> <p><b>Conclusion</b></p> <p>The Coal Authority welcomes the opportunity to make these comments. We are, of course, willing to discuss the comments made above in further detail if desired and would be happy to negotiate alternative suitable wording to address any of our concerns.</p>	<p>No changes proposed to the SPD specific to this comment.</p>
60	Formal via e-mail	Natural England	<p><b>Green Infrastructure</b></p> <p>This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area.</p> <p>The National Planning Policy Framework states that local planning authorities should plan ‘<i>positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure</i>’. The Planning Practice Guidance on <a href="#">Green Infrastructure</a> provides more detail on this.</p> <p>Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.</p> <p>There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> <li>• green roof systems and roof gardens;</li> <li>• green walls to provide insulation or shading and cooling;</li> <li>• new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity).</li> </ul> <p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.</p> <p><b>Biodiversity enhancement</b></p> <p>This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p><b>Landscape enhancement</b></p> <p>The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p> <p>For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p> <p><b>Other design considerations</b></p> <p>The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 125).</p> <p><b>Strategic Environmental Assessment/Habitats Regulations Assessment</b></p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic</p>	<p><b>LCC Comment</b></p> <p>Comment noted.</p> <p>Additional Green Infrastructure wording to be included under sections (4.2) and (7.9) in the SPD.</p> <p><b>SPD Response</b></p> <p>Changes proposed to the SPD in line with the aforementioned comments.</p>

			<p>Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p>	
61	Formal via e-mail	Landowner at 16-18 Manor Rd	<p>Page 7 – Section 4.1 Urban Design General Principles; public art. The introduction of Public Art into sites and buildings should only be applied ‘where appropriate’. There are a number of smaller sites in HUV where it will be very difficult to introduce public art. If every building / site in HUV has public art within it then there is a risk of over-load. Some buildings/sites should be quieter within the area, providing ‘background’ to the sites where it is appropriate to incorporate public art.</p> <p>Page 7 – Section 4.1 Urban Design General Principles; signature buildings. The document should incorporate a statement to encourage the creation of signature buildings in appropriate locations. New high quality buildings can be used to provide a focal point for views, help frame views, provide legibility for the wider area, help HUV deal with the impact of forthcoming large infrastructure projects such as HS2.</p>	<p><u>LCC Comment</u> The introduction of public art should always be encouraged and this is a matter of detail dealt with through the planning process. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment</u> Comment noted. Under section (4.1) Urban Design General Principles in the SPD reference to be included relating to the council’s ‘Tall Buildings Design Guide’ SPD (2010). <u>SPD Response</u> Changes proposed to the SPD in line with the aforementioned comments.</p>
62	Formal via e-mail and letter	ID Planning	<p>Page 7 – Section 4.1 Urban Design General Principles. Third bullet point: It is considered opportunities for public art should be only be incorporated “where appropriate” as not all developments should be expected and will be able to deliver public art. Eighth bullet point: When considering the scale and height of new developments it is requested that greater flexibility be expressed within this section. It is considered there should be a statement that high quality buildings which are of a greater scale will be supported where appropriate and where they act as an enabling development for the restoration of listed buildings. This point is particularly relevant for the Midland Mills site where the only possibility of restoring the heritage asset is via a development of a quantum that can deliver the necessary complementary restorative works.</p>	<p><u>LCC Comment</u> The introduction of public art should always be encouraged and this is a matter of detail dealt with through the planning process. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
63	Formal via e-mail and letter	Historic England	<p>Page 6 – Section 4.1. We support the Urban Regeneration Principles especially the requirement:-</p> <ul style="list-style-type: none"> <li>• To retain the best buildings from the past not just the Listed Buildings (As the Conservation Area Appraisal notes, Holbeck is the only place in Leeds where many early to mid- 19th Century industrial buildings survive relatively unaltered).</li> <li>• For high-quality design</li> <li>• That new developments should reflect the traditional street pattern. (The Conservation Area Appraisal notes that this is one of the few places in south Leeds where the original street pattern and majority of property boundaries survive).</li> <li>• For developments being at a scale, height, massing and alignment complimentary to the part of the village in which they are proposed</li> <li>• To retain and reinforce the varied roofline</li> <li>• To retain key views across and out of the village.</li> </ul> <p>These Principles will help to ensure that new development reflects and reinforces the distinct identity of this part of the City.</p> <p>Page 7 – Section 4.2. We support the Public Realm General Principles, especially:-</p> <ul style="list-style-type: none"> <li>• That 20% of the overall area of the urban village will be given over to publically-accessible open spaces.</li> <li>• The reuse of existing natural paving materials such as the granite setts.</li> <li>• Traffic calming</li> </ul>	<p><u>LCC Comment:</u> Comment noted. The broader South Bank Strategy will start to develop public realm proposals. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>

			<ul style="list-style-type: none"> <li>New street lighting and street furniture</li> </ul> <p>Page 7 – Section 4.2. In order to ensure that new areas of and intervention in the Public Realm are of a consistently high standard and occur in a co-ordinated manner, the City Council should produce a Public Realm Strategy for Holbeck. This guidance could also set out types and designs of street furniture, lighting and, perhaps, also suggest particular quarries or strata from which materials might be sourced.</p>	
64	Formal via e-mail and letter	Burberry	<p>Page 6 – Section 4 Urban Design &amp; Public Realm. We would like to highlight that urban design principle detailed in paragraph 4.1 that existing buildings not just listed buildings should be retained where viable is contrary to the NPPF and inappropriate in an area where the viability of repairing and retaining listed buildings is challenging.</p> <p>We understand that there should be an overall vision that retains the fine grain of the area and new development could continue this by adopting a traditional street pattern as set out in paragraph 4.1. However, the requirements of modern manufacturing lend itself to larger footprints where breakages and a traditional street pattern might not be achievable. Therefore, there needs to be an element of flexibility introduced on a site specific basis but the overall urban design principles outlined can remain as a vision for the Holbeck area.</p> <p>The comments detailed above regarding publicly accessible open space also apply to paragraph 4.2 where public realm general principles are considered. Paragraph 4.3.5 states the following in terms of funding:</p> <p><i>“The creation of an enhanced public realm and improved linkages into the area will be achieved as part of redevelopment proposals where appropriate. The expenditure of Community Infrastructure Levy (CIL) will also contribute together with other funding that the council may identify.”</i></p> <p>We would recommend that reference is made to viability and exceptions to the requirements detailed. This is particularly relevant for sites involving the restoration of listed buildings where significant financial resources are needed.</p>	<p><u>LCC Comment:</u> Comment noted. Under section (4.1) Urban Design General Principles to reference ‘viability’ <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment:</u> There can be flexibility if a land use cannot replicate traditional street patterns and urban grain. This is a site specific matter that will be dealt with on a case by case basis through the planning process. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment:</u> This is a site specific matter that will be dealt with on a case by case basis through the planning process and not a prescriptive matter for the SPD. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
65	Formal via e-mail and letter	CEG	<p>The need to promote world class architecture and public realm whilst providing sufficient flexibility to allow for progression of individual approaches and development sites within a broad framework of established objectives;</p>	<p><u>LCC Comment</u> Comment noted. Under section (4) Urban Design &amp; Public Realm the wording has been amended in line with this representation. <u>SPD Response</u> Changes proposed to the SPD in line with the aforementioned comments.</p>
66	Formal via e-mail	West Yorkshire Combined Authority	<p><b>Renewable and Low Carbon Energy</b></p> <p>It is noted that the SPD promotes delivery of green infrastructure and Sustainable Drainage Systems (SuDS). This is supported and consistent with similar aspirations within the SEP and the strategic priority to build a resource smart city region.</p> <p>We also welcome sections 7.5 (renewable and low carbon energy) and 7.6 (heat distribution networks). In cumulative these sections support delivery</p>	<p><u>LCC Comment:</u> Comments noted. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>

			of a range of renewable and low carbon technologies. Specific reference to heat distribution networks is considered to be positive as it aligns with the SEP's aspirations to develop this type of infrastructure and our District Heat Programme which is currently investigating opportunities for district heating infrastructure within the wider South Bank area. The SPDS's existing wording in these section will encourage delivery of this infrastructure and we look forward to working with Leeds Council and other stakeholders to identify further opportunities in the future.	
67	Formal via e-mail	National Grid	<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p> <p><i>Gas Distribution – Low / Medium Pressure</i> Whilst there are no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact <a href="mailto:plantprotection@nationalgrid.com">plantprotection@nationalgrid.com</a></p>	<p><u>LCC Comment:</u> Comment noted. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
68	Formal via e-mail and letter	Environment Agency	<p><b>Green Infrastructure (GI)</b> We note that green infrastructure (including blue infrastructure), is a priority area of the Leeds City Region. This was reflected in the 2016 Leeds City Region Strategic Economic Plan refresh which states that, “..high quality green infrastructure [is] a mainstream part of how we plan and shape places and developments and the corridors between them”.</p> <p>The SPD presents an opportunity, through the provision of green infrastructure, to actively enhance the setting for the growth for HUV. Areas with high quality environments are better placed to attract and retain high value private sector employers and employees. Additionally the benefits accruing from green infrastructure investments are long lasting and cumulative in nature. Blue infrastructure is also an important aspect of GI.</p> <p><b>Water Framework Directive (WFD)</b> The SPD provides an opportunity to focus on the Water Framework Directive (WFD), and specific measures and actions referred to in the Humber River Basin Management Plan (HRBMP). The WFD is a key piece of EU legislation governing protection of the water environment, with key requirements of bringing surface water bodies and groundwater bodies to “Good status or potential”, and ensuring no deterioration of current quality and ecological status. HUV has an important role to play in ensuring that development does not compromise the aims and objectives of the WFD and the HRBMP.</p> <p><b>Biodiversity</b> We are pleased to see the inclusion of paragraph 7.8. All development sites will be required to demonstrate that they will not have a detrimental impact on biodiversity. Wherever possible, they should incorporate opportunities to enhance biodiversity.</p>	<p><u>LCC Comment</u> Comments noted. <u>SPD Response</u> No changes proposed to the SPD specific to this comment.</p>
<b>AREA STATEMENTS (PART 2)</b>				
69	Formal via e-mail	Landowner at 16-18 Manor Rd	Page 20 – Section 3.2 Continuity and Enclosure. The proposed guidance in relation to Manor Road, Siddall Street and Ingram Street is confusing, fails to reflect established building lines, and if followed could lead to disparate and ad-hoc character to the streets. There is an opportunity to create greater clarity regarding building lines, to avoid the risk of the ‘canyon effect’ by setting back building frontages to the western side of Siddall Street, Eastern side of Ingram Street and the Northern side of Manor Road.	<p><u>LCC Comment:</u> This is a site specific matter of detail which will be dealt with on a case by case basis through the planning process. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
70	Formal via e-mail and letter	ID Planning	Page 15 – Section 1 Tower Works 1.1: It is considered the character analysis and aims for the Tower Works Character Area should be drafted in recognition of the 15 storey residential building that was approved adjacent to the canal as part of the second residential development approved on the ‘Greenbank’ site. At present the document appears to prevent development of such a scale on this site that is detached from the listed structures within the Tower Works site.	<p><u>LCC Comment:</u> This is a site specific matter of detail which will be dealt with on a case by case basis through the planning process.</p>

			<p>Page 17 – Section 2 Temple Works It is considered reference to the opportunities for an enabling development associated with the restoration of Midland Mills should be referenced in this section. As highlighted above development proposals that introduce a high quality building on the site to facilitate to restoration and reuse of Midland Mills should be referenced in this section.</p> <p>Page 19 – Section 3 Eastern Gateway The comments below are made in specific reference to 16-18 Manor Road. 3.2: The proposed guidance in relation to Manor Road, Siddall Street and Ingram Street is confusing, fails to reflect established building lines, and if followed could lead to a disparate and ad-hoc character to the streets. There is an opportunity to create greater clarity regarding building lines, to avoid the risk of the ‘canyon effect’ by setting back building frontages to the western side of Siddall Street, Eastern side of Ingram Street, and the Northern side of Manor Road.</p> <p>3.4: This section suggests that <i>‘In addition, a new street should be built running eastwards from Marshall Street to connect with the western end of the square created between The Mint and Manor Mills. This new street should also have a street running north---south to connect into it (approximately halfway along its length) and extending northwards to connect with Manor Road. This would be for pedestrian and cycle access only.’</i> The section fails to state where this street will be created, but the Diagram ‘Connections and Place-making Opportunities’ would suggest that this is to be provided by connecting the northern end of Siddall Street to Manor Road. This route is undeliverable as this would seriously affect the development potential of the 16-18 Manor Road site, and go against the established development footprint of the historic Planning Approval (Ref:20/545/05 FU).</p>	<p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment:</u> Reference has been made in Part 1 of the SPD regarding the guiding principle of enabling development.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment:</u> This is a site specific matter of detail which will be dealt with on a case by case basis through the planning process.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment:</u> Comment noted. The important connection highlighted through the middle of a site at 16-18 Manor Rd is to be amended to reference it as a ‘potential new route’ rather than an ‘important route’</p> <p><u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.</p>
71	Formal via e-mail and letter	Historic England	<p>Page 15 – Part 2 Area Statements. The character area summaries are useful. However, it would make the reading of this document less daunting if the SPD included at least one visual for each Character Area.</p> <p>Page 15 – Part 2 Area Statements. It would help to better understand where it is envisaged that the proposals set out in the Area Statements will be likely to be located if the SPD included an annotated map for each of the Character Areas. Such a map could show the locations of these specific proposals, any key views which ought to be safeguarded/exploited together with the general locations of where the less-detailed proposals might take place. It could also identify where the proposed new open spaces are likely to be located. These maps could also identify and non-designated heritage assets in each Character Area which ought to be retained.</p> <p>Page 15 – Part 2 Area Statements. It would make the document less</p>	<p><u>LCC Comment</u> Comment noted. The final graphic produced version will have images included. However the council considers that the number of plans included is proportionate. The character area guidance is not intended to be prescriptive and it considered that including further plans with more specific proposals will be misinterpreted as being required; this was an issue with the previous SPG.</p> <p><u>SPD Response</u> Changes proposed to the SPD in line with the aforementioned comments.</p> <p><u>LCC Comment</u></p>

		<p>confusing (and easier to refer to) if Part 2 used different Paragraph numbers to Part 1.</p> <p>Page 15 – Tower Works; Section 1.1. We support the aims for this Character area especially :-</p> <ul style="list-style-type: none"> <li>• Maximising the visual impact that the Listed Buildings have on the area and the guidance regarding development in their vicinity.</li> <li>• Enhancing the appearance of Hol Beck</li> <li>• Redevelopment/remodelling of poor quality buildings, gap sites and surface car parks</li> </ul> <p>Page 15 – Tower Works; Section 1.1 Aims (Second bullet point). In relation to the Tower Works it states that “it may be appropriate for new buildings to increase gradually in height away from the listed buildings”. This statement is slightly ambiguous and unhelpful since it doesn’t make it clear in which direction, or how far away from the listed buildings. This could be used by applicants to justify buildings which are out of scale with the character of Holbeck, just because they are “further away” from the listed buildings. It would be best if this could be removed or, at the very least, clarified.</p> <p>Page 17 – Temple Works; Section 2.1. We support the proposals for this Character area especially:-</p> <ul style="list-style-type: none"> <li>• Maximising the benefits derived from the area’s Listed Buildings</li> <li>• Encouragement of more sympathetic uses for the viaduct arches</li> <li>• Redevelopment of the many gap sites</li> <li>• New buildings being of a scale sympathetic to adjacent Listed Buildings.</li> </ul> <p>Page 18 – Temple Works; Section 2.1 (Final paragraph). New developments should not simply be of a scale sympathetic to “<i>adjacent</i>” Listed Buildings but to any others in their vicinity. Large buildings can harm the setting of a Listed Building at some distance from them. Moreover, given that the Conservation Area Appraisal recognises other non-designated heritage asset as making a positive contribution to the character of the area, the impact upon these assets should also be a consideration.</p> <p>Page 18 – Temple Works; Section 2.2 (Second paragraph). The SPD recognises the sense of enclosure that this part of the City originally had due to buildings that formed near continuous frontages being sited at the back of footpaths. It seeks to encourage new development to recreate this sense of enclosure. However, at the same time it also advocates the creation of a series of new public open spaces. In order to ensure that there is no confusion about how these two requirements can be successfully met, it might help to indicate on a map where these open spaces might be located.</p> <p>Page 18 – Temple Works; Section 2.3 (Third paragraph). Demolishing parts of a Listed Building needs clear and convincing justification. Therefore, it would be preferable to amend this sentence to read:-  <i>“It may be acceptable to open gaps in it where a clear and convincing</i></p>	<p>Comment noted, numbering to be changed to make the document more legible.  <u>SPD Response</u>  Changes proposed to the SPD in line with the aforementioned comments.</p> <p><u>LCC Comment</u>  Comment noted.  <u>SPD Response</u>  No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment:</u>  This is a site specific matter of detail which will be dealt with on a case by case basis through the planning process.  <u>SPD Response:</u>  No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment</u>  Comment noted.  <u>SPD Response</u>  No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment:</u>  This is a site specific matter of detail which will be dealt with on a case by case basis through the planning process.  <u>SPD Response:</u>  No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment:</u>  The SPD seeks to provide guidance rather than being prescriptive. This is a site specific matter of detail which will be dealt with on a case by case basis through the planning process.  <u>SPD Response:</u>  No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment</u>  Comment noted.  Changes made to SPD in line with</p>
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			<p><i>case can be made to increase east-west permeability”</i></p> <p>Page 19 – Temple Works; Section 2.5 (Second paragraph). It is not clear why one would want to reveal the side and rear elevations of Temple Works given that these are not particularly inspiring and were never intended to be seen. It is also not clear what is implied by the intention to reveal more of the interior of the building or how it is envisaged that this might be achieved. This needs to be clarified.</p> <p>Page 25 – Character Areas Map. It would be helpful to name (or include a key) which helps users identify the different Character Areas.</p>	<p>representation. <u>SPD Response</u> Changes proposed to the SPD in line with the aforementioned comments.</p> <p><u>LCC Comment</u> Comment noted, this is included as not to preclude the opportunity to make Temple Works more of a 360 degree setting but in any instance this SPD is not intended to be prescriptive or set out requirements. <u>SPD Response</u> No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment</u> Comment noted. Character Area to be named on the plan. <u>SPD Response</u> Changes proposed to the SPD in line with the aforementioned comments.</p>
72	Formal via e-mail	Canal & River Trust	<p>The Trust own and manage the Leeds &amp; Liverpool Canal which runs through the plan area and we also are the landowner of Granary Wharf. We note that specific reference to Granary Wharf has not been made in the Plan due to the fact that the area has been redeveloped.</p> <p>As such we focus our comments on the Tower Works area statement of the Plan which incorporates our canal.</p> <p>As a statutory consultee for planning applications, we have worked with the Council and the Applicants on a number of applications for sites within the Tower Works area, including the Tower Works site itself.</p> <p>Throughout, we have been consistent in our approach to the applications to ensure that the redevelopment of sites adjacent to the canal fully acknowledges the existence of the canal and incorporates the canal in the design process.</p> <p>For example, ensuring that the scale of new buildings along the canal take account of the existing historic canalside buildings, materials reflect the existing historic built environment and views and access to the canal are improved, including successfully securing section 106 agreements to improve the canal towpath.</p> <p>Page 15 – Section 1 Tower Works We note and welcome that the Tower Works Area Statement promotes the issues that we have previously raised in our responses to the planning applications. In particular, improving access through the area to link with the canal and improving views of the canal. Furthermore, the proposed approach to public realm and movement will encourage increased access and enjoyment of the canal. The aim of improving the towpath area along the canal for pedestrian usage also follows on from our work with the Council on securing s106 agreements for improvements to the towpath and specific reference to this in the Plan will further support this approach in the future.</p>	<p><u>LCC Comment</u> Comment noted. <u>SPD Response</u> No changes proposed to the SPD specific to this comment.</p>
73	Formal via e-mail and letter	Burberry	<p>Page 17 – Section 2 Temple Works. Section 2 sets out guidance in relation to the area of Temple Works. Paragraph 2.1 considers the character of the area. It states the following with regards to the Temple Mill:</p>	<p><u>LCC Comment</u> Agreed that public access may not be practical or desirable.</p>

			<p><i>“This iconic building is nationally important and one of the most significant heritage assets in the city and in the region. The building offers great opportunities for creative use of the spaces within and around it subject to detailed assessment regarding its condition. There could be the potential for sensitive physical interventions to take advantage of the space afforded by the building and facilitate greater public access for example by incorporating internal routes through the building, greater use of the offices, potential new entrances into the building and exemplar new build elements which could facilitate access to the roof.”</i></p> <p>We support the recommendations above which allow for flexibility in terms of the future use of the Temple Mill. However, we would suggest that it might not be appropriate for public access to be incorporated for some future uses. In this regard, we propose that public access is it considered appropriate in the context of some uses and exceptions are made where uses cannot provide public access but secure the longevity of the building.</p> <p>The comments detailed above regarding publicly accessible open space also apply to paragraph 2.3 where public realm requirements are outlined. There should be scope for this requirement to be relaxed when the preference is to retain as many historic buildings as possible. We would recommend that this requirement is removed from paragraph 2.3 in relation to Temple Works.</p> <p>Page 22 - Section 5 Sweet Street South. Section 5 sets out guidance in relation to the area of Sweet Street South, this is the area extended to be included within the urban village boundary. The guidance outlined is generally supported. The comments detailed above regarding publicly accessible open space also apply to paragraph 5.3 where public realm requirements are outlined. There should be scope for this requirement to be relaxed when new manufacturing facilities are proposed which need to accommodate modern requirements. There will need to be a balance in terms of public open space requirements and attracting new manufacturing uses to locate within the area.</p> <p>The comments detailed above regarding publicly accessible open space also apply to paragraph 5.4 where public realm requirements are outlined. We would like to suggest that a paragraph is added into this section to allow for on-site car parking if a major employment generating use is to be accommodated.</p>	<p>However the intention of this statement is not to preclude public access but to provide it where possible. Subject to the use of the building, partial access could be beneficial. This is not prescriptive, it is guidance and a matter of detail for the planning process. <u>SPD Response</u> No changes proposed to the SPD specific to this comment.</p> <p><u>LCC Comment</u> Reference has been made in Part 1 of the SPD regarding sensible masterplanning as a guiding principle. <u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.</p> <p><u>LCC Comment</u> Reference has been made in Part 1 of the SPD regarding sensible masterplanning as a guiding principle. <u>SPD Response</u> Changes proposed to the SPD in line with the aforementioned comments.</p> <p><u>LCC Comment:</u> It is accepted that flexibility may be required for high intensity employment uses, however each development will be dealt with on a case by case basis through the planning process. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
74	Formal via e-mail and letter	CEG	<p>Reconsideration of the need for, and value of, prescriptive Part 2 Area Statements which have the potential to undermine individual and innovative approaches.</p> <p>Suggestions regarding the revised Character Areas, and the role and function that these interrelated areas will continue to play in the regeneration of the South Bank. This is discussed in further detail below;</p> <p><b>Revised Character Areas</b> Extending the boundary of the SPD has also afforded Leeds City Council the opportunity to reconsider the existing character areas.</p> <p>The updated SPD proposes creation of a new character area incorporating the land added to the south of Temple Works, named ‘Sweet Street South’. Granary Wharf remains within the revised SPD boundary, but has been</p>	<p><u>LCC Comment:</u> Comment noted. It is not proposed to amend the Character Areas, and these will remain as per the previous SPG. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>

removed as a specific Character Area, along with the corresponding Area Statement guidance, on the basis that the regeneration of this part of the SPD area is now complete.

CEG has reviewed the proposed character areas and considers that there is the opportunity to further update to this plan to better reflect the different character areas within the SPD boundary, and forthcoming development proposals. An updated plan is attached to this letter which identifies the following Character Areas:

**1 Granary Wharf** – this has been re-introduced to the plan as a helpful indicator of the character of this part of the SPD area, without the need for accompanying design guidance (on the basis that the regeneration of this area is now substantially complete);

**2 Holbeck Urban Village** – this is proposed as a new character area incorporating land around the Round Foundry (not previously contained within a character area) in recognition of the strength and success of this area at an early stage in Holbeck’s regeneration, and the potential to carry through these principles and uses into immediately adjacent land. This area also includes land to the front of Temple Works which has long been earmarked for the provision of open space. It is not proposed that a further Area Statement is required for this area, the regeneration of which is now substantially complete. The requirement for an exemplar public space to be provided to the east of Temple Works is already adequately referenced within Part 1 of the SPD, and noted on the Connections and Placemaking opportunities Plan.

**3 Eastern Gateway** – this area has been amended slightly to reflect transfer of part of this area to the Holbeck Urban Village character area, but is otherwise unchanged.

**4 Tower Quarter** – this area has been adjusted to remove land to the west of the viaduct which relates more appropriately to the other land contained within ‘Viaduct West’, and renamed to reflect the fact that sites beyond Tower Works are included within this development area;

**5 Holbeck Viaducts** – This area has been extended to incorporate land within the green triangle and along the canal to more appropriately reflect the likely nature of developments to the west of the existing viaduct. No changes are proposed to the extended boundary as proposed by LCC.

#### **Part 2: Area Statements**

Notwithstanding the proposed changes to the various character areas suggested above, and tracked changes set out within the accompanying SPD, it is not considered necessary for the updated document to retain reference to the more prescriptive Area Statements set out in Part 2 of the SPD.

Much of the guidance provided within Part 2 of the SPD repeats that covered within Part 1, such as the need for sites to contain approximately 20% public realm, and for strong frontages to be provided to the street, and there is very limited reference to genuinely varied or specific development requirements, which are also covered within the Part 1 document in any event.

Where additional clarification is provided, this is overly prescriptive and unnecessary in the context of the document’s aim to provide a broad set of principles to which new development should adhere, and could undermine a design approach which is equally appropriate albeit not previously considered. Indeed, and as reflected within Part 1 of the document, a number of significant new developments have come forward within the various character areas of a nature, scale and design not previously envisaged by the SPG, and in taking the opportunity to revisit the guidance it is important that similar opportunities are not unduly constrained in the future.

Finally, whilst the character areas are generally divided along historic routes, or reflect areas of ownership, some of the boundaries appear arbitrary, and do not genuinely reflect distinct differences in character, questioning the need and justification for any meaningful variation to their approach. It is also unclear how significant elements along dividing lines, such as Hol Beck and other key routes which cross various character areas,

			will be treated. CEG maintain that a better approach is for the SPD to facilitate complementary regeneration throughout the SPD area with reference to the strategic objective and guidelines established within Part 1, without the need for the more prescriptive Part 2 guidance.	
75	Formal via Talking Point	T. Reid ID 6249184	<p>Page 20 – Section 3.4 Movement (Eastern Gateway). More streets: I think that several streets of the kind described are important for making connections, human-scale, engaging environments. There should likewise be an ambition to move away from the impersonal motorway infrastructure which separates communities, fragments the urban realm and creates dead zones where people do not want to linger.</p> <p>Page 21 – Section 4.2 Continuity and Enclosure (Viaduct West). There is huge potential to open up further high quality mixed-use urban development around the viaduct as an exciting new piece of public open space. Similar to New York's High Line project, urban regeneration can stem from such a central spine with the adoption of a landscape-led masterplanning approach. Public Realm Comments generally: I agree with the 20% anticipated allocation of sites to open green space. However, the various sites run the risk of becoming segregated, resulting in a series of disconnected spaces, bereft of interest and physical connect.</p>	<p><u>LCC Comment:</u> Comment noted.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
76	Formal via e-mail and letter	Environment Agency	<p><b>2. Area Statements</b></p> <p><b>1 Tower Works</b> This site is located with Flood Zone 3. Please see our above comments in relation to the Sequential and Exception Tests.</p> <p><b>2 Temple Works</b> This site is located in Flood Zone 2/3. Please see our above comments in relation to the Sequential and Exception Tests.</p> <p><b>3 Eastern Gateway</b> Majority of the site is located in Flood Zone 2, with the northern section located in Flood Zone 3. Please see our above comments in relation to the Sequential and Exception Tests.</p> <p><b>4. Viaduct West</b> This site is located in Flood Zone 3. Please see our above comments in relation to the Sequential and Exception Tests.</p> <p><b>5. Sweet Street South</b> This site is mainly located in Flood Zone 1, with some areas along Sweet Street in Flood Zone 2.</p>	<p><u>LCC Comment:</u> Comment noted. Flood Risk Management will be considered as part of the planning process as new development comes forward. As a statutory consultee the Environment Agency will be consulted as part of the planning process.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
<b>KEY VIEWS</b>				
77	Formal via e-mail	Landowner at 16-18 Manor Rd	<p>Page 7 – Section 4.1 Urban Design General Principles; Key Views. The requirement to retain key views ‘across and out of the village’ is supported, but this statement does not fully reflect the importance of views to the creation of building forms and spaces within an area, such as Holbeck, where the character of the urban grain is tight-knit and high-density. Views (framed views, surprise views, focal points) within the area should also be given a level of importance, as well as the desire to enhance key views where possible. This would also help enhance the stated desire to ‘retain and reinforce the varied roofline to the area’ and to ‘reflect the traditional street pattern’ with new developments. This statement is too limited and should be amended.</p>	<p><u>LCC Comment:</u> Comment noted. Wording has been amended under section (4.1) Urban Design General Principles in the SPD.</p> <p><u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.</p>
78	Formal via e-mail and letter	ID Planning	<p>Page 7 – Section 4.1 Urban Design General Principles. Thirteenth bullet point: The requirement to retain key views ‘across and out of the village’ is supported, but this statement does not fully reflect the importance of views to the creation of building forms and spaces within an area, such as Holbeck, where the character of the urban grain is tight-knit and high-density. Views (framed views, surprise views, focal points) within the area should also be given a level of importance, as well as the desire to enhance the key views where possible. This would also help enhance the stated desire to ‘retain and reinforce the varied roofline of the area’ and to ‘reflect the traditional street pattern’ with new developments. This statement is too limited and should be amended.</p>	<p><u>LCC Comment:</u> Comment noted. Wording has been amended in the SPD under section (4.1) Urban Design General Principles.</p> <p><u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.</p>
79	Formal via e-mail and letter	Historic England	<p>Page 27 – Key Views &amp; Listed Buildings Map. The arrows are not easy to see. There is no explanation in the text how or why these points have been chosen. What do these views contribute to the significance of the Listed Buildings? For example, there is just one blue spot on Water Lane and an arrow pointing towards Tower Works. It is not clear why this particular location has been chosen as a ‘key view’ or which heritage assets you can see.</p>	<p><u>LCC Comment:</u> Comment noted. The arrows will be made bolder on the plan. Key Views are a matter of detail to be dealt with through the planning process.</p>

			There is a need to differentiate between static views, dynamic views, framed views, long distance and glimpse views, etc. The map should also identify other Non-designated heritage assets which are important to the character of this part of the City and which should be retained in future development proposals where possible.	The plan provides guidance for development coming forward in the area. <u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.
80	Formal via e-mail and letter	CEG	<p>Page 27 – Key Views &amp; Listed Buildings Map. This map identifies existing listed building within, and in the vicinity of, the SPD area, alongside a number of very prescriptive views into, within, and through the SPD area. Whilst the assessment, and protection, of key views will be an essential consideration for all new developments within the SPD area, the approach advocated within the map is too prescriptive in proposing rigid protection of a number of viewpoints, and could potentially lead to missed opportunities to provide effective visual connections to key heritage assets, and undermine more flexible and innovative master planning approaches and place making opportunities.</p> <p>A better approach would be to provide a list of assets and general locations, or a zone, within which key views within the SPD should be maintained and/or created. This approach should be informed by the latest development context and will enable different approaches to the protection, and creation, of new, framed and glimpsed views to form part of the effective master planning of vacant and redeveloped sites.</p>	<p><u>LCC Comment:</u> Key Views are a matter of detail to be dealt with through the planning process. The plan provides guidance for development coming forward in the area.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
<b>COAL MINING LEGACY</b>				
81	Formal via e-mail	The Coal Authority	<p><i>Surface Coal Resources, Development and Prior Extraction</i></p> <p>As you will be aware, the entire SPD area contains coal resources which are capable of extraction by surface mining operations. The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process.</p> <p>Within the Plan area there are 2 recorded mine entries. A range of other mining legacy features are present including thick coal outcrops and unrecorded probable shallow coal workings. The 2 mine entries are located in the centre of the SPD area east and west of Marshall Street (Union Place and Leodis Court). The thick coal outcrops and unrecorded probable shallow coal workings underlie the southern tip of the SPD area south of Trent Street.</p> <p>Mine entries and mining legacy matters should be considered by Planning Authorities to ensure that site allocations and other policies and programmes will not lead to future public safety hazards. No development should take place over mine entries even when treated.</p> <p>Although mining legacy occurs as a result of mineral workings, it is important that new development recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not always a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.</p>	<p><u>LCC Comment:</u> Comment noted. This is considered a matter of detail dealt with through the planning process with the Coal Authority as a statutory consultee.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
<b>FLOODING</b>				
82	Formal via e-mail and letter	Historic England	There is no mention of flooding within the document or the impact of flood protection measures on the special character of the area. Flood protection works are already being undertaken and one can reasonably assume that further works will become necessary in the future. These could have a significant visual impact and affect land use, individual building design, landscaping etc.	<p><u>LCC Comment:</u> Comment noted. Flood Risk Management section to be added to the SPD.</p> <p><u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.</p>
83	Formal via e-mail and letter	Environment Agency	<p><b>Flood Risk</b></p> <p>We appreciate the importance of Holbeck historically and architecturally. However, large areas within the Holbeck Urban Village (HUV) boundary are in Flood Zones 2 and 3 (medium/high risk). Therefore the SPD should highlight flood risk issues more and set out a proposed approach to flood risk in HUV. The plan also provides an opportunity to promote flood risk mitigation and resilience measures that is linked to the growth aspirations</p>	<p><u>LCC Comment:</u> Comment noted. A Flood Risk Management section has been added to the SPD. Flood Risk Management will be considered as part of</p>

		<p>of HUV. The SPD should actively promote this through the vision and strategic objectives and make reference and promote Core Strategy policy EN5 (Managing Flood Risk).</p> <p>Proposed development in the HUV should be informed with the sequential, risk-based approach to the location of sites to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change. This means applying the Sequential Test and if necessary, applying the Exception Test which is detailed in the paragraph 100 of the National Planning Policy Framework (NPPF).</p> <p>A sequential approach should also be applied to the layout of any proposed developments, to ensure more vulnerable uses are located in lower risk areas of a site. This should be a specific requirement for mixed-use development, as HUV is designated as a mixed-use area.</p> <p>Demonstration that development is safe from flooding and does not increase flood risk to others throughout the development lifetime will also be required, along with a consideration of climate change and the need to assess all sources of flooding on a site by site basis.</p> <p>The LLFA may have additional information about the risk of flooding from sources other than main rivers, which may usefully feed into the preparation of the SPD.</p> <p>We would request that paragraph 7.3 (Sustainable Urban Drainage) is split between surface water flooding and fluvial flooding. Leeds Drainage team (as LLFA) should be consulted on surface water requirements of the SPD.</p> <p>We are currently reviewing the hydrology for the River Aire at Leeds following the recent flood events. We are currently expecting the outcome of this review in the next couple of months.</p> <p><b>Leeds Flood Alleviation Scheme (FAS)</b> Any proposals with HUV will need to be in conformity with the Leeds FAS and we request that you consult the FAS project team to ensure compatibility with the scheme and up to date information (including level of protection) is referenced and used in the SPD.</p> <p><b>Flood risk considerations</b> As all the above character areas are located in either Flood Zone 2 or 3, any proposed development will require a Flood Risk Assessment (FRA). A FRA should assess the level of risk from all flooding sources and take into account historic events (including the recent 'Boxing Day Floods'); provide details of any proposed mitigation measures; demonstrate that the development will not increase flood risk elsewhere and show consideration to emergency access and egress in an extreme event.</p> <p>Typically for development within a flood zone in Leeds finished floor levels are suitably raised above the 1 in 100cc flood level for the site depending on their vulnerability and use as per the 'Leeds Minimum Development Control Standards for Flood Risk'. Flood resilience measures should also be considered. We recommend a minimum freeboard of 600mm and 300mm above the 1 in 100cc level for residential and commercial developments respectively wherever possible.</p> <p>Any compensatory flood storage requirement should be carried out on a 'level for level' / 'like for like' basis and detailed within the FRA.</p> <p>The lead local flood authority should be consulted in relation to surface water management. Where discharging into a main river from a greenfield development the discharge rate should be restricted to the greenfield discharge rate for the site. When discharging from a brownfield site the discharge rates should be restricted to a minimum reduction of 30% from the pre-development rate.</p> <p>HUV is within the vicinity of the Leeds Flood FAS extent and the works may extend to this section of Holbeck. We therefore strongly recommend that you consult the Leeds FAS project team to ensure that the any development in HUV is compatible with the Leeds FAS.</p>	<p>the planning process as new development comes forward. As a statutory consultee the Environment Agency will be consulted as part of the planning process. The SPD role is to provide guidance rather than being overly prescriptive on matters which can be dealt with through the planning process.</p> <p><u>SPD Response:</u> No changes proposed to the SPD specific to this comment.</p>
<b>GENERAL COMMENTS</b>			

84	Formal via e-mail and letter	Historic England	This is a somewhat text-heavy document and would benefit from the inclusion of a greater number of photographs to illustrate some of the points it is trying to get across.	<u>LCC Comment:</u> Comment noted. Images to be included in the final published version. <u>SPD Response:</u> Changes proposed to the SPD in line with the aforementioned comments.
<b>NO COMMENT LEFT/ACTION REQUIRED</b>				
85	Formal via e-mail	Alwoodley Parish Council	Thank you for your recent e-mail about the consultation for Holbeck Urban Village. Alwoodley Parish Council discussed the proposal at the recent meeting and agreed that they do not wish to make any comment about the proposal.	<u>LCC Comment:</u> Comment noted. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.
86	Formal via e-mail	Wakefield Council	With regard to the above consultation I can confirm that Wakefield Council have no comments.	<u>LCC Comment:</u> Comment noted. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.
87	Formal via e-mail	Kirklees Council	Thank you for consulting Kirklees council on this document. I can confirm that we do not have any specific comments to make.	<u>LCC Comment:</u> Comment noted. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.
88	Formal via Talking Point	S. Brown ID 6247962	It's all good.	<u>LCC Comment:</u> Comment noted. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.
89	Formal via Talking Point	P. Thomas ID 6248342	In general the plans look good. My only comment is why is and has it taken so long to develop all of this brownfield and derelict sites. Let's build and develop, and grow Leeds city centre.	<u>LCC Comment:</u> Comment noted. <u>SPD Response:</u> No changes proposed to the SPD specific to this comment.
90	Formal via Talking Point	Sonia P ID 6244737	Consultation accessed, no comments left.	<u>LCC Comment:</u> Noted. <u>SPD Response:</u> No changes proposed to SPD.
91	Formal via Talking Point	S. Clayforth ID 6245071	Consultation accessed, no comments left.	<u>LCC Comment:</u> Noted. <u>SPD Response:</u> No changes proposed to SPD.
92	Formal via Talking Point	P. Panczyszyn ID 6245464	Consultation accessed, no comments left.	<u>LCC Comment:</u> Noted. <u>SPD Response:</u> No changes proposed to SPD.
93	Formal via Talking Point	A. Ndure ID 6245534	Consultation accessed, no comments left.	<u>LCC Comment:</u> Noted. <u>SPD Response:</u> No changes to SPD.
94	Formal via Talking Point	Canal & River Trust	Consultation accessed, no comments left.	<u>LCC Comment:</u> Noted. <u>SPD Response:</u> No changes proposed to SPD.
95	Formal via Talking Point	D. Vernals ID 6248567	Consultation accessed, no comments left.	<u>LCC Comment:</u> Noted. <u>SPD Response:</u> No changes proposed to SPD.

96	Formal via Talking Point	J Ndure ID 6248952	Consultation accessed, no comments left.	<u>LCC Comment:</u> Noted. <u>SPD Response:</u> No changes proposed to SPD.
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