

**APPENDIX 1**

**Schedule of Detailed City Council Representations**



GOVERNMENT OFFICE  
FOR YORKSHIRE AND THE HUMBER

## THE YORKSHIRE AND HUMBER PLAN THE SECRETARY OF STATE'S PROPOSED CHANGES COMMENTS FORM

Representations about the Secretary of State's Proposed Changes are invited and must be received by GOYH before **4pm on Friday 21 December 2007**. We will be able to deal with responses more quickly if they are made online. Alternatively, completed comments forms can be submitted by email, post or fax.

- To make an ONLINE RESPONSE please visit: [www.goyh.gov.uk](http://www.goyh.gov.uk)
- Please send this comments forms by EMAIL to: [yhregionalstrategies@goyh.gsi.gov.uk](mailto:yhregionalstrategies@goyh.gsi.gov.uk)
- Please send comments forms by FAX to: 0113 3413076
- Please send comments forms by POST to: Regional Strategies Team, GOYH, Lateral, 8 City Walk, Leeds, LS11 9AT

Please note that all comments will be made available for the public to read – they cannot be treated as confidential. All comments received will be taken into account before the Yorkshire and Humber Plan is finalised and published, currently expected to be in Spring 2008. If you wish to be notified when the Plan is finalised and published please tick here ✓

### Section A: Your Contact Details

Comments by or on behalf of:		Agent (if applicable):	
Organisation	Leeds City Council	Organisation	
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Fax		Fax	

These comments are being made on behalf of (please tick most appropriate)			
Private individual		Development company	
Local Authority	✓	Utility company	
Parish Council		Other company / business	
Government Agency		Campaign group	
Other public sector body		Voluntary / community group	

You need only fill in Section A of this form once irrespective of how many different parts of the Plan you wish to comment on. For each different part of the Plan you wish to comment on, please complete a separate Section B of this form and attach these to the completed Section A.

## Section B – Your Comments

Please note that comments are invited about the Secretary of State’s Proposed Changes to the draft Yorkshire and Humber Plan, not those parts of the Plan that are unchanged from the draft published by the Yorkshire and Humber Assembly in 2006. The Proposed Changes are listed in a Schedule and are also identified in a revised draft version of the Plan.

Please ensure that your comments relate clearly to a specific part of the Plan (e.g. a particular policy, paragraph, Figure or Table) and that you explain what further changes you would like to see to the Plan. This will make consideration of your comments much easier.

### Which part of the Plan that we are proposing to change are you commenting on?

<b>Pages: 19 - 39 Section 4, Spatial Vision and Core Approach</b>	Policy / Para / Fig / Table etc:
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### Do you object or support the proposed change (please tick one)?

Support	<b>Object</b> ✓	Comment
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### Why do object to or support the proposed change?

#### General Comments

The RSS intensifies the housing growth in the Leeds area but it also tightens up Flood Risk Policy and introduces Green Infrastructure, both of which are objectives that conflict with housing growth. It would appear that the RSS sees the solution to the conflict as being through the use of Green Belt, as Policy YH9 advocates a review of Green Belt for West Yorkshire (and deletes the requirement for exceptional circumstances). **The RSS therefore needs to clarify what spatial vision it sees for growth in Leeds, is it either through re-engineering and re-modelling of the urban area, or is it through expansion in to Green Belt ? There is a lack of clarity, inherent tensions and conflicts across a series of policy areas when applied to the local level and within the context of local circumstances. These include, the delivery of urban transformation, substantial housing and economic growth, adapting and mitigating the consequences of Climate Change, managing flood risk, the protection and provision of green infrastructure. Within the context of the draft Plan’s own commitments to sustainable development, the Proposed Changes therefore need to give clarity and direction to how such a range of requirements and relative priorities can be meaningfully and practically delivered.**

#### Policy YH2 - Climate Change

**There is no justification for the deletion of the regional target for CO2 reduction. It is a statement of the Region’s target, not a direct RSS target and therefore should remain. It is needed to help drive CO2 reduction and helps to justify the introduction of local energy efficiency, renewable energy, sustainable transport and other low carbon policies and should therefore be reinstated through the Proposed Changes.**

Given the scale of the housing requirement and economic growth projections contained within the Proposed Changes, there is a heightened need to manage development in a sustainable manner and to seek to mitigate and adapt to the consequences of Climate Change. The absence of a regional target would not allow for effective monitoring as a basis to introduce or bring forward where appropriate necessary policy interventions.

Whilst the Proposed Changes Sustainability Appraisal/SEA summary indicates a series of positive and neutral impacts of the Plan, “key significant negative impacts” are identified on Page 9 of the

Revised Sustainability Appraisal of the Proposed Changes to the Yorkshire and Humber RSS, Summary Report of Findings. These include the consequences of air travel, road development and climate changes. The absence of specific targets for CO2 reduction, compromise the ability to address these negative consequences or allow a structured approach to prioritising action.

### **Policy YH5 - Regional Cities and Sub Regional Cities and Towns and Policy YH6 Principal Towns**

The City Council (and others) made representations on the Draft Plan regarding the confusing terminology used in the Draft RSS making it impossible to differentiate between the use of 'centre' to describe both 'settlements' as a whole and 'town centres' in particular. The Proposed Changes have tried to address this by changing the terminology but unfortunately replicated the same problem but with a different label. The word 'centre' is replaced by 'town' or 'city' as appropriate. For example, "Principal Service Centres" are now described as "Principal Towns". This implies that the YH5-8 policies are concerned with the settlements as a whole rather than their town centres. However, the confusion will persist as all the Proposed Changes has done is strip out the term 'centre' which still makes it equally unclear whether reference to 'Principal Town' mean a settlement, the whole town or just the 'town centre'. Similar problem occurs with Regional city and Sub-regional city. The text of the policies refers to these settlements being the prime focus for shopping, leisure & cultural uses plus housing, employment and education when the locational needs for these various uses is and should be different.

**The policy wording has mixed together 'main town centre uses' and every other use that does not need to be located within a town centre This needs urgent qualification to make it clear that that it is the town and city centres of the designated settlements that are first choice location for 'main town centre uses.'**

Leeds City Council recommended at the EIP that;

"There is a need to separate settlement classification and role from town and city centre hierarchy and role and apply it equitably across the region." That still needs to be done otherwise the whole basis of the proper Spatial Planning of Leeds City Region and Yorkshire and the Humber region is undermined.

There are knock on implications for a whole raft of other policies that follow from the 'Core Approach to wrongly mixing settlement hierarchy and town centre hierarchy terms in the RSS. For instance, there is an inability to clearly identify and direct 'main town centre uses' to town centres at one obvious extreme (the focus of Policy E2), whilst another example is mixing settlement hierarchy and town centre hierarchy terms as a basis for determining the level of car parking required with developments via Policy T2.

The Proposed Changes do not fully address the concerns raised by Leeds that significant town & district centres embedded within existing urban areas were, apart from Wetherby, completely ignored in the hierarchy of centres. The Panel Report suggested that local authorities should be empowered to identify Principal Service Centres. The Proposed Changes advances the incomplete selection of centres put forward in the Draft RSS plus an option for local authorities – exceptionally – to identify further centres. The text of the Policy implies that this option only applies to freestanding towns, as opposed to centres embedded within urban areas. The explanatory text suggests this option should be pursued sparingly.

The consequence for Leeds is that the 27 town and district centres will only 'exceptionally' be allowed to be classified in a similar manner to Wetherby. Which could mean that Leeds can only have one 'town centre' and one city centre rather than the 28 town and district centres it has identified. RSS does not recognise a lower order of 'settlement' or 'centre' in the urban area other than the one Principal Town level of settlement.

**RSS must give more discretion to local authorities to allow them to determine which centres in West Yorkshire are worthy of Principal Town 'centre' designation without**

**limitation of numbers as implied by the explanatory text. Local authorities should be encouraged and supported to designate and identify town, district and local centres as part of a centre hierarchy/network and not artificially constrained by the RSS embargo on local distinctiveness.**

**Policy YH7 - Local Service Centres and Rural and Coastal Areas**

The RSS offers rural areas recognition of a rich and extensive hierarchy of centre/settlement classification down to small Local Service Centres (potentially 200 in total), a level lower in the settlement/centre hierarchy not replicated in the urban areas and the city regions. RSS encourages LDF's to identify this Local Service Centre and does not constrain local authorities from identifying more than those listed in the RSS.

In the urban areas there is no recognition of a similar lower order level in the settlement/retail hierarchy. This is a major imbalance between the spatial planning approach to urban and rural areas allowing a much finer grain of detail in the spatial form of the rural area not recognised nor supported in the urban areas. **There is positive encouragement for local distinctiveness of rural areas by allowing local authorities to define additional centres beyond those listed in the RSS but the same level of support is not carried over to urban areas. This discrepancy in approach should not be embodied in the RSS. Urban areas should be encouraged to recognise and identify their own Town and equivalent Local Service Centres.**

**RSS should not adopt a different approach between rural and urban areas.** As currently expressed RSS allows more flexibility to rural areas but heavily constrains and limits the ability of local authorities within the urban areas, such as Leeds City Region, to locally determine the designation of town, district centres and local centres. The restriction is arbitrary and totally contrary to the intentions of PPS6 to foster a full and extensive recognition of a broad centre hierarchy.

**What further change would you like to be made to the Plan?**

See above changes emphasised in bold text.

**These comments are by or on behalf of (please insert your name as in Section A of this form:**

Leeds City Council

## Section B – Your Comments

Please note that comments are invited about the Secretary of State’s Proposed Changes to the draft Yorkshire and Humber Plan, not those parts of the Plan that are unchanged from the draft published by the Yorkshire and Humber Assembly in 2006. The Proposed Changes are listed in a Schedule and are also identified in a revised draft version of the Plan.

Please ensure that your comments relate clearly to a specific part of the Plan (e.g. a particular policy, paragraph, Figure or Table) and that you explain what further changes you would like to see to the Plan. This will make consideration of your comments much easier.

### Which part of the Plan that we are proposing to change are you commenting on?

<b>Pages: 41 – 45, Section 5, Delivering the Core Approach</b>	Policy / Para / Fig / Table etc:
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### Do you object or support the proposed change (please tick one)?

Support	<b>Object</b> ✓	Comment
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### Why do object to or support the proposed change?

The City Council supports the principle of the Delivering the Core Approach. In particular the City Council welcomes the approach to ‘early years’ in providing for housing re. the need to make best use of existing allocations identified urban potential in cities and towns, improving low demand neighbourhoods and the provision of more affordable homes. Table 5.2 also notes the need to improve flood defence and sewage infrastructure, together with the need for public transport improvements. In broad terms such an approach recognises the reality of the opportunities and challenges for a major City such as Leeds, in tackling wider ranging issues in an integrated manner and the fact that such issues need to be addressed as a priority as a basis to make provision for longer term growth.

**The City Council remains concerned however, that the RSS Proposed Changes provides no further certainty regarding the delivery of specific infrastructure. This relates both to existing requirements and the need to deliver future longer term requirements to achieve ‘transformation’ and the scale of housing and economic growth envisaged. Consequently, linked to a clearly phased and ‘plan, monitor and managed approach’, the RSS needs to give more clarity and commitment to infrastructure planning at a regional and sub regional level. This is not only essential as part of a “plan – led approach” but necessary to achieve critical mass, economy of scope and regional prioritisation (to reflect the intent of the RSS Core approach). Furthermore, such an approach would also help to avoid individual local authorities (through their LDF documents), seeking to undertake this in a piecemeal and potentially uncoordinated manner. Such an approach would therefore provide LDF documents with a broader delivery context and avoid duplication of effort as individual local authorities seek to underpin LDF documents with the necessary evidence to support proposals for major infrastructure.**

**What further change would you like to be made to the Plan?**

See above changes emphasised in bold text.

**These comments are by or on behalf of (please insert your name as in Section A of this form:**

Leeds City Council

## Section B – Your Comments

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Please ensure that your comments relate clearly to a specific part of the Plan (e.g. a particular policy, paragraph, Figure or Table) and that you explain what further changes you would like to see to the Plan. This will make consideration of your comments much easier.

### Which part of the Plan that we are proposing to change are you commenting on?

<b>Pages: 47 – 57 Section 6</b> <b>Leeds City Region</b>	Policy / Para / Fig / Table etc:
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### Do you object or support the proposed change (please tick one)?

Support	<b>Object</b> ✓	Comment
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### Why do object to or support the proposed change?

#### General Comments

The City Council remains very concerned that the Proposed Changes do not fully reflect the operation and spatial dynamic of Leeds City Region. The RSS and Proposed Changes solution to housing and economic growth, seeks to concentrate the majority of development within the West Yorkshire conurbation and Leeds in particular. The City Council is concerned that whilst there are positive aspects for Leeds and the City Centre, this approach does not fully reflect the needs and longer term competitiveness of the region. If the scale of proposed growth within Leeds (and significant resources and infrastructure to achieve 'transformation' are not available) is unsustainable or cannot be achieved, this will be to the detriment of the sub regional and regional economy as a whole. In addition the focus of the RSS and Proposed Changes to optimise the co-location of 'jobs' and 'homes', has resulted in imbalances across the Leeds City Region. For example, Selby now has housing provision in excess of job growth (where it is understood that the authority would like to see higher levels of job growth) and in some North Yorkshire District the housing requirement is now below Draft Plan requirements (and where it is understood that such authorities would like higher requirements reinstated). **Such points demonstrate that the key strategic and spatial thrust of the RSS and the Proposed Changes needs to be revised to more fully examine opportunities and challenges in relation to regeneration and growth on a Leeds City Region rather than a West Yorkshire basis.**

#### Policy LCR2 – Leeds City Region

The scale of the housing and economic growth proposed for West Yorkshire can only be delivered if both (inadequate) existing levels of infrastructure (such as public transport & flood alleviation) and the need for substantially higher levels of strategic infrastructure are addressed, to achieve the scale of growth envisaged.

To achieve such growth, a fundamental step change in the scale of infrastructure provision (for housing and economic development) is required to support Leeds, as part of a plan - led approach. **Within this context, the City Council is concerned that Leeds City Region Policy (LCR2) has been weakened in its specificity with regard to the need for major infrastructure and investment programmes to support growth locations (i.e. Leeds).** Whilst it is helpful that the need to improve public transport in Leeds is acknowledged in LCR2 A, the text relating the preceding text relating to the need for 'investment programmes' and the 'delivery of infrastructure' have been deleted. The 'transformational' and 'growth' agenda requires substantial levels of



infrastructure across a wide range of agencies and the private sector. This needs to be not only of a sufficient scale but (linked to a phased approach and the 'plan, monitoring and management of housing requirements') carefully integrated. Such matters cannot be resolved exclusively at a local level as various mechanisms exist at a sub regional and regional, which need to be directed towards regional priorities at a local Leeds level.

**The City Council considers that the geographical references to areas in and around Leeds described in Policy LCR2 need to be clearer. For example, does LCR2 A mean the whole of Leeds MD or Leeds city centre and also, it is not clear if the reference to "West Leeds" in LCR2 D means West of Leeds City Centre or West of the main urban area of Leeds. A similar point can be made in relation to "northwards" to Leeds LCR2 E. Such points need to be clarified in order to translate the intent of policy to the local LDF level.**

**What further change would you like to be made to the Plan?**

See above changes emphasised in bold text

**These comments are by or on behalf of (please insert your name as in Section A of this form:**

Leeds City Council

## Section B – Your Comments

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Please ensure that your comments relate clearly to a specific part of the Plan (e.g. a particular policy, paragraph, Figure or Table) and that you explain what further changes you would like to see to the Plan. This will make consideration of your comments much easier.

### Which part of the Plan that we are proposing to change are you commenting on?

<b>Pages: 99 – 116, Section 14, Economy</b>	Policy / Para / Fig / Table etc:
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### Do you object or support the proposed change (please tick one)?

Support	<b>Object</b> ✓	Comment
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### Why do object to or support the proposed change?

## General Comments

The City Council supports the following Proposed Changes, either because they helpfully clarify, are innocuous, or strengthen policies appropriately for Leeds. Within this context the City Council makes the following general comments.

- the specific reference to a modern manufacturing sector and its modernisation is an important signal for a city that is still one of the largest manufacturing centres in the UK (Policy E1).
- The recognition (Policy E1 D and H) of the potential of higher and further education institutions, hospitals and the cultural sector to contribute to economic development and a knowledge-driven economy in particular.
- the recognition of financial and business services, given the regional significance of the sector in Leeds and particularly in the city centre (Policy E4).
- The strengthened reference to tourism in cities (Policy E6).

The City Council does however have a number of concerns arising from the scope and content of a number of the Proposed Changes.

## Employment Forecasts and Employment Land

**Employment land has an important role in supporting the economic competitiveness of the region. It is recognised that this is a complex and dynamic subject but the City Council has objections regarding the scope and clarity of the Proposed Changes' approach to employment land – linked to inaccuracies regarding the econometric forecasts for economic growth. The proposals in connection with employment forecasts and therefore the provision of employment land are therefore considered by the City Council to be unrealistic.**

Early in the RSS process the Regional Assembly stressed the need to deal with an over-supply of employment land throughout the region. **The current proposals are likely to exacerbate that over-supply.** The following table puts the forecasts into context:

<b>Leeds MD, net job change estimates and forecasts, '000s</b>	
REM: Actual change 1996-2006	38.7
REM: Baseline forecast 2006-16	21.9
Arups Employment Land Review for LCC, 2006-16	39.3
YF submission to RSS EiP, Option E, 2006-16	58.2
YF CRDP forecasts, Option D, GOYH proposal, 2006-16	60.3
LCC/YF Revised Econometric Forecast Dec. 2007 2006-16	48

Nearly 39,000 net additional jobs were created in Leeds over a recent 10 year period. The Employment Land Review commissioned by the City Council from Arups proposed that we should plan for a similar number over the next 10 years (this forecast was based on faster economic growth in the previous 5 years). Even this figure is now looking ambitious when compared with the current baseline forecast (which in turn does not take into account the expected slow down in growth nationwide). **However, the Proposed Changes figures are almost three times bigger than the baseline forecast.**

The employment land implications of the employment forecasts are as follows:

	<b>Hectares required (incl 50% margin of choice and provision for leakage)</b>	
	<b>2006-21 (RSS employment land planning period)</b>	<b>2006-26 (Leeds LDF Core Strategy period)</b>
<b>B1a,b</b>	137*	183*
<b>B1c,B2</b>	583	777
<b>B8</b>	192	256

\* In the City Council's Written Statement to the RSS EiP, it was argued that the B1a figures should

be expressed as floorspace rather than land requirements. Given that PPS6 (and RSS) gives greater emphasis to offices being located in city and town centres, LPAs will struggle to find the hectareage expected. With higher plot ratios in centres, a half hectare city centre site could easily supply 15,000 sq.m. of floorspace, whereas a suburban site would supply only around 1,000 sq.m.

Over the Leeds LDF Core Strategy period, the Proposed Changes suggest that Leeds would need to find around 1,000has of B1c,B2 and B8 land. The current supply (of B1c, B2 & B8) is 432has and so a 570+has shortfall is implied. By comparison, the demand forecast generated from the Arups study for the City Council suggested around 390has. would need to be found.

The implications of such a shortfall are profound. The City Council is currently assessing the current employment land portfolio and it might be that some sites are discarded because they are no longer sustainable and/or attractive to the market. Consequently, the need therefore to find an additional 570has (potentially beyond the main urban areas), is in conflict with the desire of the RSS to achieve 'urban transformation' and also presents conflicts with the policy objectives to co locate 'jobs' and housing. In addition, the Proposed Changes also promote a significantly higher housing requirement for Leeds, which again lead to policy conflicts at a local level given the competing demands for land and the prospect of greenfield development (to achieve housing targets), in advance of the necessary delivery of regeneration priorities on brownfield land within the urban area.

The City Council has considered the supporting information which has been used in the preparing the RSS including feeding into tables 14.7 and 13.1 in the RSS Proposed Changes, which deal with employment forecasts and housing distribution respectively, to look at what relationships are at work. The City Council cannot clearly understand how the original data included in the Leeds City Region Development Programme (CRDP) have been fully accommodated or transposed into both tables. The supporting work that is in the public domain (such as the Nathaniel Lichfield Report or Arup's revised employment land work on Scenario D (the CRDP modelling work) does not really explain how exactly the numbers in those two tables have been arrived at.

The piece of work by Nathaniel Lichfield, reworking the Sub National Population Projects into RSS, which was commissioned by the Government Office, picks up the implications and changes of economic migrants in the revised 2004 sub national population estimates (and is the basis of CLG's approach to their Housing numbers). The City Council recognises that this report goes closest to explaining the distribution of housing numbers – particularly in the West Yorkshire districts of the city region.

Given concerns about the underpinning employment data the City Council is currently reworking our original employment forecasts, contained in the CRDP with the Regional Development Agency and a revised set of econometrics will be available in the near future.

In light of the discrepancy between the figures in the Secretary of State's Report and the City Council's own data, it is requested that table 14.7 in particular is revisited, or at least the underlying assumptions made clear to us. We are concerned that potential errors in this table could undermine the credibility of both the Employment Land and Housing figures contained within the report.

It is considered also that the way the employment forecasts have been interpreted in the Secretary of State's response raised fundamental questions. In producing the employment data for the CRDP, the potential employment outputs from a number of existing renaissance schemes as a means of estimating the economic potential of the city region in a scenario where our economic aspirations are not limited by lack of investment in our infrastructure or skills base, were captured. This economic potential is not the same as a hard target or indeed necessarily a likely scenario without huge levels of investment in infrastructure.

**The City Council strongly recommends therefore, that the best approach for RSS would be to plan on the basis of the revised transformational forecast that the Leeds City Region**

local authorities and Yorkshire Forward have recently produced. This is an update of Option E in the table above.

It would be helpful if RSS then disaggregated each local authority figure into:

- The baseline forecast requirement. When an employment land review is carried out by the LPA this figure could be updated. Also allowances for margin of choice and leakage would need to be added.
- B1, B2 and B8 land required by transformational projects (e.g. Aire Valley in Leeds' case). No allowances for margin of choice and leakage would need to be added.

It would then be for each LPA to take these figures into consideration, along with other employment forecasting methods (for example previous employment land take up rate), and use it as part of the evidence base to produce LDFs. They should also be asked to plan in a phased release way for this level of growth, much of which is dependent on securing funding for associated infrastructure.

The employment land requirements stated in the RSS are not only high, but they are net. Whilst a degree of flexibility and local discretion is necessary, overall the draft Plan needs to adopt a much firmer and more strategic line. The revised approach to employment land in the draft is not strategic. It seems to leave a great deal of discretion at the local level, to the extent that the approach could be applied too flexibly and inconsistently. LPAs are left to convert the figures to gross ones by adding allowances for margin of choice and leakage. The City Council has previously argued that the way the figures are converted from net to gross should be controlled through RSS, otherwise any LPA will have the scope to inflate the net figures substantially and render them meaningless.

The City Council understands from its own commissioned research that, depending on the assumptions used about the need to provide a choice of sites and leakage to other uses, the gross figures could vary significantly. It is recommended therefore that the following factors are taken into consideration:

- Margin of choice/churn up to a maximum of 50% of the net employment land requirement. This recognises the importance of providing the market with choice and flexibility in their site selection, and also to allow for a certain amount of 'churn' as sites necessarily stay vacant for a period of time.
- Leakage from employment sites to other uses (if this has not already been factored in: para 14.18 seems to suggest some form of leakage has been taken into account, i.e. they include the take up of land to accommodate new employment, against the loss of existing employment land to other land uses).

The above will ensure the RSS provides the framework within which LPA's can convert net employment land figures into gross, hence avoiding any possible chance of undermining the work undertaken at the regional level.

The report commissioned by GOYH from Arup (Section 1.2.1) states that one of the recommendations from the Panel Report was to extend the jobs growth and employment land figures to 2021 in line with the RSS housing figures, and ideally forecast to 2026 in line with the RSS plan period. The limitation of the modelling is that the regional econometric data used as the basis for the baseline and scenario forecasting only extends to 2016. Therefore the revised projections to 2021 have been based on projecting the average trajectory between 2006 and 2016 on a pro rata basis.

Consequently, it needs to be explicit whether the RSS and hence LDFs planning authorities should be planning for 15 years (i.e. up to 2021) or 20 years (i.e. up to 2026). The intention of the plan is to guide development over the next 15 to 20 years. However, as it stands the plan implies LPAs should be planning for 15 years as far the economy is concerned by providing employment job growth figures to 2021.

## **Policy E2 – Town Centre & Major Facilities**

**Table 14.7A.** Main town centre uses, specifically retail and leisure, as a component of ‘Job Growth’ have been introduced for the first time. Previously, retail and leisure jobs have not figured in the Economic Strategic thinking. Retail and leisure as an activity did not occupy the Economy chapter of RPG or RSS until the current RSS round. Retailing and leisure, have previously been seen, as sectors, to be not as important as office, manufacturing and the ‘B’ use classes in terms of job creation. And/or there has been concern, nationally, that interference in retail jobs by Economic Planning would in some way distort the way the retail market works and distort the working of the retail market, therefore it has always been seen as a background activity to be left well alone. But that seems to be about to change in the way that retail job creation is now seen, for the first time, as being important to the economy. It is positive that retailing and leisure are recognised as important sectors of the economy but there is a danger in adopting approaches to forecasting of job growth in these new sectors that might work well in other sectors of the economy but are totally unproven for retailing and leisure.

Retail and leisure job creation has been dropped into the total job creation scenario of RSS without any prior warning or proper scrutiny. There are concerns about their accuracy, source and soundness. The scale of jobs forecasted to grow in Table 14.7 substantial and not far short of job growth predicted in the office sector. Given the ‘efficiencies’ that occur in the retail and leisure sectors it is extremely unlikely that the job figures are true net ‘job growth’. It is more likely that they are ‘gross jobs’ and there is an element of displacement, replacement and double counting.

Unless there is a proper and sound understanding of ‘job creation’ in the retail and leisure sectors this approach is likely to lead to a major distortion of retail and leisure job expectations. The knock on effects for retail and leisure retail floorspace requirements will also result particularly when the RSS Proposed Changes now advocate job forecasting as a building block for floorspace forecasting.

**Policy E2A** – The City Council supports the clarification made that make city and town centres to be the focus for town centre uses. However, the wording still leaves scope for out of centre development of town centre uses but does not make clear in what circumstances out-of-centre development would be acceptable. It is implicit, rather than explicit, that there are situations where main town centre uses do not have to be the focus of town centre uses. It is open to interpretation and will lead to perennial arguments if not made clear in its intent that town centres are ‘the focus’ not ‘the main focus’.

Unfortunately the omission of ‘centre’ as a locus qualifier from Regional City and City could be construed as support for ‘main town centre uses’ to be located anywhere in the area of that particular Regional City or City settlement. ‘Centre’ needs to be added as a qualification of location. A further consequence of the poor typology and terminology used at YH 5-7.

The wording should be revised accordingly;

**The Regional City Centres and Sub Regional City Centres and town centres will be the ~~main~~ focus for offices, retail, leisure, entertainment, arts, culture, tourism and more intensive sport and recreation.**

Any proposal for ‘main town centre uses’ in out of centre locations would then be subject to the 5 key tests of PPS6.

**Policy E2C** – The City Council broadly supports the changes made. However, bearing in mind this policy is about town centre uses, it should cover the whole range of uses and not just out-of-centre shopping. Consequently, it should for example include out-of-centre office park, leisure parks, etc. Failure to do so will be taken as the operation of PPS6 will be less rigorously applied in Yorkshire and the Humber than nationally required.

The wording should be revised accordingly;

**No further development of new, or expansion of existing, out-of-centre regional or sub-regional shopping, leisure and office centres/parks should be permitted.**

As a result it would be worthwhile having an indicator, which measured the number of applications refused for 'main town centre uses' in out-of-centre locations.

**Para 14.11B - will need to amended accordingly to reflect the above changes.**

**Para 14.11A – The City Council supports the inclusion of large hospitals, universities or colleges as town centre uses but they should also be included in the Policy text of E2A.**

Government Office explanation for their exclusion from Policy E2A is based on a justification that suggests only a slavish replication of PPS6 'main town centre uses' is acceptable. Leeds City Council considers that the Plan can and should add local regional dimension to national policy where appropriate. In that respect Leeds City Council supports the inclusion of additional uses onto the list of 'main town centre uses'.

Leeds had supported the YHA and Inspector's addition of large scale health and education facilities as additional 'main town centre uses' as it was considered that there circumstances in Leeds which would support such uses. In the case of Leeds City Centre, the two universities are important components and in that respect should be recognised as appropriate and important functions within larger centres. Schools generally would not be appropriately identified as 'main town centre uses'. Also, hospitals can and often are key components within town and city centres. The Proposed Changes seem to have relegated these additional uses to the justification/explanatory text and removed them from the Policy wording in section A of Policy E2. Large hospitals, universities and colleges *'may also be appropriately located in or close to the centres of Regional and Sub Regional cities and towns in order to meet the accessibility criteria set out in Table 16.8'*.

### **Policy E3 – Land & Premises for Economic Development**

**Policy E3A1** – PPS6 advises that;

Additional benefits in respect of regeneration and employment do not constitute indicators of need for additional floorspace (para 2.37).

The phrasing of the introductory sentence and the general expression of sections 1-3 all add to the confusion of where 'main town centre uses' should be directed. It is implied that there are 'appropriately located' or 'sustainable locations' which might or might not include city or town centres, it is not clear why these vague terms are used where clear PPS1 and PPS6 principles should be expounded.

The standard and accepted practice for assessing the need for additional retail floorspace is defined in PPS6 para 2.32 - 2.37. It is explicit, in the Policy wording that retail and leisure job forecasts will be used to determine retail and leisure floorspace requirements. This approach will be revolutionary and untested, if adopted, as no known methodology exists that equates or links job growth with floorspace requirements. There is a strong suspicion that there is a serious issue of double counting if job forecasting is used as the building block for determining floorspace requirements. The real danger is that one spurious assumption, the retail and leisure job forecasts, will be used as the building blocks for a questionable and untried method of floorspace forecasting which is not considered acceptable or sound. It also ignores the RSS declared intention to address retail and leisure 'need' at the first Review stage of the RSS when floorspace requirements would be properly assessed.

Retail and leisure floorspace should not be lead or seeded by the job growth forecasts. There is no accepted methodology for forecasting retail and leisure floorspace 'need' based on 'potential job

growth’.

Bearing the previous point in mind any additional floorspace for town centre uses should be accommodated in our centres. Chapter 2 of PPS6 advises the steps one needs to go through to accommodate additional floorspace that cannot be directed towards our centres.

In light of the above the wording should be revised as follows, to emphasise the proper focus on town centre first as the location. However the linking of retail and leisure use floorspace should be deleted given that RSS recognises that retail and leisure need/capacity forecasting has not been carried out at this stage and is reserved to be addressed at the first Review of RSS.;

**The need for additional floorspace for office, retail and leisure uses as indicated by the potential job growth in Table 14.7A and the considerable scope for this to be accommodated ~~mainly in or adjacent to~~ city and town centres.**

**E3A3** – The City Council considers that the Policy wording is confusing. Some of the uses listed are ‘main town centre uses’ and should therefore be directed in our city and town centres. The reference to ‘mixed use’ is not helpful. Any ‘mixed use’ development should firstly be properly defined so that it is clear what uses are included or excluded from the ‘mix’ and it should be made clear that any ‘mix’ that contains ‘main town centre uses’ should be subject to the 5 key tests of PPS6.

It is considered that the types of uses to be accommodated on employment land should be determined by the Use Classes Order rather than the way the economy is projected to change. Both the RSS and City Council commissioned research on employment land has recognised that there will be significant employment growth in Leeds in sectors that would not be accommodated on B1, B2, or B8 land (e.g. healthcare).

**E3C – The City Council is concerned that there is no definition for the term “market ready sites”. This will only create further uncertainty and ambiguity by leaving it to LPA’s to decide. This therefore needs to be clarified.**

### **What further change would you like to be made to the Plan?**

See above changes emphasised in bold text.

**These comments are by or on behalf of (please insert your name as in Section A of this form:**

Leeds City Council



## Section B – Your Comments

Please note that comments are invited about the Secretary of State’s Proposed Changes to the draft Yorkshire and Humber Plan, not those parts of the Plan that are unchanged from the draft published by the Yorkshire and Humber Assembly in 2006. The Proposed Changes are listed in a Schedule and are also identified in a revised draft version of the Plan.

Please ensure that your comments relate clearly to a specific part of the Plan (e.g. a particular policy, paragraph, Figure or Table) and that you explain what further changes you would like to see to the Plan. This will make consideration of your comments much easier.

### Which part of the Plan that we are proposing to change are you commenting on?

Economy – Appendix Background Report	
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### Do you object or support the proposed change (please tick one)?

Support	<b>Object</b> ✓	Comment
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### Why do you object to or support the proposed change?

#### APPENDIX

**Questions about the background report: Update of the job growth and employment land figures in the Draft Regional Spatial Strategy for Yorkshire and the Humber (Arup for GOYH, June 2007)**

Section 1.3 states that Option D forecast data was used for modelling as this was the data set supplied by Yorkshire Forward and was considered the most up to date data available for forecasting economic growth. It states that Yorkshire Forward’s revised approach factors in employment growth from over 250 transformational projects across the Yorkshire and Humber Region, instead of the 20-30 projects identified for the 2004/2005 modelling. The basis of this approach is the assumption that by the end of the next decade existing activity on the ground will all perform as planned. This data has been used for Arup’s revised modelling, as this is the data set supplied by Yorkshire Forward.

**A clear understanding is necessary of how the forecast figures have been derived before this is used for plan making purposes and before specifically providing LPA’s with net employment land figures. Within the context of the Proposed Changes, the City Council considers that the following matters need to be clarified.**

- **What is the criteria for selecting these transformational projects ?**
- **With the exception of Aire Valley, Yorkshire Forward did not consider projects without significant planning permission or concrete approvals. This, however, does not mean these projects and hence jobs will materialise. What is going to change from the previous plan period ? In Leeds, substantial land allocations have been made (and projects identified) for employment but these have not come forward for development ? If this approach is taken, there is a prospect of the RSS over allocating employment land ?**
- **What criteria have been used for identifying the number of jobs that will be created as a result of these transformational projects ? For example, are the same employment used densities to convert number of jobs created to floorspace ? The employment land review guidance (ODPM, December 2004) note provides broad guidelines. Have these been used by local planning authorities (LPA’s) ?**
- **Of those jobs created by these transformational projects, how many will be new jobs and how many will be displaced from within the district and the region ? Has this been taken into account ?**
- **To what degree, if any, are the jobs created as a result of these transformational projects also included in the updated REM 2007 baseline data ?**

**What further change would you like to be made to the Plan?**

See above changes emphasised in bold text.

**These comments are by or on behalf of (please insert your name as in Section A of this form:**

Leeds City Council

## Section B – Your Comments

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Please ensure that your comments relate clearly to a specific part of the Plan (e.g. a particular policy, paragraph, Figure or Table) and that you explain what further changes you would like to see to the Plan. This will make consideration of your comments much easier.

### Which part of the Plan that we are proposing to change are you commenting on?

<b>Pages: 117 – 136, Section 13, Housing</b>	Policy / Para / Fig / Table etc:
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### Do you object or support the proposed change (please tick one)?

Support	<b>Object</b> ✓	Comment
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### Why do object to or support the proposed change?

#### Policy H1 – Provision and Distribution of Housing

##### General Comments

Throughout the RSS process; the City Council has consistently raised fundamental concerns regarding the scale and distribution of housing provision and the impact upon Leeds. The RSS PCs require a higher housing requirement to be delivered sooner (from 2008) - this will be very challenging to deliver but also in conflict with other RSS policy objectives, an urgent RSS review is therefore required for this to be reconsidered and re-phased as part of a robust plan, monitor and manage approach – linked to the necessary infrastructure.

The scale of housing growth proposed for West Yorkshire is in conflict with the principles of environmental sustainability. The RSS Proposed Changes highlight the importance of 'Green infrastructure' & managing flood risk as key policy issues for the region. The RSS Proposed Changes does not reconcile how these policy objectives can and should be achieved in West Yorkshire, whilst achieving the housing requirements (large areas of brownfield land in urban areas are susceptible to flood risk). There are therefore inherent policy conflicts within the RSS and consequently this needs to be urgently addressed in the Plan regarding the scale, distribution, phasing and infrastructure provision to support and facilitate the delivery of a coherent spatial strategy. Such issues are also highlighted in the RSS Revised Sustainability Appraisal but not resolved through the Proposed Changes. The RSS emphasises the importance of 'environmental designations' rather than the importance of countryside and the green belt setting of a major city such as Leeds. If the environment & quality of Leeds is compromised to such an extent, this is likely to affect the longer term economy/competitiveness of the city and the performance of the Y&H region as a whole.

The City Council is also fundamentally concerned that the prospect of major greenfield development to achieve the housing requirement, would compromise policy objectives for urban regeneration - which need sustained resources to deliver intended outcomes. Within this context, the City Council supports the intent of the broad phasing (in Delivering the Core Approach p. 43), which emphasises the need for housing to 'make the best use of existing allocations and urban potential in cities and towns, improving low demand neighbourhoods and the need to provide more affordable homes. The scale of such challenges and opportunities in Leeds

are such, that priority needs to be given to their delivery (underpinned by the necessary infrastructure). **The City Council therefore firmly recommends that the Plan and the Proposed Changes are revised to reflect a more balanced approach for Leeds (within a wider Leeds City Region and regional context), which:**

- **Includes windfall sites in housing land supply calculations,**
- **More explicitly, uses the opportunities provided by housing growth to aid the regeneration process by developing and applying the EASEL “model” (making more efficient use of land in low density areas such as former council housing estates) to other urban areas and thereby providing increased housing densities and new sustainable communities,**
- **Maximises the opportunities in inner city areas adjacent to the City Centre to provide both market and affordable family housing to complement flat provision in the core, diversify the profile of housing and residents, and enable wider social groups to share in the benefits of living in and around the City Centre.**
- **Promoting growth point/co-town in brownfield locations, such as the Leeds’ Aire Valley, Bradford Shipley Canal Corridor and Wakefield’s Five Towns, and resisting any incursions into the Green Belt,**
- **Stressing the importance of securing funding for infrastructure provision from central government and of providing high quality sustainable communities,**
- **Through the planning process, ensuring that the need for employment land is properly understood, that sufficient employment land is retained & protected and only surplus employment land is released for housing development.**

### **Specific Objections**

**Without such a considered and measured approach to housing in Leeds, the City Council is fundamentally concerned that the Proposed Changes for Housing, would have the following consequences. Going forward, these issues need to be addressed within the context of any revisions to the Plan.**

- **A substantial rise in population. Implementation of the changes would probably imply a Leeds population of over 840,000 by 2026, well in excess of the 801,000 in the 2004 based population projections and 90,000 up on the 2006 figure. There could be net in-migration of 2500-3000 a year. This would pose a significant strain on services and infrastructure.**
- **Greatly increased housing land requirements. Arising from the Proposed Changes, the residual requirement 2007- 26 is estimated at 84, 000. This is a significant increase from the 73, 800 provisionally estimated in the Leeds LDF Core Strategy Issues & Alternative Options (Table 1 – Current Sources of Housing Supply and Emerging Housing Requirement) consultation document. Depending on the source of housing supply, the new requirement could now mean that land for a minimum of 25,000 dwellings will have to be identified. This could equate to at least 800 hectares and will require further review of the Green Belt, which for wider policy considerations the City Council does not feel would be appropriate.**
- **The end of the current strategy that has concentrated over 90% of development on brownfield sites. Even if the extra brownfield land could be found, it would not be possible to achieve the greatly increased building targets from brownfield sites alone, because these types of site tend to serve sectors of the market that are restricted spatially and in housing type. To achieve higher output, diversification into family housing and new areas of Leeds is necessary – making greenfield development unavoidable.**
- **The increase in the volume and range of the land supply consequent on the need to increase output could undermine regeneration efforts in EASEL, the Aire Valley, the West Leeds Gateway and elsewhere. Given a choice between developing an attractive**

greenfield site on the edge of the urban area or a more costly brownfield site within a challenging inner city market, housebuilders may understandably prefer the greenfield option. At the very least, the greater availability of mid to up market housing in fringe locations seems likely to stymie efforts to diversify inner city housing markets.

- Another consequence of an expanded land supply could be an increase in blight. There is currently a stock of 24000 planning permissions for dwellings on about 400 mainly brownfield sites in Leeds. Some of these are probably of marginal viability, and if alternative more attractive sites become available they could well lose out in the competition for development funds and be left as semi-derelict or vacant eyesores.
- There is a real question about whether a net housing stock increase of 4300 a year is realistically achievable over an extended 18 year period. Consequently, greater clarity is needed regarding the practicalities and phasing the scale of growth envisaged and the need for this to recognise the need to deliver major programmes of urban regeneration in the light of local circumstances in Leeds (within the context of PPS3 Para.59). With the possible exception of a brief period in the 1930s, such a rate of increase has not even been approached in Leeds in the last 70 or 80 years. Moreover, the highest rates of increase – as in the 1960s – have usually been achieved when there were very large programmes of public building, which brought new housing to those unable to afford market provision. There seems no prospect of a really significant public sector contribution over the next two decades, which means that delivery of the RSS numbers will depend largely on market forces. The market only builds if it can sell, and the unspoken assumption of RSS that removal of land supply constraints will automatically lead to greatly increased output may well be mistaken. With an unprecedented stock of 24000 dwellings in planning permissions in Leeds now, it could be said that land supply constraints are virtually absent already – but the market has still not managed to deliver the volumes proposed by RSS, perhaps because of lack of demand, or shortages of development finance or capacity problems in the construction industry. This serves as a warning that massive increases in land supply in pursuit of probably unattainable output figures could result in a legacy of unused brownfield sites and surplus allocations that would be to the detriment of the proper planning of the area and could needlessly change the face of Leeds forever.
- RSS acknowledges the implications of growth for accessibility, but appears to offer no specific proposals for improving the performance of the local transport network. The result could be that congestion just gets worse (to the detriment of quality of life and the economic functioning of the city), which would also potentially, stifle the economic growth which RSS aims to achieve.
- The new requirement is a radical departure from current policy, but there are no adequate proposals for managing the transition to the new total – it just applies from 2008. RSS recognises that output will need to build up to the new figure, but does not prescribe a transitional timetable. Meanwhile, the Council is expected to demonstrate the extent to which a 5 year supply is available under existing policy, but using RSS rates. If the supply is inadequate, planning applications are supposed to be given favourable consideration. The lack of any clear-cut transitional arrangements, despite the recognised case for them, could result in piecemeal approval for housing development on greenfield sites, before land supply policy can be formally reviewed. In the interests of coherent planning, the Council considers that RSS should be modified to include a specific tapered transition timetable to get from the 2004-8 net growth figures to the higher figures ultimately sought.

## **Policy H2 - Managing the Release of Land in Support of Interventions to Address Falling Housing Markets**

The City Council has the following comments to make. The Proposed Changes are welcome, particularly in terms of recognition of EASEL. The managed release of housing land will be important tool to help sustain the interventions to improve the housing markets of EASEL and other HMA areas in Leeds.

**Where the table below Policy H2 sets out factors to be evaluated in judging the health of Housing Market Renewal Areas (HMRAs), there is a question as to whether HMA is the right description. The description should be for all the areas listed in Part B of Policy H2. This point therefore needs to be clarified.**

### **Policy H3 – The Provision of Affordable Housing**

The City Council considers that the changes are an improvement in that the percentage ranges are no longer set as targets to be applied directly to development proposals. As indicative ranges on need, they are helpful in reinforcing the high level of need for affordable housing that needs to be addressed. They will be influential for local authorities in setting their own targets based on the findings of Strategic Housing Market Assessments, but not as prescriptive as targets. Hence, the Proposed Changes offer an increased measure of flexibility, which was lacking in the Draft Plan.

Similarly, the note in the explanatory text is welcomed that local authorities are likely to have considerable variety of needs within their districts. Leeds does have considerable variety and should have the option to set variable targets if there is reason to do so.

As regards the indicative estimates of need, the 30-40% for Leeds is considerably higher than the 15-25% target that Leeds has applied over the last 12 years. Nevertheless, Leeds' SHMA gives evidence of much higher levels of housing need, so an increase is justified in terms of need alone. Hence, Leeds does not object to the indicative estimates.

### **Policy H4 – Housing Mix**

The City Council's comments are as follows. The added note to Part A "including family homes" is supported.

**The use of a defined area on the Key Diagram is welcomed to clarify which areas are of particular concern. However, the boundary of the Regeneration Priority Area should be moved slightly northwards to avoid any doubt that EASEL is included.**

### **Policy H5 – Provision of Sites for Gypsies and Travellers**

**The City Council considers that the explanatory text should be clarified to set out how a selective review of the RSS, will use the findings of local Gypsy and Traveller Accommodation Assessments (GTAA) to provide a basis for longer term needs.** In accordance with this work, the City Council will work with neighbouring authorities to fulfil requirements.

### **What further change would you like to be made to the Plan?**

See above changes emphasised in bold text

**These comments are by or on behalf of (please insert your name as in Section A of this form:**

Leeds City Council

## Section B – Your Comments

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Please ensure that your comments relate clearly to a specific part of the Plan (e.g. a particular policy, paragraph, Figure or Table) and that you explain what further changes you would like to see to the Plan. This will make consideration of your comments much easier.

### Which part of the Plan that we are proposing to change are you commenting on?

<b>Pages: 137 – 171, Section 16, Regional Transport Strategy</b>	Policy / Para / Fig / Table etc:
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### Do you object or support the proposed change (please tick one)?

Support	<b>Object</b> ✓	Comment
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### Why do object to or support the proposed change?

## General Comments

Linked to comments on the Spatial Vision and the Core Approach (Section 4) and Delivering the Core Approach (Section 5), the City Council remains very concerned regarding the scale of growth presented by the Proposed Changes and the adequacy of the Regional Transport Strategy to deliver high quality public transport and related mechanisms to deliver this. The ambitions for housing and economic development are simply not matched by a 'step change' in the level of transport infrastructure in order for this to be sustainable. The City Council firmly believes that appropriate levels of growth needed to be "planned" with sufficient levels of transport infrastructure in place as a key priority, rather than LPA being in the position of seeking to 'retrofit' solutions once development and travel patterns (by the private car) are established. The City Council considers that these fundamental issues need to be addressed in any revisions to the Plan.

## Policy T1 – Personal Travel Reduction and Modal Shift

The City Council's concerns are as follows.

T1D has provided a limited strengthening of policy in terms of the motorway. However, RSS still fails to fully acknowledge the issues the national networks raise for travel on the wider network. This point therefore needs to be addressed in revisions to the Plan.

T1F4 has been revised in such a way as to shift the emphasis entirely to the local authority. Worded in this way with no reference to the wider network, for example motorway and trunk roads, nor the role of central government in promoting a national policy framework is a retrograde step. It is recommended that the earlier form of words (Draft Plan), which stress this continues to be supported.

Para 16.4A is a new addition which appears to strengthen the duty of the local authority to co-operate with the Highways Agency regarding developments adjacent to the strategic network. Whilst the sentiments are supported, it is recommended that the policy wording should be simplified.

Para 16.5 has made additional reference to the provision of segregated facilities for pedestrians and cyclists. Whilst this is to be welcomed, the section should also recognise that shared space between cyclists and pedestrians is often the best solution. Also, that in many situations on-highway cycle lanes represent the only opportunity to provide for the cyclist and this approach should be given continued support in planning policies.

## Policy T2 - Parking Policy

### General Comments

T2A has been reworded to significantly strengthen parking standards in town and cities. A consequence of the revisions however is to have a differential approach to Maximum Parking Standards (Table 16.5) across Principal Towns, Local Service Centres & Rural Area, Sub regional Cities and Towns and Regional Cities. The City Council is concerned that there is no clear rationale for this. To be effective, the City Council considers that this policy should be closely related to alternative choices by for example offering support for car clubs. This strengthening of policy (which is consistent with the overall direction of demand management policy) is however problematic due to the fact that the RSS cannot lever the additional injection of resources for public transport and sustainable modes if residents are to be persuaded to forego car ownership. Parking problems are becoming increasingly acute in many urban areas; consequently it is doubtful if this policy can be sustained unless the required resources are injected to support sound alternatives. This change also appears to be slightly contradictory in terms of policy T1B by seeming to undermine the role of accessibility assessment which is designed to reverse the perverse incentives of developing in less accessible locations.

The Panel's recommendation for differential inner and outer urban standards is more practical in this regard and certainly in the timescale of the present document should be supported as likely to lead to more effective policy.



T2D wording has remained unchanged and therefore previous City Council comments remain valid since it is unclear what the intent of this policy is.

Overall, the Leeds City Council supports the principle of allowing more restrictive standards in the city centre. This is already the case for Leeds City Centre and the area immediately surrounding it, i.e. the 'Fringe'.

**However, the Proposed Changes are not in line with PPG13 or the Panel's recommendation. The City Council therefore wishes to object as follows:**

- That 'town centres' within the urban area are expected to not only apply but have more restrictive standards than the Regional Cities car parking standards.
- That the wider urban area is expected to apply the Regional Cities car parking standards.
- With the exception of the city centre, the suggested standards for the remaining town centres and the wider urban area are too high.

Linked to the City Council's comments re. Policy T2 and the Spatial Vision and Core Approach (Section 4), the Proposed Changes do not fully address the concerns raised by Leeds that significant town & district centres imbedded within existing urban areas were largely ignored in the hierarchy of centres. The Panel Report suggested that local authorities should be empowered to identify Principal Service Centres. The Proposed Changes advances the incomplete selection of centres put forward in the Draft RSS plus an option for local authorities – exceptionally – to identify further centres. The text of the Policy implies that this option only applies to freestanding towns, as opposed to centres imbedded within urban areas. The explanatory text suggests this option should be pursued sparingly.

It would be better for the RSS to give more discretion to local authorities to determine which centres in West Yorkshire are worthy of Principal Town designation without limitation of numbers as implied by the explanatory text.

The City Council therefore recommends that as a minimum, all 'centres' outside the city centre should accord with the maximum standards for Principal Towns, Local Service Centres and Rural areas unless local circumstances dictate otherwise, or

The car parking standards for regional cities is amended in such a way that the range starts with the lower threshold as per the standards for Principal Towns, Local Service Centres and Rural areas. For example;

	Regional Cities ... (Proposed Changes)	Regional Cities ... (LCC recommendation)
Food Retail	1 space per 18 - 25 sqm	1 space per 14 - 25 sqm
Non Food Retail	1 space per 30 - 60 sqm	1 space per 20 - 60 sqm
Etc ...		

The same would be the case for the remaining urban area outside Leeds City Centre and the identified fringe. Most of the uses in Table 16.5 are town centre uses. Notwithstanding the above, car parking standards outlined in PPG13 do not draw a distinction between different areas within the region or local authority area.

The basis for car parking guidelines for the main urban area should reflect PPG13. The RSS does not provide any evidence or justification why an alternative approach should be adopted, albeit with the exception of 'centres' being more accessible by sustainable modes of transport as compared with out of centre locations. No justification is provided for the main urban area. If LPA's were to provide more car parking spaces than advocated in PPG13 or RSS then this would need to be justified through the plan making process. As a

general rule car parking in urban areas need, and tend, to be less restrictive than those applied for town centres on the basis that they are not as accessible by sustainable modes of transport. In Leeds the car parking guidelines applied for town centres and the wider urban area is in the main the same. The City Council therefore recommends the continuation of this approach.

Present Leeds City Council car parking guidelines are in accordance with both PPG13 and the Draft RSS. However, the Proposed Changes would require amendments in subsequent LDFs. By way of example a comparison of car parking standards for B1 Business has been reproduced below.

#### Comparison of car parking standards in the Leeds UDP & RSS – B1 Business

UDP Areas	Guidelines	RSS 2004 Areas	Guidelines	Proposed Changes	Guidelines
City Centre Core	1:175	Regional Centres	1:60	Regional Cities	1:60
City Centre Fringe	1:100				
Other Centres	1:33 (first 330 sqm) 1:50 (for 330 sqm +)	Local & sub Regional Centres	1:30		1:60*
Outside Centres	1:30 (first 300 sqm) 1:33 (for 300 sqm +)		N/A		1:60

\* on the basis that the centre is not identified as a Principal Town

In response to the Proposed Changes to Policy T2, the City Council recommends that the policy is amended to take the following into consideration;

- City centre and city centre fringe to have more restrictive standards.
- To encourage, where practical, more restrictive standards in all our centres.
- As a minimum all centres outside the city centre to accord with the maximum standards for Principal Towns, Local Service Centres and Rural areas unless local circumstances dictate otherwise.
- The wider urban area to accord with the maximum standards for Principal Towns, Local Service Centres and Rural areas
- The Policy is revised to address the concern that ‘main town centre uses’ may be attracted to out of centre locations on the basis of more generous car parking spaces.

or

- The car parking standards for regional cities is amended in such a way that the range starts with the lower threshold as per the standards for Principal Towns, Local Service Centres and Rural areas.

Para. 16.13 No revision has been made to this paragraph and therefore the context and definition of “strategic” park and ride remains ambiguous. It is suggested by SoS that further guidance on this matter should await a review of RSS.

Para. 16.14 No revision has been made to this text. The mechanisms for influencing third party parking providers remain limited outside the planning process.

### **Policy T3 – Public Transport**

**This policy has been comprehensively reworded. However, a concern remains about T3B in view of the absence of policy direction for strategic park and ride within the supporting text at 16.13.**

**Para. 16.19 The reference to the Yorkshire Bus Initiative should be reviewed with the key stakeholders concerned since this title may no longer reflect a current approach, which in West Yorkshire is now based around Performance Improvement Partnerships for future bus route improvements.**

Paras. 16.25 and 16.26 Previous City Council comments continue to apply. However, this issue is one of regulation, which is largely outwith the scope of the RSS and most properly rests with national government.

### **Policy T4 - Freight**

Part K - This policy clause has now been deleted in the Proposed Changes. However, whilst the difficulties of delivering such a policy in this manner are recognised there remains a need for policy innovation of this kind to drive change in production and distribution practice.

Para. 16.32. The Proposed Changes retains previous text. The City Council consider that further clarity is required as to how in practice freight movements can be given a higher priority than car commuting.

Para. 16.33 Limited revisions have not tackled the question of regional freight facilities. An innovative approach in this area is needed but may perhaps be best pursued at the next review of RSS.

**It is noted that a new indicator for an “integrated regional lorry routing network” has been included. The supporting text does not amplify this indicator, which without a defined target may be of limited value.**

### **Policy T5 – Transport and Tourism**

**Table 16.12, the City Council would welcome further clarification on whether the indicator/target 120 is correct ?** This section has been revised. However, a new indicator for “promoting the journey component of tourism” and potentially difficult to establish a meaningful target. Should a regional strategy, which on one level is seeking to reduce travel and congestion be seeking to encourage it simply for its own value?

### **Policy T6 - Airports**

Minimal revisions have been made to this section and the City Council remains concerned that the region will continue to lack a coherent airports strategy in common with the UK as a whole.

A clarification regarding ancillary developments at airports has been provided at 16.42A and this change is supported as is the additional support for improving surface access to Leeds Bradford International Airport at 16.53.

### **Policy T9 – Transport Investment and Management Priorities**

**Revisions have been made including new wording for T1A. This rewording is limited in scope and the previous City Council comments on the Draft Plan are considered to remain valid.**

**It is considered that given the changes to housing allocations set out in Table 13.1 and the local employment figures set out in Table 14.7 much greater emphasis needs to be provided on internal transport improvements within Leeds (and to a lesser extent elsewhere in West Yorkshire). It is important that effective transport is to be provided which is able to compete in time and quality with the provision made for longer distance journeys within the city region if a more locally based policy is to be achieved. In this regard it is suggested**

**that to increase this emphasis, Policy T9A should be subdivided to include a T9A1 specific to Leeds and those areas where high levels of housing and economic growth are above presently planned requirements.**

**In terms of the housing policy H1B, it is considered that the present RTS and Policy T9 specifically is unsatisfactory in so far as it is not founded on an adequate appraisal of the local transport demand and infrastructure requirements to meet a quantum change in residential provision, population and local travel.**

**What further change would you like to be made to the Plan?**

See above changes emphasised in bold text.

**These comments are by or on behalf of (please insert your name as in Section A of this form:**

Leeds City Council

## Section B – Your Comments

Please note that comments are invited about the Secretary of State's Proposed Changes to the draft Yorkshire and Humber Plan, not those parts of the Plan that are unchanged from the draft published by the Yorkshire and Humber Assembly in 2006. The Proposed Changes are listed in a Schedule and are also identified in a revised draft version of the Plan.

Please ensure that your comments relate clearly to a specific part of the Plan (e.g. a particular policy, paragraph, Figure or Table) and that you explain what further changes you would like to see to the Plan. This will make consideration of your comments much easier.

### Which part of the Plan that we are proposing to change are you commenting on?

<b>Pages: 173 – 221, Section 15, Environment</b>	.
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### Do you object or support the proposed change (please tick one)?

Support	<b>Object</b> ✓	Comment
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### Why do object to or support the proposed change?

#### **Policy ENV1- Development and Flood Risk**

Part B of the Policy states that development will be in the lowest risk sites identified by the SFRA but it fails to take account of differences in the 'vulnerability' of different types of development. It encompasses all types of 'development'. It should therefore differentiate between 'less vulnerable' e.g. industrial and 'more vulnerable' e.g. housing because, according to PPS25, less vulnerable development can be appropriate in high flood risk areas. It is therefore unhelpful for the Policy to state that all development should be avoided in flood risk areas - the reality is much more refined than this. Also the Policy implies that lower flood risk sites are preferential to higher flood risk sites but there may be other planning reasons for avoiding a lower flood risk site, for example Green Belt designation. Allocation of sites is not just according to flood risk. The RSS needs to be clear about how flood risk should be prioritised within the context of other overlapping policies and priorities e.g. 'Housing', 'Employment' and 'Green Infrastructure'.

The Flood Risk map, Figure 15.1 is incomplete and therefore misleading in reflecting the nature of Flood Risk issues in Leeds. The map predates more recent evidence on flood risk issues in Leeds identified as part of the recently completed Strategic Flood Risk Assessment (a copy has been included as part of the City Council's representations on the Proposed Changes). Consequently, the Plan does not acknowledge significant areas of flood risk across Leeds MD, yet many of the policy objectives of the RSS are predicated upon Leeds being able to accommodate high levels of housing and economic development, in the absence of flood risk management and wider infrastructure requirements being effectively addressed. The issue of flooding as a consequence of climate change is also highlighted as a 'key significant negative impact' of the Proposed Changes on Page 9 of the SA/SEA Summary Report of Findings. The RSS should therefore recognise the conflict between the need to provide housing and employment in Leeds and the need to avoid flood risk. This is a major challenge for Leeds at the local level and needs to be acknowledged in the RSS. At the very least its acknowledgement would help the City to secure funds for the delivery of the Leeds Flood Alleviation Scheme and other appropriate measures.

**The City Council therefore recommends that the following changes should be made:**

**Re-wording of the Proposed Change in ENV1 B to state:**

**'Allocation of areas for development will follow a sequential approach and will aim to be in the lowest risk sites appropriate to the vulnerability of the proposed use.'**

## **Accurate representation of the flood risk in Leeds on Figure 15.1.**

### **Policy ENV4 - Minerals**

Leeds City Council objects to the Proposed Change of Part B of this Policy. The proposed wording implies that if you maximise the use of secondary and recycled aggregates then primary extraction will be unnecessary, which is not the case.

**The City Council recommends that the following Changes are made:**

**Re-wording of the Proposed Change in ENV4 B to state:**

**‘The Region will maximise the use of secondary and recycled aggregates to reduce dependency on primary extraction.’**

**Exchange the use of the words ‘mineral deposits’ to ‘economic mineral resources’.**

### **Policy ENV5 - Energy**

The City Council objects most strongly to the unjustified deletion of the requirement for 10% of the energy needs of a development to come from on-site renewable energy sources. The 10% RE requirement was agreed at the EiP. It is already being used as a material consideration and establishes the principle of requiring RE energy. The LPA can set a higher target if appropriate but having the minimum of 10% in RSS ensures that at least some RE provision is guaranteed and LPAs do not have to waste resources on justifying the principle of the Policy. It is felt therefore that the RSS needs to demonstrate strategic direction on this issue to ensure a consistent approach across the region as a whole, rather than individual authorities attempting to set and implement their own targets.

The 10% requirement should therefore be re-instated into RSS policy ENV5. It is a fall-back position until such time as LPAs can get their own policies in place, it establishes the principle so that each individual LPA does not have to do this and it helps get the development industry geared up to the provision of RE energy infrastructure from the start of the development process. There is no point hiding the detail in para 15.37A. Considerable effort was placed in developing clear policies and it is considered that this revised policy is now woolly and difficult to enforce. This is inconsistent also with the precise wording of the policy where the detail in 15.37A now states that LPAs can ‘expect far greater percentages [than 10%] where it is feasible and viable’ but no clear policy to refer this requirement to.

ENV5 gives sub-regional targets for renewable energy generation. The Proposed Change is that the RE must be **grid-connected** for it to count towards the target. This means that micro-generation does not count towards the target and therefore leaves us with even less justification / support for requiring micro-generation.

The new Policy is also vague in requiring energy to come from 'local renewable sources'. This is unclear. Does it mean that it is acceptable to buy in 'green energy' and not have to contribute to the infrastructure required to produce it? In Leeds City Centre there is very little space for off-site energy infrastructure provision - it needs to be on-site.

**The City Council recommends that the following changes should be made:**

**Re-instatement of the 10% RE requirement into RSS Policy ENV5.**

**Deletion of the Proposed Change in para 15.75.**

### **Policy ENV 12 – Regional Waste Management Objectives**

**Should Objective A specifically refer to 'composting', or is 'recycling' understood as including composting ? This therefore needs to be clarified. There are currently two separate BVPIs for recycling (BV82a) and composting (BV82b). Composting is specifically referred to in a Proposed Change under 15.87. The City Council recommends that the**

indicators should include 'recovery' as well as 're-use' and 'recycling', so as to be consistent with Objective A. Some of the Proposed Changes have been made specifically to address the Waste Strategy for England 2007, but WS 2007 also includes specific recovery targets. Should landfill diversion also be included as an indicator ?

#### **Policy ENV13 – Provision of Waste Management and Treatment Facilities**

Objective A.1 refers to 'doubling' treatment capacity by 2020. Given that there is very little capacity in Leeds, and no doubt in the region, 'doubling' existing capacity seems insufficient. Consequently, the Proposed Changes need to be revised as the wording doesn't adequately reflect the massive step changes required nationally in terms of recycling, recovery and landfill diversion targets.

Para. 15.97 singles out certain treatment technologies and these are not clearly defined. The Proposed Changes appear to insert verbatim what was only a comment by the Inspector. The references to specific processes were not intended by the Inspector to be prescriptive but yet authorities could end up being restricted by this. Given these issues, it would be better therefore, if this sentence simply referred to waste treatment technologies that contributed to the achievement of waste management objectives and targets as set out in Waste Strategy for England 2007.

The indicator refers to "adequate facilities within the region". This is very vague. It is assumed that this will be measured against the overall regional projections for treatment capacity required.

Table C3 – It is not clear what the distribution is between 'treatment capacity' and 'recovery capacity', this therefore needs to be clarified.

#### **Policy ENV 14 – Strategic Locational Criteria For Waste Management Facilities**

The indicator refers to "appropriately located new waste facilities". See comment on ENV 12, Objective C.3 above.

#### **Table 3**

It is not clear what the distribution is between 'treatment capacity' and 'recovery capacity', this therefore needs to be clarified.

#### **Policy ENV15 – Green Infrastructure**

The Green Infrastructure Policy in principle is supported but has no local specificity, what does it mean for Leeds? Are there any broad areas of GI that could be joined up regionally ? The principle of Green Infrastructure is supported but it is unclear what this may mean in practice and how it relates to other policy objectives which may be applied to the same areas. This is a new area of work and LAs need more guidance on how it should be approached. As it stands, there is a potential for inconsistency in how individual LPAs might identify, map, protect, promote and maintain GI - the RSS should have a more central role in co-ordinating this. Housing pressures in Leeds are such that, there is a need to not only protect areas of greenspace where appropriate but also to 'grow' the stock of greenspace to satisfy the needs of new residents, linked to substantial housing growth requirements. **The City Council therefore recommends that further clarification is made to the intent of the policy and its application across the region and within individual sub regions.**

#### **Policy ENV10 – Landscape**

The scope of Policy ENV10 C to enhance derelict and despoiled landscapes within West Yorkshire is supported. **The supporting text however needs to fully recognise their amenity and biodiversity value within the context of wider regeneration and economic growth objectives.**

Para. 15.75. There is no need for a buffer zone around National parks and AONBs. It puts more pressure on the urban fringe of Leeds, which is the nearest countryside for a large part of the region's population. In broad terms the Proposed Changes – in promoting higher levels of housing and economic growth in Leeds, fails to acknowledge the importance of the wider countryside, landscape character and open setting of the main

**urban area and settlements across Leeds MD. Such areas not only provide opportunities for recreation but also give the City its unique character and identity. Para. 15.75 therefore needs to be redrafted to reflect these concerns.**

**What further change would you like to be made to the Plan?**

See above changes emphasised in bold text.

**These comments are by or on behalf of (please insert your name as in Section A of this form:**

Leeds City Council



## Section B – Your Comments

Please note that comments are invited about the Secretary of State’s Proposed Changes to the draft Yorkshire and Humber Plan, not those parts of the Plan that are unchanged from the draft published by the Yorkshire and Humber Assembly in 2006. The Proposed Changes are listed in a Schedule and are also identified in a revised draft version of the Plan.

Please ensure that your comments relate clearly to a specific part of the Plan (e.g. a particular policy, paragraph, Figure or Table) and that you explain what further changes you would like to see to the Plan. This will make consideration of your comments much easier.

### Which part of the Plan that we are proposing to change are you commenting on?

<b>Sustainability Appraisal of the Proposed Changes</b>	
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### Do you object or support the proposed change (please tick one)?

Support	<b>Object</b> ✓	Comment
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### Why do object to or support the proposed change?

#### General Comments

Leeds City Council has raised previous concerns regarding the earlier SA/ SEA at the Draft Plan stage, which do not appear to have been taken into account, i.e. the lack of any suggested mitigation for negative impacts that were identified. Given that the Proposed Changes are now promoting higher levels of housing and economic growth than envisaged at the Draft Plan stage, the City Council is very concerned that adaptation and mitigation issues are therefore likely to be even more acute. The City Council is also fundamentally concerned regarding of the scope and content of the Sustainability Appraisal and its compliance with the Strategic Environmental Assessment Directive (SEA).

#### SEA Directive

In the view of the City Council, the sustainability appraisal does not meet the requirements of the SEA Directive. This is because it does not show or ‘track’, how the comments on the SA have been taken into account or how the findings of the SA have been subsequently reflected in the RSS Proposed Changes. Also, it does not fully explore the likely significant effects of Proposed Changes to RSS on the environmental factors listed under the SEA Directive i.e. biodiversity, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage and the interrelationship between these.

#### SA Findings

The Proposed Changes do not include the suggestions made by the SA. For example, the SA recommends that Green Belt Reviews should be phased so as to ensure that maximum use of previously developed land is achieved.

#### Green Belt

In addition to the comment above, the SA fails to acknowledge that the previous RSS focussed housing growth within the main urban area, however the result of the Proposed Change on Green Belt reviews is that housing growth may also be accommodated on the edge of the urban area. This will lead to longer journeys to get from new housing areas to the city centre and therefore increases greenhouse gas emissions, pollution levels and congestion, particularly in the more deprived inner areas of Leeds.

### **Housing**

Within the general narrative (Page 9 in the summary document), the SA asserts that the negative consequences of increased housing are 'balanced out' in overall sustainability terms by economic and social benefits. This statement is made without any clear or explicit evidence and fails to acknowledge the local consequences of the RSS stages as highlighted at the EIP in the City Council's 'Baseline review' of Environment – presented to the EIP as a Core document. In any event, the City Council considers that the achievement of sustainable development should be via the recognition of the dependencies and interdependencies between environmental, economic and social policy areas – to achieve objectives at the same time, rather than seeking to balance one issue out against another. The Proposed Changes SA therefore fails to explicitly identify the key tensions and the specific interventions require to adapt and mitigate against their unsustainable consequences.

### **Flood Risk**

The Proposed Changes SA does not take account of the conflict between the need to avoid flood risk areas and the need to accommodate increased housing growth. This should score a negative and the mitigation could be in the form of support for an enhanced Leeds Flood Alleviation Scheme, which protects proposed development as well as existing.

### **Economy and Employment Land**

The figures for Leeds on p.45 are wrong, as is the subsequent paragraph. They underestimate the increased economic growth that the RSS is planning for (see comments on Economy).

The employment land figures are 'net'. Once they are converted to 'gross' much more land would be required.

### **Sub Regional Implications**

Unlike the SA undertaken at the Draft Plan stage, the SA of the Proposed Changes does not illustrate the sub regional consequences of the application of the Core Approach. Instead a narrative describes what the likely negative consequences are. In order to compare the differences and in order to explicitly identify the key areas for action to be taken to address such consequences, sub regional analysis should be presented. Without this the colour coding system – which positive or neutral effects is grossly misleading, when the impact of strategic policies have specific and localised negative consequences.

### **What further change would you like to be made to the Plan?**

See above changes emphasised in bold text.

**These comments are by or on behalf of (please insert your name as in Section A of this form:**

Leeds City Council