



Report of the Director of City Development

Development Plan Panel

Date: 10 June 2008

**Subject: YORKSHIRE & HUMBER PLAN
(ADOPTED REGIONAL SPATIAL STRATEGY MAY 2008)**

Electoral Wards Affected:

All

Ward Members consulted
(referred to in report)

Specific Implications For:

Equality and Diversity

Community Cohesion

Narrowing the Gap

Eligible for Call In

Not Eligible for Call In

(Details contained in the report)

Executive Summary

1. The preparation of the Regional Spatial Strategy commenced in 2004 and has included a number of consultation stages, when the City Council had an opportunity to comment on emerging options and proposals. In September 2007, the Secretary of State issued "Proposed Changes" to the Yorkshire and Humber Plan (Regional Spatial Strategy) for public consultation. The deadline for comments on the Proposed Changes was 21 December 2007 and in response to this the City Council submitted a number of key representations via Development Plan Panel and Executive Board.
2. Following the Proposed Changes stage, the Adopted Regional Spatial Strategy (Yorkshire and Humber Plan) was issued on 21 May 2008. Whilst many aspects of the Plan are positive for Leeds, throughout the preparation process, the City Council has made a series of representations regarding the scope and content of the emerging document and has expressed concerns regarding their implications for Leeds. Whilst many aspects of the Plan are broadly consistent with the Community Strategy (Vision for Leeds) and reflect aspects of the adopted Unitary Development Plan (UDP) and are therefore supported in principle, the City Council has fundamental concerns regarding a number of key elements of the Plan. Central to these concerns is the scale of housing growth (4300 p.a. net, commencing from 2008) and economic growth now envisaged by the Proposed Changes and the impact of this upon the fabric of the city and the relationship of this to a range of regeneration initiatives and the phasing of development. There are fundamental

concerns also regarding the level of infrastructure (including transport, managing flood risk and community facilities), which is likely to be required to support the scale of growth proposed. Within this context, whilst the RSS seeks to direct resources in broad terms to support the strategy of the Plan, there is no certainty that this will be adequate or deliverable.

3. At a local Leeds level, the RSS has specific implications for the preparation of Local Development Framework documents, including the Core Strategy. Under the requirements of the Planning and Compulsory Purchase Act 2004 – the Regional Spatial Strategy forms part of the Development Plan, consequently the Leeds Local Development Framework will need to be in general conformity with the RSS.

1.0 Purpose of this report

- 1.1 Following earlier consideration by the Development Plan Panel of the emerging Yorkshire & Humber Plan (Regional Spatial Strategy), the purpose of this report is to highlight the broad scope and content of the Adopted Plan (21 May 2008) and the implications for Leeds and the Local Development Framework.

2.0 Background information

- 2.1 Introduced by the Planning & Compulsory Purchase Act 2004, the Regional Spatial Strategy is a new style of Plan, which sets out the framework for the future development of the Yorkshire and Humber region. The Plan sets out the overall scale, priorities, broad locations for change and development in the region over the period to 2026. Within this context, the document provides a framework for 'where things should go' and 'how much' development should take place. The Plan also includes a regional transport strategy and a series of sub regional (including Leeds City Region) and thematic (such as housing and the economy) policies.
- 2.2 The Plan provides the statutory planning framework for the region and guide the preparation of Local Development Frameworks at a local authority level. Consequently, the Leeds Local Development Framework will need to be "in conformity" with the Regional Spatial Strategy and the RSS and LDF for Leeds will constitute the Development Plan for the City (eventually replacing Regional Planning Guidance and the Unitary Development Plan). Planning applications will therefore need to be considered within the context of the Regional Spatial Strategy and LDF documents.

Overall Scope and Content of the Yorkshire & Humber Plan

- 2.3 The structure of the Adopted Plan is as follows:

1. **Introduction** (*Providing background information on the role, purpose and coverage of the Plan*).
2. **Spatial Vision and Core Approach** (*Sets out the international/national context to preparing the Plan & develops a spatial vision and spatial objectives for the Region*).
3. **Delivering the Core Approach** (*Sets out an approach to 'managing change' and a basis for delivering the Core Approach set out in section 4*).
4. **Leeds City Region** (*Describes the composition of the Leeds City Region and identifies specific policies*).
5. **South Yorkshire** (*As above for South Yorkshire*).
6. **Humber Estuary** (*As above for the Humber Estuary*).
7. **York** (*As above for York*).
8. **Vales & Tees Links** (*As above for Vales & Tees*).
9. **Coast** (*As above for the Coast*).
10. **Remote Rural** (*As above for the Remoter Rural Areas*).
11. **Economy** (*Sets out spatial policies to compliment the Regional Economic Strategy*).
12. **Housing** (*Sets out detailed policies and operational approach for managing the provision of new housing*).
13. **The Regional Transport Strategy** (*Sets out an overarching Transport Strategy for the Region*).
14. **Environment** (*Provides more detailed policies and operational priorities for managing the environment*).

3.0 Main issues

Regional Spatial Strategy Proposed Changes

3.1 In response to the Proposed Changes consultation (2007), the City Council made a number of comments. These can be summarised as follows:

Spatial Vision & Core Approach

- Spatial vision for Leeds needs to be clearer,
- There are a series of tensions and policy conflicts when applied to the local Leeds level,
- Policy YH2 – Climate Change, regional target for CO2 reduction needs to be reinstated,
- Policies YH5 & YH6 – Regional Cities & Sub regional Cities & Towns & Principle Towns, qualification needed to ensure “town and city centres” are the first choice location for “main town centre uses”, Local authorities need to be given discretion to identify ‘principle town centre designation’,
- Policy – YH7 – urban areas such as Leeds, should be allowed scope to identify their own town and local service centres (in reflecting the RSS approach to rural areas).

Delivering the Core Approach

- The Proposed Changes provide no further certainty regarding the delivery of infrastructure (relating 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).

Leeds City Region

- The strategy for regeneration and growth needs to be revised to more fully reflect the operation of the dynamics of the Leeds City Region rather than focusing upon the West Yorkshire component,
- Policy LCR2 – the Proposed Changes weakens the Policy with regard to the need for major infrastructure and investment programmes to support growth locations (i.e. Leeds),
- The Policy wording of LCR2 requires clarification regarding descriptions such as “northwards” to Leeds.

Economy

- There is a need for more realism in the job growth and employment land forecasts, with a phased approach to accommodate any growth above the current baseline forecasts (the Proposed Changes forecasts are almost three times bigger than the baseline forecast),
- Policy E2 – Town Centre & Major Facilities – references to ‘job growth’ and ‘job creation’ need to be clarified, along with the role of such centres in achieving anticipated growth,
- Policy E2A – the policy needs to be clarified to ensure that Regional City Centres, Sub Regional Centres and town centres are the focus for ‘main town centre uses’.
- Policy E3 – Land & Premises for Economic Development – needs to emphasis that additional floor space for growth needs to be accommodated in city and town centres,
- Policy 3 C – the definition of “market ready sites” needs to be clarified.

Housing

- Fundamental City Council concerns regarding the scale and location of housing development and the impact upon Leeds,
- The approach to housing growth within the RSS conflicts with other RSS policy objectives (including Green Infrastructure, managing flood risk),
- Concerns regarding impact of Greenfield development upon regeneration projects and initiatives within the urban areas of Leeds,
- Greater emphasis therefore needs to be placed upon the role of major urban regeneration initiatives and clarity regarding the phasing of future levels of housing growth - linked to regeneration and the necessary infrastructure,
- The scale of housing growth envisaged is not supported by the necessary infrastructure,
- It is not clear how the housing requirement specifically relates to the new econometric forecasts included within the Proposed Changes,
- There are uncertainties regarding the specific housing requirements given that the YHRA have recently commissioned work on migration,
- Clarification is required on the use of the term Housing Market Renewal Area (Policy H2).

The Regional Transport Strategy

- Fundamental concerns regarding the scale of growth presented and the adequacy of the Regional Transport Strategy to deliver high quality public transport and related mechanisms to deliver this,
- Policy T1 – Personal Travel Reduction & Modal Shift – the RSS needs to fully recognise the impact of national networks upon the local network, emphasis needs to be placed on the role of national networks to help address transport issues and not placing responsibilities just on the local network,
- Policy – T2 – concerns that town centres within the urban area are expected to have more restrictive standards than Regional Cities – which are considered to be too high. Linked to this are differential parking requirements across the region, without any clear rationale or justification,
- Policy T3 – Public Transport – no strategic policy direction is given on the role of Park & Ride,
- Policy – T9 – Transport Investment & Management Priorities – the approach envisaged is inadequate given the scale of ‘transformation’ and growth envisaged by the Plan.

Environment

- Policy ENV1 – Development & Flood Risk – the Proposed Change needs to be reworded to ensure that a sequential approach is adopted to direct development to sites of lower risk appropriate to the vulnerability of the proposed use,
- Figure 15.1 needs to be revised to reflect the conclusions of the Leeds Strategic Flood Risk Assessment,
- Policy ENV13 – 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,
- Policy ENV15 – Green Infrastructure – The operation and delivery of the policy needs to be clarified in relation to conflicting and competing policy objectives included within the RSS (including substantial housing growth),
- Policy ENV10 – Landscape – the importance and future potential of landscape and wider countryside within West Yorkshire for biodiversity, recreation and amenity needs to be fully recognised.

Sustainability Appraisal

- Previous City Council comments regarding the SA of the Draft Plan have not been addressed; these concerns relate specifically to adaptation and mitigation issues. Such issues are dramatically increased by the scale of housing and economic growth incorporated within the Proposed Changes,
- The City Council is concerned that the SA is not compliant with the requirements of the Strategic Environmental Assessment (SEA) Directive – as the document does not show how comments on the SA have been taken into account and reflected in the Proposed Changes – a number of revisions are suggested in the SA but not reflected in the Proposed Changes,
- The fully impact and likely consequences of the Proposed Changes on Green Belt area and communities within the urban area is not fully reflected,
- The conclusion that the economic and social benefits of substantial housing development is ‘balanced’ is not backed by specific evidence,
- The Proposed Changes do not adequately take into account the full impact of flood risk in Leeds and the consequent impact on the RSS and its delivery,
- The SA incorrectly reflects the economic and employment land figures for Leeds and underestimate the economic growth the RSS is planning for – the employment land figures are ‘net’ rather than a ‘gross’ figure requiring a higher land take,
- Unlike the SA of the Draft Plan, the Proposed Changes SA does not record the impacts of the plan on a sub regional level. The SA at a Draft Plan stage highlighted a number of negative effects for Leeds, which are likely to be greater and impact detrimentally across other SA/SEA objectives as a consequence of the higher levels of growth included within the Proposed Changes. The SA is therefore fundamentally flawed.

Adopted Yorkshire & Humber Plan (Regional Spatial Strategy) 21 May 2008

Scope & Content

- 3.2 The broad structure of the Adopted Plan largely follows that of the Proposed Changes document. Key issues for Leeds in terms of the content of the Plan can be summarised as follows:

Spatial Vision & Core Approach

The series of YH Policies (1 – 9) set out the overall Spatial Vision & Core approach:

- YH1, emphasises that ‘change and growth’ should be delivered to achieve sustainable development. Emphasis is placed upon Regeneration Priority areas (including West Yorkshire) and a desire to grow and spread the benefits of the Leeds economy. Support is given to the role of Principal Towns and Local Service Centres across the region. Bradford, Hull Leeds and Sheffield are identified as “Regional Cities” and Wetherby is identified as a “Principal Town” – no other Town or District Centres (within the settlement hierarchy) are identified within Leeds MD. Scope also for local authorities to identify further centres in LDF Core Strategies.
- YH2, Climate Change & resource use measures should aim to achieve the Regional Economic Strategy target to reduce greenhouse gas emissions (in 2016 by 20 – 25%, compared to 1990 levels), climate change adaptation should be planned for (including flood risk/drainage).
- YH4, Regional Cities (including Leeds) and sub regional cities and towns, should be the principal focus for housing, commercial, cultural and leisure facilities. Emphasis is placed on ‘urban transformation’, good design, ‘place making’, green infrastructures, and improved transport accessibility.
- YH5, sets out the role of “Principal Towns” (Wetherby within Leeds MD) and the need for these to be identified in local LDF Key diagrams.
- YH6, covers “Local Service Centres”, within the settlement hierarchy (this covers remaining Town and District Centres within Leeds MD).
- YH7, this policy sets out a sequential approach to the location of development (effective use of brownfield land & previously developed areas, ‘suitable infill opportunities’, urban extensions), supported by a ‘transport orientated approach to development’.
- YH8, sets out criteria for the identification, protection, creation, extension, enhancement and management of Green Infrastructure and for a hierarchy of Green Infrastructure to be identified in LDF documents.
- YH9, emphasises that the ‘general extent’ of Green Belt (including areas within West Yorkshire) should not be changed but indicates also (YH9D) that “ a strategic review of the West Yorkshire Green Belt may be required to deliver longer term housing growth”.

Leeds City Region

- LCR1, support for developing the role of Leeds as a Regional City (though growth in jobs and homes and via improvement to the city centre’s offer of high order shops and services), identification of Bradford as a “Regional City” and the roles of Leeds and Bradford as major engines of the regional economy and to develop the complementary conference roles of Leeds and Harrogate. A number of policy objectives for transport are also identified including improved public transport to Leeds city centre, ‘implement stronger demand management in Leeds (Bradford and sub regional cities and towns) and improve surface

access to Leeds Bradford airport. In terms of strategic patterns of development, 'growth' is promoted south of Bradford and Leeds city centres (within Regeneration Priority Areas) and support regeneration and growth with the Aire Valley south of Leeds and East Leeds (housing growth and regeneration and economic development). The need to manage flood risk within Leeds City Region is also identified.

Environment

- ENV1, sets out policies to manage development and flood risk, reference is made to Leeds but not to the implications of the Strategic Flood Risk Assessment completed in Leeds and submitted as part of representations to the Proposed Changes. Figure 10.1 (Regional Flood Risk Areas) does not acknowledge Leeds as a flood risk area.
- ENV4, indicates that within West Yorkshire (Mineral Planning Authorities) should maximise the contribution by substitute and secondary materials and that sub regional aggregates apportionments should be updated in a future review of the Plan.
- ENV5, targets of 88MW (2010) and 295MW (2021) are set for West Yorkshire and Leeds 11MW (2010) and 75mw (2021) (installed grid – connected renewable energy capacity). In advance of adopted Development Plan Documents new developments of more than 10 dwellings or 1000m² of non residential floorspace should secure at least 10% of energy from decentralized and renewable or low carbon sources.
- ENV6 & ENV7, Increased woodland planting is promoted in West Yorkshire and the need to safeguard ancient woodland.
- ENV9, regionally distinct elements of historic environment (former 'industrial landscapes, housing areas and civic buildings') within West Yorkshire need to be conserved.
- ENV13, notes that additional landfill capacity to replace existing facilities may be required in West Yorkshire before 2020.

Economy

- E1, Table 11.1 identifies a 'potential annual job growth' for Leeds of 6,030. Table 11.2 identifies 'potential annual job growth from 2006 by different land uses'.
- E2, maintains the hierarchy of Regional Centres, Sub Regional Cities and Towns as set out in the Proposed Changes. Leeds and Sheffield are identified as the preferred locations for any future regional casinos and related development.
- E3, 'city and town centre' are identified as the focus for job growth in office, retail and leisure. Need to review current employment land allocations in West Yorkshire, consistent with the Plan's Core Approach.

Housing

- H1, the 'annual average net additions to the dwelling stock 2004 – 2026', of 4,300 p.a. is confirmed for Leeds.
- H2, specifies that local planning authorities should complete Strategic Housing Land Availability Assessment (SHLAA) during 2008 as evidence for LDFs. The managed release of land for housing should maintain the momentum of 'urban transformation' and based on SHLAAs a 15 year supply of land for housing, including a 5 year supply of specific deliverable sites, is set out as part of LDFs.. Housing development on brownfield land should be prioritised (at least 65%).

The mini review of RSS is to be completed by 2011 to ensure that longer term housing growth is planned for (considering proposals for New Growth Points and Ecotowns).

- H3, seeks to manage the release of land for housing in relation to failing housing markets and includes East and South East Leeds.
- H4, sets an indicative target of 30 – 40% for affordable housing
- H6, identifies a figures of 86 pitches within West Yorkshire for gypsies and travelers. Local authority assessments of the housing needs of gypsies and travelers need to be completed by July 2008.

Regional Transport Strategy

- T1, promotes 'road changing schemes in congested urban areas, as well as improvements to public transport.
- T2, Table 13.5 sets maximum parking standards for the region in relation to Principal towns, local service centres and rural areas, sub regional cities and towns and Regional cities. The need for more restrictive standards in city and town centres may also need to be applied.
- T3, the need to improve public transport in Leeds is identified as a priority, together with the need to develop 'strategic public transport interchanges'. Criteria for destination accessibility (access to employment and social infrastructure) is also included in Table 13.8.
- T6, sets out criteria for airport development and expansion, including the need for airport surface access, as part of a wider transport strategy.
- T9, sets out Regional Transport investment and management priorities, within the schedule included as Table 13.24A, the need for the implementation of stronger demand management as a key priority for Regional, Sub Regional Cities and Towns.

Regional Spatial Strategy 'Mini Review'

3.3 In parallel to the Adoption of the RSS, the Yorkshire & Humber Assembly have been scoping the preparation of an RSS Mini Review (with a view for this to be completed in 2011). The focus of this Review has been prompted by the Housing Green Paper (summer 2007), setting out national commitments for housing growth (*3 million new homes by 2020*). Within this context, it is advised that 'mini reviews' of Regional Plans should take place, in order to specifically address such growth (and also the assimilation "Eco-town" proposals, with the Development Planning process).

4.0 Implications for council policy and governance

4.1 The implications for council policy are summarised above. As noted above, once adopted the Regional Spatial Strategy will form part of the Development Plan to which the Leeds Local Development Framework will need to be in conformity and against which planning applications will be judged.

5.0 Legal and resource implications

5.1 See section 4. above re. the need for conformity of the Local Development Framework with the Regional Spatial Strategy. There are resource implications for the City Council in relation to the RSS process, the implications of specific policies and the necessary infrastructure to support their delivery.

6.0 Conclusions

6.1 This report has provided an initial review of the Adopted RSS (May 2008) and the implications for Leeds and the emerging Local Development Framework.

7.0 Recommendations

7.1 Development Plan Panel is recommended to:

- i). Note the contents of this report and the implications for Leeds & the Local Development Framework.