Appendix 2

City Centre Area Action Plan

**Preferred Options: Appraisal of Responses to
Alternative Options**

Introduction
This report provides the explanatory link between the Alternative Options and the Preferred Options. The Alternative Options were presented in questionnaire style within 10 themed papers for public comment:

Aim, Objectives & Strategic Options
Access
Design & Conservation
Entertainment
Growth
Managing Resources
Movement
Open Space & Greenery
Residential
Retail

This report sets out an appraisal of the responses received, the conclusions of the sustainability appraisal and other relevant influences such as national and regional planning guidance and practical implementation issues. It sets out the reasoning why particular options became the preferred options and why other options were discarded.

Responses to Aims & Objectives.

The aim and objectives were presented as follows:

Aim – **support sustainable development for Leeds to maintain its role as the regional centre and a principal city of Europe**

10 Objectives:

- **Promotion & maintenance of a high quality environment,**
- **More greenery**
- **Distinctive character & personality**
- **Vibrancy with residential living, shopping, leisure & culture**
- **Support growth of employment uses**
- **Promote development opportunities & supporting infrastructure**
- **Accessibility & appeal to all the community**
- **Good connections to other areas, and ease of movement within the city centre**
- **Safe & secure**
- **Extend the benefits of the city centre to neighbourhoods throughout the city**

Should greater emphasis be placed on anything? Please explain……………………..

Responses were made by 28 organisations which are set out in the table below. An "x" indicates support for the particular objective and additional comments are set out in the right hand column.

Respondent	a. Environment	b.. Greenery	c. Character	d. Vibrancy	e. Employment	f. Development	g. Accessibility	h. Connections	i. Safe & Secure	j. Extend benefits	Comment (summary)
Healthy Living		x	x	x	x		x	x	x		Access along canals & river. Wheelchair access
Montpellier Estates	x										Merge "Environment" with "Greenery"
English Heritage											Protect and enhance heritage
Leeds Partner-ship homes	x		x	x							
Kippax Parish Council	x		x		x					x	
Environment Agency	x	x	x						x		Ensure "environment" includes biodiversity, drainage, air quality etc, "Safety & Security" includes risk of flood. Should recognise uniqueness of river/canals

Aims and Objectives

Respondent	a. Environment	b.. Greenery	c. Character	d. Vibrancy	e. Employment	f. Development	g. Accessibility	h. Connections	i. Safe & Secure	j. Extend benefits	Comment (summary)
Caddick Ltd							x				All other objectives contribute to "accessibility"
SJS Property										x	Need high quality mixed use development in south side of city centre to spread benefits to adjoining neighbourhoods
Sustrans	x	x	x							x	a) and b) have been lost in the chase for d) e) f) and perhaps i) this is partly why Leeds lacks c). J) is the most important
Leeds Civic Trust	x			x						x	Respecting the physical and social heritage of the city centre eg conservation of buildings, places, memories, etc
LCC Economic Policy			x	x	x	x					
Highways Agency					x			x			Infrastructure is a pre-requisite for development. Key issues are congestion, air quality, sustainable and appropriate location of development.
CAMRA	x	x	x	x			x	x	x	x	
Park La Coll – Group 3			x	x			x	x			
University of Leeds		x		x			x	x			
Sport England		x		x							Provision of environmental & recreation facilities need to catch up with the pace of residential development.
Countryside Agency	x	x	x				x	x			Need to make the environment attractive for workers, residents & visitors
Thyssen krupp Woodhead					x		x			x	Good quality development & infrastructure is required to help spread city centre success to inner city areas
Metro				x			x	x		x	Removal of loop traffic to improve urban environment
Leeds SE Homes					x		x	x			Need to break down real & perceived barriers
Leeds Sustainability Net	x	x						x			A & b means climate change, h means public transport
Older Persons Ref Group										x	Don't neglect adjoining neighbourhoods
Motor Auctions				x	x		x			x	Good quality development & infrastructure is required to help spread city centre success to inner city areas
West				x	x						Need residential living to

Respondent	a. Environment	b. Greenery	c. Character	d. Vibrancy	e. Employment	f. Development	g. Accessibility	h. Connections	i. Safe & Secure	j. Extend benefits	Comment (summary)
Properties (UK) Ltd											support regeneration. B2 and B8 employment uses are inappropriate.
Leeds Lift				x							Health facilities are integral to a sustainable community
English Nature		x									Greenery needed on roofs too. Need to reduce the "heat island" effect of cities through greenery
Yorkshire Forward	x			x					x		
Leeds Initiative		x	x				x				
Totals	10	10	9	11	7	5	7	11	6	9	28 responses

Analysis & Conclusions

Of note, nobody objected to the Aim or sought to change it.

In terms of the number of "ticks" for the different objectives, not too much weight should be placed on a quantitative count because this may over-simplify the complexity of balancing objectives. Messages that can be drawn from the fact that all of the objectives received a measure of support, is that *all* have a legitimate place & there is no mandate to delete any entirely.

Respondents were asked for explanations for their choices, which are recorded as comments in the table above. Several responses suggested comments or additions at a too detailed level than ought to be accommodated within objectives including "access along canals", "Provision of environmental & recreation facilities" "removal of loop traffic", "B8 uses inappropriate" & "greenery on roofs". Other responses emphasised the importance of particular objectives listed. Several noted the importance of environment, greenery, transport infrastructure & ease of movement and strengthening connections between city centre & adjoining neighbourhoods.

New matters for consideration include health facilities, safeguarding & respecting heritage, recognising the waterways as assets and clarifying that quality environment means biodiversity, air quality & sustainability, not just aesthetics.

One of the challenges is to keep objectives succinct whilst ensuring that they cover the concerns at hand. The 10 objectives and additional matters suggested can be re-cast into a smaller number of broader objectives. This concurs with Montpellier Estates' suggestion to merge the "environment" & "greenery" objectives. However, it will also be important for the CCAAP to

explain what the broader objectives cover in terms of intent and meaning, so that the full range of elements covered in the 10 objectives & suggestions above are not lost.

Another advantage of recasting the objectives is to produce a coherent relationship of the broader objectives to the policy content of the CCAAP. In parallel, the shape & structure of the preferred options is now emerging, and offers opportunity to relate the objectives to the structure.

The structure of the preferred options reflects the following aspects of the city centre:

- A role to accommodate living, working and studying

- A function to attract visitors from the rest of Leeds and beyond, appealing to all population groups

- Support services for businesses, workers, visitors and residents

- A good quality environment

- Transport infrastructure & connections

Recommendation

To advance the following Aim & Objectives

Aim – **support sustainable development for Leeds to maintain its role as the regional centre and a principal city of Europe**

i) To plan to accommodate the employment, residential & higher educational functions of the city centre.

ii) To plan to accommodate support services & facilities for businesses, workers, visitors & residents

These mean intervening to sustain & accommodate the land use needs of all the functions so that they can all prosper.

iii) To strengthen the vibrancy, appeal and accessibility of the city centre to all. This means supporting a wide variety of attractions in terms of shopping, leisure, entertainment & culture, whilst ensuring that the city centre is physically & socially accessible & free of barriers and can support the development of a mixed residential community.

iv) To promote & maintain a high quality safe environment. This means the natural environment as well as the built, health & protection against

dangers such as pollution & flooding, respecting & enhancing heritage & reinforcing distinctive character. It means promoting provision of greenery. It means negotiating for better quality schemes & harnessing development to secure environmental improvements. Pollution includes air quality & consequently seeking to reduce traffic emissions.

v) To promote good connections to other areas, and ease of movement within the city centre

vi) To extend the benefits of the city centre to neighbourhoods throughout the city

These mean planning for movement of motor traffic, pedestrians & cycles, particularly linking the north & south sides of the city centre and connecting the city centre with adjoining neighbourhoods. It also involves strengthening the socio-economic connections in terms of employment opportunity & sharing of facilities.

Option No.	Summary of Responses
AC01	14 Responses. General restraint against commuter parking with provisions for disabled persons parking. a. Yes, unconditionally 2 b. Yes with controls to ensure only disabled use 12 c. No 0 General support of option (b). However, at least one comment requested that procedures are in place to ensure appropriate (Blue Badge) use. This control is likely to be outside the scope of the planning remit except on application where the disabled persons parking bays are on private land. It may be appropriate to put in a policy that facilitates the planning function in providing a condition to ensure that this is maintained. Guidance on percentage levels is readily available. A separate comment from Metro also mentioned that they would prefer disabled people use public transport. The difficulty is that no disaggregation is available that allows us to know the levels of mobility of a person and whether that person should be allowed to use disabled persons parking bay in the city centre. In effect a blue badge is the licence that allows people to use the bay.
	Analysis & Conclusion to Option(s) above
AC01	It is clear that there is general support for option b. This also reflects national policy on ensuring that all users have access to the City Centre. Sustainability Appraisal The SA fully supports the exception on car parking restraint for groups (particularly disabled people) that otherwise may be socially discriminated against.
	Recommendation
AC01	That the Council adopt a policy reflecting item (b). The policy should strictly enforce levels as reflected in the appropriate latest best guidance. The policy should also allow controls/conditions that make it easy to enforce the maintenance of these levels (see PO-35).
Option No.	**Summary of Responses**
AC02	15 responses. Investors in public transport infrastructure should be expected to give consideration to the needs of disabled people, particularly distances between public transport stops &

	city centre destinations and distances to change between bus, train and tram. a) Yes 14 b) No 0 Almost unanimous support for yes with the Government Office for Yorkshire and Humber stating that any other answer than yes 'would question the soundness of the plan' Some comments stressing that this issue isn't just about disabled people but all users. One comment regarding the remoteness of the bus station.
	Analysis & Conclusion to Option(s) above
AC02	Any construction of transport nodes that involves the planning process should look at this issue at a strategic level. There is little to comment on as it is a policy that would benefit all users. Sustainability Appraisal The SA fully supports that ease of access from transport nodes should be an important consideration. This would facilitate access for many user (particularly disabled people) that otherwise may be socially discriminated against
	Recommendation
AC02	The preferred option PO-31 to identify "bus interchanges" envisages potential for some bus services at peak hours to terminate. In order to ensure accessibility for the less able bodied, it is expected that others services will continue through the city and that there will be connecting services to other parts of the city centre. It is also proposed that the interchanges be located very centrally. PO-33 will improve accessibility of the rail system by identifying potential areas for new rail stations.
Option No.	**Summary of Responses**
AC03	11 Responses. Greater provision of public conveniences and baby changing facilities are needed and should be provided and managed. a i) inclusion in major mixed use 10 a ii) seek contribution from medium sized 2 b) encourage but no requirement 0 General agreement that inclusion in major mixed use should be provided. However one respondent separated the desire to seek contribution from possibility a). This suggests that they wished to

	Analysis & Conclusion to Option(s) above
AC03	Clear support for requesting that major mixed use developments provide public conveniences and baby changing and contributions from medium sized development that attract visitors. Although (perhaps) beyond the planning remit some discussion could take place regarding the possibility of using the money from major and medium sized developments to fund an overall City wide strategy. The council has identified that the City Centre is relatively (compared to the other local areas) well equipped in terms of toilet provision. This takes into account pubs, shopping centres, art galleries etc. It has stated in order to best direct limited funding it should prioritise local centres that have limited facilities. The question is whether payments from large scale mixed developments in the City Centre can fund a strategic Council wide approach. With this in mind it may be appropriate to contact AMU (Asset Management Unit) to discuss this issue. Sustainability Appraisal Although the SA recognised the sustainability of this issue it was felt that the certainty of them being provided was not strong enough to warrant a positive score.
	Recommendation
AC03	A policy be written reflecting this concern. However the challenge of such a policy is the ability to define what 'major', 'medium' and 'attract visitors' mean. Discussions to take place questioning whether it is appropriate under the planning system to fund a Council Wide strategic approach.
Option No.	**Summary of Responses**
AC04	14 responses. Public realm investment should aim to ensure that there are public places to sit down and relax. These should either be spread equally through the City Centre or in areas of activity only. a) Spread equally 10 b) Areas of activity only 2 c) Other 3 Generally speaking most of the responses supported the idea of

	an equal spread. However, at least three of the responses seemed to question the choices, some stating that the design context needed to be considered whilst others stated that the uses of the area should be considered. The Government Office stated that they felt a more flexibly, integrated middle ground approach should be taken that took into consideration public responses.
	Analysis & Conclusion to Option(s) above
AC04	Whilst it is accepted that certain areas are likely to need greater levels of seating the concept of a 'journey' should not be forgotten. For may users distance and lack of resting areas is a major barrier to undertaking a journey. A concentration of seating may divert resources away from providing seating whilst travelling to a specific location. An alterative approach may be to identify areas that need the seating whilst also identifying 'desire' routes into the city. This approach may have to sit on top of a base concept of ensuring the provision of a seat every 'X' m. This approach will reflect both the need to localise resources whilst also ensuring that people are able to use seating throughout the city. Sustainability Appraisal The SA fully supports that places to sit and relax should be an important consideration. This would facilitate access for many user (particularly disabled people) that otherwise may be socially discriminated against
	Recommendation
AC04	A discussion to take place that reflects levels of seating that is appropriate. This should also look at latest best design practice. The option for seating to be taken in a strategic context to ensure that seating is distributed evenly and not in localised small areas. This will best serve the needs of all users. Preferred options PO-25 – PO-27 should help secure money which could be used for seating in public areas.
Option No.	**Summary of Responses**
AC05	12 Comments: Do you agree that facilities in the City Centre are too expensive ? Yes to: a) Housing 8

	b) Shopping	1
	c) Eating Out	2
	d) Drinking	3
	e) Leisure Facilities	2
	f) Night Clubs	2
	g) Car Parking	3
	No to:	
	a) Housing	3
	b) Shopping	5
	c) Eating Out	4
	d) Drinking	4
	e) Leisure Facilities	5
	f) Night Clubs	5
	g) Car Parking	4
	A varied response with no clear results except that housing is too expensive. A few comments stating the inherent difficulties in controlling development in an area of such high demand. However one of these also commented that even with this level of demand the housing does seem rather over priced.	
	Analysis & Conclusion to Option(s) above	
AC05	This is a very difficult area. Essentially planning is generalist broad brush blunt tool that protects rather than pro-acts. To intervene in the market at such a specific level is generally not within the scope of the planning policy framework. It can only be done with discrete localised zoning which can only work where a clear demand can be demonstrated. For example the need for community uses etc. This may not be applicable to any of the situations above and it is unlikely that zoning or equivalent will be able to control prices. It is also likely that that the prices are not in any way higher than most City Centres worldwide (relatively speaking) and cheap options do exist but a host of contributing factors such as transport are also excluding. Lastly it is likely that the perceived 'yobbishness' of Leeds City Centre on certain nights is a very strong deterrent.	
	Recommendation	
AC05	It is unlikely that the planning system has any direct controls and very few indirect controls to influence the high prices in the city centre.	
Option No.	**Summary of Responses**	
AC06	Can the CCAAP do anything about affordability?	

	a) Lower rate car parking through CCAAP or Leeds Card/Permit 6 b) Discounts in shops and facilities through CCAAP or Leeds Card Permit 3 c) Other……..? 4 A very poorly answered question. Generally people wanted discounted parking for people with the a 'Leeds' card. Support for the Leeds card was very strong with one consultee stating that it would increase a greater sense of belonging. Other comments centred around issues of affordable housing and the provision of budget hotel accommodation such YHA or other in the City Centre. Two comments were unsure how the CCAAP would help affordability with one of these comments stating it is inappropriate to restrict trade in a free market.
	Analysis & Conclusion to Option(s) above
AC06	Whilst some of the ideas expressed above are worthy of merit and consideration it is difficult to see how a CCAAP is to address this disparity for similar reasons for AC05. The only option may be to restrict or allow some land use for items such as cheap hotel accommodation, however Leeds is still reliant on the market to provide this type of facility. Sustainability Appraisal The SA fully supports that improving the affordability of the city centre is an important consideration. This would facilitate access for many user (particularly disabled people, older people, young people, and unemployed) that otherwise may be socially discriminated against
	Recommendation
	It is unlikely that the planning system has any direct controls and very few indirect controls to influence the high prices in the city centre.
Option No.	**Summary of Responses**
AC07	10 Comments. Should the CCAAP expect provision of housing designed for elderly people, with age controls on occupiers (eg over 55's only) a) a small proportion 4 b) sheltered housing clusters 4 c) No, housing not suited 2

		Straightforward answers. The 2 'no' stated that if demand exists then provision will be made using the market.
		Analysis & Conclusion to Option(s) above
AC07		The no comments would seem to describe a chicken and egg situation. If no suitable provision exists then it is unlikely then no demand will exist. However, even this argument seems to follow the snapshot in time argument. Simply put people change and their circumstances change. If someone in a City centre flat needed facilities that may be suited for older people then they should have access to this facility and not need to move. The argument follows that in inclusive design a good home will allow the user to stay in that place for their entire lifetime. One of the phrases is 'lifetime homes'. Whether the market supports specialist homes or not the design should reflect the needs of all users. The other issues mentioned would appear primarily to deal with income, those of affordability and security. It should noted that in London all new housing is built to lifetime homes standard and 10% of new housing is designed to be wheelchair accessible. '**London Plan Policy 3A.4: Housing choice** Boroughs should take steps to identify the full range of housing needs within their areas. UPD policies should seek to ensure that: ▪ new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups, such as students, older people, families with children and people willing to share accommodation ▪ all new housing is built to 'Lifetime Home$_8$.' standards ▪ ten per cent of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.' Thus the arguments of demand seem to be largely redundant. Sustainability Appraisal The SA fully supports that ensuring housing in the city centre reflects the needs of older communities is an important consideration. This would facilitate access for many user (particularly disabled people, older people, young people, and unemployed) that otherwise may be socially discriminated against
		Recommendation

AC07	That a policy similar to the London policy is adopted for the whole of Leeds and specifically in Leeds City Centre (see PO-06 and PO-07).
Option No.	**Summary of Responses**
AC08	11 Responses. Facilities for families with children. a) Crèches 5 b) Playgrounds 9 c) Variety of indoor leisure 1 Generally in favour of the provision of facilities for children such as crèches and play grounds. However one comment stating that the planning system is trying to create a demand that doesn't exist and using the private sector to pay for it.
	Analysis & Conclusion to Option(s) above
AC08	The spirit of this question was around the reasoning of why families do not use the City Centre and what can be done help greater levels of use. Although all based on conjecture and brief discussions with 10 or so parents (officers in Building Control) the possibilities below seem to make sense. Two adults and two children go to the City Centre. The children need to be bought clothes and or other items, or perhaps they are unable to arrange child care. After the children have been 'dressed' they can quickly become bored and this in turn causes stress for the adults. The promise of a play area, whilst eating lunch or whilst one adult shops, allows freedom and flexibility for the adult users of the City Centre. Thus the barrier to accessing the City Centre is somewhat removed. It is appreciated that this is a rather simplistic view but play areas in large scale shopping centres would seem to suggest that there is some merit in this. The issue of crèches is far more complicated and may need more research. Crèches provided by organisations may be well used (eg crèches on the edges of hospitals) and an implied trust is given by the parent to the child minders. However, the feeling amongst all 10 parents in the brief spontaneous consultation exercise was they would not be happy to leave their children in a strange crèche and would rather make their own arrangements. The above is by no means an exhaustive survey but it does suggest that a need for play areas does exist.

	Sustainability Appraisal The SA fully supports the provision of playgrounds in the city centre is an important consideration with regard to accessibility. This would facilitate access for many users (particularly families with children) that otherwise may be socially discriminated against
	Recommendation
AC08	That a policy be used under the auspices of an overall strategy to provide the costs for playgrounds in the City Centre. It is likely that work will have to be undertaken to examine the level of provision needed and appropriate sites. The policy role of the CCAAP will be to deliver public space as part of major development schemes and financial contributions toward public space from large schemes on smaller sites (see PO-25 and PO-26). Potential for playgrounds will then be a detailed matter related to particular planning applications and expenditure of commuted sums raised.
Option No.	**Summary of Responses**
AC09	13 Responses. Should the CCAAP make developments of new night clubs conditional to one evening a week for teenagers or should the City Council engage with existing operators of music venues and night clubs to encourage regular entertainment evenings for teenagers. a) Condition Nightclubs 4 b) Regular Evenings 10 Although some support for regular conditioning nightclubs a greater level of support for regular evenings. Other comments included that tackling this issue may need to involve youth organisations and the police. It was expressed that this is a social issue.
	Analysis & Conclusion to Option(s) above
AC09	Again it is unlikely that the planning system has the remit to interfere to such a discrete level in the market. If such a demand exists the nightclubs etc are likely to provide a service. Sustainability Appraisal The SA supports the provision of facilities for teenagers and young people. This would facilitate access users that otherwise may be socially discriminated against
	Recommendation

AC09	It is unlikely that a policy could help achieve greater teenager access into nightclubs. More information is probably needed on the needs of teenagers and their expectations from the city centre to see where the planning system can help.
Option No.	**Summary of Responses**
AC10	13 Items. Should all development be designed to be as accessible for disabled people as possible using the latest guidance. a) Yes 7 b) Partly (exceptions) 4 c) No 0 It should be noted that the 'partly' comments above reflect Heritage and Conservation concerns. A couple of comments stated that national design guidance already stated what was best practice with the Government Office for Yorkshire and Humber stating that any other answer than yes 'would question the soundness of the plan'.
	Analysis & Conclusion to Option(s) above
AC10	A high expectation now exists to ensure that all facilities are accessible for all users and a great deal of design guidance is available to support this issue. It should noted that Leeds City Council has a good record of balancing the needs of Access with Heritage and Conservation issues and the 'partly' statement has rarely if ever arisen. Sustainability Appraisal The SA supports the provision of facilities for all users (particularly disabled people) in all developments. This would facilitate access users that otherwise may be socially discriminated against. However did identify the issue of heritage and conservation as one that had to be addressed.
	Recommendation
AC10	A policy be written using the phrase 'latest best guidance' with phrasing that makes the 'partly' into an 'exception' (see PO-17 and PO-20). e.g. All development will be expected to be accessible to all users with the latest best guidance being used unless exceptional circumstances are shown (e.g Heritage and Conservation). This is likely to be supported with some text outlining latest best guidance and what can be considered exceptional.

Option No.	Summary of Responses
AC20 (Other Misc)	4 Comments. a) One questioning the validity of AC09 as a planning issues b) One expressing a view from the Older Peoples Reference Group that they have no desire to live in the city Centre as its services are geared toward young people. c) One expressing a desire that the river frontage should be made accessible. d) One expressing a need for more family units in the city centre and all homes to be built to lifetime home standards.
	Analysis & Conclusion to Option(s) above
	a) This has been explored and picked up in AC09 b) This reflects some of the problems encountered by older people and reflects the perception (and reality ?) that the city centre is not an area for older people. Issues regarding this are covered elsewhere in the consultation. c) This is a difficult issue due to the level changes involved. It is likely that this can be controlled by the planning system to some extent. All new development along the riverside could, as one of its remits, show how they intend to show that the riverside is accessible from their location. However this may not alleviate some of the current problem of access to the river/canal side. d) This is covered in AC07
	Recommendation
	c) It is already policy of the Leeds Waterfront Strategy incorporating the partial review of July 2006 to improve the accessibility of the waterfront. Also, opportunities and proposals have been identified on the map which relates to PO-30.

Option No.	Summary of Responses
AS03	17 Responses. The following preferences were given for means of defining character areas in the city centre: a. Defined to unite the city centre 1 b. Defined as broad zones 9 c. No zonal definition 5 As regards detailed comments, broad zones would be expected to aid legibility & navigation as well as generate a "sense of place" attractive to visitors. Metro felt that a zone of dense employment uses should be encouraged around the rail & bus stations & a number of new interchanges. One strand of concern was that zones should not inhibit flexibility to develop a varied mix of uses.

Option No.	Summary of Responses
DC01	16 Responses. A conclusive preference for the design of new buildings to be governed by: a) Single policy informed by supplementary material 12 b) Set of detailed prescriptive policies 2 Regarding additional comments, GOYH pointed out that detailed prescriptive policies may not accord with national guidance. Others including English Heritage stated that development needs to be sensitive to context, informed by supplementary material

Option No.	Summary of Responses
DC03	13 Responses. Regarding whether the existing conservation areas should be extended, most respondents thought that they should be left as they are: a) Extended 2 b) Contracted 2 c) Left as they are 8 Of note, English Heritage considered that any change should only be informed by an audit. The Civic Trust favour extension, but only following an audit. Leeds Initiative favour contraction as does a landowner in Holbeck Urban Village affected by a recent extension of a conservation area.
	Analysis & Conclusion to Option(s) above
AS03, DC01 & DC03	As regards consultation on the option for defining character areas, there was strong support to do so. A piece of research is being commissioned to identify character

	areas, including re-designation of conservation areas. Character Areas & Conservation Areas will be defined with detailed analysis of form, space, architecture, history, movement & character of use in supplementary material to the CCAAP. As regards consultation on the different approaches to control design, a majority favoured a single policy informed by supplementary material (as opposed to prescriptive policy about heights, rooflines etc). Such an approach would be supported by national policy (PPS1), & concur with aspirations of Vision for Leeds II (p.41) to develop a strategy for high quality urban design in the city centre, providing distinctive identity, character & soul. Also, the sustainability appraisal awards a positive score for this approach to maintain and enhance the quality and distinctiveness of the built environment. The sustainability appraisal scored extension of conservation areas well, but it is considered that research is required to identify technical justifications on the ground for modifying conservation area boundaries. Policy over design of buildings is an appropriate context to deal with options presented in other papers concerning disabled access (AC10) and storage for waste collection (MR07).
	Recommendation
AS03, DC01 & DC03	To promote: A parent policy expecting design of new building: - to be attractive & sensitive to context, with decisions informed by supplementary townscape & conservation appraisal documents, currently the City Centre Urban Design Strategy or successor, where possible, to incorporate - disabled persons access where possible - suitable storage for waste collection - appropriate renewable energy measures (see PO-17 and Para 3.3.5).
Option No.	**Summary of Responses**
DC02	14 Responses. Regarding different approaches to ensuring safety & security, the following preferences were given: a) Activity for self-policing 5 b) Restricted access 1 c) Combination, depending on circumstance 8 Of note, the Older Persons Reference Group favoured restricted access.

	Analysis & Conclusion to Option(s) above
DC02	The strongest preference was for a combination of measures but designing for active streets to encourage natural surveillance & self policing was also popular. The "combination approach" scored best in the sustainability appraisal. In practice, a policy could give more direction than deciding on a case by case basis.
	Recommendation
DC02	The general presumption should favour permeability of space in order to provide natural surveillance, but it should be acknowledged that there will be circumstances where enclosure & prevention of public access are appropriate (see PO-28).
Option No.	**Summary of Responses**
DC03	See options AS03 & DC01 above
Option No.	**Summary of Responses**
DC04	13 Responses. Of the choices for controlling activity generating uses (bars, cafes etc), the following preferences were stated: a) accept in all large schemes 8 b) ration to certain locations 4 Of note, GOYH felt that a middle ground option should have been made available. Montpellier Estates favoured rationing, but note that too much supply can lead to mediocrity; activity generating uses should be encouraged into certain areas, but ancillary uses allowed in developments elsewhere. Leeds Civic Trust warns that decisions to designate centres of activity must be confidently backed up & given time to flourish.
	Analysis & Conclusion to Option(s) above
DC04	In the context of urban design, the consultation response does not favour an approach to ration "active uses" to certain locations within the city centre. There are parallel issues in the Entertainment Options and Retail Options papers about whether to define entertainment "focal points" and designate local centres for convenience shopping & facilities.
	Recommendation
DC04	Not to pursue the idea of rationing "active" uses to certain locations.
Option No.	**Summary of Responses**
DC05	16 responses received. One of these said we should prohibit tall buildings altogether and the other 15 all agreed that tall buildings should be accepted in defined zones, however there were varying opinions on where these should be and whether or not they

	should be in clusters. The number of respondents wanting to see tall buildings accepted in defined zones according to certain factors is as follows: i. To protect views or landmark buildings 9 ii. To create clusters 4 iii. To link public transport accessibility 9 This indicates that clustering is less favourable and one respondent indicated that they object to the principle of clustering tall buildings.
	Analysis & Conclusion to Option(s) above
DC05	The consultation response points to the need for a policy which only accepts tall buildings in appropriate situations. This conclusion accords with the sustainability appraisal, which awarded the best score to the option to limit tall buildings to defined locations. At the time of preparing these Preferred Options for the CCAAP, a Supplementary Planning Document for tall buildings is under preparation.
	Recommendation
DC05	The CCAAP should have a parent policy setting out the overall criteria for judging the acceptability of tall buildings to be informed by more detailed supplementary advice (see PO-19). The factors to be considered are: - would views of landmark buildings or valued street scenes be unacceptably impaired - would the amenity of neighbouring buildings & spaces be unacceptably reduced in terms of shading, sense of enclosure or climatic effect - would the proposed tall building aesthetically complement neighbouring tall buildings, existing or proposed - is the location sufficiently accessible by public transport. Nb spaces include waterways.
Option No.	**Summary of Responses**
DC06	17 responses received. Nine respondents thought that it should be visually apparent where the city centre begins & ends & 7 thought not. The GOYH thought the Option failed to offer a middle ground option. On this line, the Civic Trust felt that at certain points on the boundary a sharp division with high buildings might be appropriate whilst at other points a gradual blend would make sense. Yorkshire Forward supported visual definition to reinforce the city's role as regional centre. Yorkshire Forward & the University of Leeds noted the

	importance of permeability of the boundary to spread the success of the city centre to adjoining neighbourhoods.
	Analysis & Conclusion to Option(s) above
DC06	The consultation response does not give a conclusive steer on this option. In practice, different amounts of pronunciation will be appropriate at different points around the city centre boundary. This point is made by some respondents & is also the conclusion of the sustainability appraisal.
	Recommendation
DC06	Not to pursue policy to give visual definition to the edge of the city centre.
Option No.	**Summary of Responses**
DC07	14 Responses. On how routes should be designed to cohere, favoured methods were: a. use of common materials 5 b. use of design codes 5 c. street furniture co-ordination 6 d. style of signage 6 Three respondents did not support the aim of making routes cohere, including English Heritage who thought that measures might impair the distinctive character of areas. Montpellier Estates & Yorkshire Forward felt that offering coherent routes are very important to aid legibility and navigation for visitors & make Leeds modern & efficient. Routes could also be used to better connect the centre to adjoining neighbourhoods.
	Analysis & Conclusion to Option(s) above
DC07	The consultation responses do not give a conclusive steer, and English Heritage point out the potential damage that a uniform style solution for a route might do to areas of historic character. A related issue concerns identification and provision of routes for pedestrians & cyclists to travel between the city centre and adjoining neighbourhoods. This concurs with the objective of Vision for Leeds II (p67) to extend the success of the city centre to inner city areas. This matter overlaps with Movement Options 5, 9 & 10 concerning linking the south side of the city centre to the north, and encouraging walking & cycling and with Open Space & Greenery Option 9 concerning establishment of a "green network"
	Recommendation
DC07	The CCAAP to explain the importance of better connections for pedestrians & cyclists for movement within the city centre as well as between the city centre and adjoining neighbourhoods. Policy to expect the layout of new development to be designed to

contribute to connections by opening up new routes, avoiding obstruction to existing routes, making existing routes more attractive & user friendly, incorporating appropriate greenery and landscaping features and supplying appropriate off site infrastructure such as footbridges & other crossings (see PO-30).

The application of the policy should be informed by a map to identify route desire lines and the need for infrastructure improvements.

Option No.	Summary of Responses
DC08	15 Responses. The majority of respondents (11) favoured consideration of planning processes to deal with design & conservation matters. Only 3 thought that the CCAAP should limit itself to spatial planning control only. GOYH felt that a middle ground option should have been available.
	Analysis & Conclusion to Option(s) above
DC08	The sustainability appraisal identified the use of active engagement through planning processes as scoring well against objectives to improve social inclusion and to enhance the distinctiveness of the built environment.
	Recommendation
DC08	The CCAAP to set out expectation that developers of significant new buildings or re-modelling of existing to engage in pre-application discussion with planning staff about scheme design. Discussions should be informed by appropriate material to illustrate the existing site context, highlighting the existence of listed buildings or plan designations that would be affected by the proposal. The aim of the discussions should be to agree upon design concepts such as massing, spaces & styles, helping to frame a design statement for submission with a planning application (see PO-18).

Option No.	Summary of Responses
EN01	Entertainment Focal Points. 46 Responses, including 26 from Corpus Christi High School pupils. Mixed view. Numerically, most responses (31) supported identification of 1 or more focal points. Of these, Millenium Sq was the clear favourite, with several other locations suggested also. Of the more analytical responses, concerns were expressed that focal points would exacerbate problems of street disturbance & nuisance and that focal points would be insufficiently responsive to market trends & organic change. Only one respondent called for trip generating entertainment uses to be located "in-centre" but not necessarily in focal points.
EN02	40 Responses, including 26 from Corpus Christi High School pupils. Mixed response. Numerically 17 said there should be no controls applied over uses, 10 favoured partial control with a minimum of entertainment floorspace expected in new developments within focal points and 9 favouring full control over uses. Four responses were unsure or wanted to make other points. Of the more analytical responses, concerns were raised about street disturbance & nuisance. Also that controls will only work if couched in market realism, to require provision where there are natural/historic attractions such as waterfronts & Tower Works.
EN03	40 Responses, 27 from Corpus Christi High School pupils. Mixed response. Numerically 22 supported controls to provide a mix of entertainment uses within focal points whilst 17 felt such controls would be inappropriate. GOYH felt that such controls would be too detailed & complex. Montpellier estates feels that mix of uses should be left to the market.
	Analysis & Conclusion to Option(s) above
EN01-EN03	Whilst a majority of respondents like the idea of entertainment focal points, there is far less support for use of planning powers to marshal entertainment uses into particular areas because this could be insensitive to the dynamics of the market & stifle organic change. A similar conclusion was reached in the sustainability appraisal. Positive scores were achieved for the increased vibrancy of focal points and for concentrating uses into areas where the impact of noise & nuisance on residents could be minimised, but negatives for the impact of controls on uses that could stifle economic investment. In conclusion, it is considered that planning controls would be too

	cumbersome to direct investment in entertainment uses into focal points. Designating zones as focal points in name only would be ineffective.
	Recommendation
EN01-EN03	Not to seek establishment of entertainment focal points
Option No.	**Summary of Responses**
EN04	Entertainment uses and nuisance. 40 Responses, 25 from Corpus Christi High School pupils. Respondents were overwhelmingly in favour of measures to avoid nuisance & promote safety; only 2 respondents thought controls inappropriate. Most respondents favour allowing entertainment uses in designated zones only if they have suitable controls over opening hours, noise & management.
	Analysis & Conclusion to Option(s) above
EN04	The response is consistent with the conclusion of the sustainability appraisal, that allowing entertainment uses in designated zones only if they have suitable amenity controls scores best against the sustainability appraisal objectives. Any designated zones will need to be complementary to the Licensing Policy zones 2005-08. Whilst the consultation option supported by most respondents concerned bars & nightclubs in a *designated licensing zone*, there are good reasons to expect suitable mitigation measures against noise, nuisance & disturbance for new bars & nightclubs in all parts of the city centre.
	Recommendation
EN04	Promote a policy which expects all developments of bars & nightclubs in the city centre to incorporate suitable noise insulation measures & to be controlled by appropriate hours of opening and management arrangements to avoid unacceptable noise, nuisance & disturbance on the street and noise to adjoining buildings. Without sufficient mitigation, applications should be refused (see PO-14). Judgements on the level of acceptability will need to be sensitive to differences of location in the city centre, particularly whether the site is within one of the "cumulative impact" licensing zones where the Police have concerns about rowdy behaviour on streets linked to the number of pubs & bars or whether the site is in a predominantly residential part of the city centre.
Option No.	**Summary of Responses**
EN05	Protection of cultural uses. 38 Responses, 26 from Corpus Christi High School pupils. Most respondents favoured controls to retain cinemas, many also favoured retention of theatres and

	some museums. Other suggestions included traditional public houses and sports centres. Montpellier Estates felt that protection of such uses would be undue fettering of the market. Leeds Initiative, a CC pupil and Park Lane College Group 4 also felt that no uses should be protected.
	Analysis & Conclusion to Option(s) above
EN05	It is considered important for Leeds city centre to offer a wide range of cultural, leisure and entertainment facilities. A variety adds to the overall attraction of Leeds, as well as giving opportunity for a wider group of users in terms of age, income, ethnicity etc. Hence, it is considered necessary to give protection to uses which offer variety to prevent them from being displaced by mainstream uses which command higher land values. Protection will be apt for such uses that are housed in specially designed buildings for the purpose, particularly including buildings of historic merit. Consultation responses suggested that swimming pools and leisure uses also be protected. At present, the one public swimming pool in the city centre already has planning permission to be redeveloped and private leisure centres can compete with development values of other town centre uses & relatively easy to set up afresh without cultural loss. The sustainability appraisal supports protection Protecting certain entertainment uses such as theatres, cinemas and museums scored very well. Not protecting them scored badly and is not a sustainable choice.
	Recommendation
EN05	Protection should be afforded to cinemas, theatres, museums, public houses in buildings designed for the purpose (see PO-13).

Option No.	Summary of Responses
EN06	Provision of a concert hall. 44 Responses, 26 from Corpus Christi High School pupils. Most (20 responses) favoured a city centre location for a concert hall; 8 favoured within or edge of the city centre and 12 favoured out of centre. Metro note that such venue needs to be easily accessible by public transport, preferably near the rail or bus stations. The GOYH points out that an out of centre location might conflict with national/regional policy.
EN07	Provision of an arena. 45 Responses, 26 from Corpus Christi High School pupils. Only 10 respondents favoured solely a city centre location for an arena. These included Metro, Montpellier Estates & National Grid. A larger number of respondents (17) favoured a city centre or fringe location. 14 respondents thought that an Arena should go outside the city centre. As per EN06,

	GOYH points out that an out of centre location could be contrary to national/regional policy. Of note, one of the Park Lane college groups thought that the city centre is already too crowded for an Arena, although a good public transport connection would be needed including late at night. The older persons reference group favours the Aire Valley as a location for its good motorway connections, and availability of land for car parking. In contrast, Metro and National Grid point out that the city centre is the most sustainable location with its good public transport accessibility. Late recorded comment from the Youth Council was that an Arena is supported preferably in the city centre but should be accessible by public transport, including late at night.
	Analysis & Conclusion to Option(s) above
EN06 & EN07	These options were included because provision of a concert hall and an arena have been topical issues for the city, but there are question marks over the suitability of the CCAAP to deal with provision of a concert hall and an arena. The locational choices of city centre, edge-of-centre or out-of-centre are of interest, but it will be beyond the scope of the CCAAP to apply policy control to areas outside of its spatial domain. The responses indicate a significant body of support for city centre locations, particularly for a concert hall. This accords with the sustainability appraisal which scores city centre locations positively and out of centre locations negatively, particularly with regard to public transport accessibility & pollution. Of note, Metro and Park Lane College students underline the importance of public transport accessibility and GOYH points out that out-of-centre locations would conflict with national policy. Another point to make about the scope of the CCAAP to influence the location of the concert hall & arena is the timescale. Work is currently underway to identify suitable locations & planning applications are likely to be submitted before the CCAAP has been finalised.
	Recommendation
EN06 & EN07	The CCAAP preferred option should be supportive of locating both concert hall and arena within its boundary in locations accessible by public transport (see PO-12 and Proposal Area Statements for Kidacre St and Marsh Lane).

Option No.	Summary of Responses
ASO2	**How should city centre boundaries change to cater for future growth and change?** a) Consolidate its compactness (retain existing boundary and promote principal uses in identified areas with some mix) **3** b) Organic mix of uses across CC (allow expansion with mix of uses everywhere) **9** c) Some compactness of uses with some mix (retain existing boundary with a greater mix of uses) **10** Other comments GOYH questioned whether a sufficient range of alternatives have been presented? It is acknowledged that the form of growth (compact, looser/dispersed, mixture) has been addressed. But, in relation to Vision for Leeds & RSS/Draft RSS & the focus on growth & development of Leeds as a regional centre, has the magnitude of different types of growth & overall growth over the period covered by the AAP been fully considered? Should growth likely to lead to significant trip generation & commuting be tempered in any way, especially if it leads to significant congestion? Should it be related to the capacity of the transport system, in particular public transport, & other infrastructure? If to be developed into a preferred option, consideration would need to be given as to whether an extensive dispersed pattern of growth would accord with national & regional policy (including draft RSS). Option GR02 needs to be considered as a Strategic Option Yorkshire Forward - Office & retail in centre for vibrancy & consolidation of compactness wherever possible, but allowing lateral expansion for mixed use residential development where this cannot be suitably accommodated in the compact city centre. Mixed use residential development will add to the 24hr vibrancy, providing it does not compromise the growth & development of other city centre uses, particularly retail & employment. Others: Expansion needs to be controlled to ensure sites within the CC are developed first.

	Significant trip generating uses need to be located next to public transport nodes. Compact nature of CC is a positive feature.
Option No.	**Summary of Responses**
GR03	**How should the boundary of the city centre be defined?** 1. Scale of uses 10 2. Jurisdiction 5 3. Outer Boundary 2 Other comments GOYH - The choice of the boundary of the city centre being drawn for jurisdiction only may not accord with national & regional policy, & if chosen as the preferred option would question the soundness of the plan. The city centre boundary (including any expansion areas) and a PSQ within it will need to be defined with regard to national planning guidance. Accessibility by non-car-modes will be particularly important - especially for high trip generating uses when considering size/expansion. Proximity to public transport nodes, routes, linkages, convenience & scope/plans for improvement should be taken into account.
Option No.	**Summary of Responses**
GR04	**For the CCAAP, the size of the city centre should:** 1. Remain as per the UDP – 10 (comments made - many sites still exist within Adopted UDP boundary. Scope for identifying edge of centre sites where suitable sites not available in CC. Danger by spreading may affect character, not provide scope for displaced firms from CC who still require some proximity to CC). 2. Be extended – 12 (comments made - combination of all areas, some areas may be too far from p/t nodes therefore no retail/offices & significant trip generating uses. Reflect developer/market interest areas, i.e. Kirkstall Road/East St.) 3. Be contracted – 2 (comments made - nothing drastic, minor adjustments)

	Other areas suggested for extensions – Holbeck & Little London,
	Analysis & Conclusion to Option(s) above
AS02, GR03, GR04	**Purpose of the CC boundary**

Purpose of the CC boundary

The purpose is primarily about setting a limit for location of main town centre (MTC) uses vis-à-vis PPS6, but also raises issues about relationship of CC to the inner city area and offering choice of sites and opportunities for growth and urban renaissance.

The option GR04 floated the possibility of substantial extensions to the CC boundary. The issues are considered below.

Comments received regarding the CC Boundary

In the main there is strong support to maintain the compactness of the CC and hence increase one of its main advantages. Several respondents have mentioned that a number of sites and large areas remain vacant or under utilised and as such should be developed first before the city council even consider expanding the CC boundary. This is particularly the case with sites south of the river. Many have raised the point that this part of the CC needs to be better integrated with the rest of the CC in terms of pedestrian and public transport access/connectivity. At present many still perceive the area south of the river not to be part of the CC core, despite the area clearly being identified as such in the UDP. By expanding the CC boundary may exacerbate this predicament.

Where interests has been shown to expand the CC boundary this has in the main reflected owners/developers aspirations to include their respective sites as oppose to how the City and more specifically the CC could benefit, function, grow its commercial weight and provide added value to what already exist.

The GOYH raises a question as to whether the CC should grow and what the likely effects would be on commuting, congestion, public transport capacity, etc. In the City Council's opinion the CC is the most sustainable location for MTC uses and should continue to grow as <u>the</u> regional capital for these uses. Furthermore, the success and strength of the CC as the main economic driver for both the sub region and the region should be supported accordingly.

Sustainability Appraisal
The sustainability appraisal overall favours the expansion of the CC on the basis that the other options may have negative impacts in the long term as far as economic objectives are concerned.

National Planning Policy
In terms of advice on defining town centre boundaries PPS6 provides a typology of the *types of locations* and their main characteristics, i.e.;

- Town Centre
- Primary Shopping Area
- Primary frontage
- Secondary frontage
- Edge-of-centre
- Out-of-centre
- Out-of-town

These are however open to interpretation, for example, defining the extent of the town centre on the basis of assessing an area which is predominantly leisure, business and other main town centre uses within or adjacent to the primary shopping area. This raises further questions, for example, what is meant by predominant? Should there be an upper limit on the distance for the location of other MTC uses from the primary shopping area? How do we incorporate windfall sites within/adjoining town centre boundaries as part of development plan reviews, etc?

National & regional planning guidance would lead one to the conclusion that it discourages the extensive dispersal of MTC uses and thus would lead us down the option of not expanding the CC too far on the basis of current public transport infrastructure and nodes. Accessibility by non-car-modes will be particularly important. Proximity to public transport nodes, routes, linkages, convenience and scope/plans for improvements need to be taken into account when considering the boundary of the CC.

Regional Spatial Strategy – The Yorkshire & Humber Plan
The Draft RSS (Dec 05) has policy E2 which states that city and town centres will be the main focus for office, comparison shopping, health, education, casino, leisure, recreation entertainment, cultural, public services, business services and other uses which generate a high level of people movements.

Policy YH5 seeks transformation of the Regional centres (Sheffield and Leeds) through spatial planning to strengthen the identity and roles of city centres as accessible and vibrant focal points for high trip generating uses.

Policy YH8 expects authorities to adopt a transport orientated approach whereby new development makes best use of transport infrastructure and maximises accessibility by public transport, walking and cycling.

Vision for Leeds II – the Community Strategy
Vision for Leeds talks about expanding the CC. It is however, not clear whether by this it means expanding the CC boundary to allow more MTC uses; increase the influence of the CC on the surrounding inner city areas, for example, by means of investment, developments and better connectivity via public transport and pedestrian routes;

better connection and continuity along the waterfront; encouraging higher densities in the CC or a combination of all of the above.

The option to contract the city centre
This option is discounted because few respondents supported it and the Council feels it needs the space to accommodate town centre uses in mixed use formats.

The option to extend the city centre
The 3 extension areas considered in option GR04 are areas of predominantly light and general industry where some landowners are interested in redevelopment. This can be seen as part of the process of 'urban renaissance' transforming 19th century landscape into 21st century, although there are concerns about loss of traditional employment uses and the jobs it generates. The areas are large. The Kirkstall Rd extension alone covers 68 hectares.

It is considered that the main possible reasons for supporting extension are as follows:

- To accommodate land use needs of town centre uses
- If there is such a need, to ensure there is sufficient land for residential development to provide mixed use schemes
- To assist urban regeneration and renaissance

Need to accommodate town centre uses
Town centre uses typically include offices, retail, indoor leisure, hotels, bars & restaurants.

In terms of retailing the Prime Shopping Quarter (PSQ) is a zone within the overall CC boundary along with two retail warehousing zones as defined in the Adopted UDP. Any need for additional retail capacity can be met within the overall CC boundary through adjustment to the zones within it. This is considered further in the appraisal of retail options responses. This is also the case for other MTC uses such as indoor leisure, hotels, etc.

The need for offices is more likely to create a need to extend the city centre boundary and is considered in more detail below.

The first question is whether the existing city centre has sufficient development capacity to accommodate office demand. The more central areas of the city centre will always be sequentially preferable because:

- Accessibility by public transport from *all* sides of Leeds
- Proximity to the train station for business occupiers to make and receive business trips to/from London & other major cities etc
- Interaction of uses close to each other – eg office workers help

sustain the Prime Shopping Quarter
- Cohesion of place and walkability

It is important that account is taken of the need for "mixed use" schemes. Mixed use incorporating residential use adds value in terms of creating a diverse European style 24 hour city. Mixed use helps support activity at different times of the day assisting security through natural surveillance. Hence, capacity to deliver office floorspace needs to be assessed on the basis that land development opportunities would not be reserved entirely for office use, rather that developers would be expected to deliver mixed use schemes with an minimum element of office space. This is the way Preferred Option PO-02 and the Proposal Area Statements are structured.

In terms of quantities, the Proposal Area Statements for 9 development sites within the existing city centre boundary are currently written to expect a minimum of 640,000sqm.

The effects of Preferred Options PO 02 and PO 03 are more difficult to quantify because they are criteria based policies to promote office floorspace within developments close to the train station and to encourage office development elsewhere in the city centre. An urban capacity assessment of the city centre was made in 2005 using April 2005 as the base date. The sites identified within a 5 minute walk of the train station total 3.64ha (36,400sqm) and those within a 10 minute walk total 16.5ha (165,000sqm) in size. According to expected target provision of Preferred Option PO-02, the 5 minute zone sites would yield 109,200sqm of office space and the 10 minute zone sites would yield 165,000sqm of office space, giving a grand total of 274,200sqm. The zone includes part of the New Lane Proposal Area where 93,000sqm of office space is expected and forms part of the 640,000sqm above. The remaining 180,000 is probably still an over estimate as some of the sites will have had planning permission since.

As regards need, the Employment Land Study of 2005/6 identified a city wide need of 47,340sqm of office space. This was based upon a reasonably optimistic employment growth scenario and takes account of the need for occupiers to be offered a choice of sites – a 50% margin of choice. This compares with a take up rate of 64,600 over the last 5 years, which would include refurbishments as well as net additions to stock.

It is considered reasonable to take a long term time horizon planning to accommodate office accommodation in a city centre location. The city centre is the prime location and land is scarce and development opportunity limited. Once land is developed with residential accommodation, opportunity to redevelop for other uses will be extremely limited. The CCAAP has an indefinite plan period, but it is suggested that a +30 year time horizon would be appropriate for assessing ability to accommodate office needs. This would generate

a need figure of +1,420,200sqm over 30 years.

It is not a simple case of comparing city-wide need with supply potential of the city centre. There are two further factors of importance. At Sept 2006, there was over 900,000sqm of office floorspace in outstanding planning permissions city wide. About half of this relates to the city centre and half to out-of-centre sites. It is, however, impossible to say with any certainty how much might actually be built. The other factor is the degree to which the City Council embraces the thrust of national planning guidance PPS6 to steer new office development toward the city centre and town centres. Historically, Leeds' established approach has been to welcome investment in office development open armed wherever located. It remains to be seen how the City Council will respond to further out-of-centre development and whether any town centres will be prioritised for office development.

The emerging picture is incomplete and uncertain, but the following components can be brought together for comparison:

30 year city wide need for office space   1,420,200sqm
City centre Proposal Area Capacity   640,000sqm
Shortfall   780,200sqm

Shortfall can be made up by:
i) part of the outstanding city wide permissions: 900,000sqm
ii) required office space in core city
 centre areas PO-02   180,000sqm
iii) office space accepted in other city centre areas PO-03   ?sqm
iv) office space accepted in other town centres   ?sqm
v) extensions to the city centre   ?sqm
vi) out-of-centre office provision   ?sqm

To conclude in terms of need, it is not necessary to extend the city centre boundary in order to accommodate office development. In fact, there would be dangers of offering excessive choice which could undermine efforts to achieve mixed use office/residential developments on sites within the existing city centre boundary. The Proposal Areas could be sidestepped leaving the sites undeveloped or developed entirely for residential use and leading to a dispersed pattern of office uses.

Regeneration and renaissance
The extension areas offer potential to transform older industrial landscapes into 21st century high density new building, bringing jobs, improved visual appearances and associated benefits such as public space. The question is whether this type of renaissance would not be frustrated by these areas being outside of the CC boundary.

This type of redevelopment has typically been residential driven linked

to the buoyancy of the residential market. Hence, most renaissance development activity will not be dependent upon a city centre location. Such development can occur just as easily outside the city centre.

As regards jobs provided as part of office development, whether this is additional employment depends upon which catchment area is considered. Looking at Leeds as a whole, there will be a net increase in office jobs but choices as to which areas they materialise in. Whilst new jobs in one of the extension areas might be close to one adjoining residential community, they will be distant to other residential neighbourhoods that circle the city centre. In contrast, jobs provided more centrally in the city centre would be accessible to all surrounding neighbourhoods. People change jobs regularly, so the wider the accessibility to neighbourhoods the better.

In conclusion to the issue of regeneration, it is not considered that the city centre extensions would necessarily improve the prospects for regeneration and renaissance of the areas concerned. These areas can be redeveloped with higher density residential development whether they are inside or just outside of the city centre boundary. New jobs provided in the core of the city centre would be more easily accessible to the full circle of inner city neighbourhoods which would be better than jobs in fringe corners of the city centre.

The case for extending the city centre boundary
There are further reasons why extensions to the city centre boundary should be made. These are particularly strong for the Kirkstall Road Renaissance Area where an informal Planning Framework has recently been approved by Leeds City Council. The public consultation carried out on the Framework predated publication of PPS6, and its advice does not distinguish between office (B1a) and other business uses. Nevertheless, it provides a good analysis of the area and valuable advice on heights of buildings and other planning matters.

This area has a number of reasons for inclusion in the city centre:

- Flood risk. Much of the land between Kirkstall Road and the river is classified as flood risk level 3. Most city centre uses are classified by PPS25 as less sensitive and vulnerable to flood than residential use. Although the Preferred Options propose to allow residential development on zone 3 land, there may be practical reasons for other less sensitive uses at ground/upper ground floor level with residential floors above.
- A number of town centre uses (hotel/leisure) already exist along the corridor, just beyond the boundary of the existing city centre.
- Yorkshire Television has its studios in the area. This creates potential for associated media uses, some of which may be

	office uses. • The city centre end of the area is only 15 minutes walk from the train station. However, the area covers 68 hectares providing potential for an enormous scale of development. Even if only 60% of the land area were built on (allowing for roads and open space), and if this were developed at an average of 8 storeys (within advisory limits of the informal Planning Framework), a total of 3.2 million sqm of floorspace could be generated. As has been explained above, there is no need for additional land for office developments; provision within the existing city centre along with outstanding permissions is more than sufficient. If more than a small fraction of this space were developed as offices it could undermine ability to achieve more centrally located mixed use office/residential schemes.
	Recommendation
AS02, GR03, GR04	The option to extend the city centre boundary to take in the three large extensions – Kirkstall Road, Mabgate and East St – is discounted because there is not a need for town centre uses to be developed in these areas. Opening the door for unrestricted levels of office development in these areas would be likely to damage the prospects of achieving mixed use office developments in the Proposal Areas identified within the existing boundary. However, the Kirkstall Road Renaissance Area is considered an exception because of the existence of the Yorkshire TV studios and flood risk issues. It is considered that this area should form part of the city centre but be subject to special policy controls to ensure that the level of office space is not excessive and is focussed toward the city centre end of the area. Further out, office space purpose-built for users associated with Yorkshire TV and other media would be acceptable. Also, ground floor level office space may be acceptable to overcome flood risk problems of ground floor residential uses. A small scale addition to the city centre boundary is proposed at Holbeck Lane & Nineveh Road which may be necessary to accommodate part of the proposed southern loop road. Half of the Mabgate Renaissance Area falls within the UDP city centre boundary & half outside. It is proposed to extend the CCAAP boundary to include all of this Renaissance Area.
Option No.	**Summary of Responses**
GR01	**How should growth in the city centre be managed?** • Market led (i.e. plan led) 17 (comments made - focus on improving environmental quality,

	transport infrastructure/accessibility, and in consultation with local communities)
	• Market driven 2 (comments made - flexible approach in Leeds has helped sustain success of Leeds)
	Analysis & Conclusion to Option(s) above
GR01	Clearly the responses suggest that in order to take Leeds into a higher league we need to provide a degree of guidance to harness and improve the quality of the environment, social & cultural infrastructure.
	The sustainability appraisal confirms the above and is considered to be a very sustainable choice as it scored positively for almost every S.A. objective.
	National & regional guidance would also advise that leaving it to market would not achieve the necessary wider social, environmental and economic objectives.
	Vision for Leeds also provides scope for some intervention to ensure that the benefits of investment and development in the CC accrue to creating better linkages with the surrounding neighbourhoods; regenerating communities; create high-quality and attractive public spaces; open up the waterfront for business, leisure and living; and develop new facilities.
	Recommendation
GR01	The above leads to a need for several policies that cover all/some of the above. These are picked up by the themes dealing specifically with these areas for example environment, open space & greenery, design & conversation, etc.
Option No.	**Summary of Responses**
GR02	**The meaning of growth & success?** Most of respondents felt a combination of all the factors identified (i.e. jobs/floorspace; new buildings; expand quantity; residential) were important. Jobs/floorspace has been identified by the majority and by some as the most important factor. Other Comments Other areas include protecting the environment/heritage; growing the universities and to encourage graduate retention. The GOYH felt this needed to be considered as a strategic option.
	Analysis & Conclusion to Option(s) above
GR02	Not surprising most respondents considered a combination of all the

	factors as being important. It is hard to disagree. The fact that jobs and business floorspace was identified by most as being important or <u>the</u> most important factor adds weight that the CC should be the focus for MTC uses generally and Retail/B1 offices in particular to add to the commercial weight and engender the virtuous economic circle of growth. Key characteristics of growth & success include a dynamic and progressive business and finance centre creating major employment opportunities and promoting Leeds as a European business centre. Generally in accordance with national/regional planning guidance and Vision for Leeds.
	Recommendation
GR02	The meaning of growth & success does not lead to a policy recommendation on its own but rather confirms the need to have policies that; • Promote MTC uses in the CC. • Have policies in the core strategy/development control DPD on principle of not allowing MTC uses outside centres. If proposed will need to apply 5 key tests as outlined in PPS6. • To locate significant trip generating uses, i.e. retail and offices, around existing and potential future public transport nodes. • To ensure the CC is positively enhanced and developed. • To protect highly accessible sites/existing areas near public transport nodes for office and retail uses.
Option No.	**Summary of Responses**
GR03	See options AS02 & GR04 above.
Option No.	**Summary of Responses**
GR04	See options AS02 & GR03 above.
Option No.	**Summary of Responses**

GR05	**Should each major development ensure that a minimum percentage of floorspace is developed for B1 office use?**
	
	• Throughout 2
	• P/T zones 4
	• Combination of POQ and P/T zones 3
	    (many throughout but also in defined areas for e.g. Yorkshire Forward, 'the city centre has a vital role for Leeds as the region's commercial & business capital')
	• No requirement 3
	    (no market will respond)
	
	<u>Other comments</u>

	The role of Leeds CC as the business/commercial capital of the region needs to be promoted and enhanced.
	Analysis & Conclusion to Option(s) above
GR05	Varying responses received. Not surprising that developers with sites in the CC did not want to be constrained by development plan policies. Sustainability appraisal of choices in this option highlights the value of keeping B1 office space within the City Centre as the most accessible location for both clients and employees. Choice b) ensuring that a minimum amount of B1 office space within a defined zone, gained the most positive scores of the three options and with no negatives. Choice c) no requirement for B1 office space should apply, gained no positive scores and a number of negatives and is therefore not a sustainable choice. PPS6 advises; that through regional spatial strategies (RSS) and local development documents (LDDs), regional planning bodies and local planning authorities (LPAs) respectively should implement the Government's objectives for town centres, by planning positively for their growth and development. They should therefore … assess the need for further main town centre uses and ensure there is the capacity to accommodate them; focus development in, and plan for the expansion of, existing centres as appropriate, and at the local level identify appropriate sites in development plan documents; … (para 1.6) RSS should set out a vision and strategy for the region's growth, particularly for higher level centres in the region and their role as the focus for major retail, leisure, office and other main town centre development of more than local importance, and provide a strategic framework for planning at the local level. The role of plans at the local level is identified in para 2.15 – 2.18. It states that LPAs should work in conjunction with stakeholders and the community to: • assess the need for new floorspace for retail, leisure and other main town centre uses, taking account of both quantitative and qualitative considerations; • identify deficiencies in provision, assess the capacity of existing centres to accommodate new development, including, where appropriate, the scope for extending the primary shopping area and/or town centre, and identify centres in decline where change needs to be managed; • identify the centres within their area where development will be focused, as well as the need for any new centres of local importance, and develop strategies for developing and strengthening centres within their area;… • identify and allocate sites in accordance with the considerations

set out below (paragraphs 2.28–2.51);

- review all existing allocations and reallocate sites which do not comply with this policy statement;…
- set out criteria-based policies, in accordance with this policy statement, for assessing and locating new development proposals, including development on sites not allocated in development plan documents.

Under assessing the need for development para 2.39 advises, an assessment of the need for new office floorspace over the development plan document period should be carried out as part of the plan preparation and review process, and updated regularly. At regional level this should involve the forecasting of future employment levels and the identification in RSS of suitable broad locations where regionally significant office development should be located. Local need assessments for office floorspace will need to be informed by regional assessments and will form part of the evidence base for development plan documents. The physical capacity of centres to accommodate new office development and the town centre's role in the hierarchy should also be relevant to planning for new office development.

PPG13 reinforces the need to locate significant trip generating uses, i.e. main town centre uses, in centres.

Draft RSS (December 2005) also identifies Leeds CC as an area which is facing a demonstrable level of competing demand from other uses hence the need to protect and safeguard employment land/sites in appropriate locations.

Policy E5 - Safeguarding Employment Land
Local Development Frameworks should define criteria or areas where it is considered necessary to offer special protection to designated employment sites. This approach should be applied when it can be shown that:

A. It is necessary to safeguard employment land/sites on the basis of the demonstrable level of competing demand from other land uses
B. The employment land/sites so identified are necessary to support Policies YH5, YH6 and YH7
C. A review of employment land has been carried out in accordance with Policies E1-E4 or the sites are part of an area subject to an agreed masterplan …..

On the basis that Policies E3 and E4 require LPA's to rationalise their employment land portfolios, there may be pressures from competing land uses on reduced employment land portfolios. In certain parts of the Region, it is considered necessary to offer protection to employment sites. Policy E5 will assist Local Authorities safeguard employment land in specified areas where employment sites are

being lost to other uses, principally housing. This is likely to be a significant issue in Leeds/Sheffield City Centre and areas of high demand in some market towns. There is a real concern that high-density housing can displace employment to more unsustainable locations.

The city centre is considered to be vital to promoting Leeds as the regional capital and as a major European city. Hence Vision for Leeds aims, amongst other things, to;
- create a high-quality and prestigious environment and facilities which are essential to keeping and attracting highly profitable businesses;
- continue to promote the city centre as the UK's major business and financial services centre outside London, and develop its reputation in Europe.

The conclusions that follow from the Employment Land Review is that outstanding permissions for B1 office could suffice to meet demand forecasted for the next 10 years.

Given that the Leeds ELR indicates a reasonable sufficiency of supply, the question of controlling development opportunities is not so much about delivering supply quantity but rather about the sustainability of location. Office use has both a higher density of occupation and trip generation as compared with other uses, hence providing a stronger justification for close proximity to public transport nodes than residential use. As such it will be important from the point of view of sustainability & climate change to safeguard opportunities for office development in locations of the best public transport accessibility. This is the position a strategic plan like the CCAAP has to take bearing in mind it covers a period of 10 years (as a minimum) and provides the context for strategic planning for decades beyond that in terms of creating an efficient and sustainable city and making optimum use of centrally located land.

The other factor we need to take into consideration is that not all office permissions come forward for development or are superceded by permissions with reduced office content. We need to look at developing and strengthening the office element of our centres both in terms of quantity and quality to allow Leeds to compete with other core cities in the UK and Europe.

How do we take account of Kate Barker's interim findings on the effects of planning on businesses and productivity in the UK? On the face of it, the concerns expressed about high office rents, possibly as a result of shortage of supply, are not compelling. We will need to monitor the eventual outcomes of this work – including any adjustments to national planning policy - and accommodate any implications it may have for the LDF.

	Evidence base, from the 2001 <u>census data</u>, provided by the transport policy team would reinforce the view that the prime office & retail quarter are the main destinations for people working in the CC. Around 125,000 people work in the CC. Of which 37,000 and 26,000 people work in the POQ and PSQ respectively. The modal split for inbound journeys in the CC indicates that around 49% and 39% travel by car to the POQ & PSQ respectively. The rest use other forms of public transport, i.e. train and buses. To conclude the preferred strategy needs to achieve a <u>flexible</u> approach capable of dealing with the considerable future uncertainties surrounding the development of any major city. The main objectives should try and achieve a greater mix of uses throughout the City Centre, to avoid the creation of large single use areas which may be 'dead' at certain times of the day, to contribute to a livelier and more vibrant City Centre at all times, to ensure adequate provision of supporting uses and to provide variety in use and built form. At the same time, the Plan needs to accept that there are advantages for business and services, and their customers, in the concentration of particular types of broad use in highly accessible locations. The preferred approach is to identify the core areas of the city centre with the best public transport accessibility and ensure that appropriate opportunities to consolidate & increase office floorspace are taken. It is also to identify major future development sites where a component of office use should be incorporated in mixed use development.
	Recommendation
GR05	To have a policy to promote office development in core areas of the city centre: - In core areas of the city centre, expecting major new developments to provide office content and retaining existing office floorspace. This should be monitored annually and applied on zonal basis so that individual schemes can provide varying contributions (according to site circumstances) providing that the aggregate total is sufficient - Identifying Proposal Areas suitable to accommodate office accommodation - Accepting office development in other areas, although to a limited degree in the Kirkstall Road Renaissance Area (see PO-02 and PO-03).
Option No.	**Summary of Responses**
GR06	**How should we define a major development site in the CCAAP?** - Same (ie 0.5ha) 9 - Larger 0 - Smaller 3 - Other Site by site basis.

	By Gross floor area. By trip generation.
	Analysis & Conclusion to Option(s) above
GR06	Majority of respondents felt that the threshold should be kept the same. Where views differed, it was in the main, on the basis that they had an alternative method of defining major developments, for example trip generations, gross floor area, etc. On further analysis, it is noted that the meaning of major development varies in different policy contexts. The following examples make the point: • Mixed use development policy (UDP CC29) sees major as upwards of 5,000 sq m gross floorspace and/or on sites of 0.1 ha • Car parking standards for B1 offices (PPG13 & RSS) apply on developments above 2,500sqm. In the context of applying the Preferred Option (PO-02) to secure office floorspace in core zones of the city centre, because it has been decided to apply the objective to all developments with annual reviews, there is no need to set a threshold.
	Recommendation
GR06	No need to set a threshold.
Option No.	**Summary of Responses**
GR07	**Should training/employment agreements for local communities be part of development?** • Developments above 1,000 sqm 7 • Major Developments (0.5ha) 3 • Not at all 3
	Analysis & Conclusion to Option(s) above
GR07	Most people agree that training agreements should be made as part of developments of 1,000sqm or more. The negotiation of training and employment agreements as part of developments, scores very well against <u>sustainability appraisal</u> objectives. Making this a requirement for all developments above 1,000 sqm gains the most positive scores as it means that more agreements would come into force and therefore maximises the benefits. Overall there may be concerns that this will place an unnecessary burden on firms who would recruit from the local area/travel to work area anyway. <u>Policy Formulation</u>

According to Circular 05/2005 "Planning Obligations" it is important that the Agreement should be:
(i) relevant to planning;
(ii) necessary to make the proposed development acceptable in planning terms;
(iii) directly related to the proposed development;
(iv) fairly and reasonably related in scale and kind to the proposed development; and
(v) reasonable in all other respects.

The case for using Planning Agreements to secure employment objectives could be made on the basis that it contributes to 'reducing social exclusion' and 'achieving sustainable development'. Both of these aims can be considered as 'planning matters', thus justifying the use of Planning Agreements in this way.

Employment Agreements normally relate to employment on the site itself and so are connected with it.

Will assist, in part, in meeting the aims outlined in the Vision for Leeds – "to extend the success of the CC to adjoining communities".

The Adopted UDP (July 2006) already has a (parent) Part 1 Policy that seeks to gain planning agreements in relation to training and skills. These are outlined below:

Para 3.3.1 - SA8: To ensure that all sections of the community, irrespective of income, disability, age, race, religion, gender, travelling way of life, caring responsibility or place of residence have safe and easy access to housing, employment, shops, social, community and leisure facilities, places of worship and other necessary facilities, by maintaining and enhancing the current levels of provision in appropriate locations.

Section 4.5 - GP7: WHERE DEVELOPMENT WOULD NOT OTHERWISE BE ACCEPTABLE AND A CONDITION WOULD NOT BE EFFECTIVE, A PLANNING OBLIGATION WILL BE NECESSARY BEFORE PLANNING PERMISSION IS GRANTED. THIS OBLIGATION SHOULD COVER THOSE MATTERS WHICH WOULD OTHERWISE RESULT IN PERMISSION BEING WITHHELD AND IF POSSIBLE SHOULD ENHANCE THE OVERALL QUALITY OF THE DEVELOPMENT. ITS REQUIREMENTS SHOULD BE NECESSARY, RELEVANT TO PLANNING, DIRECTLY RELATED TO THE PROPOSED DEVELOPMENT, FAIRLY AND REASONABLY RELATED IN SCALE AND KIND TO THE PROPOSED DEVELOPMENT, AND REASONABLE IN ALL OTHER RESPECTS.

Paragraph 4.5.7 sets out a list of the types of community benefit that the City Council might pursue as appropriate through planning agreements. This includes:

- training centres, workshops and schemes which help develop the skills of the resident workforce and help groups such as women, ethnic minority groups and people with disabilities, facing disadvantage in the labour market …

This has now been augmented by Policy R4 which was introduced as part of the review of the previous UDP (Aug 2001). Policy R4 also now forms part of the Adopted UDP (July 2006).

11.6.4 - Training & Pathways to Employment
An important opportunity exists to connect the development process with employment and training initiatives. As major construction projects can generate employment & training opportunities for local people, links with developers are needed to facilitate the take up of jobs by local people and to connect training to required skills. The Council as well as partner agencies are able to provide tailored packages for individual development schemes. Developers of appropriate schemes will be expected to show that they have investigated the potential to offer employment and training to local people and developed suitable arrangements for provision in practice.

R4 - OPPORTUNITIES WILL BE SOUGHT TO SECURE APPROPRIATE EMPLOYMENT AND TRAINING ASSOCIATED WITH THE CONSTRUCTION AND SUBSEQUENT USE OF DEVELOPMENTS, WHICH CAN ASSIST DIRECTLY IN MEETING THE EMPLOYMENT AND TRAINING NEEDS OF RESIDENTS IN THE CITY.

The Revised Supplementary Planning Guidance on Holbeck Urban Village (February 2006) builds on the above and places a specific requirement to ensure local people have access to the new jobs created there. It states;

7. Local employment - To ensure that 5% of new jobs created in the urban village are ring-fenced for local, unemployed residents and that developers should work with Leeds City Council to ensure that there are clear training routes into the new jobs created.

The above clearly shows that the seeking of employment and training agreements form part of the UDP policy framework.

There are several examples where such agreements have been agreed in Leeds. One such example is given below;
Leeds, TESCO Seacroft Store: The Seacroft Partnership provided guaranteed employment for those successfully completing a customised training programme targeted on local unemployed people. Seacroft is a large local authority estate five miles from the centre of Leeds. The Partnership includes TESCO, Leeds City Council, USDAW, Quarmby Construction, ASDA, the Employment Service and East Leeds Family Learning Centre. Candidates included those on New Deal and other groups, with particular emphasis on young people, single parents and over 50 year olds. 320 of the store's 490 workers were recruited from within a three-quarter mile radius, 243 were previously unemployed and 147 were guaranteed jobs after their initial assessment.

Examples from other local authorities include;
- **London Borough of Greenwich and Greenwich Local Labour and Business: Prioritised targeted training and employment in 1994 local plan and developed the use of s106 agreements on major development sites (including Millennium Dome). Typically includes: endorsement of GLLaB activities (partnership service provider), prior notice of local employment and business opportunities,**

monthly monitoring information on workforce, provision of on-site recruitment and training, payment to LBG for recruitment, employment and skills development

- **City of Aberdeen: Planning Agreement under s50 of TCP (Scotland) Act with Mobil North Sea Ltd relating to major extension of SAGE North Sea Gas terminal at St Fergus. Aimed to target employment and subcontracting within thirty miles of the site. Based on clause on Local Plan stating: 'The District Council will encourage developers to give priority to local residents in relation to any new employment opportunities which arise'.**

- **Newcastle Northern Development Area: A major, mixed use development in former greenbelt land to the north of Newcastle upon Tyne including private and social housing and business premises. The Development Brief for the site includes the objectives of tackling basic employability skills in the City, construction training, customised training relating to occupiers needs, partnership approach. A draft s106 agreement includes payments to the Council to fund training for jobs with final occupiers, construction apprenticeships for local people, cooperation in planning training programmes, monitoring and joint working with the Council.**

- **Southampton West Quay Development: City centre retail development on former dockside industrial site, including 22,000 sqm retail village and 74,500 sqm shopping centre. S106 agreement with original developer, since taken over by new developers led by Hammersons. This provided for payment to the Council to cover training to increase the size of the retail workforce and provide a range of recruitment services to retail occupiers of the site.**

Discussion has taken place with the Business & Skills section of the Development Department about practical means of implementing a policy. It was considered that a requirement for all developers of schemes in excess of 1000 sqm to enter into S106 Agreements for training & employment measures would be too onerous and would overload the Council's Jobs & Skills Service. In any case, the companies who would construct developments and those who would occupy completed buildings are believed to have an interest in helping people to access jobs that will be created as this will widen the labour pool from which they can draw.

In conclusion it is considered that developers of major schemes (+1000sqm) should only be expected to make contact with the Jobs and Skills Service in order to explore what training & employment initiatives and opportunities might be relevant to the development.

Developers of very major schemes (+1ha) should be expected to enter into employment and training S106 Agreements to optimise the number of jobs and training scheme places to be offered to local unemployed and unskilled workers.

Agreements will need to be cast according to knowledge at the time of who the occupiers of buildings are likely to be.

A further issue is whether this policy approach is equally applicable

	district wide? If so, it might be better for the Policy to be set out in the Core Strategy rather than the CCAAP.
	Recommendation
GR07	Developers of major schemes (+1000sqm) will be expected to make contact with the Jobs and Skills Service in order to explore what training & employment initiatives and opportunities might be relevant to the development. Developers of very major schemes (+1ha) will be expected to enter into employment and training S106 Agreements to optimise the number of jobs and training scheme places to be offered to local unemployed and unskilled workers.

Option No.	Summary of Responses
MR01	15 responses on flood risk. a) Development to take suitable measures to reduce flood risk within the development 5 b) Dev. to take suitable measures to reduce flood risk within the development and contribute to reducing flooding overall 9 c) Refuse permission for dev. in flood risk zones 1 Environment Agency have supported b) but add that there are circumstances when permission might have to be refused.
	Analysis & Conclusion to Option(s) above
MR01	Majority of responses chose b) Sustainability Appraisal favoured b) 　　PPS25 requires that any development must be considered as to whether it will exacerbate flooding and there is a requirement that future users of the development must not be placed in danger from flood hazards during the lifetime of the development. It also acknowledges that the likelihood of flooding in most areas is likely to increase due to climate change. It is therefore important not just to address flood risk on site but also to ensure that new development does not exacerbate flooding elsewhere. PPS25 also contains a classification of land uses according to their vulnerability. Leeds Initiative chose b). SFRA will help to inform the preferred option.
	Recommendation
MR01	Option b). The policy should include: • A requirement that increased surface water run off resulting from new development should be mitigated for by appropriate and environmentally sensitive measures. • A requirement for FRA to be submitted alongside planning applications. It should assess flooding on – site and elsewhere. • A requirement for developer contributions for flood defence and mitigation works. In order to take account of the greater vulnerability of some uses to flood risk referred to in PPS25, it is recommended that flood risk policy is referred to under Preferred Options for both Residential (PO-05) and Hotel (PO-15) uses.
Option No.	**Summary of Responses**
MR02	19 responses on designing buildings to save energy, however one respondent ticked all four choices and therefore has to be invalidated as c) and d) are either /or options. a) Encourage all new buildings to use renewables 9 b) Require solar panels and wind turbines where appropriate 1

	c) 10% of energy of major developments from renewables 2 d) 10% of energy of all dev to come from renewables 4 Additionally, 2 of the respondents stated support for energy efficiency measures without selecting a choice and GOYH questioned if 10% policies accorded with national and regional policy and therefore could be unsound. YF indicated that 10% policy would accord with the RSS. Contradictions in responses from different agencies.
	Analysis & Conclusion to Option(s) above
MR02	 • Majority selected a) indicating that people are not so concerned about the effects of climate change that they think planning policy needs to get tough on it • All choices scored well in the Sustainability Appraisal but d) would require grant funding or some kind of subsidy to assist it's introduction (also suggested by U of L) • To reach Gov and RSS energy targets we need to choose d). • Vision for Leeds supports quality of life and health improvements and therefore we need strong policies to tackle climate change. • Other LAs have introduced the 10% rule and not been found to be unsound. In June 2006, since this consultation, a ministerial statement was released by Planning and Housing Minister Yvette Cooper to strengthen current guidance in PPS22. It states that the Government will now "expect all authorities" to include on-site renewable energy policies in their development plans. In the light of this statement it is considered that a 10% renewables requirement would accord with Government policy. The Ministerial Statement encourages LAs to consider a higher percentage than 10%. There is consensus that renewables should be sought from all development and not just major development, the disagreement appears to be over whether that should be encouraged or required. Leeds is finding, particularly with residential developments, that developers are not interested in providing renewable energy as it is seen as an additional cost and something that could slow the process, they are also not interested in using energy efficiency arguments to promote the sale of the development, presumably because there is high demand, consequently it is unlikely that renewable energy would be taken on board by developers unless it was required. Additionally, the RSS requires the District to contribute to renewable energy generation and sets targets for 2010, requiring a % of on-site microgeneration is the only way the Authority might be able to meet the target because there are no opportunities for large-scale renewable energy production in the District.
	Recommendation
MR02	Council's Preferred Option is d) and to enable future targets in

	the RSS to be met, it is necessary to provide a rising target for future on-site renewable energy production. <u>Zero Carbon Approach</u> Additionally, as well as seeking use of renewable energy, there should also be a requirement for developments to be energy efficient, so they use less energy for heating, cooling and electricity. The WWF Report 'One Planet Living in the Thames Gateway' 2004, shows that living in energy efficient homes or 'Ecohomes' offers savings on household expenditure which means that the cost of running a home is more affordable – this is therefore complementary to the Council's affordable housing policy and initiatives to tackle fuel poverty. Low carbon development can be achieved by using a range of existing, well-recognised standards, which provide developers with a toolkit of options from which they can select the most relevant depending on the project.
Option No.	**Summary of Responses**
MR03	All 15 responses agreed that we should encourage use of materials from local sustainable sources. YF said we should go further and require a BREEAM.
	Analysis & Conclusion to Option(s) above
MR03	All chose a) YES Sustainability Appraisal favoured a) known facts, figures, trends & evidence Leeds Initiative chose a). BREEAM standards consist of a group of criteria designed to assess a broad range of sustainability issues inherent in any construction project. The BREEAM standards are becoming the de-facto standard for much of the construction industry in the UK. Using materials from local sustainable sources is one of the things which developers can do in order to help them achieve a very good BREEAM rating. However, it is not required by BREEAM as there are lots of other ways that a good score can be achieved. The Council should be requiring all development to reach an excellent or very good BREEAM rating and this would therefore encompass the MR03 purpose within it.
	Recommendation
MR03	Council's Preferred Option = a)
	This policy choice should be encompassed within a Policy to require the use of the BREEAM rating. This should say : "For those types of uses where a BREEAM assessment scheme exists, including Ecohomes, developments of over 500 square metres or 10 dwellings or more will be required to meet at least the very good rating." A decision needs to be made as to whether this should also apply to change of use (it is possible to apply BREEAM to Cof U).

Option No.	Summary of Responses
MR04	17 responses on planning controls over the re-use of building materials, some chose both options. a) Longer lasting, more adaptable building fabric 11 b) Easily recyclable 8
	Analysis & Conclusion to Option(s) above
MR04	• Majority selected a) but could actually do both depending on circumstances. • Both choices scored well in the Sustainability Appraisal but a) achieves more positive scores in the long term This should be part of an overall approach to zero carbon emissions and zero waste throughout the lifetime of the development. It is noted that b) may be hard to enforce.
	Recommendation
MR04	Council's Preferred Option = I t may not be necessary to include this Policy as it would be covered by the BREEAM policy as described in MR03.
Option No.	Summary of Responses
MR05	12 responses on planning controls over the use of lighting a) Minimal, developers free to choose 1 b) Minimize light pollution and energy waste 11
	Analysis & Conclusion to Option(s) above
MR05	There is a clear conflict here between what people want and the findings of the sustainability appraisal. • Clear majority selected a) • Sustainability Appraisal favours b) because of energy efficiencies Taking on board climate change and the need to reduce greenhouse gas emissions there is a need for the Council to promote energy efficiency across all services both public and private. However there may be ways of using renewable energies in lighting without having to minimize lighting – if it's not what people want – as is indicated by the results. New technology also means that buildings can be lit in a way that enhances them and is functional but does not cause diffuse light pollution. Rather than being too prescriptive about controlling lighting – the Council should encourage energy efficient lighting as part of the kitbag of energy efficiency approaches that should be required in buildings.
	Recommendation
MR05	Council's Preferred Option = A specific policy on controlling lighting is not required but the use of energy efficiency measures

Option No.	Summary of Responses
	and renewable energy will be encouraged as part of policy MR02
Option No.	**Summary of Responses**
MR06	15 responses on biodiversity of natural open spaces, they should be: a) Protected 1 b) Protected and enhanced 14
	Analysis & Conclusion to Option(s) above
MR06	- Clear majority selected b) - Sustainability Appraisal favours b) b) is the better option but needs to be achievable and therefore further investigation may be required on funding and resources. The Council has developed an SPD on Biodiversity and the Waterfront. This develops in detail the protection of biodiversity along waterfront locations including the City Centre and states that the Council will seek developer contributions for habitat enhancement works.
	Recommendation
MR06	Council's Preferred Option = b) protection and enhancement of natural open spaces. This recommendation can be taken forward within other Preferred Options on protection of open space (PO-25) and enhancement of public realm (PO-27).
Option No.	**Summary of Responses**
MR07	14 responses on provision of waste collection and recycling facilities within developments. a) Yes, always 13 b) Only for major developments 0 c) Only where financially viable 1 d) No 0
	Analysis & Conclusion to Option(s) above
MR07	- Clear majority selected a) - Sustainability Appraisal favours a) - Environmental lobby calls for a zero waste approach. It is good practise to make developers aware of Council requirements for waste collection and recycling at an early stage in the development process so that it can be designed as an integral part of the scheme.
	Recommendation
MR07	Council's Preferred Option = a) All developments must provide facilities for waste collection and recycling.
Option No.	**Summary of Responses**
MR08	responses on provision of facilities for street litter collection and recycling as follows:

	a) Litter bins are sufficient 5 b) small number of recycling facilities are required across the city centre 13 c) large recycling centre is required in or on the edge of the city centre 0
	Analysis & Conclusion to Option(s) above
MR08	 • Clear majority selected b), however it may be beyond the remit of planning to deliver this option • Sustainability Appraisal favours b) It was noted that facilities for recycling could be abused by trade waste – which businesses have to pay for to have removed.
	Recommendation
MR08	Council's Preferred Option = b). Therefore a Preferred Option should be developed to require all new development to provide suitable storage for waste and recycling.

Option No.	Summary of Responses
AS04	**How do we best improve commuting to the city centre?** The following preferences were given for ways of improving commuting into the city centre: a) Enhancement of public transport 16 b) Demand management 3 c) Reliance on self regulation 0 <u>Other comments</u> Other notable comments were that a "carrot and stick" approach is required and that people need to be attracted out of using their cars rather than forced. GOYH commented that self regulation may be environmentally unsustainable & that public transport funding is available through the Transport Innovation Fund.

Option No.	Summary of Responses
MT01	**How could the congestion caused by the growth of Leeds city centre best be tackled?** Mixed view. Respondents were asked not to select more than 3 of a list of measures to help tackle congestion. Four ticked the "combination of all measures" box. a. Park and ride 18 b. Enhanced bus routes 20 c. New train stations 11 d. Restraint on commuter car parking 6 e. Demand management 4 f. Building and widening roads 2 g. Allowing traffic to self-regulate 1 <u>Other comments</u> Several suggested that certain measures need to be pursued in combination with others, particularly demand management with improvements such as park & ride & enhanced bus routes. GOYH asked whether workplace user charging has been considered. Dual use of car parks e.g. residential and offices. Leeds Hotels Association felt that the concentration of MTC uses will exacerbate congestion.

Option No.	Summary of Responses
MT08	**Any type of road user charging or congestion charging should cover which areas?** Application of road user charging or congestion charging should be: a) City centre 7 b) Wider than city centre 5 c) None 3 Other comments Yorkshire Forward felt it was too early to comment. Need to understand effects of charging. Leeds Civic Trust felt that, notwithstanding success of London, pricing is best handled as part of a national scheme. Leeds is too small on its own and there is too much competition nearby to attract those who choose not to pay.
	Analysis & Conclusion to Option(s) above
AS04 MT01 MT08	As far as commuting to the city centre and dealing with the consequences, i.e. congestion, there is strong support for enhancing public transport vis-à-vis pursuing demand management as an option. If in the event we were to pursue road user charging or congestion charging then there is a fairly even split from respondents as to whether it should focus on the city centre alone or a much wider area. In terms of the <u>sustainability appraisal</u> the public transport improvement measures come out with positive scores with enhanced bus routes fairing the best. Restraint on commuter car parking achieves a number of positive outcomes, with some negative outcomes as far as developing park & ride in greenfield/green belt locations and potentially deterring investment in the city centre. Widening roads and the self-regulating options score poorly. For congestion charging the sustainability appraisal showed that limiting congestion charging to just the city centre produces a negative and double negative score which do not occur if the congestion charge is spread more widely across the city. This is primarily because it is anticipated that a congestion charge in the city centre would encourage more people to drive around the edge of the centre to avoid the charge and this would have bad

effects in terms of pollution, noise, road safety and stress for those people living in the inner city. Often these are the areas/wards with the highest levels of deprivation.

However, without a proper national policy on <u>charging</u> which starts with the national <u>road network</u> the LDF should not be continuing to support local charging. The LDF needs to make realistic policy recommendations, which are nested within proper national and regional policies. *Effective demand management* needs to be an integrated approach that takes account of this wider context with clearly defined leadership from national government. This means robust policies to address the demand for longer trips based on the national road network (which is in the control of central government), otherwise many of these trips will continue to be made.

Similarly, greater emphasis should not be given to the use of <u>workplace parking levies</u>. These measures can only have a limited role as a demand management tool. They are only likely to dampen down part of commuter demand and, to a limited degree, in many cases businesses may well choose to support their employees' costs thus nullifying the benefits.

The RSS identifies the importance of <u>park and ride</u> facilities in influencing the use of the car. PPG13 recognises that park and ride schemes, in appropriate circumstances, can help promote more sustainable travel patterns, both at local and strategic levels, and improve the accessibility and attractiveness of town centres. It mentions that schemes need to be developed as an integral part of the planning and transport strategy for the area, and should be included in the local transport plan and, where possible, in the development plan. Proposals need to be consistent with the strategic context set out in the RTS, and where they would have a strategic role, for instance as a rail-based scheme on a main line, they would need to be considered within the regional transport and planning context.

PPG13 advises that there should be no minimum parking requirements for development, and as such it is inappropriate for a local authority to seek commuted payments based purely around the lack of parking on the site. However, it may be appropriate to negotiate for contributions towards the provision of a park and ride scheme, where this will improve accessibility to the site by public transport, or towards the costs of introducing on-street parking controls in the vicinity of the site.

For Leeds, and the city centre in particular, to fully function as the City Region, targeted transport infrastructure improvements are essential and must also be properly integrated with each other to maximise the role of public transport and interchange between

the different modes (including with the private car). This is essential to the long term functioning of transport within the City Region bearing in mind the very diverse travel patterns, especially to work, that have been emerging over the last 3 decades and which have accelerated since the 1991 census.

The majority of the schemes originally identified within the Adopted UDP city centre transport strategy have been completed. The proposals identified stemmed from the 1991 Leeds Transport Strategy. In terms of <u>major road</u> improvements all of the schemes identified in the AUDP have been completed (or are under construction). The AUDP identified the following measures;

- completion of the ring of Strategic Highway routes around the City Centre (Policy T20: Inner Ring Road Stages VI and VII, including a new Crown Point Bridge), to reduce the amount of extraneous through-traffic coming through the City Centre;
- introduction of a new circulation system in the Centre based on a one way "loop" road, including a new river crossing at Concordia Street, which will provide easy access for City Centre businesses, car parks, deliveries and servicing, public transport, taxis and disabled parking - and which provides the opportunity to expand and improve the pedestrian core, e.g. the closure of Briggate; generous provision is made around the loop for signal controlled pedestrian crossings.

Recent improvements have benefited traffic circulation in the city centre area. However, congestion remains an issue on the approaches to the city centre and the Inner Ring Road. Further issues for consideration may include pressures on the highway network from development and traffic growth; operational capacity; traffic circulation strategy, etc.

A strategic review is currently being undertaken to identify the transport requirements which will support the future sustainable development of the city. The review will inform the CCAAP and the future West Yorkshire Local Transport Plan programme and priorities. Any new schemes will need to be in line with the aims and objectives identified in the LTP and worked up through the relevant delivery mechanisms. The LDF could merely acknowledge the availability of several options/approaches leaving policy a matter for local transport strategy consideration.

The core strategy for LTP2 involves high public transport investment together with demand management measures. This core approach is developed through a series of strategies based upon the priorities of Delivering Accessibility, Tackling Congestion, Safer Roads, Better Air Quality and Effective Asset

Management. The overall strategic approach also includes consideration of the impacts on greenhouse gas emissions and climate change.

LTP2 identifies the following strategic measures to address congestion;
- Encourage modal switch to public transport
- Manage the demand for travel
- Make the best use of the existing capacity
- Improve the highway network
- Encourage more cycling and walking
- Promote smarter travel choices
- Promote sustainable land use planning policies & practices

The LTP also aims to introduce traffic demand management measures, focusing on commuter journeys, primarily to improve air quality.

The Vision for Leeds concurs with many of the above principles and aims to:
- provide a safe, sustainable and modern transport system;
- improve regional, national and international transport connections;
- reduce the need to travel; and
- create a sustainable travel culture.

Several major scheme bids are planned during the Local Transport Plan 2 (LTP2) period, for example;

Bus Rapid Transit (BRT) – An initial business case is currently being prepared for the development of a bus rapid transit scheme as a replacement to the former Leeds Supertram project. The scheme would follow a similar alignment in the city centre to the former Supertram route and would be served by park and ride sites (further information is provided later in this document).

Stourton Park and Ride - The utilisation of land formerly designated for the main Supertram park and ride site (up to 3000 spaces) just 3km south of Leeds city centre, and immediately adjacent to the M621 Junction 7, close to the M1. The scheme would build *'a safe by design park and ride scheme'*, involve necessary highway works to provide bus priority measures on the selected route to the city centre and interchange opportunities within the city centre including the rail station. This scheme would be designed for later conversion to BRT. Access into Leeds from West Yorkshire and the Region is a clearly identified priority, and this scheme enables direct access from a motorway based park and ride site into the heart of the city centre and the railway station.

	As part of developing the transport strategy for Leeds and putting forward particular schemes to deal with additional demand for commuting and potentially increased congestion there is scope to acquire funding from the Department for Transport (DfT) via the Transport Innovation Fund (TIF). The TIF represents a new approach by the DfT to the allocation of some of its budget. Through the TIF, the DfT will be able to direct resources towards the achievement of two very high priority key objectives – i.e. tackling congestion and improving productivity. The principle underlying the TIF is that resources should be allocated on the basis of an assessment of how these objectives can be most effectively and sustainably met.
	Recommendation
AS04 **MT01** **MT08**	The above options do not necessarily lead one towards a preferred option(s) which the CCAAP can put forward on its own. It would rather create the need to ensure the CCAAP is in line with other documents that outline the transport strategy for Leeds as a whole and in particular for the city centre, for example Northern Way & Leeds City Region Development Programme, TIF submissions, LTP2 (and subsequent versions) and other daughter documents, etc.
Option No.	**Summary of Responses**
MT02	**Level of car parking (short stay) for visitors?** Regarding the level of car parking for visitors, the majority thought that this should be maintained at current levels. a) Expanded 4 b) Maintained at current levels 14 c) Reduced, but with exceptions 3 Other comments Issue of parking generally & of affordable parking at the hospital. Short stay car parking should cost more. City centre car parking costs encourages people to use out of centre locations, for example, White Rose. Need for more multi-storey car parking geographically spread around the city centre.
Option No.	**Summary of Responses**
MT03	**Level of car parking for commuters?**

	Regarding the level of car parking for commuters, most respondents thought that this should be reduced: a) Expanded 4 b) Maintained at current levels 5 c) Reduced, but with exceptions 14 Other comments Of note, GOYH warns that expansion of commuter parking may be contrary to national planning policy. University of Leeds favours reduced provision for new developments. Need for public transport alternatives to cater for commuters. References to exceptions related principally to shift workers at the hospital and elsewhere.
	Analysis & Conclusion to Option(s) above
MT02 MT03	The majority of the responses received tend to favour the need to make the city centre attractive to visitors by maintaining or enhancing the current short stay provision. The converse is true for commuter car parking where most of the responses were either to maintain or reduce the level of car parking, albeit with exceptions. The <u>sustainability appraisal</u> of whether visitor parking should be expanded or reduced in the city centre did not really offer any help in choosing the best option, as advantages and disadvantages tended to cancel each other out. If reduction of visitor parking frees up land to be used as open space/greenery then this becomes the more sustainable choice. The appraisal for car parking for commuters showed that the expansion of car parking for commuters is not sustainable in the long term. However, reducing car parking for commuters in the city centre did not score as well as one might have expected. This is due to uncertainty about how land previously used for parking might be used instead & concerns about stifling economic investment. There are opportunities for reduced commuter parking with other measures to mitigate against these negative effects. **Planning Policy Guidance Note 13: Transport** Planning Policy Guidance Note 13: Transport (PPG13) provides advice to local authorities on integrating transport and land use planning. The three key objectives of PPG13 are to:

- Promote more sustainable transport choices for both people and for moving freight;
- Promote accessibility to jobs, shopping, leisure facilities and services by public transport;
- Reduce the need to travel, especially by car.

In order to achieve the objectives of the guidance, PPG13 states that local authorities should "use parking policies, alongside other planning and transport measures, to promote sustainable transport choices and reduce reliance on the car for work and other journeys".

Paragraph 49 of PPG 13 states that "the availability of car parking has a major influence on the means of transport people choose for their journeys" and that "car parking also takes up a large amount of space in development, is costly to business and reduces densities". The paragraph goes on to say that "reducing the amount of parking in new development is essential, as part of a package of planning and transport measures, to promote sustainable travel choices".

Paragraph 51 of PPG13 states that local authorities should:
- Not require developers to provide more spaces than they themselves wish, other than in exceptional circumstances which might include for example where there are significant implications for road safety which cannot be resolved through the introduction or enforcement of on-street parking controls;
- Encourage the shared use of parking (for example offices and leisure uses might share parking because the peak levels of use do not coincide);
- Take care not to create perverse incentives for development to locate away from town centres;
- Require developers to provide designated parking spaces for disabled people in accordance with current good practice;
- Introduce on-street parking controls in areas adjacent to major travel generating development to minimise the potential displacement of parking where on-site parking is being limited;
- Require convenient safe and secure cycle parking in development at least at levels consistent with the cycle strategy in the local transport plan; and
- Consider appropriate provision for motorcycle parking.

PPG13 sets out maximum national car parking standards for a range of major developments and thresholds above which those standards apply.

Paragraph 57 of PPG13 states that "local authorities should adopt on-street measures to complement land use policies" and that "car parking charges should also be used to encourage the use of alternative modes".

Regional Spatial Strategy
The draft Regional Spatial Strategy for Yorkshire and the Humber to 2016 (January 2006) incorporates the Regional Transport Strategy (RTS). The RTS promotes parking policies to encourage development in areas of high public transport accessibility, for example by providing varying maximum parking standards for different types of development according to the type of location.

LTP2
LTP2 was published in March 2006 and covers the period from April 2006 to March 2011. The objectives set out in LTP2 are to:
- Improve access to jobs, education and other key services for everyone;
- Reduce delays to the movement of people and goods;
- Improve safety for all highway users;
- Limit transport emissions of air pollutants, greenhouse gases and noise;
- Improve the condition of the transport infrastructure.

In order to achieve these objectives, LTP2 sets out the following parking-related strategies:
- Continue to reduce the number of long stay spaces in urban areas;
- Preference given to short stay spaces (less than 4 hours) over long stay parking;
- Continue to convert long stay spaces to short stay;
- Extend city centre control zones outwards;
- Continue to increase long stay parking charges in main urban centres; and
- Use additional revenue to fund initiatives linked to park and ride and improvements to car park infrastructure e.g. security.

Leeds UDP
The UDP identifies different guidelines for S2 centres, outside S2 centres, the Fringe City Centre Commuter Parking Control Area and the Core Car Parking Policy Area. Within the Core Car Parking Area the objective is to restrain the provision of additional commuter parking and within the Fringe City Centre Commuter Parking Control Area, the objective is to control the growth of commuter parking. For city centre office development, additional guidelines are presented in the UDP for developments within and immediately adjoining the public transport box and those which

fall within Prestige Development Areas (PDAs).

The UDP also sets out the approach that is taken towards commuter car parks unrelated to development on cleared or vacant sites and distinguishes between the Core Car Parking Policy Area (including the Public Transport Box) and the Fringe City Centre Commuter Parking Control Area. Within the Core Car Parking Policy Area, there is a presumption against additional commuter parking, whilst encouraging and giving preference to short stay visitor and shopping parking. In the Fringe City Centre Commuter Parking Control Area some off street commuter parking is permitted on a temporary basis and is subject to review at the end of that temporary period. However, in practice, very few proposals, if any, receive consent when tested against the criteria based policy.

Overall Conclusions
In line with the stated aim and objectives within several policy documents it is suggested to extend the Core Car Parking Policy Area outwards to the boundary of the city centre. The long stay commuter parking control area (the Fringe area) boundary falls outside the CCAAP, and this would be maintained as a saved policy from the Adopted UDP. The effect of this will be to reduce the area covered by the existing fringe policy.

The Adopted UDP City Centre Commuter Parking guidelines permit only a limited amount of on site parking, with the vast majority of employees having to make other arrangements. This reflects the high levels of public transport accessibility of the city centre. The table below summarises the availability of commuter parking for the Core and Fringe areas (based on typical employment levels of 1 person per 19 sqm GFA for office developments)(Arup Employment Land Review):

Area	Guideline	% of staff with on site parking
Core	1 : 175 sqm	11%
Fringe	1 : 100 sqm	19%

Significant enhancements to the accessibility of the city centre are highlighted in the Preferred Options paper. It is proposed to link changes in long stay commuter parking guidelines to the introduction of park and ride as this will provide additional parking to directly serve the city centre. It is anticipated that park and ride sites will deliver up to 2500 additional parking spaces during the first half of the period covered by the CCAAP. The impact of the proposed reduction of the parking guideline from 1:175 sqm to 1:350 sqm will be to reduce the proportion of staff with on site parking from 11% to 5%.

Employment growth forecasts for the city centre indicate that

office based employment could grow by between 300-500 jobs per year (Experian Business Strategies/Yorkshire Futures forecasts, 2006-2016), although recent growth has been around 1000 jobs per year (1998-2005)(full time equivalent). Over the initial ten year period of the CCAAP, therefore, office based employment growth is likely to be in the range 3,000-10,000.

The table below shows the impact on city centre commuter parking provision of the change in Core guidelines over a range of employment levels:

Change in City Centre office employment	No. spaces at 1 : 175 sqm (No P&R)	No. spaces at 1 : 350 sqm (With P&R)	Change in parking provision
5,000	545	270	-275
10,000	1085	545	-540
15,000	1630	815	-815

It is clear that the proposed provision of up to 2500 park and ride parking spaces will more than compensate for the reduction in city centre office parking due to the suggested change in standards.

It is proposed to change the parking guideline for office developments within the Public Transport Box so that new developments contain no commuter parking (the Adopted UDP permits replacement parking only, with Prestigious Developments permitted a possible greater level of parking). It is considered that the concept of Prestigious Developments is unhelpful when applying policy as their definition is imprecise. In addition, the provision of commuter parking here causes conflict between public transport and private cars, and affects the reliability of bus services. Given the very high accessibility levels of this part of the city centre it is therefore considered that this makes it inappropriate to permit office commuter parking in this location.

Parking policy for the city centre is well established. The provision of adequate short stay customer car parking is essential if the city centre is to build on its success as an important shopping and commercial centre. The intention is to support short stay parking provision where it will not result in local highway problems, and give preference in the Core Car Parking Policy Area to short stay facilities. As part of this the need to identify location(s) in the south of the city centre has emerged through the consultation process. This will help create better linkages/connections with the northern part of the city centre; encourage greater pedestrian movements/flows in a north/south direction; and also assist in the better functioning of the city centre as a whole.

	Ensuring an increase in supply of short-stay parking spaces is vital to meeting the likely increased demand, addressing any existing shortage of spaces, and remedying the likely loss of on-street metered spaces following implementation of the traffic management proposals. The LDF short stay parking strategy is thus based on supporting the implementation of a substantial number of current major proposals. The Plan will confirm existing schemes, and identify and safeguard other short-stay car park opportunities, close to the main areas of demand (primarily the Prime Shopping and Office Quarters as identified in the adopted UDP). These locations could be picked up within Proposal Area Statements, and identified on the Proposals Map.

Experience of applying policy CCP2 would suggest that the UDP has been very successful in reducing the number of commuter car parks on vacant or cleared sites unrelated to city centre developments. This is particularly so in the latter part of the Adopted UDP period with the exception of unauthorised longstay car parking schemes. It is considered that this policy should be pursued and incorporated in the CCAAP.

Adopted UDP Policy CCP3, covering Parking Permit Schemes within the fringe area, would be retained as a saved policy, however, the expansion of the Core parking area means that this will only apply outside the boundary of the CCAAP. It is therefore proposed that this policy should be included within the CCAAP, and applied to the whole area covered by the expanded Core parking area.

It is considered the above recommendations are consistent with national, regional and local planning and transport aims and objectives. |
| | **Recommendation** |
| MT02 MT03 | To have policies which cover the following policy areas; Extend the Core Car Parking Policy Area outwards to the boundary of the city centre; Apply more stringent commuter parking controls within the Core area when park and ride sites serving the city centre are developed; Apply stricter parking standards to sites within, and fronting onto, the Public Transport Box; Continuation, and where necessary refinement, of policy CCP2 dealing with commuter car parks on vacant and cleared sites. Continuation of Policy CCP3 dealing with Parking Permit Schemes within the CCAAP and applying to the whole of the expanded CCPPA. |

Option No.	Summary of Responses
	Sustainable & Public Transport
MT04	**How should Public Transport be improved?**
	Of the choices for improving public transport, the following preferences were stated:
	Contributions from development 10 Identifying sites for future rail stations 13 Improving bus & rail interchange 17 More bus priority measures 21 Better enforcement of bus priority 11 No, improvements are not needed 0
	Leeds Sustainability Network would welcome an improved night time bus services and believe this would make Leeds night time economy more sustainable.

Option No.	Summary of Responses
MT06	**Should land be protected for train stations and better public transport?**
	a) Yes 18 b) No 3
	Potential locations – Marsh Lane, South side of city centre, Jarvis Rail Depot (Sweet Street), Kirkstall Road, Armley Road, Holbeck, Hunslet, New Wortley.
	Other comments
	Yes in principle but where is there space and is it achievable? Choose sites via needs and transport assessments.
	Of the other comments, some suggested that tram train conversions of local train line should be explored. Would an electric bus like Newcastle be more effective?

Option No.	Summary of Responses
MT09	**How should the plan encourage more cycling?**
	a) More cycle lanes & routes b) More cycle priority measures at road junctions c) More facilities for cyclists, where possible, at workplaces d) More cycle parking in appropriate locations e) More signage & better lighting of quieter routes

	Generally combination of above. Other comments Require better infrastructure and designated routes. Some felt that no support should be given for encouraging more cycling as it was considered too dangerous. Concerns were expressed that cyclists tend to use footpaths. Leeds Sustainability Network would welcome more dedicated cycle routes or routes that avoid busy roads (e.g. York Road) and junctions (e.g. Sheepscar).
Option No.	**Summary of Responses**
MT10	**How should the plan encourage more walking?** a) More pedestrian routes b) More seating along routes & in public spaces c) More pedestrian priority measures at road junctions d) More signage & better lighting of quieter routes Other comments Generally combination of above. Require better access to public transport nodes. Better and wider pavements and crossing points required. Need for more places to stop and rest and have better signage. Expanding city centre boundary may hinder walking. Issues around safety. Increased pedestrianisation of city centre should be promoted by relocating car parking to the inner ring road & replacing the Loop road. There is too much traffic in the centre & the Loop road severs the core from the rest of the centre.
Option No.	**Summary of Responses**
MT12	**Should the river be promoted for a commuter river bus?** a) Yes 17 b) No 4 Other comments Leeds Civic Trust: an excellent proposal but is it practical in the space between locks!
	Analysis & Conclusion to Option(s) above
MT04	The majority of respondents focussed on bus and rail measures

MT06
MT09
MT10
MT12
	to improve public transport, for example, bus priority measures, better interchange between different public transport modes, and identifying sites for future rails stations. As far as seeking contributions from developments most people, with the exception in the main of those with land interest in the city centre, agreed this was a good way of improving public transport.
	
	The majority of the respondents felt that a site/area should be identified and protected for train stations and better public transport.
	
	As far as walking and cycling are concerned most people agreed with the combinations of the options proposed. There was a suggestion under other comments that relocating car parking to the inner ring road and replacing the Loop road will increase pedestrianisation of the city centre. It was felt that there is too much traffic in the centre and the Loop road severs the core from the rest of the centre. This suggestion involves 4 key areas and raises several issues.
	    1. Increase pedestrianisation – How effective will this be? Will the existing core pedestrian area lose its benefits, i.e. affect its compactness & cohesiveness?
	    2. Relocating car parking – Is this about relocating existing car parks or influencing new development that will be proposed from here onwards?
	    3. Replacing the Loop road – Expanding/changing the Loop road could provide opportunities to expand and improve the pedestrian core. However, one needs to understand the reasoning behind the introduction of the Loop road and whether pushing this function further out will be practical and feasible. This theme, in part, is discussed further in option MT05.
	    4. Severing – Further work/analysis needs to be done on this as to where this is an issue and how best it can be resolved. However, most highway infrastructure by its very nature causes a degree of severance for pedestrians and tends to give priority towards benefiting the users of the private car. The issue here may therefore be about mitigating the effect of existing and proposed highway infrastructure.
	
	With regards the river bus most respondents agreed it was a good idea.
	
	MT04 Sustainability Appraisal - Public Transport Infrastructure
	All choices which involved improvements to public transport infrastructure achieved some positive scores especially under the objective of providing a transport network, which maximises access whilst minimising detrimental impacts – where they achieved double positives. Choice a) levering in contributions, is

the only one of the five that had a negative score and that was due to concerns that contributions may deter developers however, it is possible to mitigate against this by ensuring that the contribution requirement is set at a fair level so developments remain viable. Choice f) no public transport improvement, scored a lot of negatives and is therefore not a sustainable choice.

MT06 Sustainability Appraisal - New Stations and Interchanges
Protecting land for new stations and interchanges scored a lot of positives and no negatives and is the most sustainable choice of the two.

MT09 Sustainability Appraisal - Cycling
All choices for encouraging cycling score well with no negatives.

MT10 Sustainability Appraisal - Walking
All choices for encouraging walking score well with no negatives.

MT12 Sustainability Appraisal - Use of the River
Promoting the use of the river for a commuter river bus into the city centre scores well as a sustainable choice. The score can be further improved by ensuring that the tourist industry is able to take advantage of the river bus and also by ensuring that wildlife habitats along the river are not disturbed.

Planning Policy Guidance Note 13: Transport
Planning Policy Guidance Note 13: Transport (PPG13) provides advice to local authorities on integrating transport and land use planning. The three key objectives of PPG13 are to:
- Promote more sustainable transport choices for both people and for moving freight;
- Promote accessibility to jobs, shopping, leisure facilities and services by public transport;
- Reduce the need to travel, especially by car.

In order to achieve the objectives of the guidance, PPG13, amongst other things, requires local authorities to
   actively manage the pattern of urban growth to make the fullest use of public transport, and focus major generators of travel demand in city, town and district centres and near to major public transport interchanges; along with making significant trip generating uses more accessible by walking and cycling
   ensure that strategies in the development and local transport plan complement each other and that consideration of development plan allocations and local transport investment and priorities are closely linked;
   protect sites and routes which could be critical in developing infrastructure to widen transport choices for both passenger and freight movements.

In preparing development plans and determining planning applications, local authorities, in conjunction with work on the local transport plan for public transport, should:

identify the key routes for bus improvements and priority measures, and the measures that will be taken;

ensure, so far as is practicable, that traffic management measures do not impede the effectiveness of public transport services;

explore the potential, and identify any proposals, for improving rail travel, in liaison with the SRA, including the reopening of rail lines, or creation of new stations on existing rail lines, light rail or guided bus routes (giving due consideration to the funding and value for money of such proposals);

identify the potential for improved interchange between different transport services and between public transport and walking and cycling;

negotiate for improvements to public transport as part of development proposals, in order to reduce the need to travel by car and the level of parking at such sites, and

work with transport operators and other organisations to improve personal security across the whole journey. (Para 79)

For walking and cycling in conjunction with work on the LTP and preparing local strategies, review existing provision, in order to identify the network of routes and locations where the needs and safety of pedestrians/cyclists will be given priority, and the measures that will be taken to support this objective, including, traffic calming measures, facilities, parking areas, etc. See PPG13 for further details.

Vision for Leeds identifies improving public transport as one the most important priorities for Leeds. It considers a good transport system as being essential to helping Leeds achieve all the aims and ambitions outlined therein. As a regional capital, Vision for Leeds identifies the need to have effective links to all parts of Yorkshire and therefore emphasises the need to have better regional public transport links.

LTP2
By way of example, the LTP2 identifies the following strategic measures to address matters in relation to sustainable/public transport;

Delivering accessibility
A1 improve physical accessibility by making bus stops more accessible, improving the continuity and signage of cycle and walk routes

A2 maintain and improve road, pavement and rights of way conditions for pedestrians, cyclists, vehicle and freight users
A4 maintain and develop public transport networks through our bus and rail strategies
A5 maintain and enhance concessionary fare schemes and address cost barriers for job-seekers
A6 raise awareness of public transport and improve information
A7 embed accessibility in other strategies, e.g. LDF's

Better air quality
AQ2 encouraging more sustainable travel

Tackling congestion
C1 encourage modal switch to public transport
C2 manage the demand for travel
C3 make the best use of the existing capacity
C4 improve the highway network
C5 encourage more cycling and walking
C6 promote smarter travel choices
C7 promote sustainable land use planning policies and practices

Safer roads
S1 provide an appropriate road environment with facilities for each user group

Effective asset management
M5 maintenance of bus stations, shelters and stops

In terms of major schemes the LTP is putting forward a revised public transport solution covering certain sections of the former Supertram line. A significant amount of work has already been undertaken on the scope of a Bus Rapid Transit (BRT) network covering certain sections of the proposed former Supertram alignment:

    South Leeds: Stourton to City Centre (with park and ride)
    North Leeds: Bodington to City Centre (with park and ride)
    East Leeds: Seacroft to City Centre

The initial approach is intended to provide the flexibility to expand the BRT network to include other corridors. It offers the capability of being developed further to take account of the emerging East and South East Leeds (EASEL) and Aire Valley Leeds (AVL) regeneration areas and options for serving North West Leeds beyond Bodington.

A BRT scheme in Leeds will contribute to delivering the transport improvements which are required to support sustainable economic growth in the sub-region, providing a step change in the quality and capacity of public transport. The scheme has the

potential to improve accessibility to employment opportunities and other facilities for local communities, whilst also serving the wider strategic network, covering both commuters and visitors to the city.

Opportunities to enhance and improve bus service provision will be explored as part of the review of the Leeds transport strategy in order to improve accessibility to public transport and cater for future passenger demand. A series of strategically located bus interchange points on the edge of the city centre will be considered to improve bus movement and circulation in the city centre. Some services would terminate at these points, enabling a smaller number of through services to move efficiently across the city; the interchange points would be served by the high frequency FreeCityBus to enable passengers to complete their journeys. It is anticipated that these measures will release capacity at city centre bus stops, and thereby reduce congestion and delay to through services. It is envisaged that this proposal would be supported with additional bus priorities to improve access for buses to the city centre and improved ticketing arrangements for passengers. Proposed areas of search will be identified in the CCAAP to assist with the location of new development.

Heavy rail (as well as proposals for Supertram alternatives) has a crucial role as part of an integrated approach to transport and spatial planning in the region. Rail services invariably straddle several local authority boundaries, even for the most local services, and carry the main intra and inter regional public transport flows. It is also important with regard to rail that good local interchange with the rail network is developed in the conurbations in order that the benefits of a regional network can be accessed by local people. There are aspirations for additional rail stations *within* the city centre to improve access to rail services and to alleviate pressure on the City Rail Station. In particular there has been a long-standing desire for a rail station at Marsh Lane in the East of the city centre. The consultation revealed strong support for protecting land for train stations and other sites in the West and South of the city centre have been suggested. The CCAAP will identify areas of search for potential new stations.

Opportunities for the introduction of tram-train technology are being considered for certain heavy rail routes such as the Harrogate Rail Line, and potentially the Castleford Line. Outline options will be identified in the CCAAP to highlight the opportunities which could be afforded by the implementation of a scheme.

The overall objectives are, therefore, to improve accessibility to

	and within the city centre for all, whilst ensuring improved safety for transport users and pedestrians, and improved environmental quality. A range of measures are required to improve accessibility and the following areas will need to be considered:
	
	    The effectiveness of the one way Loop road for public transport
	    Improvement & expansion of the pedestrian core area
	    Improvement to the quality of the pedestrian environment.
	    Improvement of pedestrian access and routes in and around the city centre (especially on north-south axis).
	    How do we take advantage of new schemes to ensure high standards of accessibility?
	    Improved provision for cyclists.
	    Improved access for those with impaired mobility.
	    The effectiveness of the public transport box (does it act as a continuous route with public transport route priority). How will the Eastgate scheme affect or improve the function of the public transport box?
	    The role and function of existing public transport nodes including bus/coach station and rail station.
	    What is the realistic potential and provision for new public transport nodes in particular new rail halt(s)?
	    What modern new forms of public transport will aid the role and aspirations of Leeds City Centre to function as one of the principal cities of Europe?

	Recommendation
MT04 **MT06** **MT09** **MT10** **MT12**	The LDF has an important role in supporting the transport strategy proposals, fundamentally by providing the overall land-use context. The LDF's purpose is thus to develop a land-use strategy which responds to and supports the transport strategy objectives, by providing a complementary environmental and development strategy, and by establishing policies and making specific proposals where necessary. Although the implementation of many of the transport proposals for the city centre made in the WYLTP will be through legislation other than the LDF, the potential role of planning obligations in securing implementation needs to be stressed. Some WYLTP proposals need a specific recognition within the LDF - for example new developments need to support and be accessed from the transport system. These considerations could be taken into account where appropriate in the proposal/site area statements in the CCAAP.
Option No.	**Summary of Responses**
MT05	**How should the south side of the city centre be better connected to the north?**

<table>
<tr><td></td><td>The following preferences were indicated to improve the links with the south side of the city centre;

a) Expanding the city centre Loop road   7
b) More bridges over the river & canal   13
c) Bus interchange in the south   8
d) Train station access from the south   15

Other comments

Metro mentioned that more bridges, a south bus interchange, and a station access are required. They also suggested re-routing Loop traffic to Crown Point Rd, Great Wilson St, and Neville St. In their view, they felt this will enable/encourage development of the railway (particularly along The Calls) and will facilitate better integration of this part of town with the city centre. Metro also intend to expand the FreeCityBus network south of the river. Metro are also currently carrying out a study as to how a southern access from the train station could be achieved. Should this study propose a firm scheme, land south of the station will be required to achieve this.

Issue is not just in relation to the South side of the city centre only. The city centre as whole does not function and relate well with different parts within it.

The Gaitskells local community association (Beeston/Holbeck) favoured extending the loop road south of the river.

Of the other comments, some suggested that bridges should be for pedestrians/cyclists. Montpellier Estates suggest a viaduct walkway, monorail or people mover.</td></tr>
<tr><td></td><td>**Analysis & Conclusion to Option(s) above**</td></tr>
<tr><td>**MT05**</td><td>As far as improving pedestrian connections and flows respondents felt that more bridges over the river/canal and a train station access from the south would help. Some respondents felt that a bus interchange located in the south of the city centre would assist in this regard.

In the Sustainability Appraisal there were no negative scores amongst any of the choices. Choice b) more bridges
over the river and canal, came out slightly better than the others.

The level of new development in the south of the city centre has increased the pressure for improved traffic circulation in this area. Expanding the City Centre Loop could provide easy access for city centre businesses, car parks, deliveries and servicing, public transport, taxis and disabled parking and would also provide the opportunity to expand and improve the pedestrian core. A</td></tr>
</table>

detailed study will be carried out as part of the Leeds transport strategy review to determine the most suitable highway proposals which will improve connections with the south of the city, improve the flow of traffic and traffic management on the existing network, enhance the facilities for pedestrians and cyclists and address road safety and air quality concerns. Schematic desire lines for new traffic circulation routes to the south of the city centre will be designated in the CCAAP.

The Adopted UDP identified several areas where pedestrian routes had to be improved, linked to public spaces where possible, including new river footbridges, for example, Whitehall Road (phase 2) & Bowman Lane.

For the Sovereign Street area, it was recognised that as part of the City Centre Loop, the north landing of the proposed Concordia Street bridge linking Sovereign Street and the City Centre Loop in the north with Meadow Lane to the south of the river needed to be accommodated within the Proposals Area. The bridge would have provided access to the City Centre Loop and the Proposals Area from the south, and provide an additional pedestrian link across the river. This proposal never materialised as it was considered the initial issues that were identified could be resolved by accommodating the needs of the competing users on the Leeds Bridge, i.e. Supertram, pedestrians, private car, etc.

An assessment needs to be made whether the aspiration of getting footbridges/bridges as part of developments have been realised, what is outstanding and what new provision is required as the city centre grows. If the perception is that the UDP has not been successful then the CCAAP needs to look at whether more prescriptive policies/proposal area statements are required to bring these measures forward.

In principle the idea of having bus interchange in the southern part of the city centre is good and this will be explored as part of the proposals for a series of strategically located public transport interchanges, mentioned in the earlier section regarding public transport options. At this stage no further information can be provided as to the exact location, size and function of such an interchange although it is intended that the CCAAP will identify areas where interchanges could be developed.

With regards expanding the FreeCityBus service to the southern part of the city centre it is considered that this can be done without having the need to specifically make reference to it in the CCAAP.

A scheme to improve the southern access to the City Rail Station is in an early stage of development (pre-feasibility) but is likely to

	include the provision of new rail passenger facilities on the south side of Leeds City Rail Station adjacent to the developing Holbeck Urban Village. The outcome of the study will need to be reflected in the CCAAP. Access into Leeds from West Yorkshire and the Region could be compromised if the existing exit/entrance capacity to/from Leeds City Station is not enhanced. The LTP strategy seeks to increase rail use as a preferred mode of access into Leeds, and a direct route into the south bank will reduce journey times for passengers to that area (and the existing city centre). This will enable rail growth and modal transfer from the car, particularly into expanding employment and residential areas on the south side. The implementation of many of the transport proposals for the city centre made in the WYLTP will be through legislation other than the LDF. However, some WYLTP proposals need a specific recognition within the LDF - for example new developments need to support and be accessed from the transport system. These considerations could be taken into account where appropriate in the proposal/site based statements in the CCAAP.
	Recommendation
MT05	To have policies/options which cover the following areas; 　City Centre Loop – to designate schematic desire lines for new traffic circulation routes to the south of the city centre 　Assessment of effectiveness of policies to bring footbridges/bridges forward as part of development proposals. Identify need for further footbridges & bridges to improve pedestrian connectivity between north and south of city centre. 　Identify scope for bus interchange in the South. 　Understand spatial implications of Leeds City Station southern access including the need to protect land. 　To pick up the issue of the FreeCityBus service in the public transport contributions SPD.
Option No.	**Summary of Responses**
MT07	**Emphasis on Travel Plans** The following responses were made; a) Expanded 20 b) Reduced 1 c) Same 1
	Analysis & Conclusion to Option(s) above
MT07	The majority of the responses agreed that there should be an increased emphasis on the use and application of travel plans. Via the <u>sustainability appraisal</u> 'expanding the use of travel plans'

	scored well with no negatives and is the most sustainable of the three choices. Effective travel plans can bring benefits both to existing communities and to new or expanding developments. They can assist in reducing traffic congestion, widening accessibility and reducing air pollution and other environmental impacts. The Adopted UDP has a parent policy on travel plans (policy T2C) which will be 'saved' during the transitional period. One would presume a similar, if not stronger, policy would be included in the core strategy or an appropriate DPD. That said it is considered that a separate policy on travel plans is not required in the CCAAP, on the assumption that as with other Section 106 agreements a standard admin fee is taken from the developer. However, if the developer does not provide the necessary details, for example, providing monitoring details at agreed intervals, then there needs to be scope for some form of penalty payments, etc. The draft SPD on Public Transport Improvements, Travel Plans & Developer Contributions has incorporated details of how it will seek contributions for the administration and enforcement of travel plans.
	Recommendation
MT07	To continue and extend the emphasis on travel plans for the whole of Leeds via the UDP and city-wide LDF documents, with the details expanded upon in a supplementary planning document.
Option No.	**Summary of Responses**

MT11	**How should road safety be promoted?**
	
	20 mph speed limit on main city centre routes
	Use of speed deterrence devices
	       Throughout the city centre, or
	       At sites where there have been accidents
	Greater separation of pedestrians, cyclists from traffic on routes
	Greater sharing of pedestrian & road space to make drivers naturally cautious & courteous?
	Identifying zones where traffic will be prohibited or limited? If yes, where…..?
	Limiting daytime or deterring HGV & other vehicle entry to the city centre?
	
	Generally combination of all or some of the above. A total of 5 respondents have said 'no' to certain options. These relate to 20mph speed limit; city centre speed deterrence; separation from traffic; limiting access to city centre; and devices at accident sites.

	Other comments Leeds Civic Trust: reduced speeds should be accompanied by removal of surplus street furniture and far greater mixing of road users. This has worked elsewhere with no increase in accidents and Leeds is being left behind. Highways Agency - Depends on the areas and balances between flow of traffic, this is a local decision.
	Analysis & Conclusion to Option(s) above
MT11	Most respondents favoured a combination of the above with very few indicating '*no*' to some of the options. The <u>Sustainability Appraisal</u> of how to promote road safety revealed that all choices for improving road safety scored well with no negatives. Choices e) zones where traffic is prohibited or limited and f) determining HGV and other vehicle entry, have the potential for additional positive scores if carried out at locations where cultural, leisure and recreational activities take place. In order to deliver the objectives within <u>PPG13</u>, it advises LPA's, when preparing development plans and considering planning applications, to consider how best to reduce crime and the fear of crime, and seek by the design and layout of developments and areas, to secure community safety and road safety. In relation to traffic management measures PPG13 advises that it should also be promoted to improve the quality of local neighbourhoods; enhancing the street environment and improving road safety particularly in sensitive locations in both urban and rural areas such as residential areas, and near shops and schools. The <u>LTP</u> identifies the following elements to address matters in relation to road safety; • **S1** Provide an appropriate road environment with facilities for each user group; • **S2** Provide the relevant skills for driving, riding, walking and cycling; • **S3** Promote awareness of road safety issues and of the road user's responsibility for others; • **S4** Encourage the correct behaviour of all road users; and • **S5** Improve safety through new technologies that can reduce the risk injury. In order to achieve the aim of **providing a safe, sustainable and modern transport system,** Vision for Leeds identifies several projects including the need to introduce measures to improve

	safety for people on all journeys.
	Recommendation
MT11	It is considered that the options put forward and responses received do not necessarily generate a preferred option. Rather matters in relation to road safety can be addressed through other transport powers but also indirectly via transport assessments, travel plans, design & layouts of developments, etc.

Option No.	Summary of Responses
MT20	4 Responses. Some of the comments made have been picked as part of the debate in the previous options. GOYH: Many options in this paper put forward discreet choices/extremes. The preferred options should examine a more flexible, integrated or middle ground approach, taking account of other public responses.
	Analysis & Conclusion to Option(s) above
MT20	The comments have been noted. It was felt as part of the alternative options stage that a range of choices should be presented to allow a full and frank discussion to take place. However, as advised the preferred option stage will look at providing a more flexible and integrated approach for the benefit of Leeds city centre and the context within which it operates at the local, sub regional and regional level.
	Recommendation
MT20	To draft policies that are realistic, achievable, and flexible.

Option No.	Summary of Responses
OS01	17 Responses on size of development to make OS contributions in one shape or form: a) 0.5ha site size 4 b) Larger 3 c) Smaller 7 Dept of Constitutional Affairs suggested requirements should be on a case by case basis to take account of viability. Montpellier Estates saw the idea as opportunistic & one-size fits all. No contributions should be sought.
OS02	16 responses on size of development to make *on-site* OS provision a) 0.5ha site size 2 b) Higher threshold 4 c) Lower unconditionally 1 d) Lower with criteria 8 Dept of Constitutional Affairs suggested requirements should be on a case by case basis to take account of viability. Montpellier Estates stated that the approach should not be one-size fits all.
OS03	15 responses to the size of space to be provided on-site: a) 20% of site area 10 b) More 2 c) Less 1 As above, concern from Dept Constitutional Affairs & Montpellier Estates that a case by case approach should be used, rather than a threshold. The Civic Trust and University of Leeds have suggested that 20% should be genuine open space, not streets & gaps between buildings.
OS04	14 responses on the method of calculating financial contributions: a) Equivalent to on-site provision 3 b) A £/sqm tariff 8 c) Other 1 As above, concern from Dept Constitutional Affairs that a case by case approach should be used, rather than a threshold. Montpellier Estates favoured an "other" method, essentially paying for space provision through general taxation, not developer contributions. Sport England suggest there may be occasions to seek a combination of on-site space and contributions for off-site space too.
	Analysis & Conclusion to Option(s) above
OS01-04	The existing UDP policy of seeking 20% of site area as public space from developments on sites of 0.5ha or more is a "one-size-fits-all" approach that has shortcomings. One is that tall buildings on smaller sites make no contribution, even though the

	occupiers will make demands upon open space. Hence, the policy needs broadening in scope to capture contributions from tall buildings on small sites. This is in line with the view of most respondents to OS01. As regards the threshold site size for developments expected to provide public space on-site, most respondents to OS02 favoured smaller sites only in particular circumstances, for example ability to join to other public spaces. In this way, spaces of a realistic useable size may be created. As regards the size of public space to be provided for standard sites, most respondents to OS03 favoured 20% of site area, although comments were made that this should be genuine space as opposed to roads & paths etc. As regards the method of calculating financial contributions, most respondents favoured a simple £/sqm tariff. The sustainability appraisal of these options revealed an overall positive score for provision of more public space which provides opportunity to achieve greenspace. This has advantages by helping to mitigate against flooding and promoting biodiversity, as well as benefits of appearance & recreation opportunity. Design & management of public spaces will be important to avoid crime & vandalism etc.
	Recommendation

OS01-04	To promote policy that:
	1. applies to developments on sites of 0.5ha or more as standard except also to:
	    a. developments of tall buildings on smaller sites
	    b. developments of smaller sites that adjoin existing public space or adjoin another re-development site(s) capable of delivering public space
	2. requires provision of a minimum of 20% of total site area to be laid out as public open space for sites of 0.5ha or more, and for sites as per 1b above, **but allows more than 20% to be sought as part of development schemes of strategic importance.** The definition of public space needs to be defined more tightly to exclude footpaths, roads & gaps between buildings which do not form genuine public space.
	3. requires provision of a commuted sum proportionate in scale to floorspace to be used toward provision of public open space elsewhere in the city centre (nb see also Options OS07 & OS08 below)
	See PO-25.

Option No.	**Summary of Responses**
OS05	16 responses on what types of open space should be provided: a) Case by case assessment 7 bi) Grass depending on site size 1

	bii) Grass depending on shortage ½ biii) Grass depending on proximity 1 to other greenspace c) Guide by Open Space Plan 4 d) Minimum % grass, always Some respondents ticked a) and b) or a) & c), contrary to instructions. These were given ½ point scores above. The Civic Trust note that careful design can avoid wear & tear & muddying of grassed areas. The Leeds Sustainability Network favour as much green space as possible to allow for urban food production or allotments. The Older People's Reference Group suggest linking green space to the waterways. The Environment Agency notes the benefits of green space in slowing water run-off & biodiversity as well as access & recreation.
	Analysis & Conclusion to Option(s) above
OS05	The response is less than conclusive but few respondents favoured prescribing the proportion of grassed space according to criteria. Most preferred flexibility to determine the type of provision according to site circumstance, although some favoured deciding according to an open space plan. The sustainability appraisal notes the benefit of green space provision, particularly for mitigating against flood risk. It would be difficult for a public space plan to predict the nature of future redevelopments & whether green space or hard surfaces will be appropriate
	Recommendation
OS05	The decision about mix of green space and hard surfacing in new public open space needs to be decided in negotiation with the developer taking account of the nature of the development. Green space will be expected as the rule, but hard surfacing will be appropriate in the following circumstances: • where the space is designed to host events (eg Millenium Sq) • for pathways across green areas • to provide a base for café seating • covered areas Outdoor hard surfaces must be porous for rainwater absorbtion. See PO-26.
Option No.	**Summary of Responses**
OS06	16 responses types of recreation & passive space: a) Active Sport 5 b) Active movement 6 c) Young children's play area 6 d) Teenage area 6 e) Skateboarding/BMX 7½ f) Performance space for events 8

	g) Public gardens & pocket parks 12 The Resident Association pointed out that the play areas need policing, maintenance & cleaning to deal with drinking/drug problems, dumping, motorcycling & prostitution. Montpellier Estates thought that it is too much to expect the city centre to pay host to all activities – parks outside the city centre need to be better linked to provide for a wider range of activity. Sport England note that the city centre's youthful population are more likely to favour sport. Late recorded comment from the Youth Council favoured provision of a skateboard park, even if on a temporary basis.
OS10	16 responses on opening & access arrangements for public space: a) open all times 5 b) during opening hours of buildings 0 c) during daylight hours 2 d) according to an agreed schedule 9
	Analysis & Conclusion to Option(s) above
OS06 & 10	Public parks & pocket parks were favoured by most respondents, but all the other forms of recreation had a fair level of support. The sustainability appraisal made little differentiation in terms of the advantages of the different types of recreation & passive space. As regards opening & access arrangements, the majority of respondents favoured opening according to an agreed schedule, although a substantial proportion favoured opening at all times. As noted in the sustainability appraisal of this option, the only negative is the potential for crime from all hours opening. Nevertheless the "open all times" option scored well for reasons of public health & amenity. Hence, it optimum approach would be to press for long opening hours, but agreed with the developer.
	Recommendation
OS06 & 10	The decision about the use of new public open space needs to be decided in negotiation with the developer taking account of the nature of the development. This will need to be informed by an appraisal of current available provision in the vicinity of the development, including public space in adjoining neighbourhoods. Similarly, the decision about times of opening also needs to be decided in negotiation with the developer taking account of site circumstances, although the underlying aim should be to maximise opening hours.
Option No.	**Summary of Responses**

OS07	15 responses on the use of financial contributions for open space enhancement outside of the city centre: a) Yes, up to 25% of proceeds 4 b) Yes, up to 50% of proceeds 1 c) Yes, any amount 9 d) No 1 The Resident Association and Leeds initiative call for spending to be in consultation with local people & potential users. Leeds Civic Trust said "No" but with no explanation
OS08	15 responses on whether to use contributions for maintenance as well as infrastructure: a) infrastructure and maintenance 12 b) infrastructure only 3 The three favouring only infrastructure represent developers/landowners. One suggests that maintenance should be covered by general taxation.
	Analysis & Conclusion to Option(s) above
OS07 & 08	Virtually all respondents to OS07 favoured some level of use of financial contributions to enhance open space outside of the city centre, most preferring the city council to decide as appropriate. The sustainability appraisal scored the ≤50% of proceeds well against the social objectives because it is likely to enhance life for inner city residents, as well as make provision for city centre residents. And the overwhelming majority of respondents to OS08 favoured use of contributions to fund maintenance of spaces as well as their creation. This makes practical sense to sustain the functionality & attractiveness of spaces which are likely to face heavy use from a wide variety of people in the city centre. Limitations on the use of contributions for maintenance are set out in national planning policy (circular 5/05 "Planning Obligations", paras B18-20) which advises that, as a general rule, maintenance should be covered by the public body in which ownership & control of the space is to be vested, although payments for maintenance may be acceptable for an initial temporary period. Leeds City Council has a track record of seeking maintenance payments for greenspace outside of the city centre calculated for a period of 10years only. It would make sense for any maintenance requirement in the city centre to be consistent with the rest of the city. On a related point, the City Council has a Supplementary Planning Document to seek contributions from developers for "public realm improvements" in the city centre. This supplements parent policies set out in the Unitary Development Plan, including Policy CC9 which will be superseded by the City Centre Area Action Plan. Therefore, a replacement parent policy will be

	required in the CCAAP to take the place of Policy CC1.
	Recommendation
OS07 & 08	Make clear that financial contributions may be used for enhancement of spaces outside of the city centre, providing that they are reasonably accessible to city centre residents & within easy walking distance of the city centre boundary.
	Advance policy to seek contributions to cover the cost of 10 years of maintenance of public spaces which are to be vested with the City Council. The policy will have to define what types of work are to be covered by maintenance, & differentiate between maintenance & public realm improvement (see PO-25).
	Advance a replacement policy to Policy CC1 of the UDP to seek contributions from development for environmental improvements in the city centre (see PO-27).
Option No.	**Summary of Responses**
OS09	17 responses on ways to provide a green network: a) green existing routes to link places 8 b) identify new routes 9
	Analysis & Conclusion to Option(s) above
OS09	The public response is mixed. The Sustainability Appraisal scored both option choices favourably, but with proviso that design of new routes will need to avoid creating opportunities for crime.
	A practical way forward will be to plan for both greening existing routes and designating new ones. There is overlap with other options concerning design coherence of routes (DC07) and Movement options for linking the south side of the city centre to the north, and encouraging walking & cycling (MT 05, 09 & 10)
	Recommendation
OS09	The CCAAP to explain the importance of better connections for pedestrians & cyclists for movement within the city centre as well as between the city centre and adjoining neighbourhoods.
	Policy to expect the layout of new development to be designed to contribute to connections by opening up new routes, avoiding obstruction to existing routes, making existing routes more attractive & user friendly, incorporating appropriate greenery and landscaping features and supplying appropriate off site infrastructure such as footbridges & other crossings.
	The application of the policy should be informed by a map to identify route desire lines and the need for infrastructure improvements (see PO-30).
Option	**Summary of Responses**

No.	
OS10	See OS06 above
Option No.	**Summary of Responses**
OS11	16 responses on how to develop a programme for the planting & management of street trees: a) Fully, identifying locations 8 & an implementation plan b) As a) with pavement build outs 6 c) As b) with utility diversions 1 Leeds Civic Trust favoured c). Montpellier Estates calls for a case by case approach depending on street circumstance.
	Analysis & Conclusion to Option(s) above
OS11	
	Recommendation
OS11	The City Council will actively promote the planting and maintenance of street trees.
Option No.	**Summary of Responses**
OS12	15 responses on whether to identify hidden watercourses: a) Yes 15 b) No 0 The Environment Agency points to benefits of biodiversity & flood defence as well as recreation & access.
	Analysis & Conclusion to Option(s) above
OS12	An overwhelming public endorsement for the identification of hidden watercourses, the option also scores positively in the Sustainability Appraisal. There is overlap with Policy N39 of the UDP, which states that the City Council will promote actively re-opening culverts & restoration to a more natural state. This Policy may be recast in the LDF Core Strategy. It is essential, however, that resilience against flooding is not compromised by opening up the culverts. To this end a flood risk assessment would need to be carried out for any specific proposal. Large flow depths and velocities can occur in some of these watercourses (e.g. Lady Beck), so public safety would be a paramount consideration. The idea of achieving improved biodiversity by means of opening up a city centre culvert would have to be carefully considered. We would be against the introduction of vegetation such as shrubs or trees in close proximity to the watercourse (because of blockage

	risk arising from natural debris). Natural banks (as opposed to smooth concrete or masonry) would be difficult to achieve without ensuring a wider channel (to preserve the same capacity). Access for maintenance would need to be built into any proposals. It is acknowledged that the heavily built up nature of the city centre means that it will not always be appropriate to uncover hidden watercourses, but better identification of their existence will be a good starting point, with an expectation on developers to explore opportunities and open watercourses up where it would be practical and beneficial to do so. Developers should also be encouraged to plan the provision of open space and promote biodiversity around opened up watercourses where appropriate.
	Recommendation
OS12	The CCAAP to identify the lines of all hidden & culverted watercourses in the city centre, and to expect developments over hidden watercourses to explore opportunities to open up them up, and to open them up, in full or in part where it is practical to do so, taking into account depth below ground, flood risk, public safety, potential to create an open space feature, potential to introduce biodiversity and appropriateness in terms of proposed land uses. A flood risk assessment would be required for any proposal (see PO-29).
Option No.	**Summary of Responses**
OS13	16 responses on promoting water recreation: a) Yes, in principle 7 b) Yes, but only recreation suited to the city centre 8 c) No 0 A Resident Association suggested that recreation activity should be free.
	Analysis & Conclusion to Option(s) above
OS13	The responses indicate clear support for promoting water recreation either in principle or types of water recreation suited to a city centre setting. The Sustainability Appraisal scores water recreation well, albeit with concern about conflict with biodiversity objectives. An important further consideration is health. On the one hand, water recreation may provide opportunity for exercise in an area where opportunities for outdoor recreation are limited. On the other hand, the river & canal through the centre of Leeds are known to harbour bugs that can cause illness. It is also the case that most of the city centre riverside has either been developed or has permission for development, leaving little opportunity to incorporate facilities and physical access to water

	level for water recreation. There is overlap with the decision not to extend the city centre boundaries to include further riverside areas around Kirkstall Road and South Accommodation Road (GR04). The need to plan for water recreation should be addressed by the LDF Core Strategy, to cover the whole of Leeds.
	Recommendation
OS13	Not to pursue a preferred option to promote water recreation in the city centre.
Option No.	**Summary of Responses**
OS14	16 responses on ways to protect water habitats: a) protect & enhance 5 b) protect & enhance plus funding 11
	Analysis & Conclusion to Option(s) above
OS14	A clear majority of respondents support the "protect & enhance plus funding" option, although both options scored well in the Sustainability Appraisal against the objective concerning biodiversity. There is current policy applicable across Leeds to expect protection, enhancement & financial contributions for biodiversity in the Unitary Development Plan (UDP) (Policies GP7, N49, N50 and N51) as well as an emerging SPD on Biodiversity and Waterfront Development. The UDP also has a city centre specific policy to seek planning obligations to secure environmental improvements (CC1). The policy expectation to protect & enhance biodiversity, as well as the financial contributions for enhancement apply district wide, and will ultimately need to be reviewed & taken forward in the Core Strategy, consistent with the emerging SPD on Biodiversity and Waterfront Development. The CCAAP will need to replace the UDP's Policy CC1 which will provide a "parent policy" for the Public Realm Contributions SPD, as well as waterfront biodiversity enhancements (see Options OS07 and 08 above).
	Recommendation
OS14	Advance a replacement policy to Policy CC1 of the UDP to seek contributions from development for environmental improvements in the city centre (see PO-27).

Option No.RS01	Should residential development be promoted or discouraged in the city centre?
	Summary of responses: Total of 25 responses a) Promoted – 22 b) Discouraged – 1 2 responses saying neither: – leave to market to determine, and more flexible 'middle ground' approach should be taken (Govt Office)
	Analysis & Conclusion to Option RS01
	i. Responses received Promoting residential development favoured. **ii. Sustainability Appraisal** Promoting city centre living is most sustainable option, due to reducing the need to travel and reducing pressure for development on greenfield land. Concerns: i) too much residential could displace employment uses – could be mitigated by protection of existing employment uses ii) Flood risk – mitigated by policy choices suggested in Managing Resources option. **iii. Known facts, figures, trends and evidence** From 1997 to 2006 over 5000 new dwellings have been completed in Leeds city centre as well as over 700 dedicated student flats. Only 15 houses have been provided in a scheme associated with Denison Hall on the north west edge of the city centre boundary. Of the 5300 non-student new dwellings, 1964 were 1 beds, 3188 were 2 beds, 75 were 3 beds, 16 were larger and the rest were unclassified. Over a similar period, more than 13,000 dwellings have been permitted in the city centre, averaging 870 per annum. Over the period 2000-2006, the average has been 1800. In terms of population, it was estimated that 3,700 people lived in the city centre in 1996, but that this had grown to 10,200 at the end of 2005. It was also estimated that this could grow to 27,500 if all the schemes permitted and under construction at the end of 2005 were completed. Occupancy levels have been rumoured to be unhealthy, but analysis of Council Tax records reveals that between Nov 2005 and Nov 2006, occupancy as main residence rose from around 72% to 75% despite 1000 new dwellings coming onto the market. The remainder is accounted for by second homes (approx 10%) and short and long term vacancies. Analysis of vacancy rates over the last 5 years shows unsurprisingly that the most recently

	built developments have the highest vacancy, but after a few years the vacancy level reduces. **iv. National Policy** **PPS3** 'A diversity of uses in centres makes an important contribution to their vitality and viability. Different but complementary uses, during the day and in the evening, can reinforce each other making town centres more attractive to local residents, shoppers and visitors. Local planning authorities should encourage diversification of uses in the town centre as a whole..' (para 2.22) **PPS6** - Promotion of mixed use developments (para 2.20). - 'Residential or office development should be encouraged as appropriate uses above ground floor retail, leisure or other facilities within centres.' (para 2.21) **v. Regional Policy** **vi. Vision for Leeds** 'Leeds has transformed itself – major investment in housing, offices, shops, transport and other facilities. Leeds population has also grown during this period of change, a sign that people have confidence in the future.' – This reported confidence and transformation supports the promotion of residential development in the city centre. The Vision also has an objective to achieve a city centre population of 20,000 by 2020 (p.48). **Conclusion** There is already a substantial population which is continuing to grow. The residential market is strengthening and rumours of excessive vacancy levels are unfounded. A mixed and varied city centre with residential use complementing the commercial essence of the city centre is supported by a range of policy documents.
	Recommendation
	Policy to promote/encourage residential developments throughout the city centre, with policies protecting existing uses where appropriate, and encouraging main town centre uses on ground floors.
Option No. RS02	**If residential development is to be promoted in the city centre, should it be:** **a)allowed to develop anywhere, subject to policies concerning other uses** **b)channelled into residential quarters** **if so, where?**

	Summary of Responses: Total of 23 responses a) 14 b) 5 Other responses: 4; more flexible 'middle ground' approach should be taken (Govt Office); no preference but large residential schemes should include sufficient floorspace for other town centre uses (Yorkshire Forward); need to take objective view of individual merits of scheme – quality of environment before granting planning permission (Leeds Partnership Homes); housing should be on the edge of the centre where it won't cause congestion (East Park CA and Saxton Gardens RA)
	Analysis and Conclusion to Option RS02
	i. Responses received Promotion of residential development anywhere in centre favoured, allowing for other town centre uses **ii. Sustainability Appraisal** If residential development is to be promoted it is more sustainable in residential quarters, especially if such quarters are located close to transport nodes. Residential quarters could help to foster community spirit and contribute to vibrancy as well as ensure that employment uses are not threatened by takeover from residential uses. **Conclusion** Conflict between consultation responses and sustainability appraisal – could be resolved if developments generally are supported by good public transport nodes. Relative to the rest of Leeds, the whole of the city centre is very accessible by public transport and by other modes including walking from adjoining neighbourhoods and cycling. The core areas of the city centre around the train station and the prime shopping quarter have the best public transport accessibility which makes them particularly important for town centre uses which generate high levels of trips. Hence, in these areas it will be important to ensure that residential development doesn't unduly displace such town centre uses. Policies to protect existing employment uses and promote main town centre uses will control location of development to a certain extent.
	Recommendation
	Policy to allow residential uses anywhere, but with supporting policies protecting existing employment uses and promoting main town centre uses and policies for improved public transport.
Option No. RS03	**What should be the mix of types and sizes of dwellings in new residential developments?**
	Summary of responses: Total of 22 responses a) Controlled to appeal to family and elderly persons as well

	as single/couple households - 12 b) Controlled as above only for large developments - 1 c) Left to builders – 7 Other responses: 2: new dwellings in centre should be just for young, not for elderly or families (Park Lane College student group); facilities to attract a more diverse population are needed first, then private sector will respond)
	Analysis and Conclusion to Option RS03
	i. Responses received A mixed response, but majority in favour of controlling types and sizes mix within new developments. **ii. Sustainability Appraisal** It is better to control the mix of types and sizes of dwellings in new residential development than to leave it to house builders to decide – benefits tend to emerge in the long term. **iii. Known facts, figures, trends and evidence** An early draft of the Housing Market Assessment reveals that city-wide preferences of households intending to move are for a range of sizes and types of dwelling. The preferences of newly forming households are more skewed towards flats and smaller sized dwellings, but still for a range. This is in contrast to the supply of dwellings in Leeds which has become dominated by flats over the last few years. The final HMA should include a more information of preferences for different parts of Leeds, including the city centre, providing this is statistically valid. Existing policies in the adopted UDP do not control the mix of sizes and types of dwellings permitted in individual schemes. The only controls are for needs for special groups – students, elderly & those needing affordable housing – to be addressed where there is an evident need (see Policies H9 & H10). The Allsop Market Review, Spring 2006 in the 7th Leeds City Centre Audit states: 'As to the outlook for the city centre, many support the view that a different type of product is now required – larger, owner-occupier units with car parking, some houses and a support infrastructure (surgeries, supermarkets and public space). The finely balanced market will be upset if developers merely deliver more of the same.' The city centre audit also reports on the City living in Leeds 2005 report by the University and KW Linfoot, which found that a third of city centre residents are aged 25-30, and 60% are 30 or under. The main factors that might encourage residents to move out of the city centre include: lack of greenspace, having children, and inadequate living space. Other significant factors were lack of adequate shops, cost of property and preference for a house.

	iv. National Policy **PPS3** There are overall objectives to achieve a wide choice of high quality homes and to create sustainable, inclusive, mixed communities in all areas (para 9). There is an expectation for Local Authorities to undertake Strategic Housing Market Assessments to understand the scale & proportion of need for new housing from population groups (paras 20-22). This includes the needs of specific groups (eg disabled, elderly & Gypsies & Travellers) and overall proportions of households requiring: • Affordable or market housing • Housing for families, single person & couples Large developments will be expected to deliver a mix. Smaller developments, the mix needs to contribute to mixed communities in the neighbourhood (para 24). **v. Regional Policy** The Draft RSS (Dec 05) has policy H4 regarding housing mix, but it concerns the appropriateness of historic housing stocks in parts of the region. It does not address specifically the issues of mix of flats/houses and of city living. **vi. Vision for Leeds** This states that, 'We will; make sure that local neighbourhoods provide choice in the types and costs of housing available so that people do not have to move out of an area" and; 'we will reduce the amount of unpopular housing and replace it with housing that is suited to people's needs' **Conclusion** Policies to encourage mix of types and sizes of accommodation.
	Recommendation
	Policy to encourage all residential developments to provide for a mix of households, including single people, couples and families. Link to policies elsewhere for disabled – wheelchair use.
Option No. RS04	**Should new residential developments be required to make contributions to green space provision?**

	Summary of responses: Total of 19 responses
	   a) Yes for all – 14 (1 of which then specifies for 5 or more dwellings)
	   b) No – 1 (Park Lane College student group)
	   c) Yes for large developments – 2 (1 refers to 'see comments about open space options – not done yet)
	If c) how many dwellings mean large?
	Other responses: 2: More gardens should be provided; option raises complex issues or enforceability issues which need to

	be addressed in the preferred options (Govt Office)
	Analysis and Conclusion to Option RS04
	i. Responses received There is a consensus that residential developments in the city centre should contribute to greenspace provision. **ii. Sustainability Appraisal** The most sustainable option is to require greenspace for all residential developments. Not providing greenspace scores very badly against social and environmental objectives. **iii. Known facts, figures, trends and evidence** Sport England guidance 'Planning Policies for Sport' states 'Local Sports strategies, which take account of local needs and deficiencies, should inform the planning process and provide the link between strategic planning for sport and the land use planning system.' **iv. National Policy** **PPG!7**: Local authorities should produce Strategies for Open Space, Sport and Recreation for the whole of their areas. A strategy should assess need, through carrying out a demand assessment, and by auditing supply, for 10 basic categories or types of open space, ranging from outdoor formal sports, parks and allotments to semi natural urban greenspaces. Through doing the assessment of supply and demand, areas of deficiency and over-provision of the different types of open space can be identified. Local standards for provision, based on the 10 fold classification can be derived. Standards are to be based on quantity, quality and accessibility. Planning obligations should be used as a means to remedy local deficiencies in open space (justified with the strategy) All residential developments, not just large ones are expected to contribute to open space provision, and authorities should also 'look to provide areas of open space in commercial and industrial areas' (para 20) **Companion Guide to PPG17**: **v. Regional Policy** Policy YH5: The transformation of Regional and Sub Regional centres as *attractive and safe places* where people want to live, work, and invest in will be achieved through spatial planning and investment measures to: ii) Develop a strong sense of place with a *high quality* of public realm and well designed buildings *within a clear framework of routes and spaces* iii) *Create new and improve existing networks, corridors and areas of green space*, including the urban fringe to enhance

	biodiversity and recreation. **vi. Vision for Leeds** The Vision for Leeds identifies 12 major projects, one of which is to 'make Leeds Europe's cleanest and greenest city' through a variety of means including improving the quality of and access to our local parks and green spaces. In addition, one of the themes is 'Environment City', the vision for which is: 'Leeds will have a reputation for environmental excellence through the quality of our built environment, the use of our green space, the effective use of natural resources, clean air quality and waste management. It will be a place that joins economic, social and environmental objectives so that the action we take today does not limit the choices of future generations or others elsewhere in the world.' The objectives listed include improving access to parks, informal green space, natural areas and open spaces, making sure that we manage these more sensitively to meet the needs of people and nature, and agreeing a parks and green space strategy to improve local management of leeds' green spaces and facilities. **Conclusion** Provision of or contribution to greenspace required
	Recommendation
	Policy for provision of or contribution to greenspace in all residential developments. Need also to consider and encourage such a policy on other developments, including industrial or commercial. Cross reference to section on open space.
Option No. RS05	**Should new residential developments provide funding to attract shops and facilities?**

	Summary of responses: Total of 15 responses
	   a) Yes - 7
	   b) No – 2
	   c) Only where there is a shortage – 5
	   Other responses: 1, stating 'shops should be leased initially on terms that include a high element of 'turnover' rent' (Uni of Leeds)

	Analysis and Conclusion to Option RS05
	i. Responses received Majority for residential developments to provide funding to attract shops and facilities **ii. Sustainability Appraisal** More sustainable to fund facilities needed by residents as it is a way of helping to provide facilities such as doctors and dentists which might otherwise not be provided. (No negative scores as it was not anticipated this would have any significant impact on economic objectives, but it may be necessary to define a size threshold over which funding is required to ensure small schemes

	remain viable).
	Housing Market Assessment Results of the survey show that city centre respondents believe that they have easier access to a wide range of local facilities compared with respondents of all other parts of Leeds. **Conclusion** Facilities either already exist or are emerging in response to the growing city centre residential population. There are a range of convenience stores around the city centre and several mixed use development schemes have been permitted with the intention of providing further convenience shopping facilities. A number of GP surgeries exist already in adjoining communities which are less than 10 minutes walk away from all of the fringe areas of the city centre. A drop-in-health facility is due to open in the Light shopping centre with a GP facility which will provide ease of access for residents of core areas of the city centre. A number of dental surgeries already exist in the city centre. Whether these are NHS or private practices is not considered a planning matter.
	Recommendation
	To discard the option of seeking financial contributions from developers to help provide and sustain convenience shops and facilities.
Option No. RS06	**Where should student housing be allowed to develop?**

	Summary of responses: Total of 20 responses
	    a) Anywhere in the city centre - 8
	    b) Only in peripheral city centre locations well connected to universities - 10
	If b) specify locations
	Other responses:2; This option puts forward discreet choices/extremes – a more flexible middle ground approach should be taken (Govt Office) ; should be close to universities, or, if edge of centre, well connected by shuttle bus.

	Analysis and Conclusion to option RS06
	i. Responses received Mixed response **ii. Sustainability Appraisal** Allowing student accommodation anywhere has no significant impact on SA objectives. Allowing it only in peripheral locations well connected to the universities scores better as it reduces the need to travel, and is therefore the most sustainable option, but there may be ways of making the first option (allowing developments anywhere) more sustainable (eg. by using historic

buildings).

iii. Known facts, figures, trends and evidence
Leeds has 2 major universities. There are over 45,000 university students in the city, and around 74,000 people study at colleges in Leeds. The University of Leeds is now rated as 1 of the country's top 10. (Source: Vision for Leeds). Historically, most student housing has gravitated towards the north west inner corridor of Leeds, including Headingley, Hyde Park and adjoining neighbourhoods. The level of concentration has been regarded as excessive, contributing to an unbalanced community and provoking disquiet amongst long term residents in the area.

In terms of Leeds-wide strategy, UDP policy has sought to disperse the concentration to other parts of Leeds and secure a more mixed community within inner north-west Leeds.

During the mid noughties, a considerable amount of new purpose built student accommodation has been completed or commenced construction (1522 units providing 6792 bed spaces developed between 1995 and 2006. A further 1267 units offering 3424 bed spaces under construction and 544 units offering 1800 bed spaces awaiting planning permission) leading UNIPOL to predict that there is likely to be a surplus of approximately 5500 student bed spaces by 2008.

iv. National Policy
PPS3. Broad objectives favour mixed inclusive communities.

vi. Vision for Leeds
'We will promote Leeds….to develop Leeds' national and international position as…. The most popular choice for national and international students.'
'Leeds will measure its success by; being recognised as the best UK city for business, tourists and students.'
- Promotion of the universities in such a way indirectly supports the view that student housing should be encouraged anywhere within the city centre.

Conclusion
Surplus of bed spaces is a natural product of market competition with new purpose built accommodation offering an alternative to traditional private rented stock. There are signs that this is shaking out some of the peripherally located private rented student stock in the inner north-west Leeds area. Arguably, the city centre is a better location for most student accommodation than peripheral inner north west Leeds locations because of proximity to the Universities and lifestyle compatibility, so there would not be reason to restrict locations for new student housing development within the city centre. Ensuring student

	accommodation has to have good public transport links with the universities will mean developments could be accepted anywhere in the city centre in principle. Exception is made for the "City Heights" part of the Kirkstall Road Renaissance Area which already has a large number of purpose built student housing schemes built, under construction or permitted. It is considered that further development in this area should be non-residential in order to add variety and mix to the locality.
	Recommendation
	Policy to encourage development of student accommodation throughout the city centre, having regard to main town centre uses etc.
	Further comments made:
	A total of 7 other comments were made; city centre living is very expensive and no local shops/GP's etc; dwellings should have cycle storage; should be able to develop anywhere; need for affordable housing; S106 use for healthcare needs to ensure sustainable healthy communities in residential developments; a budget hotel or Youth Hostel should be encouraged in the city centre; need to undertake work to understand what housing requirements there are in relation to mid market and social rented housing, other issues are lack of infrastructure and lack of variety in housing type and conflict of housing with other uses.
	Analysis and Conclusion to other comments
	Recommendation

Option No.	Summary of Responses
RT01	15 responses were received. 5 preferred Option (a) which proffered the prospect of an increase in density of retail development on the assumption that more city centre retail floorspace would be required over the plan period. However, one of the respondents was of the view that there would be no need for any expansion for decades given the commitment to Harewood Quarter and Trinity Quarter. In response to Option (b), limited expansion, respondents were asked for opinions on direction of expansion; 3 favoured expansion Northwards around Regent Street, 5 across Merrion Way, 2 into rail station site and 5 favoured other directions for expansion (Quarry Hill, locations accessible by public transport, peripheral to city centre other locations). Government office reminded that expansion will need to have regard to national policy. Several respondents raised the need to carry out an assessment of retail need first to see if there is a need to be addressed. Strength of the current compactness of Prime Shopping Quarter emphasised by several respondents.
	Analysis & Conclusion to Option(s) above
RT01	There are two very large retail schemes proposed for the Prime Shopping Quarter at Trinity Quarter and Harewood Quarter. The time taken to deliver complex city centre sites is often protracted and in the past out-of-centre sites could be delivered more speedily than in-centre. Whilst in aggregate both schemes add a sizeable addition of new retail floorspace to the PSQ this is needed to maintain the PSQ market share and ensure the vitality and viability of the city centre shopping function. Both these developments are considered critical to underpinning the city centre's regional shopping centre function, important in maintaining its competitive edge over out-of-centre regions and sub-regional attractions. In addition they help to drive the economy of the city centre forward with beneficial multiplier effects on other sectors of business situated within the city centre. **Sustainability Appraisal** Under economic objectives the option for limited expansion of the PSQ scored better than no expansion but increased density There was uncertainty as to what the implications of these policy interventions might be. If there is no expansion in density but the PSQ is allowed to increase in density then this might potentially bring about positive scores in reducing travel because it keeps the centre relatively compact. However, if there is expansion of the PSQ this could lead to a shopping centre which is too

	disparate for easy access and therefore encourages people to drive to different parts of it. In scoring the **SA** there was uncertainty as to how people might respond in their patterns of behaviour, however, to ensure that scores are maximised choice b) should be accompanied by a deliberate attempt to ensure that the PSQ does not become disparate. **PPS6** Whilst PPS6 advocates the identification and allocation of sites (N.B. ***the PPS6 advice applies to all main town centre uses, not just retail***) within the considerations set out in PPS6 it is not intended, at this stage, to identify any further sites in the PSQ in addition to Trinity Quarter and Harewood Quarter. There is a strong probability, based on the increasing level of competition from out-of-centre shopping destinations, that Leeds city centre will need additional retail floorspace over and above that currently proposed at Trinity Quarter and Harewood Quarter if it is to maintain its market share relative to other retail destinations. Leeds city centre's regional shopping centre role requires it to grow its market share if it is to remain fully competitive with competing centres. It needs to grow its market share in comparison with other retail destinations. Further work is likely to be undertaken to assess that need and the scale of floorspace that might be required in addition to these two schemes. However, Leeds City Council wishes to see both schemes well advanced before making any further decisions regarding additional sites or expansion of the PSQ. The retailers, and the retail market needs to be able to react to the changes that are likely to occur once development is well advanced on these two schemes.
	Recommendation
RT01	• Reconfirm the definition of the PSQ (Primary Shopping Area). • Not to propose any significant expansion of the PSQ other than consolidating boundary changes to incorporate The Light and the proposed changes to provide Templar Street Proposal Area with a principal frontage to Eastgate at the south-eastern part of the site. • Reassess need to identify additional retail development sites within PSQ or further expansion of the PSQ once Trinity Quarter and Harewood Quarter are well advanced.
Option No.	**Summary of Responses**
RT02	14 responses received in response to the question "*how should expansion of "large format" retailers be met when expansion cannot be met in PSQ*";

	5 favoured limited expansion around Crown Point, 5 favoured expansion around Regent Street and 5 favoured retailers to be encouraged to modify their store formats so that they would fit in the PSQ. 3 preferred the option not to expand the existing retail warehouse designations. 2 supported the strict use conditions to ensure that only retail warehousing goods are sold from "large format" stores. 3 respondents do not offer a response. 2 respondents stressed that there is a practical difficulty in trying to meet the very large retail formats stores (e.g. Ikea and B&Q) even on the edge of the PSQ/expansion areas and alternative sites should not be ruled out beyond these areas being currently considered.
	Analysis & Conclusion to Option(s) above
	The question posed presumes that large format stores cannot be reasonably be catered for within the PSQ, the claim made by a number of retail operators, but city centres have traditionally been the favoured location of one of the largest store formats, the department store. Leeds did contain one of the largest stores in the city centre at Allders, now closed. There is a current proposal to develop a 25,000 sq m department store for John Lewis. These stores by any standard are large format stores. However, retail formats such as B&Q and Ikea have placed a high expectation on customers being able to take away products form the store by car combined with very large floor plates which has, according to a number of retailers, produced a business model that would not fit easily in to a town or city centre. **Sustainability Appraisal** Generally speaking the SA scoring is not particularly useful in helping to choose between the options in this case and offers mixed signals. **PPS6** Government guidance (PPS6) also recognises that there can be opportunities to accommodate the very large retail users on the edge of town and city centres if in-centre sites are not available. Where a need has been identified local planning authorities are encouraged to identify sites through the LDF process working closely with stakeholders. **Is the Retail Warehouse format special** The UDP has made previous allocations for retail warehousing outside the PSQ to cater for the needs of those retailers that allegedly could not fit in or be accommodated within the city centre PSQ (Crown Point and Regent Street). It was asserted that there are special and unique requirements of bulky goods

retailers, retailers who needed large floor-plates not available in the PSQ and retailers who needed single storey outlets and extensive showrooms. However the accommodation of the needs of the retail warehouse sector has resulted in a number of outlets in retail parks being occupied by retailers who have shifted out of the PSQ. Several of the retail warehouses on the retail parks are now occupied by retail users that are not selling bulky goods products, unit sizes have reduced in size to the size of units to be found in the PSQ and retailers are occupying multi-level units. Retail warehouse units have evolved to accommodate the traditional retailers that have previously occupied the High Street.

There is some concern about the creation of yet further sites for specialist retail warehouse users when retail uses simply migrate from the PSQ to the retail warehouse parks. There is little difference between the retail characteristics of occupiers of a large percentage of the retail warehouse units outside the PSQ and those retailers located within it. In the case of some sectors of retailing the city centre PSQ has now seen particular sectors of retailing virtually disappear from the PSQ altogether (e.g. DIY, electrical retailers and office stationery).

Further questioning of validity of Retail Warehouse
A significant number of respondents reacting to the options appear to question the validity of the claimed unique locational requirements of the retail warehouse format. A number of respondents suggested retail warehouse operators be encouraged to modify their formats to make them fit within the city centre PSQ, some supported no expansion of the existing retail warehouse designations and a small number favoured a tightening of conditions to control the range of products on sale.

Regent Street and Crown Point
There was a fifty-fifty split between those respondents advocating an expansion of Regent Street retail warehouse allocation and Crown Point. There is still some unused capacity within the Regent Street allocation but the boundary, drawn down the middle of Regent Street does not incorporate the older retail warehouse units that are located on the eastern side of Regent Street. There would appear to be scope to redraw the boundary to reflect the uses on the eastern side of Regent Street. There is constant interest to develop retail warehousing within the Roseville Road area to the north of Regent Street but it is considered that this area is too remote from the PSQ and there is no realistic prospect of any meaningful connection with the city centre.

Prospects to expand the Regent Street allocation in other directions, north and west are considered to be heavily

	constrained by the rapidly developing new residential schemes which have limited any realistic spread and consolidation of the allocation. Further tempered by a lack of any quantitative or qualitative need. Crown Point retail park has secured a number of mezzanine floor Lawful Development certificates and it has the capacity to virtually double the retail floorspace within the existing building envelopes. This process appears to have resulted in a progressive reduction in the size of units, an increase in the density of retail floorspace and a shift to retail user types away from 'traditional' bulky goods retail warehousing to retail sectors previously associated with the High Street. An expansion of retail activity in this location is of questionable merit if it were to lead to further development of retail units that no longer met the 'bulky goods' retail warehousing requirement. The area in and around Crown Point, or at least the land holdings and sites generally south of the river could possibly house some of the genuine large space user needs of the very large retail floor-plates associated with a small number of retail warehouse traders (e.g. Ikea and B&Q). The needs are limited in number of sites, subject to further clarification from the relevant stakeholders, but equally the scope to identify suitable sites or buildings is also limited.
	Recommendation - Modify Regent Street allocation boundary to include the frontage retail units on the eastern side of Regent Street. (NB takes boundary beyond the current City Centre UDP boundary.) - Have discussions with the stakeholders and their representatives about the site and locational needs of the very large retail warehouse operators with a view to identifying suitable sites. - Consolidate the Crown Point retail park boundary.
Option No.	**Summary of Responses**
RT03	Shopping Frontages. 10 responses received. Of these, the majority (7) favoured updating the Shopping Frontage Policies to reflect the changes that have occurred in the Prime Shopping Quarter since the UDP was adopted. Two respondents suggested a complete revision and one of those advocated allowing the market forces to determine the use of secondary and fringe frontages and the "backfilling" of vacated property by non A1 uses. One respondent suggested that the Shopping Frontage policies should be unchanged.
	Analysis & Conclusion to Option(s) above
	By far the majority of the responses favoured updating the

Shopping Frontage Policy rather than any other course of action. There is a need to do so in response to the development changes that have occurred in and on the edge of the Prime Shopping Quarter since the UDP was produced in the early 1990's. Although there have not been any very large shopping developments in the Shopping Quarter in aggregate, the individual changes are significant. The addition of "The Light" and changes to the Headrow Shopping Centre, Leeds Shopping Plaza and numerous small changes warrant at least an updating of the extent and status of the Shopping Frontage definitions.

There have inevitably been qualitative changes in parts of the Prime Shopping Quarter which could cause the relative status of the current frontage definitions to change and the ability of some frontages to maintain their current designations. The purpose of the Fringe Frontages that often span or lie outside the Prime Shopping Quarter should be reassessed.

Sustainability Appraisal
The possible policy choice only had a significant effect on one of the SA objectives (16) which strives to ensure that local needs are met locally. Option (b) was considered to score positively because up to date policies should help to ensure that the city centre retains comparison shopping in the PSQ.

Use Class Changes
There have been national changes in the definition and structuring of the 'A' Use Classes (now extended from A1-A5) and subsequent changes allowed between various categories of use within the 'A' Use Classes. A3 (food and drink) is extended to include three new use classes: restaurants and cafes (A3), drinking establishments (A4) and hot food takeaways (A5). The three new use classes have permitted development rights to change to shops (A1) uses or financial and professional services (A2) uses. In addition A4 and A5 are given permitted development rights to change to A3 restaurants and cafes.

The implications for controlling an extended range of uses within the 'A' Use Class has to be further considered in how it may now have an effect on securing a significant minimum percentage of A1 retail use within the Prime Shopping Quarter. The complementary role of some aspects of the extended A3 uses into A4 and A5 are likely to be different form the old A3 use class. Restaurants and cafés were seen to be complementary to the shopping trip where A4 and A5 might not have that same supporting linkage to the shopping experience.

Control of uses that have shifted from A1
An issue that has arisen under the current working of the Shopping Frontage Policies is what approach should be taken to

uses that have shifted out of A1 use to other parts of the 'A' Use Classes or beyond? What is the preferred change of direction as far as future changes of use are concerned? Currently the Shopping Frontage Policies only control the change from A1 to other uses and not the change from uses outside A1 to other subsequent changes.

Relevance of Shopping Frontage Policy approach to night-time economy uses
Additionally, it was thought that there might be scope to consider using controls, based on a modified Shopping Frontage Policy approach, to control changes of use to activities that are part of the night-time economy and located partly in the PSQ and elsewhere throughout the city centre. The Alternative Options floated the possibility of creating nodes where night-time uses would be focussed and concentrated and Shopping Frontage Policy type controls would be used to control an appropriate mix of bars, restaurants and nightclubs at these nodes. However, there was little support for such an approach and as a consequence it is not intended to use the Shopping Frontage Policy style of control to cover night-time economy uses in that manner.

Amenity implications of the night-time economy are covered in PO-14.

PPS6 clarification
PPS6 is quite narrow in its expectation of the role of Shopping Frontage definitions and policy development. In addition to defining the extent of the primary shopping area for their centres, PPS6 advises that local planning authorities may distinguish between primary and secondary frontages. Cautioning that the frontages should be realistically defined. Having regard to the need to encourage diversification of uses in town centres as whole, primary frontages should contain a high proportion of retail uses, while secondary frontages provide greater opportunities for flexibility and a diversity of uses. Where frontages are identified the appropriate local development documents should include policies that make clear which uses will be permitted in such locations. In this respect PPS6 is prescriptive about the scope and purpose of Shopping Frontage policy which is likely to inhibit and policy approach that varies from PPS6 guidance.

	Recommendation
	• Minor up-dating of the extent and definition of Shopping Frontages, particularly to reflect where significant changes have occurred within and on the edge of the Prime Shopping Quarter (e.g. The Light). • To carry out a comprehensive update of the scope, extent and definitions of Shopping Frontages, at a later date, by

Option No.	Summary of Responses
	the means of a Supplementary Planning Document.
RT04	Convenience shopping. 17 responses received. The responses are virtually evenly split (5:6) between those supporting allowing convenience shops to locate anywhere as long as they are small scale and those favouring locating where there is currently a shortage/or as part of a new large scale development. Slightly less in number but evenly split response between allowing convenience stores only to locate in defined local centres and those who did not support any of the options proposed. Other approaches were suggested in addition to the ones listed in RT04 include; stop all further 'drive' to supermarkets, raises complex issues that need to be addressed in preferred options (GOYH), planning constraints should be relaxed to allow edge of city (centre) neighbourhood stores and support for 24/7 convenience shopping throughout city centre.

Option No.	Summary of Responses
RT05	Defining local centres. 9 responses received. Clear overlap and progression with issues raised in RT04 recognised by a number of respondents. Preference scoring for location of local centres-City station (7); Clarence Dock, HUV and Wellington Street (6); Leeds Uni, Wellington Plaza (5); George Street, Crown Point (4). Other locations suggested-Quarry Hill and anywhere.

Option No.	Summary of Responses
RT06	Respondents suggested additional convenience facilities or services that should be planned for in local centres including; post office, bank, hairdresser, dry cleaner, delicatessen, café, grocer, newsagent, barber, chemist, internet, photocopying, art, crafts, medical, dentist, health centre/GP, off-licence, HFTA, herbalist/alternative medicine, therapies, greengrocer, butcher. A number suggested that it would be possible to combine a number of the activities in a single outlet.

Option No.	Summary of Responses
RT07	10 responses were received. The majority (6) were in favour of protecting new convenience shops from changing to other uses.
	Analysis & Conclusion to Option(s) above
	There is a strong interrelationship between the four options RT04-RT07 and it is appropriate to deal with the options together.

Sustainability Appraisal
Allowing convenience shops only in locations in the city centre where there is a lack of convenience shops scored well in SA. Allowing convenience shops only in local centres also scored well. There is a cautionary note to the option allowing convenience shopping anywhere in the city centre because although it did not directly result in any negative scores there could be potentially four negatives if shops became too dispersed and therefore do not remain viable causing customers to have to travel by car to go shopping.

Protecting existing convenience shops from change of use scored well with five positives and two double positives. It was noted that there could potentially be two negative scores if shops are not viable and have to close, resulting in a vacant property, which might fall in to dereliction.

Conversely, providing no protection for convenience shopping scored poorly with six negatives and one double negative and no positives. Indicating that the CCAAP does need to introduce a form of policy intervention to protect convenience shopping in the city centre.

PPS6
Policy mechanisms for fine tuning discreet elements of retailing within a city centre are not generally recognised as mainstream activities expected from an Area Action Plan. There is support and encouragement from PPS6 to develop spatial policies and proposals to promote and secure investment in deprived areas. An absence or deficiency within the city centre of convenience shops is not quite the same issue as expressed in PPS6. The city centre is not a community that could be described as deprived by any known indicator, although that can be said about the communities that abut the city centre.

Responses to Options
A growing residential population has begun to place expectations on the services available within the city centre which are said to be different from long established users of city centre facilities. There has been concern expressed about the adequacy and provision of services generally and of convenience shopping in particular within Leeds City Centre. The options offered in RT04-06 explore different mechanisms for tackling the issue.

Those supporting an uncontrolled distribution across the city centre with the proviso that they are small scale is almost matched by those favouring locating where there is currently a shortage/or as part of a new large scale development.

There is a practical difficulty in identifying areas of 'shortage' as

there is an absence of any clear measures in defining and pinpointing a 'shortage'. Conversely it is difficult to address so called 'shortages' as often the assertions are subjective. The criteria used in the suburbs by retail operators to define gaps in provision or express operator requirements are not transferable to the complex dense urban environment of a city centre. The precision that is expected in policy application to meet and identify very localised convenience needs is not a practical or realistic option.

The current policy approach, outside the PSQ, is to allow small scale provision of convenience shops where it is considered they can reasonably fulfil an ancillary function. Planning condition restrictions are applied to prevent convenience shops shifting to other non-food retail uses or shifting to inappropriate non-A1 uses. That approach could continue and it is beginning to address the shortfall in provision that some residents perceive. However, often there is a lag between residential development taking place and the retail operators reacting to meet that need.

As residential development and mixed use schemes spread across the city centre provision will generally improve as the number of pockets of residents increase and are capable of supporting new convenience retail provision. However, there is a concern that new food retailing should not occur in locations or densities that could prejudice the existing patterns of provision outside the city centre and in the deprived communities that abut the inner city. It is hoped that the increase in residential population within the city centre will to some degree support the shops that already exist in those inner city communities. The Vision for Leeds places an emphasis on 'narrowing the gap' and not exacerbating social exclusion, city centre convenience retail provision has to be sensitive to the nearby inner city convenience retail provision and not harm its operation.

There is a strong level of support for the provision of convenience shops to extend beyond just food shops and include 'convenience services' (the response to RT06 lists a number of the services that are being sought). The grouping of shops within a parade or other small scale centre offers the opportunity to aggregate together a range of convenience services to the benefit of customers. There is recognition that there are currently locations within the city centre that carry out that role currently and other locations which offer an opportunity to expand on a nucleus of existing provision or the creation of new ones. In addition to those 'service centres' identified in the options Quarry Hill was suggested.

Service centres
Service centre is the term used to describe aggregations of shops

and services that are intended to serve the resident and working population within the city centre. They differ from local centres in that they are focussed narrowly on convenience shops and 'convenience services' and do not have the broader range of community, health, religious or educational activities associated with a local centre.

Not the role of the Planning System to restrict competition
Once established there is an understandable reluctance to loose 'convenience goods' and 'convenience service' outlets, they are seen as being valuable in meeting the daily needs of residents and the working population within the city centre.

PPS6 states that '…*it is not the role of the Planning System to restrict competition, preserve existing commercial interests or to prevent innovation.*' The application of planning conditions and planning controls cannot make a convenience shop continue to trade when market conditions are against its continued existence. Any 'protection' must be considered in the context set by PPS6 and market conditions. The focus of any restrictions should be to prevent the establishment of inappropriate alternative uses. The existence of a convenience shop should not be seen as a step to other 'A1' uses without proper planning justification.

Recommendation

- Maintain a policy approach that allows small scale ancillary retail provision outside the PSQ to meet the needs of convenience goods (food).
- Define the role, distribution and function of a 'service centre'.
- Identify those locations that currently merit 'service centre' designation and those locations where future 'service centres' can be located.
- Define what activities and uses constitute 'convenience goods' and 'convenience services'.
- Require and encourage 'convenience services' to be located within 'service centres' rather than to be distributed across the city centre.
- Control and limit, by planning condition. the use of 'convenience goods' in new ancillary shops located outside the PSQ and preclude, without separate planning application, a shift to non-food or other 'A' category Use Classes.
- Control and limit, by planning condition, the use of 'convenience services' in new shops located outside the PSQ but within a designated 'service centre' and preclude, without separate planning application, a shift to non-food retail sales.