

Report of the Director of City Development

Report to Executive Board

Date: 7th November 2012

Subject: LDF Core Strategy – Pre-submission Changes for Consultation

Are specific electoral Wards affected? If relevant, name(s) of Ward(s):	<input checked="" type="checkbox"/> Yes All	<input type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Summary of main issues

1. In aspiring to be the 'best city in the UK', the Core Strategy takes forward the spatial and land use elements of this vision. Central to this approach is the desire to plan for anticipated population changes and the homes, jobs, education and investment needed across the District, in a sustainable manner. Consequently, whilst supporting ambitions for regeneration, growth and infrastructure, a key emphasis of the plan is for this to be achieved in a form which respects and where possible, addresses local needs, character, distinctiveness and the management of environmental resources. As a basis to address these priorities and in order to provide a strategic framework for the preparation of the Site Allocations Development Plan Document (DPD) and Neighbourhood Plans, there is some urgency to take the Core Strategy forward.
2. At its February meeting (10th February 2012) Executive Board approved the release of the draft Core Strategy for a 6 week period of public consultation to invite representations on the soundness of the plan (28th February – 12th April 2012), along with other supporting and background material. Following consideration of representations received and subsequent analysis presented to the Development Plan Panel (June – September 2012), this report provides a summary of the key issues raised and seeks Executive Board's approval of a number of pre-submission text and map changes (and related background material) and proposes that it recommends to Council that it approves the Publication draft Core Strategy and the sustainability report for submission to independent examination. It is also proposed that an opportunity for further

representations is provided prior to submission and that any responses received are submitted to the Secretary of State together with the Publication draft Core Strategy.

3. The purposes of this report is to provide a summary overview of the Core Strategy's broad approach and within the context of this, outline the scope and response to the Publication draft consultation. Arising from consultation, a number of pre-submission changes to the plan are proposed (included as Appendix 1). Following consideration of the pre-submission changes by full Council, it is proposed that there is a 6 week period for representations to be made on the proposed changes. Any representations received prior to submission will be forwarded (along with any representations subsequently arising), to form part of the formal submission process to the Secretary of State, for consideration as part of the examination process. Based on this broad timetable, it is envisaged that formal submission will take place in Spring 2013, with the examination process commencing thereafter.

Recommendations

The Executive Board is recommended to:-

1. Approve the pre-submission changes to the Publication draft Core Strategy, together with the sustainability report (addendum) and recommend to Council that it approves the Publication draft Core Strategy and the sustainability report for submission to the Secretary of State for independent examination pursuant to Section 20 of the Planning and Compulsory Purchase Act 2004.
2. Agree that a further period for representations is provided on the pre-submission changes and that any further representations received are submitted to the Secretary of State at the time the Publication draft Core Strategy is submitted for independent examination.

1 Purpose of this report

Core Strategy Context

- 1.1 In reflecting the priorities and ambitions for Leeds (as set out as part of the Community Strategy – Vision for Leeds), the Core Strategy sets out the broad spatial and land use planning framework for the district (to 2028). Central to its preparation has been the desire to plan for the people and places of Leeds, in a manner which seeks to manage growth in a sustainable way. This approach seeks to balance the overall needs of a growing population in the delivery of an appropriate scale, distribution and phasing of development, taking into account local character and distinctiveness.
- 1.2 In developing an appropriate policy approach to these issues, the Core Strategy has been informed by a number of elements including the conclusions of the Strategic Housing Market Assessment (2011), work in relation to the Strategic Housing Land Availability Assessment (SHLAA), the Scrutiny Board Inquiry into Housing Growth and the informal consultation and debate (summer 2011) regarding housing growth in Leeds (including representatives of the development industry, Members and community groups). Based on this evidence and informed by the conclusions of the Scrutiny Board Inquiry and housing growth informal consultation, the Core Strategy incorporates the agreed overarching housing growth principles and also through specific policy approaches. An important aspect of this consultation processes is the need to support housing growth, in a manner which delivers sustainable development, supported by the necessary infrastructure (including transport and schools). Within this context, the Core Strategy provides a broad framework to help secure investment and to bid for additional funding.

Housing Growth Principles:

- Ensure housing growth is linked to the creation of sustainable neighbourhoods throughout the city (see SP1),
- Set a realistic and phased target for the delivery of new homes (see SP6),
- Ensure housing growth targets reflect local housing needs, now and in the future, in terms of tenure, type and size, (see SP6 and H4),
- Enhance the distinctiveness of existing neighbourhoods and quality of life of local communities through the design and standard of new homes, (P10 & EN2),
- Facilitate the development of brownfield and regeneration sites, (see SP1, SP3, SP4 and SP6),
- Agree a range of mechanisms to deliver additional affordable homes, (see H5),

- Work in partnership to find ways to facilitate housing growth (see Section 6 Implementation & Delivery).

1.3 In playing its part, (and linked to a range of a range of strategic initiatives and programmes), for Leeds to become ‘the best city in the UK’, the Core Strategy provides a framework to deliver a range of key priorities. These include:

- responding to forecasts that the population of Leeds is set to grow and the opportunities and challenges associated with this, including, greater numbers of children and young people, more people 75 and over and more people from black, ethnic minority and mixed race backgrounds;
- arising from the spatial pressures of population growth, the need to develop a longer term strategy to create more and affordable homes, whilst seeking to respect and enhance the character and distinctiveness of local communities and settlements;
- seeking to help, plan, direct and co-ordinate the infrastructure necessary to support regeneration and growth (including roads, public transport, health care, meeting the needs of an elderly population and schools), in providing a framework to secure investment and to bid for additional funding;
- the promotion of urban regeneration, through the recycling of brownfield land and the development of land in sustainable locations, as a basis to minimise the impact upon greenfield and Green Belt land;
- harnessing the ‘housing growth principles’ agreed through public consultation (summer 2011), as a basis to meet housing needs and delivery in appropriate locations through a phased approach;
- planning for job creation and economic growth by promoting key economic sectors (including financial & business services, low carbon manufacturing, retail, housing and construction as identified within, the Leeds Growth Strategy), key strategic locations for development (including the City Centre and the Aire Valley – Urban Eco-Settlement/Enterprise Zone), together with a portfolio of opportunities for employment development & job growth and regeneration;
- delivering quality of place, high standards of urban design, conservation & construction, the protection and enhancement of the environment and ease of movement (through walking & cycling), in support of a sustainable, child friendly and healthy city;
- mitigating the consequences of climate change by managing flood risk, enabling sustainable design and construction and support for low carbon energy;

1.4 Incorporating the above approach and following consideration by the Executive Board (10th February 2012), the City Council’s Publication draft Core Strategy has been subject to a 6 week period of public consultation (28th February – 12th April 2012), along with other supporting and background material. The purpose of this

report is to seek Executive Board's approval of pre-submission changes and to provide a 6 week period for representations on the proposed changes, in order to provide an opportunity for comment prior to submission, which will be forwarded to the Secretary of State, as part of the submission and examination process. As part of the background material, a number of topic papers have been prepared, these will need to be reviewed and updated in the light of new information, prior to submission. The preparation of the pre-submission changes, follows the consideration of representations and recommendations for changes to the document (including the supporting text and policy wording) by the Development Plan Panel.

- 1.5 Consultation on the Publication draft Core Strategy has been beneficial in helping to confirm, further shape and inform the overall policy approach and the soundness of the plan. Within this context, a number of changes are therefore proposed (attached as a schedule of changes included as Appendix 1), where they help to clarify and strengthen the plan. This includes the introduction of two new policies; a General Policy regarding the presumption in favour of sustainable development, following the receipt of ministerial guidance and the inclusion of a criteria based policy regarding the provision of Cemeteries and Burial Grounds to reflect corporate priorities). In addition there are a number of changes to supporting text and policy wording and cross references to new legal requirements, such as the 'duty to cooperate' and to make more explicit the role of planning in contributing to the 'duty of local authorities to improve public health'. The Publication draft Core Strategy has been developed within the context of a comprehensive evidence base and it should therefore be emphasised that the changes advocated in this report do not alter the overall thrust of the plan considered by Executive Board on 10th February 2012 and in particular, the overall scale and distribution of the housing requirement (Spatial Policies 6 and 7). Consequently, the changes have focused upon reinforcing the soundness of the document and in clarifying the City Council's strategic approach, in taking forward key planning priorities, in order for Leeds to meet the aspiration to be the 'best city in the UK'.
- 1.6 Following an advisory meeting with the Planning Inspectorate (PINS), the City Council has been advised to provide an opportunity for representations to be made on 'pre-submission' changes prior to formal submission to the Secretary of State for independent examination. The purpose of this is to address issues of soundness and modifications to the plan, in advance of the commencement of the examination process, as a basis to reduce examination time and the potential number of matters to be considered. Within this context, it should be noted that the City Council will need to submit the attached schedule of changes (see Appendix 1) and any representations received (supports and objections), as part of the formal submission material.

2 Background information

- 2.1 In aspiring to be the 'best city in the UK', the Core Strategy takes forward the spatial and land use elements of this ambition, as part of an overall strategy. As a basis to address these priorities and in order to provide a strategic framework for the preparation of the Site Allocations Development Plan Document (DPD) and Neighbourhood Plans, there is some urgency to take the Core Strategy forward.

This is necessary in order to provide an up to date development plan for the district, as a basis help manage the planning of regeneration, growth, investment and infrastructure delivery, consistent with strategic priorities and ambitions. The absence of an up to date policy framework, currently leaves the city vulnerable to planning applications and proposals, which do not reflect the City Council's priorities and aspirations.

- 2.2 In seeking to help deliver the priorities set out as part of the Vision for Leeds, responding to major changes in the economy and national guidance, there is considerable urgency to progress the Core Strategy. Central to this is the need to plan for the implications of a growing and changing population. Based upon the Strategic Housing Market Assessment (SHMA), it is anticipated that the population of Leeds will rise from 755,136 in 2010 to 859,583 in 2028 (Employment led, fixed headship scenario, extrapolated to 2028). It should be noted that the mid 2011 census based population estimates, shows the Leeds population to be 750,700, which in turn supports the overall population approach of the SHMA. Associated with this growth, are greater numbers of children and young people, more people 75 and over and more people from black, ethnic minority and mixed race backgrounds. Meeting the challenges and opportunities linked to these changes, is therefore a key issues for Leeds as a whole and in taking forward the Core Strategy.
- 2.3 The Core Strategy is the key spatial and land use planning document for Leeds. This in turn needs to take into account national planning guidance (including the National Planning Policy Framework) and the Localism Act. The plan is also crucially important in providing an overall direction and planning framework for the preparation of the Site Allocations DPD, Neighbourhood Plans and in helping to deliver City Council priorities (including the delivery of City Priority Plans & the Leeds Growth Strategy). Once adopted, substantive parts of the Core Strategy will replace the existing Development Plan (the Leeds UDP 2006).
- 2.4 Following early technical work and stakeholder engagement in 2006, wider public consultation on an Issues & Alternative Options document (October – December 2007) and a further 6 week period of public consultation (October – December 2009) on a 'Preferred Approach' document, a Publication draft consultation (February – April 2012), a number of pre-submission changes are now proposed. This material has been developed in the light of the consultation work described above and also informed by supporting technical work and evidence base material. This material includes the Strategic Housing Market Assessment (SHMA), the Strategic Housing Land Availability Assessment (SHLAA), the housing growth consultation with key stakeholders (summer 2011), the PPG 17 Needs Assessment & Audit, Retail & Town Centres Study and Employment Land Review.
- 2.5 Following the close of the Publication draft consultation in April, the Development Plan Panel has considered a series of reports (6th June, 2nd July, 7th August, 11th and 26th September meetings) summarising and analysing the representations received, the proposed City Council response and recommended changes to the Core Strategy text and maps.

3 Main issues

Overview of the Core Strategy

- 3.1 The Core Strategy has been prepared during a major period of change. This includes significant and emerging changes to national and regional planning policy, (including the National Planning Policy Framework, the impending abolition of Regional Spatial Strategies) and the introduction of the Localism Act. These changes have been against a background of global economic restructuring, a reduction in public funding and national (regional and local) priorities to stimulate economic recovery and growth. Within this context, it is important that the Core Strategy has regard to these circumstances in the short term but seeks to be ambitious in the longer term (the plan period and beyond) to plan for places, communities and infrastructure, in aspiring to be the 'best city in the UK'. The performance against these objectives will need to be monitored, to ensure that the plan is sound and remains 'fit for purpose'. In seeking to meet these objectives, the document is subdivided into two key policy sections the Spatial Development Strategy (supported by the Key Diagram) and Strategic Themes & Policies. The broad content of this approach is as follows:

Place Making

- 3.2 A fundamental strand of the Core Strategy is the importance of the character and distinctiveness of Leeds, as a context for securing opportunities for regeneration and longer term growth. Particular characteristics of Leeds MD, are the extensive areas of greenspace and open land surrounding and linking through urban areas via green corridors and river valleys. Leeds is distinctive also, as a consequence of the wide collection of individual towns and villages across the District, in addition to the main urban area (which also includes the city centre). Leeds is therefore unlike many other cities and it is important therefore, that an appropriate balance is struck between the needs of economic and housing growth, quality of life and in maintaining and enhancing this special character. Within this context, the publication draft Core Strategy provides a policy framework to facilitate and enable the delivery of development proposals in a sustainable manner, as a basis for 'Place making'. Consequently, emphasis is given to Regeneration Priority Programme Areas (Spatial Policy 4), identifying and supporting the role of the places and settlements across the District, a 'centres' based approach to the need to enhance the role of the City Centre, Town and Local Centres, as a basis to provide the range of services required by the community in accessible and sustainable locations (Spatial Policies 2 and 3). Policies are also contained within other sections (see para. 3.5 below) regarding the importance of design and conservation.

Retail Development & supporting the needs of Communities

- 3.3 Within the context of 'Place making' and the focus of Spatial Policies 2 & 3 upon a strategy of 'centres first', detailed policies are also set out, to designate Town & Local Centres and appropriate uses within them. Policies P1, P2, P3, P4, P5 and P6, set out the approach in planning for shopping development (including the creation of new centres, in appropriate circumstances, linked to regeneration and longer term opportunities for growth). Integral to this overall approach, is the

desire to safeguard, enhance and develop the role of Leeds City Centre as the primary destination for major retail, commercial, leisure and cultural development. This also recognises its key role at the heart of the strategic transport hub (including Leeds City station and interchange facilities). Within this context, it is critically important to ensure that major investment opportunities (including major retail development at Eastgate) within the City Centre, are secured as a priority.

- 3.4 In supporting the needs of communities across Leeds, the Core Strategy also places emphasis upon the provision of Community Facilities and Services (Policy P8). Central to this approach is the need to make provision for education and schools (both the expansion of existing and the provision of new facilities), to address both current and future demographic changes i.e. the increasing numbers of children requiring school places. Linked to this approach Section 6, of the Core Strategy covers Implementation and Delivery issues and the document is supported by ongoing work in the preparation of an Infrastructure Delivery Plan. In complementing the overall strategic approach to the need to respect local character and distinctiveness, policies for Design, Conservation and Landscape are also set out, to ensure that development proposals are appropriate.

Local Distinctiveness, Sustainability & environmental quality

- 3.5 Population increase, climate change and the global economy are all huge challenges facing Leeds. In seeking to meet these challenges and the benefits of longer term economic prosperity, environmental quality, local identity and distinctiveness, the Core Strategy sets out the spatial planning framework for the District. Fundamental to this approach, is the need to plan for the homes and jobs the city needs in a sustainable way, in balancing the overall, scale, location, distribution and phasing of development. Consequently, emphasis is made throughout the publication document the need to deliver sustainable forms of development and policy outcomes, whilst protecting and enhancing environmental quality. This should be achieved by respecting local distinctiveness, for example through a focus of development upon the role of settlements and Town & Local Centres (Spatial Policies 1 & 2), the identification of strategic Green Infrastructure (Spatial Policy 13) and detailed policies for Conservation, Sustainable Design and Construction (Policies P9, P10 & EN2).

Planning for Economic growth & prosperity

- 3.6 The Leeds Growth Strategy focuses upon seven key employment sectors including Health and Medical, Low Carbon Manufacturing and Housing & Construction. In helping to support and facilitate this strategy, the approach of the Core Strategy is to support and enable job retention, opportunities for training and the creation of new opportunities. Spatial Policies 8 and 9, set out criteria in support of a competitive local economy, offices, industry and warehouse development. Emphasis has also been given to the important strategic economic role of the City Centre (Spatial Policy 3) and Aire Valley Leeds (Urban Eco-Settlement & Enterprise Zone) in providing opportunities for economic development (Spatial Policy 5). In support of promoting job opportunities, detailed policies are also set out for General Employment Land, Office Development and for Safeguarding Existing Employment Land and Industrial Areas (EC1, EC2, EC3).

Supporting the Role of Leeds within the Leeds City Region

3.23 In seeking to promote and deliver the strategic ambitions for Leeds at the heart of the City Region, the Core Strategy is planning positively for new homes, jobs and key infrastructure (including transport links and hubs within Leeds MD, including the City Station and the Airport and connecting this across the City Region and beyond). The Core Strategy provides a framework also for the protection and enhancement of Strategic Green Infrastructure and directing major investment to key strategic locations including the City Centre and Aire Valley Leeds (Enterprise Zone/Urban Eco-settlement). The important relationship between the Core Strategy and the City's role as part of the Leeds City Region is set out in more detail in Appendix 4.

Meeting Housing Need & planning for longer term growth

- 3.8 Planning for housing needs and delivering housing development in appropriate locations, is a major opportunity and challenge for the District. This is made especially difficult by the current nature of the housing market and current rates of housing delivery. As noted above, it is anticipated that the population of Leeds will rise significantly over the plan period. Meeting the complex demographic needs of the existing population, together with the implications of an ageing and growing population, are therefore key considerations for the Core Strategy. Consequently, planning for such growth is therefore integral to the overall approach. The Core Strategy therefore, seeks to plan not just for a sufficient housing land supply in appropriate locations but also the quality, type and affordability of homes in meeting local needs. As emphasised throughout this report, a key dimension of this approach is to manage growth in a sustainable way, whilst maintaining local character, distinctiveness and environmental quality.
- 3.9 In taking into account the above considerations and a range of factors including, demographic requirements, current housing market conditions, the desire to meet a range of housing needs, the City Council's longstanding commitment to the regeneration of brownfield land and historical past performance in the successful delivery of windfall development, Spatial Policies (6 & 7) set out the approach to the Housing Land Requirement, Allocation and Distribution of Housing Land.
- 3.10 As a large post industrial city and through an on going process of urban regeneration and renaissance, Leeds has continued to evolve in terms of its economic diversity and formats for housing delivery. A major aspect of these changes has been the recycling of brownfield (previously developed land – PDL), for windfall housing and other uses. Leeds has a long and well recorded history of windfall housing being delivered, which has been monitored continuously by the City Council since the 1980s, as a key source of land for development.
- 3.11 Within this overall context, Spatial Policy 6 sets out a housing requirement of 70,000 dwellings (net) over the plan period. In recognition of the conditions of the current housing market, it is proposed that this is phased over two periods, 3,660 p.a. (2012/13 – 2016/17: 18,300 dwellings) and 4,700 p.a (2017/18 – 2028: 51,700 dwellings). In meeting this requirement (and based upon past performance) a 'windfall' allowance for has been made for 500 dwellings p.a on small and unidentified sites. The 66,000 units remaining (following the discounting of the windfall allowance), are comprised of current, undelivered allocations (7,500

units), extant planning permissions (20,000 units) and other additional sites (including infill development within existing urban areas and suitable urban extensions) deemed appropriate for housing delivery, against the criteria set out in Spatial Policy 6. This will entail the need to use Protected Areas of Search (PAS) sites and to carry out a selective review of the Green Belt.

- 3.12 In reflecting the overall strategy approach of the Core Strategy and as a basis to provide a framework for the future Site Allocations DPD and the preparation of Neighbourhood Plans, Spatial Policy 7, sets out tables indicating the overall magnitude and distribution of housing land by Settlement Hierarchy and by Housing Market Characteristic Area.
- 3.13 In seeking to meet the complex housing needs of a growing population and as a basis for a qualitative approach to housing delivery, a series of detailed policies are also set out to cover a range of housing issues. These include the Managed Release of Sites (H1), Housing Density (H3), Housing Mix (H4), criteria for the allocation of Gypsy and Traveller Sites (H7) and Housing for Independent Living (H8). These policies underpin the overall strategic approach and a basis to consider housing need issues at a local level.
- 3.14 Current housing market conditions, wider economic uncertainties and the need to plan for the necessary infrastructure and facilities to support growth are major issues for the delivery of the Core Strategy. Within this context a draft Infrastructure Delivery Plan has been prepared as a basis for on going dialogue to securing infrastructure improvements and longer term requirements to support growth. Housing delivery and output, will therefore need to be closely monitored against the above requirements (and a monitoring framework is therefore being developed as part of the Core Strategy). Notwithstanding these difficulties however, in seeking to meet the housing needs and requirements as set out over the plan period, the delivery of housing growth will result in the need for a selective Green Belt review (as a basis to identify sites for future housing/employment development as necessary and also Protected Areas of Search for future development beyond the plan period). Within this context, Spatial Policy 10 sets out the overall approach. It needs to be emphasised however that the precise extent and detailed boundaries will need to be identified through the Site Allocations DPD process, as a basis to deliver the housing growth principles and location of development criteria identified as part of the Core Strategy.

Regeneration Priority Areas

- 3.15 In meeting local needs, including opportunities for homes and jobs, the Core Strategy reflects the City Council's long standing priorities for major urban regeneration. Spatial Policy 4 therefore identifies East Leeds, Aire Valley Leeds, the Leeds Bradford Corridor (incorporating the West Leeds Gateway) and South Leeds, as Regeneration Priority Programme Areas. In seeking to meet local aspirations within these areas and to plan for the effective use of land, the Core Strategy provides a framework to facilitate housing renewal and provision and local environmental improvements (improvements to greenspace quality through suitable remodelling) within such areas. Within this overall context, as noted in

para. 3.6 above, Spatial Policy 5 sets out a strategic policy for Aire Valley Leeds, in underpinning the significance of this area to the District's growth aspirations.

A Well Connected City (Transportation & Accessibility)

- 3.16 Planning for Transport Infrastructure and Investment priorities, is a key priority for the Core Strategy. Within this context, the Plan reflects District wide priorities incorporated as part of the Local Transport Plan and ongoing work at a City Region level. Consequently, Core Strategy Spatial Policy 11, provides an overarching framework to help direct and bid for infrastructure provision to support the city's priorities. These include enhancements to Leeds City Station, opportunities to create new rail stations and the delivery of Park and Ride facilities. In recognising the important strategic and economic role of the Airport, Spatial Policy 12, sets out an approach to support managed growth, linked to the provision of infrastructure improvements and the consideration of related environmental issues. In support of this strategic approach, Policies T1 and T2 provide a basis to consider Transport Management and Accessibility requirements associated with development proposals.

Managing Environmental Resources

- 3.17 Leeds has a reputation for innovation, effective environmental management and a commitment to mitigating the consequences of climate change. In taking these commitments forward and in contributing to the environmental sustainability of the District, the Core Strategy sets out a broad policy framework to cover the Management of Environmental Resources. The desire to help 'future proof' the city in respect of climate change (including mitigation) and planning for a low carbon economy (to support job growth as well as the protection and enhancement of the environment) are integral to this approach. Detailed Policies are therefore provided to protect and enhance the 'green environment', including Green Infrastructure (Spatial Policy 13 and G1, Increasing Tree Cover (G2), Greenspace provision (G3, G4, G5 & G6), Biodiversity (G7 & G8) and planning for Energy and Natural Resources, including, Carbon Reduction & Low Carbon Energy (EN1 & EN3), Sustainable Design & Construction (EN2) and Managing Flood Risk (EN5). Policies are also included for Waste Management and Minerals (EN6 & EN7), in providing a Core Strategy context for related and expanded policies in the Natural Resources and Waste DPD.

Core Strategy Publication Draft – Consultation (28th February – 12th April 2012)

- 3.18 The receipt of representations on the Publication document has been a very positive process in helping to underline support for the overall scope and direction (and soundness) of the plan. Overall, 1260 representations have been received. This includes support as well as representations commenting that the plan was unsound or should be subject to amendments. Of these, some 907 representations are concerned with the proposed scale of development in the Morley (Outer South West) area. The remaining 353 representations were received from a range of interests including the public, statutory consultees, agents etc and cover a range of issues from the strategic to the site specific. An important issue to emerge from the consultation more generally and through Area Committee meetings, were concerns regarding the scale of housing growth and

the need to improve or provide additional infrastructure (including schools and the capacity of the highway network to accommodate further development). These points are addressed further in section 3.23 below.

- 3.19 In terms of the scope of the consultation, respondents were specifically asked to comment on the overall soundness of the document (i.e. is it Justified, Effective and Consistent with National Policy and positively framed) and if not, to provide details of why the plan is considered to be unsound. Reports prepared for the Development Plan Panel (see para. 2.4 above) set out the detailed responses to each topic.
- 3.20 Whilst a number of representations commented that the plan should be subject to amendments or is 'unsound' in a number of specific areas, a significant number of representations received are very supportive of the overall thrust of the strategy. These comments include support for the desire to deliver sustainable development, regeneration priorities and the desire to plan positively for growth, within the context of the overall character and distinctiveness of the District. For example, there is support for promoting the role of the City Centre and Aire Valley Leeds (and the regeneration priorities identified in Policy SP4), as key locations for investment and regeneration. There is support also, for the positive approach being taken to tackling the challenges and opportunities associated with housing growth, safeguarding and enhancing existing town and local centres and the commitments associated with environmental management and enhancement (such as Green Infrastructure). It should be noted also, that a number of the representations which express 'support', also suggest minor changes and clarifications, that do not alter the substance of the plan.
- 3.21 Arising from the Publication draft consultation, the following key issues were identified, these include: the duration of the plan period, the 'duty to cooperate', the Office of National Statistics (ONS) projections, the overall housing strategy, infrastructure provision and viability issues.
- 3.22 In responding to issues raised through the consultation, the purpose of the City Council's proposed changes, is to help clarify and strengthen the overall approach of the plan, in relation to soundness, rather than to fundamentally review the policy framework and supporting evidence base. Consequently, the changes do not fundamentally alter the approach of the plan (for example, identifying the scale and distribution of housing growth) but where necessary, seek to amplify and update aspects of the document, consistent with the spatial vision and objectives. It should be noted also, that the Core Strategy has evolved through a series of informal and formal stages of consultation, with the Publication stage being the final formal stage to make representations prior to submission. Because of this, the focus of the changes is to assist with the forthcoming submission and examination process (in seeking to resolve matters raised in representations), rather than revisiting and overhauling major areas of the plan.
- 3.23 The key issues raised in response to the consultation and the City Council's response are summarised below.

Plan period:

The plan period needs to be extended from 2028, to 2030 or 2031, to reflect the Vision for Leeds. This would increase the plan period from the normal 15 year period (as advocated in the NPPF) by a further 2 or 3 years. This would have a number of significant impacts, including the need for a higher housing requirement and allocation of housing land (beyond that currently set out in policies SP6 and SP7).

City Council's response:

The plan period of 2012 – 2028, is consistent with the National Planning Policy Framework (NPPF), which states that plans should be drawn up over an appropriate timescale ('preferably a 15 year time horizon'). The 15 year plan period specified in the Core Strategy is therefore sound in relation to this advice. Whilst the desire for alignment with the timescale of the Vision for Leeds is noted, the Core Strategy is consistent and takes forward the overall objectives of the vision. A change to the Core Strategy's plan period at this stage, would have major implications for the plan and spatial strategy as a whole, for example the overall scale of housing growth and its distribution across the district. The plan is sound in relation to the plan period advocated by the NPPF and the supporting evidence base.

'Duty to cooperate'

The plan needs to give greater emphasis to the role of Leeds within the City Region and the impact of this upon employment growth, housing provision & 'cross boundary' infrastructure issues. It has been commented that there is an imbalance between employment land requirements and housing growth requirements. The Key diagram needs to be more specific in identifying, 'cross boundary' infrastructure proposals.

City Council's response:

Paragraphs 1.16 – 1.18 of the Core Strategy Publication draft describe the Leeds City Region context. It is accepted that since initial drafting, new City Region arrangements have been or are being introduced. Consequently, it is proposed that this section should be updated to reflect these changes and further information on detailed governance arrangements and planning issues set out as part of a background paper.

Use of Office of National Statistics (ONS) Population projections

The plan should use the ONS population projections, rather than the population projections derived from the SHMA (May 2011 update), as a basis to determine household numbers and the housing requirement. The impact of using the latest March 2012 projections, would be to increase the 2010 population estimate of 781,000 to 802,500 and the 2028 Core Strategy forecast of 860,618 to 898,000.

City Council's response:

As part of the Core Strategy's evidence base the Leeds Strategic Housing Market Assessment (SHMA), addresses the issue of population growth in the District and concerns regarding the reliability of ONS forecasts. Consequently, an evidence base has been developed which is considered to be more realistic at a local level than the nationally derived ONS projections. Within this overall context, ONS has

recently published the first results from the 2011 Census. This data shows that the mid 2011 census based population estimates (which refer to the population at 30 June 2011) show the population for Leeds at 750,700 (a fall of 600 from the Census estimate adjusted to locate armed forces personnel to the local authority where they are usually based), which is considerably lower than previous mid-year estimates. The population estimate is significantly lower than the indicative population estimates of 780,925 published by ONS in November 2011. The City Council has previously raised concerns that the mid-year estimates may have been an over estimate of the population figures for Leeds, an important part of the SHMA was the detailed scrutiny of official statistics to ensure that the demographic evidence on which the study is based is robust and reliable. This approach has been justified by the outcome of the 2011 Census which shows a modest percentage difference between the SHMA estimate and official Census population published on 16 July 2012. Within the overall context of the census material and further information as it becomes available, additional work will be undertaken across the City Council (including Children's and Adult Services), regarding further analysis of the census return and longer term implications, as a basis to analyse and plan for future provision.

Housing Strategy:

A number of comments have been received in respect of the overall scale of the housing requirement and the distribution of housing growth (Spatial Policies SP6 and SP7). These include, the scale and justification of the windfall allowance, accounting for under-provision before the start of the plan period, planning for an extra 'buffer' to the 5 year supply, weaknesses in the evidence base, the role of existing planning permissions for housing, allowance for non-implementation of permissions, justification for the requirement figure (2012-2017), and cross (local authority) boundary needs.

City Council's response:

These matters have been addressed extensively in reports to the Development Plan Panel on the 11th and 26th September. In broad summary Leeds is planning for extensive housing growth in all geographies of the District and on different types of land. Central to this approach is the desire to meet the complex requirements of housing need at a local level, in delivering longer term growth in sustainable locations. This overall position is considered to reflect the evidence base and seeks to promote the delivery of the housing requirement over the plan period, consistent with the overall objectives of the plan and in providing a framework for the preparation of the Site Allocations plan and Neighbourhood Plans. Within this overall context, a key dimension of the plan is not to simply plan for a numerical housing requirement, without regard to the complex nature of housing need across the District. Following the consultation regarding Housing Growth issues (Summer 2011), a series of housing growth principles have been embedded within the Publication draft Core Strategy (para. 4.6.2). These include the need for the creation of sustainable neighbourhoods across the district, support for the distinctiveness of local areas, secure mechanisms to deliver additional affordable housing and aim to ensure that housing growth targets reflect housing needs. Following the consultation on the Publication draft, it is not proposed to amend or dilute these principles but for these to be carried forward to submission and examination. Within this context also, the plan currently includes

a housing policy for Independent Living – for elderly or disabled (Policy H8). Again, it is proposed to carry this policy forward to submission and examination, without further changes.

Legitimacy of SPDs to set local targets for Affordable Housing & HMOs

Some respondents have raised concern, that targets for Affordable Housing and HMOs should be contained within the Core Strategy and not within supplementary guidance.

City Council's response:

Within the context of the Core Strategy's evidence base on Affordable Housing viability, it is considered to be appropriate to set out the overall parameters as part of the Core Strategy for the duration of the plan period, with more detailed guidance being provided as part of supplementary guidance, which can be reviewed on a regular basis. In terms of HMOs, the Core Strategy focuses upon a criteria based approach to consider the impact of such proposals on a case by case basis.

Green Belt Review

Whilst the plan (Spatial Policy 10) sets out the approach to selective Green Belt review, via the Site Allocations plan, representations have been raised that the plan needs to be more explicit in identifying specific locations, areas and specific sites for the selective review.

City Council's response:

The Core Strategy directs the scope of a selective Green Belt review, within the context of the overall strategy of the plan. The focus of the review is upon the settlement hierarchy, with any exceptions needing to demonstrate that they are in sustainable locations. It is not appropriate for the Core Strategy to identify specific sites and this approach is considered to provide an appropriate framework to consider individual sites through the Site Allocations plan (informed by the Neighbourhood Planning process).

Employment Land Projections

There are concerns that the City Council's employment land projections are over optimistic.

City Council's response:

The overall approach is considered to be consistent with the Core Strategy evidence base, the regional role of Leeds (for job growth in relation to the City Centre and the Aire Valley Leeds Area Action Plan/Enterprise zone) and the aspirations set out as part of the Leeds Growth Strategy. In addition, the Core Strategy's plan period is to 2028 and as a consequence, there is a need to plan for longer term economic recovery, rather than just focussing upon immediate economic challenges.

Viability

A number of representations ask that the cumulative impact of policy requirements (including greenspace and affordable housing) upon the overall viability of development proposals be assessed, as is now required by the NPPF.

Also, linked to this is a concern, that the City Council's requirements for BREEAM/Code for Sustainable Homes are excessive and beyond government requirements.

City Council's response:

The preparation of Core Strategy policies has reflected the findings of a wide ranging evidence base, including viability. Within the context of the preparation of a Community Infrastructure Levy (CIL) charging schedule, further work has been undertaken on economic viability issues. This work is yet to be finalised but the Publication draft (Section 6, Implementation and Delivery) takes into account a range of delivery and implementation issues, including viability. The approach of the Core Strategy to BREEAM/Code for Sustainable Homes, is consistent to be consistent with government requirements, the City Council's strategic commitments to CO2 reduction (Climate Change Strategy) and the detailed approach set out as part of the Sustainable Design and Construction Supplementary Planning Document.

Provision of Infrastructure

A number of representations have been made regarding the proposed scale and distribution of housing growth, expressing concern regarding the impact this would have upon existing levels of infrastructure provision and the need for additional facilities.

City Council's Response

In support of the Core Strategy, the City Council is working with a range of agencies and providers in the preparation of an Infrastructure Delivery Plan. This identifies both planned and projected requirements. Within this context, a key challenge for the delivery of the Core Strategy (and related strategy documents), relates to securing the necessary funding for projects and programmes. At a strategic level there are a number of opportunities at a Leeds City Region level (including City Deal) to put the necessary provision in places. Within this context, the City Council is also working with neighbouring authorities and the Highway Agency (as part of the 'duty to cooperate' and also as part of the Local Transport Plan), to tackle sub regional and more locally based highways issues. Furthermore, in relation to individual planning applications and the preparation of the Site Allocations DPD, there are opportunities to work with a range of partners (including the private sector) to help the provision of the necessary infrastructure such as schools and adult and social care providers, to address identified needs across the District. Within this context, Policies ID1 and ID2 of the Core Strategy provide a framework for Implementation and Delivery as an integral part of the overall strategy. As part of this overall approach, the City Council is also seeking to progress work in developing the Community Infrastructure Levy (CIL) for Leeds. Subject to the level at which the charging schedule is set and economic viability, CIL will be able to make a contribution to gap funding. The overall approach of the Core Strategy, in planning positively for regeneration and longer term growth, also provides a framework to bid for additional resources and funding arising from Leeds City Regional and Central Government initiatives.

4 Corporate Considerations

4.1 Consultation and Engagement

- 4.1.1 Consistent with the City Council's adopted Statement of Community Involvement (SCI), the Core Strategy has been subject to a series of formal and informal phases of public consultation and engagement. It is proposed that prior to submission a further 6 week period for representations is planned. Any further representations received, will form part of the submission of the Core Strategy to the Secretary of State for Independent Examination, prior to Adoption. The decision to submit the Core Strategy to examination and subsequently to adopt the document are decisions reserved to full Council.
- 4.1.2 Following Consideration by the Development Plan Panel and Executive Board, a 6 week period of public consultation commenced on 28th February to 12th April 2012. Consistent with the LDF regulations, this is a focussed stage of consultation, with emphasis upon requesting responses in relation to the "soundness" of the plan. This contrasted with the previous stages of consultation, concerned with exploring a wide range of issues, options and preferred policy approaches. Within this context, the consultation material comprised of a range of documents, which were subsequently made available on line or as paper copies, including:
- Core Strategy Publication Draft (Main Document)
 - Sustainability Appraisal (& Non Technical Summary)
 - Habitats Regulations Assessment Screening
 - Equality Impact Assessment Screening
 - Draft Infrastructure Delivery Plan
 - Draft Core Strategy Monitoring Framework
 - Health Topic Paper
 - Report of Consultation on Preferred Approach (October – December 2009)
 - Links were also incorporated to the consultation web pages to the evidence based material, which has been prepared to help inform the emerging document (including the Employment Land Review, Leeds City Centre, Town and Local Centres Study, Housing Growth in Leeds, Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment and the Leeds open space, sport and recreation assessment.
- 4.1.3 With this context, consultation material was made available to a wide range of organisations and individuals. These included statutory consultees internal City Council stakeholders (including members, Area Committees and the Development Plans Panels), developers and their agents, Parish & Town Council's, the general public, local organisations (such as the Civic Trust and Ramblers Association) and previous Core Strategy consultation respondents. In addition and in relation to the 'duty to cooperate', the City Council has also consulted with neighbouring local authorities and bodies such as the Highways Agency and Environment Agency. In total over 1300 individuals/organisations (as outlined above) were notified about the consultation. Information was also placed in the City Council's network of libraries and One Stop Centres across the district and also use made of social media (facebook) to raise awareness of the consultation. Officers also

attended (all 10) City Council Area Committees, the 3 Development Plan Panels and other sessions (see Appendix 1) to brief members and other stakeholders, on the Core Strategy consultation material (and to respond to questions).

- 4.1.4 In addition to the work undertaken through the Development Plan Panel, consideration of the Core Strategy and aspects of the evidence base has taken place through the City Council's Scrutiny Boards (Health and Wellbeing and Adult Social Care Scrutiny Board, Housing and Regeneration and Sustainable Economy and Culture). With regard to the Health and Wellbeing and Adult Social Care and Sustainable Economy and Culture Scrutiny Boards, meetings of the Boards have taken place on the 24th October and 1st November, with recommendations being available for Executive Board on 7th November.
- 4.1.5 In relation to the schedule of changes included as Appendix 1 and the Sustainability Appraisal Addendum of the pre-submission changes (Appendix 2), a number of further Background documents have been prepared. These include a Habitats Regulation Assessment Screening (Addendum of the Changes), a Sustainability Appraisal Overview and the Sustainability Appraisal of the Preferred Approach, a Report of Publication Draft Consultation and working draft Background Papers for Housing, Employment and the Duty to Co-operate.

4.2 Equality and Diversity / Cohesion and Integration

- 4.2.1 As outlined to Executive Board in February 2012, due regard has been given to Equality, Diversity, Cohesion and Integration issues in the formulation of the Core Strategy. This has included meeting the requirements of the Strategic Environmental Assessment Directive, which has meant that the Core Strategy has been subject to the preparation of a Sustainability Appraisal (and an Addendum to the Sustainability Appraisal based upon a review of the pre-submission changes). The purpose of this Appraisal is to assess (and where appropriate strengthen) the document's policies, in relation to a series of social, environmental and economic objectives. As part of this process, issues of Equality, Diversity, Cohesion and Integration, are embedded as part of the Appraisal's objectives. In complementing the preparation of the Sustainability Appraisal, a Health Impact Assessment exercise, has also been undertaken (See Publication draft, Health Topic Paper – Background documents) in the preparation of the emerging Core Strategy Publication document, the conclusions of which have also been embedded within the document.
- 4.2.2 Given this approach, considerations of equality of opportunity and good relations have been integrated into the formulation of the Core Strategy and an assessment of the impact of the policies on the advancement of equality and good relations has been carried out. This is evidenced in the comprehensive Equality Impact Assessment Screening document, is included as Appendix 3.
- 4.2.3 The Equality, Diversity, Cohesion and Integration screening document describes the overall scope of the Core Strategy and the many stages of public consultation which have been completed to date. The planning and delivery of this consultation has been consistent with the City Council's adopted LDF Statement of Community Involvement. The consultation process, within available resources, has been extensive and has sought to engage with a wide range of communities

and groups across the District, including, people of all ages, people with disabilities, gender and black, ethnic minority groups. In the preparation of the Core Strategy, a fundamental consideration has been to recognise that the population of Leeds is growing, resulting in demographic changes across the District and in spatial pressures in particular areas. Consequently, the Plan seeks to provide a strategic planning framework to address these issues, which in turn is to be monitored for effectiveness. The implications for Equality and Diversity, Cohesion and Integration, will again be considered in the production of the Site Allocations DPD which will take forward the policy requirements of the Core Strategy.

- 4.2.4 In providing an overall analysis and review of the Core Strategy in relation to equality issues, Equality, Diversity, Cohesion and Integration screening document provides a summary of the impact of individual policy areas. These include Transport, Retail, Housing, the City Centre, Employment, Environmental Resources and Green Infrastructure. Consistent with the overall objectives of the Core Strategy, these policy areas aim to promote equality, respect diversity and seek to improve cohesion and integration. The conclusions highlighted in the screening document, show a demonstration of how equality has been an important component of the formulation of the Core Strategy policies and that the Core Strategy has a positive effect (for example seeking to meet a range of housing needs and the provision of affordable housing).

4.3 Council policies and City Priorities

- 4.3.1 As highlighted in this report, the Core Strategy, plays a key strategic role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to the 'the best city in the UK'. Related to this overarching approach and in meeting a host of social, environmental and economic objectives, where relevant the Core Strategy also seeks to support and advance the implementation of a range of other key City Council and wider partnership documents. These include the Leeds Growth Strategy, the City Priority Plan, the Council Business Plan and the desire to be a 'child friendly city'.

- 4.3.2 In reflecting the requirements of national legislation, a number of changes to the Core Strategy text are also proposed to reflect the 'duty to cooperate' (Localism Act 2011) and the duty of local authorities to improve public health (Health & Social Care Act 2012). The inclusion of reference to these duties, not only clarifies and strengthens the wording of the Core Strategy text, as part of the overall strategic approach but also helps to support City Council commitments as part of the Leeds City Region / Local Enterprise Partnership (LEP) and priorities associated with the Leeds Health and Well Being Strategy.

4.4 Resources and value for money

- 4.4.1 The preparation of statutory Development Planning documents is an essential but a very resource intensive process. This is due to the time and cost of document preparation (relating to public consultation and engagement), the preparation and monitoring of an extensive evidence base, legal advice and Independent Examination. These challenges are compounded currently by the financial constraints upon the public sector and resourcing levels, concurrent with new

technical and planning policy pressures arising from new legislation (including the Community Infrastructure Levy and Localism Act). There are considerable demands therefore in taking forward the Core Strategy and related work, including the preparation of the Site Allocations DPD, which is due to quickly follow on.

4.5 Legal Implications, Access to Information and Call In

4.5.1 The DPD is being prepared within the context of the LDF Regulations and statutory requirements. The DPD is a Budgetary and Policy Framework document. Within the context, views are awaited from the Sustainable Economy and Culture Scrutiny Board (due to meet on 1st November).

4.5 Risk Management

4.5.1 As emphasised in this report, there is considerable urgency to take the Core Strategy forward. The absence of such an up to date strategy would leave a vacuum in strategic and land use planning in being able to respond to the priorities set out in the Vision for Leeds and a range of other key documents (including the emerging Site Allocations DPD and Neighbourhood Plans).

4.5.2 The preparation of the Core Strategy document has been a complex process and the Publication stage is necessary prior to formal submission and Independent Examination. Given the range of issues covered, the City Council will need to continue to take appropriate advice, in order to respond to issues which may arise and in order to keep the momentum behind the process.

5 Conclusions

5.1 The preparation of the Core Strategy has been subject to a number of stages of consultation (including 'Issues and Alternative Options' 2007, the 'Preferred Approach' 2009 and 'Publication draft' 2012). Subject to the Executive Board agreeing the proposed pre-submission changes, the Publication draft Core Strategy can now be recommended to Council for submission to the Secretary of State for independent examination which is a key stage in the process of the plan moving forward towards adoption. The provision of a further 6 week period for representations on the proposed changes will provide a final opportunity for representations to be made which will then be submitted together with the Publication draft Core Strategy. It is not the intention that these representations will be further considered by the Council in advance of submission, but they will be included in the information going forward to examination. The changes proposed are considered to help clarify and strengthen the soundness of the plan, consistent with the City Council's evidence base and in support of the key role of the Core Strategy in supporting the aspiration of Leeds to be the 'best city in the UK'.

6 Recommendation

6.1 The Executive Board is recommended to:-

1. Approve the pre-submission changes to the Publication draft Core Strategy, together with the sustainability report (addendum) and recommend to

Council that it approves the Publication draft Core Strategy and the sustainability report for submission to the Secretary of State for independent examination pursuant to Section 20 of the Planning and Compulsory Purchase Act 2004.

2. Agree that a further period for representations is provided on the pre-submission changes and that any further representations received are submitted to the Secretary of State at the time the Publication draft Core Strategy is submitted for independent examination,

7 Background documents¹

None

¹ The background documents listed in this section are available to download from the Council's website, unless they contain confidential or exempt information. The list of background documents does not include published works.