

Core Strategy Selective Review

Report of Consultation

Publication Draft
Leeds Local Plan
Development Plan Document
February 2018



Summary of Core Strategy Selective Review Regulation 18
Consultation Responses

Introduction

This paper sets out a summary of the consultation responses that were received on the Regulation 18 stage of consultation on the Core Strategy Selective Review. The consultation period ran for 6 weeks from 19th June until 31st July 2017.

Summary by Topic

Housing Requirement and Plan Period

1. A lower housing requirement is supported but the plan period should not be extended to 2033. This means that SAP Green Belt and Greenfield Sites are unnecessary. Brownfield urban sites should now be sufficient. [Mr John Iceton](#), [Cllr Tom Leadley](#), [Jennifer Kirkby \(Aireborough NPF\)](#), [Mr Martin Thomas \(Weetwood RA\)](#), [Horsforth Town Council](#), [Natalie Goonesinghe \(Aberford PC\)](#), [Janet Matthews \(Friends of Meanwood Park\)](#), [Sue McQuire \(Garforth NPF\)](#), [Martin Fox](#), [Joanne Austin](#), [Neil Beaumont](#), [Dawn Beaumont](#), [Adrienne Sykes](#), [Save Parlington Action Group](#), [Kathy Horne](#), [Karen Baxter](#), [Celia Moran](#), [Howard Bedford](#)
2. Review of housing requirement is premature and should wait for adoption of the SAP, [Rachel Flounders \(ID Planning\)](#), [Persimmon Homes](#), [Leeds Chamber of Commerce](#), [James Benyon \(Quod\)](#), [Nicola Berry \(Pegasus Group\)](#), [Iain Bath Planning](#), [Andrew Rose \(Spawforths\)](#), [Richard Frudd \(Quod\)](#), [James Seabury \(Banks Property\)](#)
3. Review of housing requirements should reflect the economic growth aspirations of Leeds and City Region. [Chris Martin \(Barton Willmore\)](#), [Leeds Chamber of Commerce](#), [Paul Leeming \(Carter Jonas\)](#), [Andrew Rose \(Spawforths for Miller Homes\)](#)
4. Pegasus has modelled Leeds' OAN using a 15 year pattern of net migration which produces a housing requirement of 71000 (c.4440/pa) 2017-33. Long term trends are preferable because they iron out short term volatilities. [Ian Deverell \(Pegasus Group\)](#).
5. Plan period should extend to 2035 to allow for slippage in plan preparation. [Paul Leeming \(Carter Jonas\)](#),
6. Review of the housing requirement via a SHMA should consider household formation rates, market sensitivities and affordable housing. [Anna Turton \(Lichfields for CEG\)](#)
7. Objectively assessed need for the housing requirement should exclude students. [Deryck Piper \(Little Woodhouse NPF\)](#)
8. Under-delivery backlog should be wiped away. [Cllr Tom Leadley](#). Under-delivery should be addressed. [Persimmon Homes](#), [Andrew Rose \(Spawforths for Miller Homes\)](#), [Iceni Projects \(Ideal Standard\)](#).
9. The effects on the strategic highway network of additional dwellings 2028 – 2033 will need to be modelled. [Highways England](#)
10. Unqualified support. [Dandara](#)
11. A higher housing requirement will have implications for mineral extraction in North Yorkshire. [North Yorks County Council](#).

Housing Space Standards

1. Introduction of space standards are supported. [Cllr Tom Leadley](#)

2. Standards should apply to student accommodation. [Deryck Piper \(Little Woodhouse NPF\)](#). Should not apply to student accommodation. [Simon Grundy \(Carter Jonas\)](#), [David Smith \(Indigo Planning\)](#)
3. Ensure Housing Standards will not reduce housing delivery. [Persimmon Homes](#), [David Smith \(Indigo Planning\)](#)
4. Demonstrate need for Housing Standards, including localities. [Persimmon Homes](#).
5. Housing Standards will reduce viability and choice. [Chris Martin \(Barton Willmore\)](#)
6. Housing Standards can stymie innovation, flexibility and increase development costs. [Anna Turton \(Lichfields for CEG\)](#), [David Smith \(Indigo Planning\)](#)
7. Exemptions are necessary for listed buildings. [David Smith \(Indigo Planning\)](#)
8. LCC evidence lacks consideration of other factors that influence quality of housing including volume, amenity, common areas, technology, glazing ratios, ventilation and running costs. [Anna Turton \(Lichfields for CEG\)](#)
9. Holistic viability testing is necessary. [Paul Leeming \(Carter Jonas\)](#)
10. Concern about impact of Housing Standards on PRS Schemes. [Dandara](#), [James Benyon \(Quod\)](#), [Richard Frudd \(Quod\)](#)
11. Should be introduced through an SPD. [Iain Bath Planning](#). [Iceni Projects \(Ideal Standard\)](#)

Housing Access Standards

1. Concern about impact of Housing Standards on PRS Schemes. [Dandara](#), [James Benyon \(Quod\)](#), [Richard Frudd \(Quod\)](#)
2. Access standard percentage requirements need evidence of need and consultation with Access Groups. [Cllr Tom Leadley](#)
3. Support. [Jennifer Kirkby](#), [Aireborough NDF](#)
4. Should be introduced through an SPD. [Iain Bath Planning](#). [Iceni Projects \(Ideal Standard\)](#)

Affordable Housing

1. Policy should not accept commuted sums for PRS schemes. [Mixed delivery and mixed communities are important](#). [Cllr Tom Leadley](#)
2. Affordable housing target requirements should be increased. [Horsforth Town Council](#).
3. Review supported as a means of incorporating recent national policy changes. [Rachel Flounders \(ID Planning\)](#), [Persimmon Homes](#), [Chris Martin \(Barton Willmore\)](#), [Aecom \(M&G\)](#), [Anna Turton \(Lichfields for CEG\)](#), [David Smith \(Indigo Planning\)](#)
4. Affordable housing policy must be viability tested. [Paul Leeming \(Carter Jonas\)](#)
5. Concern about impact of Affordable Housing on PRS Schemes. [Dandara](#), [Richard Frudd \(Quod\)](#)
6. New policy should have more flexibility to take commuted sums for delivering affordable housing in innovative schemes in off-site locations. [Conservative Group](#). [Anna Turton \(Lichfields for CEG\)](#)
7. Review unnecessary now. Should await clarification of national guidance. [Iain Bath Planning](#).

Greenspace

1. Requirements of current Greenspace policy should not be watered down. [Cllr Tom Leadley](#). [Conservative Group](#).
5. The review of Greenspace policy (80sqm/dwelling) is needed to viability test and change an onerous requirement. [Rachel Flounders \(ID Planning\)](#), [Persimmon Homes](#), [Chris Martin \(Barton Willmore\)](#), [Simon Grundy \(Carter Jonas\)](#), [Iceni Projects \(Ideal Standard\)](#)
2. Concern about impact of Greenspace on PRS Schemes. [Dandara](#)
3. Commuted sums should be exceptional. [Cllr Tom Leadley](#)
4. Greenspace should not be provided on adjacent GB land, but be on-site. [Cllr Tom Leadley](#)
5. Policy should have regard to Government Policy on ancient woodland. [Forestry Commission](#).
6. Policy should extend to retrofitting existing spaces. [Deryck Piper \(Little Woodhouse NPF\)](#)
7. Expect review to improve delivery of greenspace to achieve Policy G3 Standards. [Natural England](#), [David Smith \(Indigo Planning\)](#)
8. Policy should prevent existing greenspaces from being built on. [Horsforth Town Council](#).
9. Policy review should consider the role of eco-corridors/green infrastructure. [Jennifer Kirkby](#), [Aireborough NDF](#), [Aecom \(M&G\)](#)
10. Review should be addressed via an SPD. [Iain Bath Planning](#)
11. Implementation practice should also be reviewed. [Paul Leeming \(Carter Jonas\)](#)

EN1 and EN2

1. There is no evidence to support Leeds adopting the higher optional water standard, using the Environment Agency Water stressed areas – final classification 2013 as recommended by PPG, ID 56-016. [Point raised by: Home Builders Federation](#)
2. Evidence base for water standards. What is the current daily water use in Leeds? Is there any evidence that Leeds water use is excessive in comparison to other areas? [Point raised by: Councillor Tom Leadley](#)
3. Standards beyond those of Building regs are not needed. [Point raised by: Matthew Shipman, Persimmon Homes, Home Builders Federation](#)
4. Energy efficiency standards should apply to small developments. There is no logic to exempting smaller developments, because without energy efficiency measures they are 'out-classed and out-sold'. [Point raised by: Councillor Tom Leadley](#)
5. The definition of Sustainability should be expanded, to include housing mix. Housing mix has an impact on the sustainability of communities and therefore policy on sustainable development should include a consideration of housing mix. [Point raised by: Little Woodhouse Neighbourhood Plan Forum](#)
6. Standards are inadequate. [Point raised by: Dr Alistair Watson, Mr John Kennedy](#)
7. Standards should be dealt with in an SPD. The matter is too detailed for Core Strategy and should be dealt with in an SPD. [Point raised by: Iain Bath Planning](#)
8. Support for Sustainable Construction policies. [Point raised by: Martin Fox, Councillor Andrew Carter](#)
9. 'All new homes should be built to a minimum of national standards providing this meets the current LCC housing standards. Sustainable homes need to be built in

sustainable developments both in terms of construction , local infrastructure , health and educational provision’ [Point raised by: Mrs McQuire, Garforth Neighbourhood Planning Forum.](#)

10. Policy will need to be subject to viability testing. [Point raised by Simon Grundy, Carter Jonas, Icen Projects \(Ideal Standard\)](#)
11. Opportunity to use dwellings at Parlington new settlement as exemplars. [Aecom \(M&G\)](#)

Supportive of all Review Topics: [John Kennedy](#)

Procedural

1. Reg 18 Consultation is premature, given that the SHMA 2017 was incomplete and unavailable. [Rachel Flounders \(ID Planning\)](#)

Additional Matters for CSSR

1. Review the need for employment land up to 2033 for consistency and for highway modelling. [Highways England, Chris Martin \(Barton Willmore\), Nicola Berry \(Pegasus Group\), North Yorkshire County Council, Paul Leeming \(Carter Jonas\), Andrew Rose \(Spawforths\), Andrew Rose \(Spawforths for Miller Homes\), Matthew Shepherd \(Turley\)](#)
2. Review all CS Policies which are calculated on a fixed period should also be reviewed up to 2033. [Andrew Rose \(Spawforths for Miller Homes\)](#)
3. Review retail needs up to 2033. [Anna Turton \(Lichfields for CEG\)](#)
4. Review Distribution of Housing (SP7). [Simon Grundy \(Carter Jonas\), Paul Leeming \(Carter Jonas\), James Seabury \(Banks Property\), Joanne Austin, Neil Beaumont, Dawn Beaumont, Adrienne Sykes, Save Parlington Action Group, Kathy Horne, Karen Baxter, Celia Moran, Howard Bedford](#)
5. Review Spatial Strategy (Policy SP1). [James Seabury \(Banks Property\)](#)
6. Address community and natural infrastructure (schools, health, roads, greenspace) needs. [R&SE Tindall, Jennifer Kirkby Aireborough NDF, Yorkshire Greenspace Alliance, Sue McQuire \(Garforth NPF\), Martin Fox, Joanne Austin, Neil Beaumont, Dawn Beaumont, Adrienne Sykes, Save Parlington Action Group, Kathy Horne, Karen Baxter, Celia Moran, Howard Bedford](#)
7. Infrastructure (Policy ID2) to review the Community Infrastructure Levy. [Simon Grundy \(Carter Jonas\), Paul Leeming \(Carter Jonas\)](#)
8. Transport Infrastructure Priorities (Policy SP11). [James Seabury \(Banks Property\)](#)
9. Strategic Green Belt Review. [Yorkshire Greenspace Alliance, Sue McQuire \(Garforth NPF\), Conservative Group, Martin Fox, Joanne Austin, Neil Beaumont, Dawn Beaumont, Adrienne Sykes, Save Parlington Action Group, Kathy Horne, Karen Baxter, Celia Moran, Howard Bedford, James Seabury \(Banks Property\)](#)
10. Green Belt Policy exceptional circumstances development criteria. [Yorkshire Greenspace Alliance](#)
11. Green Belt land review at Leeds Bradford Airport. [Charles Johnson LBA](#)
12. Housing site release phasing, including availability of PDL. [Yorkshire Greenspace Alliance, Sue McQuire \(Garforth NPF\), Martin Fox, Simon Grundy \(Carter Jonas\), Paul Leeming \(Carter Jonas\), James Seabury \(Banks Property\)](#)
13. Housing Density (Policy H3). [Yorkshire Greenspace Alliance](#)

14. Housing Mix (Policy H4). [Simon Grundy \(Carter Jonas\)](#), [Paul Leeming \(Carter Jonas\)](#)
15. Address air Quality. [R&SE Tindall](#), [Dr Alistair Watson \(Otley NF\)](#), [Jennifer Kirkby, Aireborough NDF](#)
16. Sustainability Issues affecting Otley. [Dr Alistair Watson \(Otley\)](#)
17. The evidence base needs to be extended to sustainability issues: environment, place making, community infrastructure. [Jennifer Kirkby, Aireborough NDF](#)
18. More research is needed on the effects of large scale housing development on flooding and traffic/air quality. [Norma Kaczmar](#)
19. A strong link with neighbourhood plans is needed. [Jennifer Kirkby, Aireborough NDF](#)
20. The proposed siting of the HS2 depot at the Aire Valley Crofton site would sterilise 25 - 35ha of employment land that ought to be made up elsewhere. [Andrew Rose \(Spawforths\)](#)
21. Bring forward defunct employment sites (such as the Ideal Standard site), Otley. [Iceni Projects \(Ideal Standard\)](#)
22. Policy H4 (housing mix) should not be applied prescriptively. [David Smith \(Indigo Planning\)](#)

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