



DEVELOPMENT PLAN PANEL

Meeting to be held in Civic Hall, Leeds on
Tuesday, 11th May, 2010
at 1.30 pm

MEMBERSHIP

Councillors

P Gruen
T Hanley
T Murray
R Lewis

R Harker
S Smith

B Anderson
C Fox (Chair)

T Leadley

D Blackburn

A G E N D A

Item No	Ward	Item Not Open		Page No
1			<p>APPEALS AGAINST REFUSAL OF INSPECTION OF DOCUMENTS</p> <p>To consider any appeals in accordance with Procedure Rule 25 of the Access to Information Rules (in the event of an Appeal the press and public will be excluded)</p> <p>(*In accordance with Procedure Rule 25, written notice of an appeal must be received by the Chief Democratic Services Officer at least 24 hours before the meeting)</p>	
2			<p>EXEMPT INFORMATION - POSSIBLE EXCLUSION OF THE PRESS AND PUBLIC</p> <p>1 To highlight reports or appendices which officers have identified as containing exempt information, and where officers consider that the public interest in maintaining the exemption outweighs the public interest in disclosing the information, for the reasons outlined in the report.</p> <p>2 To consider whether or not to accept the officers recommendation in respect of the above information.</p> <p>3 If so, to formally pass the following resolution:-</p> <p>RESOLVED – That the press and public be excluded from the meeting during consideration of the following parts of the agenda designated as containing exempt information on the grounds that it is likely, in view of the nature of the business to be transacted or the nature of the proceedings, that if members of the press and public were present there would be disclosure to them of exempt information, as follows:-</p>	

Item No	Ward	Item Not Open		Page No
3			<p>LATE ITEMS</p> <p>To identify items which have been admitted to the agenda by the Chair for consideration.</p> <p>(The special circumstance shall be specified in the minutes).</p>	
4			<p>DECLARATION OF INTERESTS</p> <p>To declare any personal / prejudicial interests for the purpose of Section 81(3) of the Local Government Act 2000 and paragraphs 8 to 12 of the Members' Code of Conduct.</p>	
5			<p>APOLOGIES FOR ABSENCE</p>	
6			<p>MINUTES</p> <p>To approve the minutes of the Development Plan Panel meeting held on 9th March 2010</p> <p>(minutes attached)</p>	1 - 6
7	All Wards;		<p>LEEDS LDF NATURAL RESOURCES AND WASTE DEVELOPMENT PLAN DOCUMENT - 'POLICY POSITION' CONSULTATION (INITIAL REPORT OF CONSULTATION)</p> <p>Further to minute 23 of the Development Plan Panel held on 13th October 2009, to consider a report of the Director of City Development providing information on the initial results from the consultation on the Natural Resources and Waste Development Plan Document and progress in preparation of submission documents for independent examination</p> <p>(report attached)</p>	7 - 14

Item No	Ward	Item Not Open		Page No
8	All Wards;		<p>LEEDS LDF CORE STRATEGY - 'PREFERRED APPROACH' ANALYSIS OF CONSULTATION RESPONSES : A WELL CONNECTED CITY (TRANSPORT) THEME</p> <p>Further to minute 34 of the Development Plan Panel held on 2nd February 2010, to consider a report of the Director of City Development providing further information on the comments received in respect of the transport theme</p> <p>(report attached)</p>	15 - 50
9	All Wards;		<p>LEEDS LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY - 'PREFERRED APPROACH' ANALYSIS OF CONSULTATION RESPONSES : SUSTAINABLE COMMUNITIES THEME</p> <p>Further to minute 34 of the Development Plan Panel meeting held on 2nd February 2010, to consider a report of the Director of City Development setting out further details of the comments received in respect of the Sustainable Communities theme</p> <p>(report attached)</p>	51 - 86
10	All Wards;		<p>LEEDS LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY - 'PREFERRED APPROACH' - ANALYSIS OF CONSULTATION RESPONSES: GREEN INFRASTRUCTURE (AND NATURAL ENVIRONMENT) THEME</p> <p>Further to minute 34 of the Development Plan Panel meeting held on 2nd February 2010, to consider a report of the Director of City Development providing further details of the comments received in respect of the Green Infrastructure theme</p> <p>(report attached)</p>	87 - 110

Item No	Ward	Item Not Open		Page No
11			DATE AND TIME OF NEXT MEETING Tuesday 8 th June 2010 at 1.30pm in the Civic Hall, Leeds	

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Development Plan Panel

Tuesday, 9th March, 2010

PRESENT: Councillor C Fox in the Chair

Councillors B Anderson, R Harker,
T Leadley, D Blackburn, T Murray, S Smith
and R Lewis

36 Late items

There were no formal late items but Panel Members were in receipt of the following additional information tabled by Officers for consideration at the meeting:

LDF Core Strategy –Infrastructure Delivery Plan – a flow chart showing a stepped approach to infrastructure planning and delivery (as a basis to provide further information on the methodology advocated by the Planning Advisory Service)

37 Declaration of interests

The following Members declared personal/prejudicial interests for the purpose of Section 81(3) of the Local Government Act 2000 and paragraphs 8 to 12 of the Members Code of Conduct:

Revisions to the Local Development Scheme – Councillor Blackburn declared a personal interest as a member of the West Leeds Gateway Regeneration Board as the report proposed the withdrawal of the West Leeds Gateway Area Action Plan (minute 39 refers)

38 Minutes

RESOLVED- That the minutes of the Development Plan Panel meeting held on 2nd February 2010 be approved, subject to the following amendments:

The inclusion of Councillors Coulson and Latty in the attendance record for the meeting

Minute 34 - Leeds LDF Core Strategy – Preferred Approach - the deletion of the duplicate reference to Affordable Housing

39 Revisions to the Local Development Scheme

The Panel considered a report of the Director of City Development setting out proposed changes to the Local Development Scheme (LDF) in respect of Area Action Plans (AAPs)

The Head of Forward Planning and Implementation presented the report and explained that due to changes in national guidance through PPS12, there was a need for Local Authorities to prioritise the Core Strategy amongst all of the Local Development Framework (LDF) documents. This increased emphasis on the production of a Core Strategy together with the current economic downturn which had led to uncertainty in the delivery of both long-term regeneration proposals and

Draft minutes to be approved at the meeting held
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schemes which had already obtained planning permission, had led to the proposals before Members to withdraw three Area Action Plans, these being the EASEL AAP, the West Leeds Gateway APP and the City Centre AAP, although informal planning frameworks would remain to continue the work which had already been carried out. It was emphasised also, that the continued regeneration and renaissance of such areas remained a priority; as a consequence a variety of mechanisms would continue to be explored to deliver priorities within these areas

Regarding the production of a series of thematic Development Plan Documents (DPDs) there was also the proposal to remove the retail, greenspace and highways DPDs and replace these with a Site Allocations DPD which would cover some of the issues which would have been contained in these separate DPDs

Concerning the Aire Valley Leeds AAP, it was proposed to progress this as the area had been accepted as one of the Leeds City Region Urban Eco-Settlements which would most likely lead to the proposals being properly tested through the planning system by public examination

Members commented on the following matters:

- whether by the withdrawal of the AAPs voids would be left in the planning process and how Officers would deal with an application which would have been contrary to the AAP
- that much work had been done on the West Leeds Gateway AAP and to withdraw it at this relatively late stage could be regarded as a waste of public money
- that the function of this AAP was to set the framework for regeneration money into areas of West Leeds where funding would not normally be provided and to reduce this to the lesser status of guidance would not be beneficial
- that the proposed simultaneous withdrawal of three AAPs was dramatic
- that the withdrawal of the West Leeds Gateway AAP was not appropriate and whilst it could be accepted that there might be funding issues, the progression of this AAP was needed to steer development
- the amount of work required to complete the West Leeds Gateway AAP
- in respect of the EASEL AAP, that development had already commenced on part of the site; that the community knowledge of EASEL was considerable; that to withdraw the AAP was a negative approach and that other partnerships should be sought to progress the development
- that many changes had occurred in the city centre and the number of major developments which were not now progressing did warrant the withdrawal of this AAP
- the costs associated with progressing an AAP
- that due to the increased priority of the Core Strategy and the resources this would require, that AAPs were being sacrificed and that other partnerships for the EASEL development would not be sought
- that plans needed to be in place for when the economic climate improved

Officers provided the following responses:

- regarding the effect of the withdrawal of the AAPs on the planning process, it was noted that AAPs in production would only gain

substantive weight following formal adoption. In the meantime current UDP policies would remain in place, providing planning policy, until superseded by the Core Strategy (and related Development Plan Documents)

- that the proposals before Members were the result of lengthy considerations. Resources had to be diverted to the Core Strategy as national guidance had moved the emphasis to that body of work but it was hoped in respect of the West Leeds Gateway AAP that the work which would be continuing on a Supplementary Planning Document (SPD) would help in the regeneration of this part of the city
- that there were costs involved in taking a document to public examination and the Inspector's costs commenced the day the plan was formally submitted (in addition to the costs associated with hosting and managing the Public Examination process). Whilst exact costs were not available, it was estimated that these were considerable ie in the region of thousands of pounds)
- that the West Leeds Gateway AAP was at the publication stage which would last for 6 weeks, which if it received a positive endorsement the AAP would then go to the formal submission and public examination stage, culminating in the adoption of the Inspector's final report
- that an SPD was proposed for the West Leeds area with this being the next highest level of planning policy status available. Although it was not possible to allocate land in a SPD, as could be done in an AAP, the main thrust of planning policy would not be lost and that the aspiration and intent of the AAP would remain. Officers would be taking on board the work which had been done on the Leeds/Bradford corridor and that a further round of consultation would be carried out which would also aim to reassure people in the area, with a further report coming to Development Plan Panel in late Summer, with the aim of the SPD being in place by Autumn
- regarding the EASEL project, that the main issue delaying this development was the inability of people to obtain mortgages as the scheme envisaged mixed communities. Due to the economic situation expectations had changed and that currently the only development which was taking place was for 100% affordable housing schemes
- that the transformational change which had been envisaged for EASEL could not be delivered at this time and that a different type of plan was needed to help some development to occur and as part of this Officers would be working on neighbourhood plans starting in Seacroft and then moving onto Whinmoor

Members commented further on the following issues:

- that the comments made by Officers on the work which would continue in the absence of the AAPs had not been detailed in the submitted report; concerns that developers could view the withdrawal of the AAPs as a weakening of the Council's commitment to urban regeneration and that the report to be considered by Executive Board at its meeting on 10th March should strengthen these points to give greater emphasis to the Council's commitment to this and the regeneration of brownfield land as a priority

- that just as an over- optimistic view of development had been a factor in the changed economic climate, that a pessimistic view could also be damaging and that a balanced view was necessary

Members considered how to proceed

A proposal to retain the West Leeds Gateway AAP and the EASEL

AAP was defeated by the Chair's casting vote

RESOLVED –

- i) That the report should be strengthened in respect of the coverage of regeneration commitments and priorities
- ii) That Executive Board be requested to:
 - i) Authorise the Director of City Development to make the appropriate revisions to the Council's Local Development Scheme to reflect the changes set out in section 4 of the submitted report and to submit the revised LDS to the Secretary of State pursuant to section 15 of the Planning and Compulsory Purchase Act 2004. Further, should a direction be received from the Secretary of State under section 15(4), the Director of City Development be authorised to make any necessary changes to the revised LDS prior to it coming into effect in order to comply with the direction
 - ii) Agree that the revised Local Development Scheme shall be brought into effect as from 1 May 2010 subject to one of the statutory requirements below having been met. Namely that either:
 - Before the end of a 4 week period starting on the day on which the Council submit the revision to the Secretary of State, the Council receive notice from the Secretary that he does not intend to give a direction under section 15(4); or
 - The 4 week period has ended and the Council have not received either a direction under section 15(4) from the Secretary of State or notice that he requires more time to consider the revision; or
 - The Council have received a direction under section 15(4) and have either complied with it (as varied by any further direction), or have received a direction revoking it; or
 - The Council have received notice from the Secretary of State that he requires more time to consider the revision and either subsequently received notice from the Secretary of State that he does not intend to give a direction under section 15(4) or such a direction is received and the Council have complied with it (as varied by any further direction), or have received a direction revoking it
 - iii) Authorise the formal withdrawal of the EASEL, City Centre and West Leeds Gateway AAPs pursuant to section 22 of the Planning and Compulsory Purchase Act 2004
 - iv) Agree that the Director of City Development undertake further public consultation on the West Leeds Gateway proposals with a view to their eventual approval as a Supplementary Planning Document

40 Leeds Local Development Framework (LDF) Core Strategy - Infrastructure Delivery Plan (IDP)

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The Panel considered a report of the Director of City Development outlining the work which was being undertaken in the preparation of an Infrastructure Delivery Plan (IDP), to support the Core Strategy

The Head of Forward Planning and Implementation presented the report and stated that this was a challenging undertaking which was at an early stage. A questionnaire had been sent out to key infrastructure providers to establish future plans and commitments within five year periods to establish where the major priorities were, with the responses being set out in the appendix to the submitted report

Members commented on the following matters:

- the response given by Centrica and the need for a more meaningful response to be provided
- that a response had not been received from Yorkshire Water
- that energy provision for new homes must be considered
- the need for infrastructure to be provided before housing developments occurred which did not seem to be the case
- the likelihood of the proposals for EASEL and the West Leeds Area Gateway in view of the decisions taken on the previous report
- concerns that responses relating to education had not been provided
- that the number of applications for family housing being submitted was a concern in terms of infrastructure which the Council needed to provide and that this should be given more prominence within the report
- concerns that the current infrastructure in some parts of the city was not adequate
- regarding the health and wellbeing section, that regarding Joint Service Centres, that the PCT had pulled out of some of these and that efforts should be made to establish whether the PCT would support JSCs
- that any work within the 5 year period 2010 – 2015 should have commenced and if this had not, then attention should be drawn to that fact
- that in respect of the rail network and provision of park and ride facilities, these were required now

Officers informed the Panel that whilst the schedule submitted as Appendix 1 to the report was a useful start, it was acknowledged that it reflected work in process and that Officers were seeking to work with a range of infrastructure providers and partners to address information gaps

RESOLVED – To note the report and the comments now made

41 Date and time of next meeting
13th April 2010 at 1.30pm

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Report of the Director of City Development

Development Plan Panel

Date: 11 May 2010

**Subject: Leeds LDF Natural Resources and Waste Development Plan Document –
'Policy Position' Consultation (Initial Report of Consultation)**

Electoral Wards Affected: All

Specific Implications For:

Equality and Diversity

Community Cohesion

Narrowing the Gap

EXECUTIVE SUMMARY

1. The Natural Resources and Waste Development Plan Document is a significant part of the Leeds Local Development Framework (LDF). The purpose of this Plan is to provide an integrated approach to managing natural resources and waste in Leeds as part of the spatial planning framework. This Plan (along with its evidence base) has been subject to "Issues and Alternative Options" consultation, which then informed a 'Policy Position' report laying out the preferred approach of Leeds City Council.
2. Consultation and public engagement has been undertaken on this Policy Position report and the summary of responses is presented here.

1.0 Purpose Of This Report

- 1.1 To advise and update Development Plan Panel members on initial results from consultation and progress in preparation of submission documents for independent examination.

2.0 Background Information

- 2.1 Members are aware that a series of Development Plan Documents are currently being prepared as part of the Local Development Framework. Once adopted, these will form part of the statutory Development Plan for Leeds, setting out a framework for planning policy and where appropriate, site specific allocations. Within this context, the scope of the Natural Resources & Waste DPD is to provide a basis to plan for waste management and to ensure development considers the resource and waste implications implicit in its activities, together with the wider protection and management of natural resources.

- 2.2 As statutory plans, they are prepared under a process prescribed by national regulations. The Natural Resources and Waste DPD is being prepared under the following programme:

- Engagement and Information gathering stage (Issues & Alternative Options)
- 'Policy Position' stage
- Publication stage
- Submission stage
- Public Examination
- Adoption

- 2.3 The Issues & Alternative Options stage was successfully completed in 2008 and a Policy Position report approved by Development Plans Panel in October 2009 (for a six week period of informal consultation). Consultation on this document is now complete and an initial summary of responses received is presented here.

3.0 Progress to Date & Next Steps

Progress to date

- 3.1 A six week consultation effort was progressed from 18 January to 1 March 2010. A range of consultation methodologies were employed to engage:

- Statutory consultees (including: Government Office, Environment Agency)
- Internal stakeholders (including: Members)
- External stakeholders (including: Highways Agency, Parish Councils)
- Seldom heard groups (including: Leeds Voice Environmental Forum)
- The general public

Stakeholders were those identified from the beginning of the Plan development and continually updated with additional interested parties from previous consultation efforts or ongoing communication.

- 3.2 Information for consultation was presented in an accessible, plain English manner and a 'non-technical' summary was produced to assist involvement and understanding. The information made available (through physical hand-out, post or electronic format) was:

- Non-technical summary document
- Response sheet (questionnaire and comment format)
- Policy Position Document

- Appendices (background information figures to support main document)
- Map Book (specific information on each of 210 sites potentially affected and overview maps)

Background evidence reports (such as waste site selection reports, planning information or sustainability reports) were available online, or on request by post.

- 3.3 Consultation comprised different activities and methods as appropriate to different consultee groups. Methods were informed by evaluation of the Issues and Options consultation. These included:
- Individual letters to owners or tenants of specific sites that may be affected
 - 2 workshop meetings convened with invited stakeholders (400 invited)
 - 2 drop-in sessions prior to the workshop sessions
 - advertisements and press releases about the consultation
 - use of website, libraries and 'one-stop shops' to make documents accessible
 - 2 sessions with hard to reach groups facilitated with Planning Aid (Leeds Tenant's Federation, Leeds Building College students)
 - 12 supermarket /shopping centre exhibitions spread across Leeds district.
- 3.4 Responses and views were collected via letter and email responses, notes taken and post-it notes (workshop sessions), notes of comments during other sessions and a formal response questionnaire.
- 3.5 Details of the consultation methodology and the responses are all presented in a Consultation Report currently being completed. All DPD consultation responses have been recorded. The key patterns of response to each topic of the NRWDPD are discussed below however, it should be noted that consultation responses were detailed, particularly as comment was encouraged, and will be produced in full as appendices to the full Consultation Report.
- 3.6 A total of 101 written responses were received either by email or post. No verbal responses were received that were not subsequently followed by a written response. Of these responses 40 included the formal response sheet although not all policies were necessarily responded upon.
- 3.7 Many of the other responses dealt with a single specific issue, such as 31 responses regarding the safeguarding of wharves, and made no comment on other topic areas. A number of detailed letters were received covering either specific topics such as minerals, or the views of a particular stakeholder such as the Environment Agency.
- 3.8 It should be noted that this consultation has a relationship to other engagement activities recently undertaken by Leeds City Council, including the Core Strategy Preferred Approach consultation and waste PFI procurement process. Within this context, four potential waste sites were therefore identified in the NR&W DPD Policy Position consultation material. In parallel, the PFI ongoing consultation exercise is engaging the public to find out what their concerns are about the proposals for sites and technology. An outcome of this process has been a significant number of responses have been received objecting to locating an Energy from Waste facility in east Leeds.
- 3.9 The preliminary overview of the NRWDPD consultation responses is shown below, for each topic theme covered in the consultation document. The numbers in the table shows the breakdown of the 101 written responses. Key comments also include comments received at workshops and Planning Aid facilitated sessions.

Land Use

The majority of responses received about the land use policies were representing organisations, including a significant amount of responses from individuals or companies in the boat and barge industry, or associated with moving materials by water.

Question	Agree	Disagree	No Answer
Do you agree that policies are needed to ensure the efficient use of previously developed land?	33	3	65
Do you agree that we should encourage more tree planting and resist healthy tree and vegetation loss when development takes place?	29	2	70
Do you agree that railway sidings and canal wharves which are, or could be, used to enable the transportation of minerals and/or waste materials by rail and canal should be safeguarded for that purpose?	60	6	35

- Strong support for all land use policy positions (90%+ approval by those who chose to answer)
- The safeguarding of railway sidings and wharves policy position had twice as many respondents in favour than any other Policy Position
- The safeguarding of canal wharves in particular has strong support, locally, regionally and nationally.
- Objections were received to specific wharf or sidings sites; British Waterways and Network Rail responded with concerns over individual sites.
- Canal wharf support comes from industry specialists with specific knowledge as well as individual enthusiasts and groups.

Minerals

All but three of the responses received on Mineral policies came from industry groups, site owners / tenants, or Statutory bodies with an involvement in Minerals.

Question	Agree	Disagree	No Answer
Do you agree that we should protect mineral resources from development that would prevent them being used in the future and that existing mineral reserves should be safeguarded to reduce pressure for new sites to be exploited?	31	0	70
Mineral-related activities are often located in general industrial areas and we want to make sure that these locations are not lost to other uses. For this reason we propose to safeguard existing mineral-related sites (these are shown as B1 sites on Maps A1 and A2). Do you agree with this approach?	30	1	70
Do you agree that we should find alternative uses for quarries, once they are exhausted, such as nature conservation or recreation, rather than filling them with landfill waste first?	24	8	69

- Strong agreement to all three Policy Questions
- A small amount of disagreement (8 responses) mainly all site specific as opposed to policy specific
- An objection was received by the coal authority, regarding the need for the DPD to identify coal reserves across the District

- Detailed points made with regards to specific sites at the stakeholder workshop
- Comments regarding reuse of sites and nature conservation.

Water Resources

All responses to this topic came from government organisations or companies.

Question	Agree	Disagree	No Answer
Do you agree with the measures that we have suggested for minimising water consumption? Do you have any further suggestions?	28	0	73
Do you agree with the measures that we have suggested to reduce flood risk? Do you have any further suggestions?	29	3	69

- Strong agreement to both policy questions
- Comments encouraging grey water recycling, water use reduction, water efficiency.
- Comments regarding levels and type of flood risk and flood protection level depending on nature of land or buildings at risk.
- Comments supporting stronger stance on protection of water quality

Air Quality

The majority of respondents on air quality were organisations and statutory organisations.

Question	Agree	Disagree	No Answer
Do you think planners should be able to require the developments include measures for improving air quality?	24	3	74
We are investigating whether it would be beneficial to create Low Emission Zones (LEZ) in some areas of the District. These would be areas where the more polluting vehicles would not be permitted. Do you think this is a good idea?	18	7	76

- Strong agreement for Policy position 10 regarding developments improving air quality
- Agreement for policy position 11 regarding Low Emission Zones
- Comments upon Low Emission Zones depending upon location.
- Comments with regards to air quality risk and waste incinerator(s) both in short term as a cumulative effect.
- Comments about electric car provision.
- Comments about future developments impact on air quality after mitigation.
- Concerns about LEZ and possible impacts upon other aspects of the City.

Energy

Question	Agree	Disagree	No Answer
Do you agree that Leeds needs to do significantly more to encourage energy production from renewable energy sources?	30	0	71
Do you agree that we need to encourage wind energy provision but consider the impacts on local landscape, built-up areas, nature conservation, highway safety, aeronautical radar and transmission mast reception?	28	5	68

- Strong agreement on both Policy questions
- Comments ranging from a policy point of view to a detailed technical and engineering point of view
- Comments about solar power and waiting for next generation of solar technology
- Comments about wind power location
- Comments about sceptical belief in energy saving, mentioning production of petrol driven cars.
- Objections to Energy from Waste
- Comments agreeing with Energy from Waste especially for Industry
- Comments supporting all forms of renewable energy
- Comments regarding the practicalities of energy generation with regards to Grid access.

Waste

Waste comments were received from a mixture of statutory bodies, organisations and individuals.

Question	Agree	Disagree	No Answer
Do you agree that we should meet our need to identify sufficient land for managing our waste by safeguarding existing waste sites across the District, providing a limited number of strategic sites for larger facilities in the industrial areas of the Aire Valley and identifying where there are existing industrial estates that have potential for more waste related activities to take place?	21	7	73
Do you agree with the allocation of the four sites in the Aire Valley (as shown on Maps E) that have been identified as strategic waste sites?	20	6	75
Do you agree with the five industrial estates (as shown on Maps F) that have been identified as appropriate for waste and mineral uses? Do you know of any others that you think we should consider?	18	7	76
Do you agree that we should discourage landfill provision and only allow it when there is a proven need for it and when it can be demonstrated that it will not be harmful to the environment or quality of life of local people?	23	5	73

- Agreement for Policy positions regarding waste
- Support for waste reduction
- Objections or concerns about specific sites
- Support and suggestions for specific sites
- Objections to using specific sites for Energy from Waste (EFW) facility
- Comments that all EFW sites are within the same area and consequently affect adversely the same residents.
- Comments by waste companies of as technical nature.
- Comments by waste companies regarding geographical provision of sites in north and north west Leeds.
- Comments about inclusion of consultation comments and timeframe
- Comments both agreeing with and comments disagreeing with the “zero waste” aim policy.
- Comments linking waste to land use with regards to canals and navigable rivers

Next Steps

- 3.10 The information derived from the consultation results will be analysed to consider:
- update of information / evidence base
 - incorporating ideas or representing views in final policy
 - removal or change of policy in response to views
 - requirement for additional work to address an issue
 - influence or change on other LDF documents (including the Core Strategy).
- 3.11 Within the context of the above, further detailed analysis will be undertaken regarding the consultation responses. These will be reported to Panel in due course, as a basis to identify actions and recommendations in the preparation of the draft Publication document.

4.0 Legal and resource implications

- 4.1 Once adopted (following Independent Examination), the Natural Resources and Waste Development Plan Document will form part of the Local Development Framework for Leeds. The preparation of LDF documents continues to make demands on staff resourcing.

5.0 Implications for council policy and governance

- 5.1 None at this stage

6.0 Conclusions

- 6.1 This report has provided an overview of the Policy Position consultation and how this feeds into the next steps in relation to the preparation of the NRWDPD.
- 6.2 The results of this consultation will be used to prepare a draft publication document of the Natural Resources and Waste DPD. This will be the final policy document and under the process, will be made available once completed for final consultation comment. The preparation of a detailed DPD is a complex process and must be integrated with the other documents in the LDF. Continued work is therefore necessary to complete, and where necessary review, the work currently underway to ensure that the emerging document is both sustainable and can be evaluated as sound.

7.0 Recommendations

- 7.1 The Development Plan Panel is asked to note the progress and next steps in relation to the preparation of the LDF Natural Resources and Waste Development Plan Document and the next stages in production of the Publication draft.

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Report of the Director of City Development

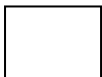
Development Plan Panel

Date: 11 May 2010

Subject: Leeds LDF Core Strategy – ‘Preferred Approach’ Analysis of Consultation Responses: A Well Connected City (Transport) Theme

Electoral Wards Affected:

All



Ward Members consulted
(referred to in report)

Specific Implications For:

Equality and Diversity

Community Cohesion

Narrowing the Gap

Executive Summary

1. At Development Plan Panel on 2 February, members received a report concerning the Leeds LDF Core Strategy ‘Preferred Approach’, setting out an initial report of consultation and a headline summary of the initial comments received.
2. Within this context, the purpose of this report, is to provide further detailed consideration of the comments received in respect of the transport theme.

1.0 Purpose of this report

- 1.1 At Development Plan Panel on 2 February, members received a report concerning the Leeds LDF Core Strategy 'Preferred Approach', setting out an initial report of consultation and a headline summary of the initial comments received. Within this context, the purpose of this report, is to provide further detailed consideration of the comments received in respect of the transport theme.

2.0 Background information

- 2.1 As noted in previous reports to Panel, the Core Strategy is the overarching and central document of the LDF process. Government Guidance (PPS12, 2008), emphasises the key role of the Core Strategy, in setting out an overall spatial vision for an area and how the places within it should develop, to provide a link to the Community Strategy (Vision for Leeds) and Local Area Agreements, and the provision of an Infrastructure Delivery Plan (IDP).
- 2.2 Following consideration of the 'Preferred Approach' document by Development Plan Panel on 30 September, a period of informal public consultation has been undertaken across the District (26 October – 7 December 2009). In support of this, a range of consultation activity has taken place. In response to this consultation activity a number of comments have been received in response to the transport theme. These are summarised in section 3 below and a more detailed summary scheduled is attached as Appendix 1 to this report.

3.0 Main issues

- 3.1 The principal theme of the transport chapter of the 'Preferred Approach' document is a 'well connected city' based on the delivery of a sustainable and integrated transport strategy to support economic growth and the RSS housing targets. At the same time the strategy seeks to address the issues of climate change; safety, security and health; equality of opportunity and quality of life. There are four policies covering: Transport Investment and Management Priorities (T1); Accessibility Requirements and New Development (T2); Freight (T3) and Managing the Growth of Leeds Bradford Airport (T4).
- 3.2 A summary of the main comments received is given below, and full details and responses are included in Appendix 1.

Transport Investment Priorities

- General support for Transport Investment priorities and the delivery of an Integrated Transport Strategy for Leeds but need to expand transport initiatives (such as 'Car Clubs'), link the approach to the transport strategy for Leeds and regional infrastructure decisions, more integrated and comprehensive public transport solutions (such as NGT), Park & Ride and better provision for walking and cycling;
- Support for the role of canals and waterways as part of a wider integrated transport strategy;
- Some concern regarding the impact of individual proposals (Tram train) and that the NGT proposals do not follow all the original Supertram corridors;
- Need to utilise opportunities to target funding more effectively and recognise financial constraints (and capacity issues on the Strategic Highways Network);

- Need to improve public transport provision in community areas (not just focus upon the City Centre) which are currently poorly served, and to consider congestion issues outside the main urban area;
- Need to more effectively integrate the location of transport infrastructure and potential housing growth areas (and the overall spatial strategy of the plan) and the more effective 'joining up' of policy approaches;
- Some concern that transport proposals and initiatives need to be more radical, make more use of demand management and make better use of technology;
- Need to make more explicit policy reference to transport links to Leeds/Bradford Airport;
- More explicit policy reference should be made to the provision of Roadside Services.

Accessibility Requirements for new development

- General support for the overall approach of the policies;
- Need for development to be in sustainable locations and greater clarity regarding the quantum of development in order to understand and manage impacts (including car parking and trip generation);
- Development should only be permitted where sufficient infrastructure is in place.

Freight

- The policy makes no reference to the provision of overnight parking facilities for HGVs.

Managing the Growth of the Airport

- Mixed support for managed growth of the airport to support economic development aspirations and to mitigate environmental impacts;
- Concern that proposed transport and surface access measures are inadequate;
- Suggestion that the section should be redrafted to more clearly reflect national policy, the Vision for Leeds and the nature of proposed surface access solutions.

- 3.2 The consultation responses are on the whole supportive of the broad thrust of the transport chapter, with if anything a view that the strategy should be more ambitious. Key issues identified relate to the lack of specific interventions to meet the needs of the potential housing growth areas; the integration of the text with the map; cross referencing supporting documents; the policy relating to the growth of Leeds Bradford airport, and the need to ensure that all the proposals are fundable and deliverable.
- 3.3 Ongoing work being undertaken as part of the Leeds City Region Connectivity Study (being progressed under the Department for Transport's DaSTS programme (Delivering a Sustainable Transport System)) and the outcomes from the Transport for Leeds project will be used to refine the transport strategy. The new Leeds Transport Model (being developed under Transport for Leeds) will be used to test the impact of the land use proposals and will assist in the development of the necessary transport interventions. Further internal discussion is required to agree the appropriate policy wording for the airport.

Next Steps

3.2 The Phase 1 report under DaSTS will be completed by the end of May and reported to the DfT in June. This will identify a medium length priority list of transport schemes across the Leeds City Region, and subject to DfT commissioning, may be followed by a second phase of work to further refine the priorities. This would not be completed until the end of 2010 at the earliest.

3.3 The Leeds Transport Model is expected to be available from mid July and will enable more detailed assessment to take place of specific land use proposals and their transport implications. This is likely to require a significant level of input and analysis over a period of months through the summer and autumn.

4.0 Implications for council policy and governance

4.1 None, other than to reiterate that the LDF Core Strategy needs to be in general conformity with the adopted Regional Spatial Strategy (2008)

5.0 Legal and resource implications

5.1 A number of the consultation responses make reference to the City Council's evidence base in support of the Core Strategy. Following the detailed consideration of comments received, it may be necessary to undertake further technical studies and research, to underpin particular policy approaches where necessary. Subject to the scope of such work, it is likely that there may be resource implications in terms of staffing and the commissioning of technical work, as required. Such work and resource commitments will need to be addressed within the context of existing provision and the City Council's overall budget position and priorities.

6.0 Conclusions

6.1 This report has provided further analysis of the comments received in respect of transport, as part of the Core Strategy Preferred Approach consultation. In response to comments received the schedule attached as Appendix 1 details the changes and next steps in preparing the draft Core Strategy Publication document for Panel consideration in due course.

7.0 Recommendation

7.1 Development Plan Panel is recommended to:

- i). To note and comment on the contents of the report and the course of further action (as detailed in Appendix 1) in preparing a draft Publication Core Strategy.

APPENDIX 1

**LCC RESPONSES TO REPRESENTATIONS ON THE WELL CONNECTED CITY
(TRANSPORT) THEME**

CORE STRATEGY PREFERRED APPROACH

LCC RESPONSES TO REPRESENTATIONS ON THE WELL CONNECTED CITY (TRANSPORT CHAPTER)

Representor	Those Represented	Representor Comment	LCC Initial Response	Action
Overall Strategy and Transport Investment Priorities				
J Schofield	43785	<p>The policy is not sufficiently radical.</p> <p>What is required is –Tram/trolleybus on all main radials; Extensive priority over other traffic; Car free city centre; Park and ride; Freight deliveries to out of town with shuttle service to city centre with underground service bays.</p> <p>Control speeds using technology rather than traffic calming.</p> <p>Improved highway maintenance is required.</p>	<p>The majority of responses are supportive of the general thrust of the overall strategy, although some take the view that it is not radical enough. Several responses refer to the need to ensure that it is not simply a wish list but is deliverable and fundable. Others that the land use and transport policies do not align, and also that the interventions map appears divorced from the text.</p> <p>Work on developing a transport strategy for Leeds as part of the Transport for Leeds project is ongoing. In addition the Leeds City Region Transport Strategy (Oct 2009) and the DaSTS (Delivering a Sustainable Transport System) Connectivity Study (ongoing) will need to be reflected. Further work is required to establish the transport implications of the full Core Strategy land use proposals – in particular the housing growth areas, and it is accepted that this is not reflected in the current proposals map. The text in the transport chapter will be revised to better link to the transport proposals map.</p>	<p>Cross reference to LCRTS and DaSTS and Infrastructure Delivery Plan (IDP).</p> <p>Revise supporting text as appropriate.</p>
Inner NW Area Committee Planning Sub Group	44407	<p>Any policy that delivers an increase in private car capacity should be opposed in favour of policies that encourage edge of city park and ride, walking and cycling. Parking restrictions, speed constraint, roadspace reallocation and filtered permeability are all useful tools in curtailing unnecessary car use, improving public transport efficiency and encouraging walking and cycling.</p>	<p>By nature of the scale of map in the document it is not possible to provide details of transport interventions.</p> <p>It is recognised that the current proposals map includes a number of transport schemes with significant cost implications. Indications are that transport spending is likely to be significantly reduced over the next 10 years, and this raises the possibility that it will be challenging for land use proposals may be supported by the necessary transport infrastructure. The role of travel planning/smarter choices is likely to have to be significant in order to accommodate the level of longer</p>	<p>Explore the potential of funding options through the preparation of the IDP.</p>
Mr S Harris	43588	<p>There needs to be a more joined up and integrated approach, a bit of bus lane here, a bit of trolley bus there, is not going to meet the current or future needs, this is regardless of the failed tram scheme. The A65 Quality Bus Route is a poor version of the original proposal, the failure to acquire all the land for the scheme puts its viability into question.</p> <p>Pre-paid tickets akin to the London Oyster card is needed, and Zone for annual tickets, its cheaper to pay per journey from Kirkstall to the City Centre every working day than to purchase an annual ticket.</p>	<p>By nature of the scale of map in the document it is not possible to provide details of transport interventions.</p> <p>It is recognised that the current proposals map includes a number of transport schemes with significant cost implications. Indications are that transport spending is likely to be significantly reduced over the next 10 years, and this raises the possibility that it will be challenging for land use proposals may be supported by the necessary transport infrastructure. The role of travel planning/smarter choices is likely to have to be significant in order to accommodate the level of longer</p>	<p>Explore the potential of funding options through the preparation of the IDP.</p>

Leeds Civic Trust	43388	Generally concur with the approach - public transport improvements should also consider orbital movements. Pedestrian priority should be given far greater consideration in the design of highway schemes. Enhance railway stations. Consideration should be given for reducing traffic in the city centre,	term growth envisaged in the Core Strategy. Unfortunately, the supporters of a more radical strategy in terms of high cost interventions are likely to be disappointed, as the funding available up to 2026 will almost certainly not be sufficient to deliver the current proposals.	
Spawforths	43954 43959 43964 43969 43974	CS should encourage better utilisation of existing public transport infrastructure , including railway stations. New development should be directed firstly towards transport corridors , in accordance with a range of guidance. Only Garforth and Micklefield are mainline stations that can accommodate growth. Schemes that will create the critical mass necessary to assist with the delivery of new facilities and sustainable transport should be encouraged.	Accessibility is a key consideration when allocating new developments, so that the use of existing public transport corridors will be maximised where appropriate. The infrastructure delivery plan will provide more detail of the interventions.	
Carter Jonas	44437 44756 44757 44758 44759 44760	Measures to manage travel demand and encourage modal shift away from the private motor car are consistent with the RSS and Government guidance. We would support the generality of the priorities and measures set out in the policy TI&MP1.	See above.	Revise text to ensure development & infrastructure requirements are coordinated.
D Parker & Sons (via Lister Haigh Ltd)	43748	Links should be made to previous under utilised transport corridors.	See above.	
Aireborough Civic Society	43541	Need to focus on outer area congestion and bottlenecks. Not just inside the outer ring road residents in outer areas drive in/use rat runs because the lack of bus lanes (e.g. A65) and bottlenecks at the ring road Junction A65. NB your map emphasises the concentration of initiatives limited to within the outer ring road far too vague.		
Mrs H Longfield	43164	There is a mismatch between the location of potential transport infrastructure and potential housing growth areas. Limited transport investment is proposed for the Morley, Churwell, Lower Wortley and Middleton areas, yet three out of the eight potential long term housing growth areas are planned for these areas. The LDF should encourage coordination of infrastructure and development.	The longer term strategy of the Core Strategy,, will need to be underpinned by an Infrastructure Delivery Plan, to ensure that development & infrastructure requirements are co-ordinated.	

Government Office for Yorkshire & the Humber	44371	<p>Eco settlements – specifically Aire Valley Leeds - need to be set in a wider policy context (backed up by actions) of encouraging sustainable travel on a much broader scale.</p> <p>If housing growth is to be concentrated in the South of the district why do the transport improvements on Map 5 generally appear to be in the north?</p> <p>the transport section does not integrate with the rest of the document. There is no real sense of a transport vision how difficult it will be to achieve a growing city in a sustainable way.</p> <p>Other transport issues need considering, including : i) how to accommodate trips generated by increased economic activity and new housing, not just trips to and from work; ii) the need to improve the public transport offer; iii) the likely need for more stringent demand management in the plan period; iv) the need to make walking and cycling more attractive options; v) capacity on the trunk road network.</p> <p>Infrastructure delivery plan will need to deal with funding</p>	<p>Better explanation of the Urban Eco settlement to be included.</p> <p>Review of integration of transport strategy and housing growth points required.</p> <p>In the current economic situation there is considerable uncertainty over the level of future transport funding. Any proposals will need to be realistic, however, this will present significant challenges as the land use targets in the RSS were derived prior to the downturn and will potentially require significant transport infrastructure.</p> <p>The specific transport issues identified will be addressed.</p>	Revise supporting text as appropriate.
MEPC (via Savills (Northern Branch))	43982 43983	MEPC supports the notion of sustainable Transport	Support is welcomed.	None
Mr S Thomson	43001	<p>I think improving transport in Leeds is the foremost priority, schemes like the outer Ring Road improvements & NGT and Cycle routes must be driven to ensure future efficiency and prosperity of Leeds.</p>		

Natural England	44401	<p>Natural England welcomes the proposals to reduce the severance between the 'rim' and the city centre as well as the priorities to improve bus and rail networks and park and ride facilities. These will help reduce pollution levels in the urban area and the contribution of transport to climate change. Further measures could include requiring large transport intensive developments, particularly in AQMAs, to implement low emissions strategies to reduce air pollution and its effects on the wider environment.</p>	<p>To be effective low emissions strategies would need to apply generally in terms of transport not just to firms located in AQMAs. A Low Emissions Zone would be potential way forward, although this does not currently form part of the proposals.</p> <p>Cross reference to Natural Resources and Waste DPD</p>	<p>Cross reference required.</p>
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Highways Agency	43771 43663	<p>Modelling work indicates that the combination of traffic growth and the proposed development strategy would have a significant impact upon the level of service provided by the Strategic Road Network, with a marked increase in congestion, notwithstanding the implementation of the proposed managed motorway schemes on the M62 and M1.</p> <p>As the rail network is in a similar position to the SRN (in that planned future improvements are largely to address existing capacity issues rather than accommodate additional development related traffic) the focus should be on the bus network to provide additional capacity.</p> <p>There are no specific details on public transport within the document other than the schematic diagram and Map 5. It is not clear whether the proposals shown on the Map are merely aspirational or what level of commitment there is to any of the proposals. It will be vital to understand what the public transport proposals are and to be assured that they are both feasible and fundable before Core Strategy Independent Examination and before acceptance of an agreed Infrastructure Development Plan.</p> <p>We are in a position to make a substantial contribution to the evidence base needed to support the Core Strategy e.g our Network Analysis Tool (NAT), our M62/M1 and A1 Corridor Studies, the work that we will do on housing and employment accessibility, and the VSSIM models of the M621 and M1 (junctions 44-46).</p>	Engagement with the HA over the proposals in the Core Strategy will be maintained, including ongoing work on Infrastructure Delivery Plan. The development of new parking standards and the parallel utilisation of smarter choices, together with the introduction of enhanced public transport, will be used to minimise the impact of additional traffic on the SRN.	Revise supporting text as appropriate. Cross Ref Infrastructure Delivery Plan.
Scholes Community Forum	44793	The failure of the current service providers to meet the present Ltp2 objectives is cause for concern. Failure to secure funding for “Supertram” and the ambiguity surrounding funding for NGT or East Coast Main line services casts doubt for reliance on the “wish list” accompanying the overall strategy. The authority’s reliance on “hopes”, when determining policies, to be achieved during the plan period is questionable.	In the current economic situation there is considerable uncertainty over the level of future transport funding. Any proposals will need to be realistic, and will be detailed in the Infrastructure Delivery Plan. The NGT scheme achieved DfT Programme Entry status in March 2010.	Cross Ref Infrastructure Delivery Plan. Revise supporting text as appropriate.

The Oulton Society	43423	it is considered that development should only take place when infrastructure is under construction or a scheme is imminent.	Individual land use proposals will be linked to specific transport requirements, where appropriate, that would require their construction prior to any development. e.g East Leeds Orbital. Phasing will be covered within the Infrastructure Delivery Plan.	Revise supporting text as appropriate. Cross Ref Infrastructure Delivery Plan.
North Yorkshire County Council	43940	The County supports proposals to provide the necessary physical and transport infrastructure and to ensure that appropriate employment and commercial land and office development is available to meet the Core Strategy's wider objectives	Support is welcomed.	None.
Metro	43668	Metro is encouraged by the tone of the document and that public transport has been recognised as a key part of the development of the city. Enhancing, making best use of existing public transport and improving accessibility where necessary is a consistent theme running through the document. This has been embedded with a number of spatial policies as well as a key consideration in transport specific policy. Metro supports the use of the DaSTs approach as a framework to accommodate the additional growth, improve journey time, improve connectivity to other destinations outside the City Centre and to manage the demand to travel by car. Metro unequivocally support these principals.		
Weetwood Residents Association	43829	The emphasis on consolidating development in existing areas and encouraging use of public transport and non-car modes of travel should be complemented by policies which seek to minimise the need for travel such as maximising flexibility in the use of buildings through mixed-use developments and live/work arrangements.	The site allocations DPD will promote mixed use developments for certain locations, however, in general there is little guarantee that they will be effective in minimising travel. The one area where this can be more successful is in the city centre and this will continue to be a focus.	None.
Bus				

Leeds Teaching Hospital	44478	The Trust remains concerned that, as most of the bus routes within the city are radial in nature, getting across the grain of the city to some of its sites by bus is still difficult.	<p>Within the current deregulated bus market this is an area than is entirely under the control of the operators.</p> <p>Unfortunately, DfT approval (programme entry) for the NGT scheme currently no longer includes the link to St James' hospital and this element of the scheme is no longer being progressed, although it is part of the longer term aspirations.</p>	Update text
Mr M England	43595	<p>I am writing in reference to the proposed East Leeds Extension between Scholes and Whinmoor. I and my family live in Scholes and we have several major concerns about the proposed development of houses that would be built between Scholes and Whinmoor [including]:</p> <ul style="list-style-type: none"> · Public Transport: The village of Scholes being relatively small is consistently overlooked in terms of public transport infrastructure. For example the recent reduction of bus services by First Bus with practically no intervention by LCC makes accessing timely public transport extremely difficult. How will the enlarged areas public transport infrastructure be improved to provide the basic service required now and an enhanced service required for the additional population? 	<p>Within the current deregulated bus market LCC have no control over the provision of bus services. Metro do provide financial support for evening and Sunday services, however, budgets are limited.</p> <p>Nevertheless, the East Leeds Extension would provide an additional catchment for public transport which would potentially make services more viable, and could therefore result in enhanced services for Scholes.</p>	None.
Metro	43668	With regard to the highway proposals for the City Centre, the circulation of bus services should be a key consideration in any highway changes. This includes making provision for additional kerb space for bus services as well as ensuring suitable locations are identified for interchange between services to allow improved access to development in the Rim area.	Too detailed for Core Strategy, however, consultation with Metro will be key to developing proposals for the City Centre.	None
Rail				
Mr R. Grahame	43719	Provide a railway station to serve Rookwood/Osmondthorpe	The proposals for new rail stations are based on : Investing in Public Transport – A Framework for Leeds	Cross reference to

Highways Agency	43771	<p>The Agency welcomes proposals for new stations at Kirkstall Forge, Horsforth Woodside and Apperley Bridge (Bradford).</p> <p>The Agency is working with relevant stakeholders over the proposed East Leeds Parkway Station and the potential for this station to become a strategic park and ride facility. The results of this dialogue should be fed into the Core Strategy.</p> <p>The proposal for a new station in the Stourton area, in combination with the enhanced Knottingley-Castleford-Leeds rail service proposed in the RUS, would strengthen links between development areas in Wakefield and the Aire Valley to the benefit of the SRN. The proposed station would have a negative effect on the SRN if it had a park and ride role.</p>	<p>(LCC/Metro, March 2009) and The Leeds City Region Transport Strategy (Oct 2009). These include proposals for new stations at Apperley Bridge, Kirkstall Forge and East Leeds Parkway (and these have all received RFA support). Horsforth Woodside is a longer term aspiration, linked potentially to tram train.</p> <p>Proposals for a new station at Stourton to serve the Aire Valley are no longer being progressed.</p> <p>Consultation outcomes with the HA over East Leeds Parkway will be incorporated where relevant.</p> <p>Any consideration of new stations needs to take account of the impact on existing services/capacity, together with the potential demand arising from the station. There are few locations where line capacity can be maintained without costly additional works to provide passing loops for express services (line capacity is a particular issue for the Leeds-York/Selby line). In addition, new stations within the urban area of Leeds –such as Osmondthorpe - would not provide much journey time advantage over buses or NGT. Rail is better suited to longer distance commuting.</p>	LCRTS and Investing in PT.
Spawforths	43954 43959 43964 43969 43974	<p>Needs to take account of regional infrastructure decisions eg Electrification of the Leeds/Selby/east Coast line. This will reduce pressure on the Wakefield route to London, which would allow a reassessment and feasibility study of closed and new stations including one at East Ardsley.</p>	<p>The Yorkshire and Humber Route Utilisation Strategy (July 2009) states that: ‘The proposal put forward by the former Great North Eastern Railway (GNER) for an “electric horseshoe” providing a circuit whereby London – Leeds services could return to London without reversal via a continuous circuit of electrified lines is not currently being pursued by any party. The wider issue of electrification strategy has been addressed in the Consultation Draft of the Network RUS Electrification Strategy, published in May 2009.’ None of the outline consideration reported in the RUS has any mention of the potential for new stations.</p>	
Mr D Deebank	44630	<p>The logic regarding shops, offices etc in the central locations good but it’s success is greatly dependant upon some form of transport system from the suburbs. My own thoughts are centre on a railway system with few intermediate stops but each stop would be a local transport hub/ interchange plus plenty of car parking spaces. I’m disappointed to see no such arrangement in the NE quadrant where my wife and I now reside. Buses and trolley buses are not the answer. Too many stops with no facilities e.g. toilets for workers / passengers. No covered facilities for bicycles.</p>	<p>There are no plans for a comprehensive new system as proposed by Mr Deebank – this would be prohibitively expensive.</p>	

Mr WH Tymms (Harrogate Line Rail User)	43027	Strong objection to suggestion to run a tram train on the Harrogate line. Would involve closure of line for 2 years to create infrastructure. Would lose line as heavy rail route. Would lose National Express' contingency rights to run extra trains from London to Harrogate via Leeds using the Hambleton curve. The Yorkshire and Humberside RUS identifies a need for extra services to run to Horsforth with new signalling and a turn back facility. If insist on a route to the airport, should be a line just from Horsforth to protect the existing busy rail route.	Both the LCRTS (Oct 2009) and 'Investing in Public Transport – A Framework for Leeds' (LCC/Metro, March 2009) make reference to solutions to boost capacity on the Leeds-Harrogate line, including tram train, as well as improving access to LBIA by tram train. This project is also being considered as part of the DaSTS work. The RUS proposals for a turn back facility at Horsforth would not be incompatible with tram train and could allow tram train conversion to be progressed in phases.	
Government Office for Yorkshire & the Humber	44371	There is no mention of the problem with interchange in Leeds arising from the rail and bus stations not being co-terminus.	Proposals for a city centre transport strategy are being developed and will be incorporated within the Core Strategy.	Revise text as appropriate
Mr S Garforth	44784	No apparent thought has been given to provision on a new high speed rail infrastructure alignment - this should be far more important than encouragement of basically short term growth of LBIA since LBIA will be closed in 50yrs. Air travel will be seen as antisocial other than inter continental travel.	National consideration of high speed rail is at an early stage, and until further clarity is available it would not be appropriate to make any allowance in the Core Strategy. Recent government proposals do not envisage high speed rail to Birmingham until 2025, so any scheme to serve Leeds would be a much more long term intervention.	Refer to long term potential
Mr R. Grahame	43719	Freight and storage distribution – the European rail connection should be enhanced to come in to Leeds to the Stourton bonded warehouses and on to Leeds City Station for business and leisure in to Europe.	The main London HS1 interchange at St Pancras provides a high level of connectivity with Leeds-London rail services at Kings Cross. The Natural Resources and Waste DPD recognises the benefits of utilising non-road transport for freight movements.	Revise supporting text to refer to DPD.
New Generation Transport				
Dr P Greaves	42714	Extend the NGT network to offer circular and connecting shuttle routes, e.g. around the ring road with intersecting shuttles between the City Centre and Otley, Wetherby, Wakefield, Bradford etc. Consider the light rapid transit system for disused railways.	The NGT scheme being promoted by LCC/Metro is based on a strategic review of the potential for significant public transport enhancements within the city. (Strategic Context for Public Transport Investment in Leeds. (Arup, August 2008) and the accompanying summary document: Investing in Public Transport – A Framework for Leeds (LCC/Metro, March 2009))	Cross reference to Investing in Public Transport.
Barwick in Elmet & Scholes Parish Council	44442	The East Leeds Extension promoted on Transport Policies such as “Supertram”, which is now superseded by a NGT bus proposal which does not terminate in proximity to the site. The Current proposal questions the infrastructure requirement and may be subject by us for challenge relating to the authority of land release.	The Review considered the impact of future land use changes up to 2021 based on allocations in the UDP and the (at the time) emerging Area Action plans for EASEL, City Centre, West Leeds and the Aire Valley. Overall	Revise supporting text to refer to main schemes and commitments

Spawforths	43954 43959 43964 43969 43974	Supports Bus Rapid Transit system, but should follow entire former Supertram proposal if aspirations to grow modal; share are to be achieved. In particular, the extension of the route to Tingley would have significant benefits, and could be used as a Park and Ride.	changes were capped at the level of the RSS and the Yorkshire Forward employment forecasts. The report concluded that the strongest case for rapid transit interventions was on the A660 and M621 (E) corridors. Further work was recommended on the potential for schemes to serve the EASEL and Aire Valley areas.	.
Leeds Teaching Hospital	44478	LGI and SJUH are noted. There is regret that the east Leeds route will not extend to Seacroft in its initial phase, this is a missed opportunity.		
Highways Agency	43771	The Agency is already considering the impact of the NGT southern route and the proposed park and ride at Stourton in association with Leeds City Council. There is a need for a 'fallback' bus priority / BRT position if the business case for NGT is not accepted by DfT. The Agency has already commented on the proposal for an NGT extension into the Aire Valley Leeds AAP area – welcoming the concept as a key to influencing mode share. Two other NGT extensions are proposed on Map 5 – Boddington to Holt Park is of no concern to the Agency, but the proposed extension from St. James's Hospital to Seacroft is welcomed. We do ask why the Seacroft extension is not shown to continue to the Whinmoor bus park and ride site on the A64.	The role of P&R at Grimes Dyke (Whinmoor) and service by NGT will be reviewed as part of the Transport for Leeds and DaSTS studies. (Transport for Leeds is a 2.5 year study funded under the DfT Transport Innovation Fund. It is centred on Leeds, with the objective of developing a 20 year transport strategy for the city. The DaSTS – Developing a Sustainable Transport System – study is looking at prioritising transport intervention in Leeds City Region principally for the period 2014-2019. Both have similar objectives in terms of supporting economic growth and addressing environmental, safety and social issues.). P&R proposals at Tingley are not being considered at the current time.	
Metro	43668	T1 & MP1 - Metro also encourage the inclusion of investment in 'Rapid Transit' as a separate priority for infrastructure improvements and investments. This encompasses both New Generation Transport (NGT) and Tram Train.	Text will be reviewed.	Update as appropriate.
Park and Ride				
Mr R Tyrell	42842	Why not have a lot more park and ride centres? York does this well - Why can't Leeds do the same?	Park and ride is considered to form a key part in the future transport strategy for Leeds. Together with rail it is seen as the way forward to provide more sustainable access to Leeds city Centre from communities outside the main urban area of Leeds. (Surveys show that 75% of am peak period traffic with a CC destination starts its journey outside the ORR. Even in the inter peak this figure is still 60%). Whereas rail would normally give faster journey times, the network is limited to certain corridors and stations,	Update supporting text.
Mr M Clerk	43097	Any new transport infrastructure need to consider improved public transport not park and ride which only solves local congestion not sustainability.		Individual sites will need to be referenced in Site Allocations DPD.
Mrs J Clerk	43119	Investment is also needed to ensure adequate public transport from City Centre to towns i.e. Otley – one shouldn't need a car and bus to reach work! Park and Ride only solved city centre congestion and doesn't address the sustainability of travel.		

Spawforths	43954 43959 43964 43969 43974	Supports proposals for Park and Ride and new local railway stations.	and the costs of providing new stations are high. In addition, rail station parking is limited at many locations with little scope for this to be expanded. Park and ride is therefore seen as a way of addressing gaps in the rail network.	Implications for saved policies need addressing.
Highways Agency	43771	In some circumstances, park and ride facilities have the potential to attract commuter trips onto the SRN. Therefore the Agency will require to be consulted on park and ride strategy and the location of all proposed park and ride sites.	Future employment growth in the City Centre will depend on achieving high levels of sustainable travel as highway and parking capacity will severely limit the scope for car travel, and environmental considerations would preclude any expansion.	
University of Leeds	43886	Provide park and ride in several locations.	Where facilities are proposed adjacent to the SRN full consideration of the impacts will be undertaken in dialogue with the HA.	
Scholes Community Forum	44793	Investment in Park and Ride should be sought for both Rail and Bus facilities.		
David Lock Associates	44611	We remain committed to working with partners in south Leeds but are concerned that the Core Strategy represents a missed opportunity to plan for long term economic regeneration and growth. Designating south Leeds as a Strategic Development Location would provide for a number of benefits: [including] help transform public transport infrastructure including a potential park and ride facility , new transport interchange and guided bus corridor to reduce car usage.	Comments appear to relate to specific site(s). The role of P&R and enhanced public transport is being considered as part of the Transport for Leeds and DaSTS (Developing a Sustainable Transport System) studies.	None
Parking				
Highways Agency	43771	Effective demand management will be vital in securing solutions that enable the planning needs set out in the Preferred Approach to be satisfied whilst also allowing the SRN to perform its primary strategic function. We will expect to see policies in the final Core Strategy that require the application of parking standards that are less generous than RSS levels. This does not appear to be reflected in Policy T1 & MP1 or in Policy T2 which makes reference to 'current guidelines' for parking provision.	New parking guidelines are to be developed. These will take account of the RSS and the recently published PPS4. Workplace parking for new developments will be controlled by the use of maximum parking standards. Over time, as existing sites are redeveloped, there will be a change in the provision. There are no proposals to charge for workplace parking. Equally, the use of emissions levels to control access to city centre car	Review role of new standards in Core Strategy/SPD. Modify supporting text and

University of Leeds	43886	Parking: phase out free workplace parking; differential charges for vehicles of different emission levels in all city centre car parks.	parks would be incredibly complex and expensive. Furthermore, Council control over public parking is limited in the City Centre. A more appropriate way of reducing emissions would be by way of a Low Emissions Zone, although this does not form part of any transport proposals at this time.	policy T2.
Mr S Harris	43589	T1 - 'Managing supply and use of parking' is a double edged sword , not providing the parking just relocated the problems in to the local neighbourhoods, e.g. Immigration centre on Kirkstall Road with restricted parking for staff and no visitors has choked the local residential streets with staff who no longer drive to work, but drive to the street opposite work. Residents only schemes just move the problems along one.	Parking guidelines have to comply with relevant guidance. DCLG have recently issued PPS4 which states that parking standards should align with the relevant local transport plan and regional strategy. The role of the Core Strategy is to ensure that new development takes place in the right accessible locations so that the need to travel by car is minimised.	None
Cycling and walking				
Mr R Tyrell	42842	It is time cyclists had continuous routes away from cars.	Support for walking and cycling is welcomed.	Cross Reference to Core Cycle Network. Revise supporting text as appropriate.
Government Office for Yorkshire & the Humber	44371	The outer edge of the Rim is approximately 2km from the transport interchanges in the City Centre (Map 3), or 30 minutes walk, making it a significant challenge to provide access to development in the Rim by sustainable means.	The Rim shown in Map 3 is diagrammatic. However, 2km would normally take less than 30 mins to walk, although the main point is acknowledged. A key approach to this will be to improve the ability to interchange within the City Centre, so that these journeys can be made by bus or NGT.	
Leeds Civic Trust	43388	Pedestrian priority should be given far consideration in the design of highway schemes.	The inclusion of details of walking and cycling schemes would not be appropriate at the scale of the current map. Consideration of pedestrian requirements is, however, much more fully integrated into transport interventions than in the past.	
Horsforth Riverside LLp (via Drivers Jonas)	43760	In bringing forward residential development on the Riverside Mill site, it is expected that linkages with the adjoining public transport and pedestrian/ cycle network will be improved.	The Riverside Mill comment is beyond the scope of the strategy. Individual sites will be covered in the site allocations DPD. Consideration will be given to explicitly referring to towpaths.	
British Waterways	44418	British Waterways supports the delivery of an integrated transport strategy for Leeds and improvements to existing infrastructure, including the waterways and towing paths. Policy T2 - BW welcomes the suggestion that where appropriate new development should contribute to improving access to walking and cycling routes. We suggest that specific reference is made in the policy to waterway towing paths.		

NHS Leeds	43657	T2 Transport - This policy relates to accessibility requirements and new developments. Can we include children in here more specifically? Children's cycling needs are crucial if we are to expect future generations to cycle as adults. The development of cycling infrastructure in Leeds should consider children's safety and create environments in which they can develop their skills and where parents can feel confident to encourage their children to cycle	The point about cycling infrastructure and children's safety is too detailed for inclusion in the Core Strategy. Nevertheless safety is a key issue when schemes are designed and the development of the Core Cycle Network will deliver seventeen signed routes using a combination of cycle lanes, tracks, quiet roads and junction improvements to link to housing, Leeds City Centre, schools, employment sites, parks and greenspace, and the wider bridleway and cycle route network.	Revise supporting text as appropriate.
University of Leeds	43886	Improve walking routes into the city centre.		
Inner NW Area Committee Planning Sub Group	44407	Walking and cycling need to be central to the strategy. Should recognise the importance of developing high quality cycle routes, reducing CO2 from transport, reducing car dependency, and restraining traffic growth. The CS needs to help create an environment where more people are prepared to walk and cycle for short distances. The Leeds Cycle Network should be fully integrated with the National Cycle Network to secure external match funding.		
Ms Garance	43023	5 - Well connected city- "the Challenge is to encourage a greater proportion of journeys to be made by public transport, cycling and walking". To take up that challenge n look no further than the bridge linking Little woodhouse and Great George Street - the bridge is sitting on the inner-rim of the city waiting to be redeveloped into a significant new public space. Already it is linking a network of key routes for pedestrians and cyclists, but does absolutely nothing to contribute to standards of best practice in the public realm. The area should be regenerated in to a high quality Gateway appropriate for 24 hour usage. With imaginative and innovative use of infill and reclaimed space, a hospitable and green corridor could be created to form more than just a link route.	Connectivity with the Rim is being considered as part of the work on a city centre transport strategy. Too detailed for Core Strategy.	None

Highways				
Mr WH Tymms	43027	Disappointed airport road route only goes to the A65, which would not decrease the volume of traffic on the A6120/A65 roundabout. Could a way be created from the A6120 ring road using an improved road from Calverley Lane past the crematorium to the A65? Could link in with road infrastructure for plans for the Clariant works and Riverside development.	Development of the link road scheme is still ongoing, however, proposals are also being developed to signalise the Horsforth roundabout.	None
Highways Agency	43771	The Aire Valley North – South Link is essential for development of sites in the Aire Valley. It also has the potential for relieving M1 between Junctions 45-44 but it could place extra stress on these two junctions. This needs to be assessed using the VISSIM model. The potential impact of the proposed East Leeds Orbital on the A63/M1, A63/A1 and A64/A1 junctions will need to be considered in combination with possible housing growth in the Garforth and Micklefield areas. Policy T1 and MP1 also specifies a priority of orbital highway improvements . However, it does not set out which routes are being considered. Map 5 shows the M62 and M1 forming part of the outer loop. This will have implications for the SRN and any proposals must therefore be developed in close consultation with the Agency. There is an incorrect reference to the M62 Improvements on Map 5 – it should refer to Junctions 25-30.	Where facilities are proposed adjacent to the SRN full consideration of the impacts will be undertaken in dialogue with the HA. Policy T1 was written to be non scheme specific. Better coordination is required between the text and the proposals map. Map notation error noted.	Revise supporting text as appropriate.
Aire Valley Leeds				
Swayfields (Skelton) Limited (via Turley Associates)	43931	The delivery of AVL requires improved infrastructure including enhanced transport infrastructure. This should be reflected in the provision of Policies T1 and MP1.	Consider including specific reference in T1	Revise text as appropriate

Goodman International (via White Young Green Planning)	44014	We support the principle of the Council's delivery of an integrated transport strategy for Leeds. Out of centre office development has the potential to reduce the impact of traffic within the centre, but Goodman consider it important for employees of Leeds Valley Park to be able to access the city centre. More detail is required on the emerging Transport Strategy.	More detail will be provided on transport strategy. Issues over LVP access are related to provision of bus services which are commercially operated. Too detailed for Core Strategy.	None
Templegate Developments Ltd (via Barton Willmore Planning Partnership-Northern)	44477	Templegate Developments supports the extension of NGT into the AVL strategic regeneration area.	Support is welcomed.	None
Airport				
Mr M Staniforth	42822	Should be much more aggressive in restricting and reversing airport growth. Allowing continued growth is irresponsible in environmental and climate change terms. The airport is too big now and should be shrunk not developed.	The Future of Air Transport White Paper (ATWP)(2003) supports the growth of LBIA subject to improvements to both public transport and road access in the medium term.	Further internal discussion required.
Mr R Davis	42611	The planning of the transport requirements due to the imminent expansion of Leeds / Bradford airport is totally inadequate and pathetic. Problems are increasing everyday and there appears to be no answers immediately to hand. The problems, including grid lock on some roads at certain times is unacceptable and need addressing now and not put off until passenger numbers get to a specific number.	The Leeds City Region Transport Strategy (LCRTS)(2009) also identifies the need for improved access to the LBIA, particularly by public transport. The text in Policy T4 needs to be better aligned with the proposals map. More clarity is required with regards to the level of public transport interventions required to permit further growth. The highway link road is not referenced in the text, and yet is shown on the map.	Cross Ref to White paper and LCRTS.
Mr S Harris	43590	As above, the A65 can not cope with the additional traffic generation from any Airport expansion.	In the short term the A65 Quality Bus Scheme will improve bus access from the CC along the A65. Construction is due to commence in 2010 following approval by DfT.	
Aireborough Civic Society	43543	No - Recent planning permission for the airport terminal building placed no requirements to improve road infrastructure nor any new limits on aircraft noise (no limits or restrictions at all exist for light aircraft flying over built up areas.	Need to consider whether thresholds would be appropriate to trigger new transport interventions.	
Mr R Hill	42654	I would prefer that the airport does not expand at all and I'm particularly opposed to the proposed new road link from the A65 through greenbelt land. If the airport is serious about growth then this should only be permitted if a light rail (or similar) connection is made from the Leeds Harrogate rail line.		

Highways Agency	43781	Leeds Bradford International Airport (LBIA) Expansion of the airport will most certainly generate additional vehicular trips from within the region and beyond, thus increasing vehicular traffic on the SRN. The Council would therefore have to demonstrate how any additional trip generation would be reduced. It would also have to demonstrate how surface access will be substantially improved by sustainable modes of transport. There is a proposal for a tram-train link to LBIA, but it does not figure in Network Rail plans for Control Period 4 (2009-2014) set out in the Route Utilisation Strategy for Yorkshire and Humber.	Growth at Leeds Bradford airport is likely to reduce the need to travel further afield to other airports (on the SRN) and could potentially therefore have a positive impact on the SRN. Investigating the scope for tram train is included within the Leeds City Region Transport Strategy (Oct 2009). Given likely funding limitations this is likely to be a longer term intervention. (Post 2020). It is not considered that more substantial interventions would be likely within the Plan period, however, the LCRTS includes the provision of enhanced rail connectivity to Manchester (a major airport hub with a wide range of international flights).	Further internal discussion required. Cross Ref to White paper and LCRTS.
Stanks and Swarcliffe residents Association	43723	The rail connection to Leeds Bradford Airport is required and this will create jobs for our local communities.	The LCRTS / ATWP analysis indicates that both LBIA and Manchester Airports are expected to grow significantly, with Manchester Airport attracting significantly more passengers than LBIA, but for LBIA to play an increasingly complementary role to Manchester in supporting the economic competitiveness of the city region.	
Mr M Clerk	43099	Allowing the airport to grow will become unsustainable without much better transport links than you are proposing. Increased air travel will add to Leeds carbon footprint through LBA. What is needed is a fast rail link to a major hub airport - not a regional airport link LBA or Robin Hood.		
Mrs J Clerk	43121	Airport growth is not sustainable. The airport focuses on tourism but needs rail infrastructure to improve travel logistics and increase commercial use. Think other airports are in better location for expansion than Leeds / Bradford.	The Future of Air Transport White Paper (2003) supports the growth of LBIA subject to improvements to both public transport and road access in the medium term.	None

Natural England	44403	Natural England does not agree with the policy to manage the growth of Leeds Bradford International Airport. While the focus on sustainable transport and environmental assessment in the policy is important, Natural England would expect to see a far greater emphasis on ensuring that any development at the airport is not detrimental to landscape character; does not impact on designated sites for biodiversity as well as priority habitats and species; minimises noise and tranquillity impacts; has regard to public rights of way; minimises air quality impacts and considers impacts on the road network; and minimises land take. They would also expect to see sustainable design and the use of renewable technology in the policy. Further refinements to the policy may be required as a result of undertaking habitats regulations assessment on the core strategy.	Any interventions will seek to minimise the impacts.	Revise text as appropriate & address as part of Sustainability Appraisal / Appropriate Assessment requirements.
Inner NW Area Committee Planning Sub Group	44404 44411	Good intentions of the Well Connected City chapter undermined by pages about Leeds Bradford Airport, which will wipe out any potential transport emission savings gained elsewhere. The Government will support airport growth but only if the Council can show it is making compensatory bigger emission cuts elsewhere. So which Leeds residents are going to have to take a hit and why not those who fly? Policy T4 Inconsistent with the UK Climate Change Act and CO2 reduction targets unless it is amended to impose on the airport operator a further requirement to demonstrate airport growth and carbon emission reductions. It will soon be a breach of international and national law to expand airports without meeting CO2 reduction targets. Policy needs to identify where compensatory emission cuts will come from.	Climate change targets are a matter for national policy and are outside the scope of the Core Strategy.	None
Leeds Civic Trust	43390	Any spend on LBIA should be carefully balanced against other transport priorities.	The delivery of improved access to the airport has been identified as a priority in the LCRTS, but would nevertheless be subject to the normal scheme appraisal process. A significant decline in the growth of air travel would make progression of such interventions less likely in the short term.	None
University of Leeds	43888	It seems to me that the further substantial growth of the airport is unlikely, given the outlook on energy prices and carbon taxes. Improved connection to whatever size of airport would be a benefit for various reasons but funds should not be diverted to this purpose from other pressing needs.		

Mr LJ Jackson	42674	Speed up the Leeds Bradford Airport Strategy including public transport links.		
Bradford Metropolitan District Council	44425	Policy T4 on managing the growth of Leeds Bradford International Airport is welcomed and supported.	Support is welcomed.	None
Metro	43668	<p>The Leeds City Region Transport Vision identifies the connectivity of LBIA as a category A intervention priority. The development of the airport is therefore supported by Metro subject to the interventions required to meet the travel demand as identified in point A of the policy. Point B of the policy requires the transport strategy to identify funding. Whilst we understand the principal of these requirements, we are unsure who would be responsible for producing this document or who would be expected to fund any intervention identified.</p> <p>Metro supports the development of an LBIA SDP / DPD which details the infrastructure requirements for the development of the airport. Such a document would need to consider the Surface Access Strategy, Airport Master Plan, LTP2 / LTP3 and the Leeds City Region Transport Strategy.</p>	<p>Support is welcomed.</p> <p>The existing Airport Surface Access Strategy (May 2006) was produced by LBIA. It would be expected therefore that a revised airport transport strategy would also be undertaken by LBIA in consultation with LCC and Metro. Funding will be considered in the Infrastructure Plan.</p>	Revised text.
Miller Homes (via Mosaic Town Planning)	44022	Support for the improvement of surface access to Leeds Bradford Airport.	The delivery of improved access to the airport has been identified as a priority in the LCRTS. Funding constraints are however likely to affect the delivery of such schemes.	Further internal discussion required.
Learmonth Property Investment Company Ltd (via CB Richard Ellis)	44347	Supportive of airport link road and potential tram train , on the basis that improved infrastructure is merited by the proposed improvements and planning increase in passenger numbers at the airport.		
Montpellier Estates (via Aspinall Verdi)	43634	LCC should ensure that the investment is in place to enable the growth of LBIA which should not be constrained. In an ideal world this investment should take place first, however, where the private sector is willing to invest in the airport this should not be curtailed and the 'public sector' infrastructure can 'catch up'.		

LBIA (via White Young Green Planning)	43040	Given that the supporting text acknowledges the role of LBIA within the integrated transport system for Leeds, we do not understand why LBIA transport links have not been addressed in Policy TI & MP1.	Consider including specific reference in T1	Consider revising text
Learmonth Property Investment Company Ltd (via CB Richard Ellis)	44348	Fully support the principle of continued improvement and expansion of the airport. However, Policy T4 makes no reference to the potential for growth of associated infrastructure outside of the airport's operational boundary. Policy needs to give direction to the potential for the growth of ancillary developments such as airport car parking, hotels and leisure facilities , having regard to the availability and proximity of the Airport Industrial Estate and its ability to play an integral part in the future growth of the airport.	Further internal discussion required.	Further internal discussion required.
D Parker & Sons (via Lister Haigh Ltd)	43750	The site could help to provide the requirement for 185 hectares of local employment opportunities, being adjacent to the motorway network to attract distribution businesses and close to Leeds Bradford Airport (20-30 mins). Links could be made with Leeds Universities as well as York for research and innovation related business.	Appears to relate to a specific development site. These will be covered in the Site Allocations DPD.	None

BIA (via White Young Green Planning)	44106	<p>The improvement, growth and success of LBIA should be included as a key objective within the key long term ambition of going up a league and developing Leeds' role as the regional capital and support for improved surface access links to LBIA under the same sub-heading.</p> <p>The growth forecasts contained in the ATWP and the masterplan should be referenced and in accordance with these documents, the growth of the airport should be supported in principle.</p> <p>Reference should also be made in the supporting text/context to the economic benefits of LBIA, citing the GVA generated by LBIA, its importance as an employer in its own right and its potential to generate more jobs and generate further economic benefit to the City and Region in the future. Reference should also be made in the supporting text to the 'leakage' of passengers from LBIA to other airports further afield.</p> <p>increasing the patronage of the North's airports will reduce the numbers of people driving from the North further away to other airports, which would lead to direct reductions in congestion and emissions. Government's policy in the ATWP was informed by a careful consideration of climate change and now forms part of the Government's policy on that issue.</p> <p>•It is not Government policy to require every sector to follow the same path in reducing overall greenhouse gas emissions. Growing industries such as aviation are to be catered for within a reducing total.</p> <p>it would be informative to explain that a formal Sustainability Appraisal (SA) was undertaken in the preparation of the LBIA masterplan, that there is both an Airport Transport Forum and a Steering Group reviewing the impact of LBIA on the local highway network and there is funding in place from LBIA to make improvements to public transport and/or road infrastructure in the future. There is also a detailed noise monitoring system to protect the amenity of local residents.</p>	<p>The comments here are primarily connected with the emphasis in CS relating to supporting growth at the airport. Consideration will be given to the points raised.</p> <p>There is a question mark about the relevance of the 2003 ATWP and the 2005 LBIA Masterplan in today's economic climate and the validity of the growth assumptions. However, airport growth will be ultimately driven by market demand, and on this basis policies need to be in place to mitigate the impact.</p> <p>Need to consider whether thresholds would be appropriate to trigger new transport interventions.</p>	Further internal discussion required.
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	<p>Policy T4 indicates that supplementary guidance will be produced “to manage any local impacts and implementation issues”. This explanation for supplementary planning guidance is vague and unclear. Neither the draft Policy T4 nor the supporting text clarifies the reason for its preparation, its objectives or how it will support Policy T4 in decision making.</p> <p>The Airport Operational Land Boundary (AOLB) is defined in the current Leeds UDP, common with many local authorities approach to airport development. This is currently addressed under UDP Policy T30A. The UDP also includes Policy T30B: Airport Public Safety Zone and Policy T30C: Aerodrome Safeguarding Area.</p> <p>These policies should be included in the Core Strategy and annotated as appropriate on the new Proposals Map.</p> <p>The following replacement draft Policy T4 is proposed:</p> <ul style="list-style-type: none"> - LBIA is recognised as an asset of City and Regional significance. It is a key driver of the City and Region’s economic growth, prosperity and competitiveness and is a key element of the City and Region’s transport system. - LCC support the continued improvement and growth of LBIA in accordance with the ATWP subject to: Seeking to ensure that any new operational development minimises its impact upon the local environment including the local highway network In addition: LCC will work with LBIA and other partners to maximise accessibility to the airport by public transport and other sustainable means in preference to single occupancy car journeys. <p>LCC will work with LBIA and its partners to secure long term improvements to surface access to the airport including the development of an airport link road and tram train/rail link.</p> <p>LCC will work with LBIA and other partners, including the local community, to seek to minimise the environmental impact of operations at, and connected with, the airport.</p>	<p>It is anticipated that these will continue as ‘Saved policies’.</p>	
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Developer Contributions				
D Parker & Sons (via Lister Haigh Ltd)	43748	Developer contributions would be sought to provide on and off-site improvements to transport.	Policy on developer contributions is no different from current situation and will continue to be sought. Need to ensure that this is reflected in text.	Revised text as appropriate
Barratt Strategic (via Turley Associates)	44538	The policy should be clear that developer contributions can and will only be sought where they are required and directly related to the development giving rise to the requirement.		
Highways Agency	43771	If new capacity or some other improvement to the Strategic Road Network is required to mitigate the impact of traffic generated by development after all demand management and travel planning opportunities have been exhausted, it will need to be funded by the developer or through some other mechanism.		
Scholes Community Forum	44793	Connectivity and Accessibility made possible through developer contributions as outlined in policy T2 is key to underscoring both the housing and economic vision; for this reason the word “may” in bullet point two is thought to be less than robust.		

Metro	43668	<p>Metro also support the use of the Public Transport Improvements and Developer Contributions SPD. We are concerned that the introduction of the CIL regulations effective 6/4/2010 will mean the SPD can no longer be applied. It is our understanding that Leeds will not be in a position to implement CIL by 6/4/2010 and therefore could potentially be unable to have a policy mechanism to secure developer contributions for more strategic schemes identified as investment priorities in Policy T1 and local interventions identified in T2. Given the limited life of the Public Transport Improvements and Developer Contributions SPD, policy T2 needs to be strengthened to include a requirement to contribute towards strategic public transport schemes currently covered under the SPD. It is not clear from the current text for this policy if contribution could be sought for the more strategic schemes. This requirement should be included in the policy and be made explicit. It is our understanding that the enactment of the CIL regulation in April 2010 will include a restriction of the use of S106 Agreements to secure developer contributions. We are unclear what framework will be available to secure developer contributions for public transport improvements, particularly for bus service enhancements (which would historically be secured through S106 Agreements). The policy indicates that public transport improvements will be secured through S278 Agreements. We are not confident that the S278 process allows this.</p>	LCC are still considering the implications of CIL and will continue to seek contributions from the most appropriate mechanism.	None.
Sustainable development / accessibility requirements for new developments				
Barwick in Elmet & Scholes Parish Council	44447	<p>Support is given to: All developments must be in sustainable locations. Major developments must be subject to sustainability appraisal. Certified agreement with the Integrated Transport Authority, Bus or other service provider forming a part of the design and access statement Consistent with WCC 2</p>	Planning applications require assessment of transport impacts.	None

Horsforth Riverside LLP (via Drivers Jonas)	43761	T2 - Agree in principle with the location of new developments in proximity to existing networks. Notwithstanding this position, accessibility to and from new housing development should be addressed on a site by site basis to ensure sites with redevelopment potential are not overlooked in instances where they could reasonably deliver improved accessibility for both existing and future residents.	Windfall sites will be considered on their own merits & longer term development requirements through site allocations will need to be considered as part of the future planned Site Allocations Development Plan Document.	
Caddick (Tingley) Ltd (via White Young Green)	44631	We support Policy T2 of the Draft Core Strategy which states that new development should be located in accessible locations adequately served by existing or programmed highways by public transport. It is our view that the policy continues to advocate developing in sustainable locations in areas which have already been recognised in the UDP (Saved Policies) as transport hubs , specifically through Policy T17 of the UDP as locations for Park and Ride facilities.	Support is welcomed.	None
Carter Jonas	44438 44761 44762 44763 44764 44765	It is appropriate to set out the accessibility requirements as stipulated in Policy T2. Reference is made with regard to repetition of policy in T2 and Policy SC9 Disabled Access.	T2 relates to accessibility of getting to developments, SC9 refers to physical access into the building.	None
D Parker & Sons (via Lister Haigh Ltd)	43749	The site will help to encourage a greater proportion of journeys to be made by public transport. Cycling and walking, through improving existing and providing new links. The site could be adequately served by public transport and links to previous under utilised transport corridors. Traffic could avoid the built up area of Wetherby's Town Centre and being strategically positioned in the "Golden Triangle" has Park & Ride qualities.	Appears to relate to a specific development site. These will be covered in the Site Allocations DPD	None
Natural England	44402	Policy T2 is supported and its emphasis on securing sustainable transport provision through developer contributions	Support welcomed.	None

Highways Agency	43780	The accessibility guidelines in Appendix 8 of the Core Strategy document are broadly, though not exactly, compliant with RSS accessibility guidelines. The guidelines given in the Core Strategy Appendix for housing and employment are quite close to RSS guidelines and are therefore not a cause for concern.	Comment noted. Difference appears to relate purely to employment sites in extensions to Leeds main urban area/major settlements.	Review details of Appendix 8 and RSS
Inner NW Area Committee Planning Sub Group	44419	Policy T2 Care needs to be taken to ensure developers do not rely on reference to S106/278 highway investment in order to increase road capacity for off site vehicles. It leads to more congestion on other unexpanded parts of the road network.	TAs are used to ensure that highway improvements are undertaken where necessary, including locations further from the developments.	None
Indigo Planning	43454	Policy SC5 - Town centre uses is in the main consistent with PPS6 however it is inconsistent [with regards to public transport] :- Although development must have good pedestrian and cycle access the relevant criterion goes on to state that the site must also be within a high frequency public transport corridor. This is unnecessary and unreasonable. It is therefore recommended that the wording of the policy be amended to properly reflect government guidance.	Policy SC5 is being revised – see Sustainable Communities report.	None.
Metro	43668	With regard to travel plans, a policy basis needs to be developed to allow travel plan monitoring and penalties to be developed through a future SDP.	Policy T2 will be revised to include reference to this.	Amend text.
Health Impact Assessments				
Leeds Primary Care Trust	43361 43362 43496 43497	Health Impact Assessments should be carried out on the transport development and accessibility plans.	Health Impact Assessments although not statutory are best practice. Need to treat each site on its merits and the scale of devt. The overall strategy supports sustainable travel and the use of active modes which should generate health benefits.	None

Freight				
Metro	43668	<p>POLICY T3: FREIGHT</p> <p>The policy makes no reference to the provision of overnight parking facilities for HGVs. The policy should also include guidance on the management of local freight movements by setting out requirements for servicing vehicles.</p>	<p>The HA have recently undertaken a study into the provision of services on Motorways and the Trunk Road Network. (Review of Strategic Road Network Service Areas - Jan 2010).</p> <p>This does not identify any gaps in provision within Leeds District on the motorway network or the A1.</p> <p>The UDP 2006 Review includes policies (T29/T29A) on the provision of lorry parking and these will need to be retained as saved policies as appropriate.</p> <p>Servicing requirements for commercial vehicles is too detailed an issue for the Core Strategy.</p>	Consider as part of saved policy review.
British Waterways Board	44418	<p>Para 5.5.22 and Policy T3 - BW notes the need to balance support for economic development through facilities for distribution with environmental concerns, and is pleased to see that the proposed policy recognises the important role waterways can play in this. However several points are made in relation to this:</p> <ul style="list-style-type: none"> •BW continues to encourage greater use of inland waterways in the movement of freight where it is practical and economically viable to do so and in locations where supporting facilities are operationally and environmentally appropriate. A blanket approach to safeguarding all existing and potential wharf sites will not in itself generate freight activity. BW seeks to identify and safeguard Strategically Important Wharf Sites where redevelopment involves land within BW ownership. In such cases British Waterways would seek to identify or, in some instances, secure an alternative site. This issue may also be pertinent to sites not in BW ownership. •As set out in TCPA Policy Advice Note: Inland Waterways: Unlocking the Potential and Securing the Future of Inland Waterways through the Planning System (2009), the inland waterways represent a truly multifunctional asset for Leeds. 	<p>Support welcomed.</p> <p>The preparation of the future planned Site Allocations DPD, provides an opportunity the future potential of key sites. BWB will be consulted over strategically important wharf sites.</p>	Ensure that BWB are consulted when site allocations are being progressed.

Miscellaneous				
Mr R. Hill	42652	I support fully the growth of the City Car Club and car sharing initiatives. Can some car share only parking be created in the city centre?	Car share only parking would be expensive to manage as enforcement would require permanent staff on site. The possibility of establishing dedicated car share parking spaces will be examined as part of the future parking strategy. The provision of HOV lanes and encouragement in participation of car clubs is supported by LCC.	Consider revising text.
Zeigler Farms Limited (via DPP)	43364	<p>A new policy should be inserted after Policy T4 that states: "The provision for new road side services will be met and planning permission will be granted for the development of roadside services and facilities provided: 1) There is a demonstrable need for such new facilities. 2) The development will not be detrimental to the visual amenity or nature conservation interest of the location, create traffic problems, or adversely affect the amenity of neighbours or the character of the existing environment. 3) The proposal will incorporate a high standard of landscaping 4) Signage, including the level and appearance of illumination, will not be in discord with the surrounding area 5) Appropriate safe access is designed in accordance with the requirements set out by the Highway Authority.</p> <p>There is a need for such as policy as Leeds currently has a high level of arterial routes passing through and around the city, but a limited amount of Road Side Services serving these routes.</p>	<p>The HA have recently undertaken a study into the provision of services on Motorways and the Trunk Road Network. (Review of Strategic Road Network Service Areas - Jan 2010).</p> <p>This does not identify any gaps in provision within Leeds District on the motorway network or the A1.</p> <p>Leeds is a predominantly urban area, and consequently existing facilities in town and district centres would be expected to serve such a role. Such a policy as proposed would not therefore be appropriate.</p>	None
Dacre Son and Hartley	44496 44514 44527 44548 44561 44573 44585 44597 44609	While broadly supportive of the thrust of the policies in this section we object to the wording contained within para 5.5.18 insofar as it needs further qualification on meeting actual needs. Policy H4 indicates a general appreciation that more family type homes need to be built, this appears to run counter to the case put forward in this section.	Para 5.5.18 will be re-evaluated in the context of Policy H4.	Revise supporting text as appropriate.

University of Leeds	43886	Reworking the loop is a high priority , especially with a view to reducing traffic in City Square.	Proposals for a city centre transport strategy are being developed and will be incorporated within the Core Strategy where appropriate.	Revise supporting text as appropriate.
LBIA (via White Young Green Planning)	44112	In light of the information contained in the Vision for Leeds and the evidence presented in section 2 above, it is considered that the development of a modern transport system , with good connections within and between cities and internationally should be included in the Core Strategy under the sub-heading going up a league and developing Leeds role as the regional capital.	Spatial vision and flow of document to be re-examined.	Revise supporting text as appropriate.
City East Limited (Rushbond Group) (via GVA Grimley Ltd)	43822	T2 - The quantum of development considered to constitute 'significant trip generating sites' should be made explicit to enable consultees to comment on the acceptability of proposed thresholds.	National guidance covers this as stated in T2.	Cross reference to National Guidance.
Mr G Kite	43191	there is a total lack of consideration for the major reasons for the destruction of the environment so this is a pointless exercise. 1 Parking access delivery transport in planning and development 2 no coordinated and controls in road works highways maintenance no effective enforcement of vans parking on pavements. The response of the Civil Servants police etc is a joke and a master class in passing the buck. In 30 years no mp politician or councillor has done anything to rectify these major problems	New parking standards will be developed as part of the LDF. Coordination of roadworks and parking enforcement is outside the scope of the Core Strategy.	None.
Highways Agency	43783	In the glossary, developer contributions are defined as being required because development 'causes an increase in demand for public facilities, such as roads, traffic solutions...' The Highways Agency would suggest that 'roads, traffic solutions' is replaced with 'the transport network' .	Agree.	Modify text as appropriate

Metro	43668	<p>We have identified within a number of policies the use of vague and inconsistent wording, particularly with reference to ‘good’, ‘high frequency’ and ‘adequate’ public transport services. Use of vague and inconsistent wording without clear definitions could leave the policies open to individual interpretation and challenge. We require a better understanding of what councils assumptions are with regard to public transport levels, which policy document they are set out in, and the process available to allow the assumptions to be reviewed to reflect both the location of the development (rural / urban) and other changes in the public transport network.</p> <p>See text in policies SC5 (High frequency PT corridor) H1 (adequate level of service) H3 (‘development must not exceed the capacity of transport’ – assume this relates to highway and PT?) T2 (adequately served)</p>	Comments noted – will consider consistency and relevant definitions as appropriate.	Revise text as necessary.
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Report of the Director of City Development

Development Plan Panel

Date: 11th May 2010

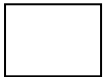
Subject: Leeds LDF Core Strategy – ‘Preferred Approach’ Analysis of Consultation Responses: Sustainable Communities Theme

Agenda Item:

Originator: Lora Hughes
Tel:39 50714

Electoral Wards Affected:

All



Ward Members consulted
(referred to in report)

Specific Implications For:

Equality and Diversity

Community Cohesion

Narrowing the Gap

Executive Summary

1. At Development Plan Panel on 2 February, members received a report concerning the Leeds LDF Core Strategy ‘Preferred Approach’, setting out an initial report of consultation and a headline summary of the initial comments received.
2. Within this context, the purpose of this report, is to provide further detailed consideration of the comments received in respect of the Sustainable Communities Chapter.
3. There was overall support for the Chapter, with comments generally requesting minor changes rather than any major overhaul. More detail is to be provided about the characters and proposals of the regeneration areas, the links between planning and health will be further highlighted, and the design criteria and sustainable construction standards are to be unchanged.
4. The key work stream underway as a result of the representations received, and also as a result of changed national policy, is the undertaking of a District wide City, Town, and Local Centres Study. This will provide quantitative data of the capacity of centres to accommodate town centre uses such as retail, offices, and leisure. It will also provide further clarity on the role and local context of the centres across Leeds, and the different roles they can play in future years including where there are deficiencies. It will be the key evidence base for the relevant policies in the draft Core Strategy Publication document.

1.0 Purpose of this report

- 1.1 At Development Plan Panel on 2 February, members received a report concerning the Leeds LDF Core Strategy 'Preferred Approach', setting out an initial report of consultation and a headline summary of the initial comments received. Within this context, the purpose of this report, is to provide further detailed consideration of the comments received in respect of the Sustainable Communities theme.

2.0 Background information

- 2.1 As noted in previous reports to Panel, the Core Strategy is the overarching and central document of the LDF process. Government Guidance (PPS12, 2008), emphasises the key role of the Core Strategy, in setting out an overall spatial vision for an area and how the places within it should develop, to provide a link to the Community Strategy (Vision for Leeds) and Local Area Agreements, and the provision of an Infrastructure Delivery Plan (IDP).
- 2.2 Following consideration of the 'Preferred Approach' document by Development Plan Panel on 30 September, a period of informal public consultation has been undertaken across the District (26 October – 7 December 2009). In support of this, a range of consultation activity has taken place. In response to this consultation activity a number of comments have been received in response to the Sustainable Communities theme. These are summarised in section 3 below and a more detailed summary scheduled is attached as Appendix 1 to this report.

3.0 Main issues

- 3.1 The fundamental priority of the Core Strategy is to ensure that Leeds has sustainable communities, which offer a high quality of life and strong sense of place for the people who live and work within them. The Core Strategy must direct the regeneration priorities and urban renaissance across Leeds. Also, the physical aspects of development must reflect community needs, including modern forms of retailing, services, and facilities, which are accessible to all via sustainable transport.
- 3.2 These aspects are all brought together in the Sustainable Communities Chapter. It covers Regeneration Priority Areas, the hierarchy of centres, lists all the centres by name, and sets out the types of uses, which should be directed towards each level of centre. It then sets out what criteria are to be considered when creating new centres and edge of centre development proposals. The chapter also addresses health, education, cultural, and leisure facilities, access to playing pitches, sustainable design and construction, and design policies including disabled access.

Specific representations and Leeds City Council responses

- 3.3 Regeneration Priority Areas
- Policy SC1 identifies a number of Regeneration Priority Areas, which will be given priority for regeneration funding, alongside any other areas identified by the Council through the Plan period.
 - *Responses* - Overall strong support, but needs further justification through evidence, and identification of future areas should be undertaken now rather than leaving uncertainty. There should be more detail on the implications and action, which will be taken within regeneration areas, including the Leeds-Bradford Corridor, and how the Urban Eco Settlement relates to Aire Valley Leeds (AVL).

- *LCC Actions* - Detail on the different regeneration areas will be expanded, which in part will emerge from the forthcoming Regeneration Plan. Flexibility is required as neighbourhood characteristics change. The AVL is to be highlighted more throughout CS, and further input will be gained from the Leeds Bradford Corridor Project Officer.

3.4 Hierarchy of Centres

- Policy SC2 sets the centres hierarchy from the City Centre down through town and local centres, to neighbourhood shopping parades and smaller settlements with an aspiration for local facilities. The accompanying table identifies all the centres in Leeds. Out of centre development is strongly resisted.
- *Responses* – Support for the hierarchy and location of centres, although need to recognise the differences in roles between centres which are on the same level of the hierarchy. Needs more evidence. Need more clarity on centres in rural settlements, and on how centres can move between hierarchy levels. Support restricting out of centre development including existing retail parks. A number of comments in support or against specific centres.
- *LCC Actions* – Agree need more local context and better reflection of the different roles and characteristics of different centres, including in the rural settlements. A City, Town, and Local Centres Study has been commissioned in order to provide evidence to help direct these centres policies.

3.5 Uses in Centres, and Edge of Centre Proposals

- Policy SC3 directs particular types and sizes of uses such as shops, offices, and recreation into the different levels on the centres hierarchy. Policy SC5 sets criteria for developments proposed on the edge of centres, such as that it should not undermine the vitality and viability of existing centres, and no more central sites are available.
- *Responses* – General support but need to ensure that setting out proposed uses in Leeds' centres is locally specific and expands on higher level guidance. Support for creating critical mass in centres, but do need a level of flexibility. Concern over the uses, which can dominate shopping centres (often hot food takeaways and charity shops) and need a balance of uses appropriate to centres' roles to provide a good range of services and choice and opportunities for residents. Should require retention of post offices and banks.
- Need more recognition of facilities which will not be able to find a suitable town centre site, and existing facilities which will therefore not be relocating and may need to expand in situ, e.g. education, places of worship, hospitals, and culture/leisure in countryside locations.
- *LCC Actions* - SC3 will be reviewed to provide more clarity and to bring in line with updated national policy (PPS4). It will also aim to be more geographically specific, which will be informed by a Housing Background paper and Town Centre Study. The policy is intended to direct uses visited by the public to centres, not to prevent the continuation of existing uses, and this will be clarified.

3.6 New Centres

- Policy SC4 sets criteria which would allow the creation of new centres, such as not undermining the vitality or viability of existing centres, and demonstrating its need for instance as a result of regeneration, or the development of large sites nearby.
- *Responses* – The policy was welcomed overall, although comments noted that should identify where all the new centres will be needed including in the Aire Valley (AVL) where appropriate, and should be based on more evidence.

- *LCC Actions* – The potential location of new centres will be defined further through the Town Centres Study, although centres associated with strategic housing development (at the Site Allocations stage) will be developed using the criteria in SC4.

3.7 Health, Learning, Cultural, and Leisure Facilities

- Policy SC6 aspires to promote and improve the provision of high quality health, education, cultural, and leisure facilities, to be accessible to all, and to work in partnership with relevant stakeholders.
- *Responses* - Support for promoting these facilities, but consider the policy needs to be more delivery specific, and potentially separated into its different themes. There needs to be more discussion of how health and planning are linked.
- *LCC Actions* - The Spatial Vision section is to be reviewed, and the need for this policy in the current form will be considered again at that time. It is likely to become more delivery specific, although there is a place for advocatory policies. Throughout the Core Strategy the constant links between planning and health will be further highlighted.

3.8 Sustainable Design and Construction

- Policy SC7 sets the sustainable construction standards required for major developments (e.g. Code for Sustainable Homes levels), which are stricter than the national standards.
- *Responses* - A range of comments ranging from those who want stricter sustainable design measures and standards, including that they should apply to all developments, and those who thought requirements were too onerous, too inflexible, will impact on viability, and therefore should only match national standards.
- *LCC Actions* - The changing national agenda underpins this approach, and higher standards are required in order to mitigate the negative effects of growth. High standards of sustainability and design will be encouraged everywhere, however, economies of scale mean that it is likely to make smaller developments unviable. Standards need to be carefully set in order to avoid being too onerous. Viability can be assessed at application stage and considered alongside other policies. SC7 will ensure the standards are achieved for some schemes, whereas without it no schemes would achieve them. Also, the Core Strategy is a long term document and over time the costs will come down.

3.9 Design, Conservation, and Landscape, and Disabled Access

- Policy SC8 provides a range of design guidelines and geographical elements specific to Leeds' identity, which should be considered for all developments. SC9 requires all development to be accessible for all users.
- *Responses* - Design policies were supported, but considered they needed more clarity and more detail on disabled access and shared space, lifetime homes, tall buildings, improvement and management of historic assets including those which do not have statutory protection, biodiversity, landscape character, and waterfronts.
- *LCC Actions* – The policies will be merged so that access for all is an integral design consideration. It is considered that alongside the range of other design guidance produced by the Council, that only minor additions are needed to this policy to reflect comments made.

Next Steps

- 3.10 Changed national policy, advice from the Planning Inspectorate and representation responses, have made it clear that further work is necessary on the 'centres' across Leeds MD. The purpose of this is to provide more evidence regarding the future need for retailing and town centre uses, and the capacity of existing centres to accommodate this. Therefore, the City, Town, and Local Centres Study is to be undertaken. It is anticipated that consultants will be appointed May / June, and the Study will be completed in early October.
- 3.11 Drawing from the recommendations in the Study, plus the consultation undertaken so far, it is proposed that there will only need to be a limited redrafting of the Sustainable Communities Chapter, including giving more detail about regeneration areas (together with updates to reflect City Council's emerging Regeneration Strategy), the different centres, and making the chapter more specific to the Leeds context, as well as reflecting updated national policy. The technical policy on construction standards will move to the Environmental Resources chapter and the disabled access policy will merge with the general design policy.

4.0 Implications for Council policy and governance

- 4.1 None, other than to reiterate that the LDF Core Strategy needs to be in general conformity with the adopted Regional Spatial Strategy (2008)

5.0 Legal and resource implications

- 5.1 A number of the consultation responses make reference to the City Council's evidence base in support of the Core Strategy. Following the detailed consideration of comments received, it may be necessary to undertake further technical studies and research, to underpin particular policy approaches where necessary. Subject to the scope of such work, it is likely that there may be resource implications in terms of staffing and the commissioning of technical work, as required. Such work and resource commitments will need to be addressed within the context of existing provision and the City Council's overall budget position and priorities.

6.0 Conclusions

- 6.1 This report has provided further analysis of the comments received in respect of the Sustainable Communities Chapter, as part of the Core Strategy Preferred Approach consultation. In response to comments received the schedule attached as Appendix 1 details the changes and next steps in preparing the draft Core Strategy Publication document for Panel consideration in due course.

7.0 Recommendation

- 7.1 Development Plan Panel is recommended to:

- i) To note and comment on the contents of the report and the course of further action (as detailed in Appendix 1) in preparing a draft Publication Core Strategy.

APPENDIX 1

**LCC RESPONSES TO REPRESENTATIONS ON THE SUSTAINABLE COMMUNITIES
THEME**

CORE STRATEGY PREFERRED APPROACH

LCC RESPONSES TO REPRESENTATIONS ON THE SUSTAINABLE COMMUNITIES THEME

Representor	Those Represented	Representor Comment	LCC Initial Response	Action
Policy SC1 – Regeneration Priority Areas				
Government Office 95	Government Office	Regeneration should flow from the key objective of 'narrowing the gap'. Even long-term commitments need to be justified through evidence. Should be a stronger policy hook to the AAPs. Boundaries to be indicated on the key diagram. Where no AAPs are planned, need sufficient policy detail to proceed straight to masterplans to guide future planning applications. Also important to have clear delivery and infrastructure plans for regeneration areas. Remove reference to abandoned AAPs.	Will change policy to reflect withdrawal of three AAPs and scope for future guidance in regeneration areas. Delivery will be included through Infrastructure Delivery Plan. Regeneration work in former AAP areas will continue. For evidence base, now have 'Neighbourhood Index' which brings together all the elements of deprivation, and emerging Regeneration Plan.	Update text Work required – DF to discuss Regen Plan with E&N
Dacre Son & Hartley 480	Taylor Wimpey / Persimmon / Redrow	Area based regeneration should not automatically be regarded as a suitable location for additional net housing, as it may instead be about improving the environment, image and local economy in order to stimulate and sustain private sector investment in the future.	Regeneration in Leeds is holistic and includes wider aspects than new housing alone, each regeneration area has its own needs and solutions, which are a mix of uses specific to defined sites and localities.	None
Highways Agency 5604	Highways Agency	No substantial reference to the Leeds-Bradford corridor, which is described as a regeneration area "not necessarily for housing". We need more information on the proposals for this area in order to assess the likely scale and nature of impact on the strategic road network.	Agree, need to expand text.	Gain input from Leeds Bradford Corridor Project Officer, continue discussions with HA
Dacre Son & Hartley 480	Taylor Wimpey/ Persimmon/ Redrow	Is the 'Urban Eco Settlement proposal' in addition to the Aire Valley Leeds?	The UES is a new and emerging concept, agree more clarity is needed.	Reference in text

Turley Associates 5670	Swayfields (Skelton)	AVL should be identified as a strategic site (as its delivery is central to the achievement of the Vision) and addressed in a specific section; it deserves greater priority and a coherent description of the approach and amount of development in this area, to provide greater certainty. It would also set the context for the AAP and for public funding bids e.g. the ADZ and UES.	Agree AVL needs further expansion and higher profile. Infrastructure Delivery Plan will address infrastructure needs.	AVL to be highlighted more throughout CS and consider having its own chapter
Arup 397	Arup	No strategic direction yet included as to how the multiple expectations for the AVL can co-exist and which, if any are priorities. In addition, the CS does not include any evidence base or policy direction about how necessary physical infrastructure will be provided to support its growth.		
David Lock Associates 787	Millshaw Property / White Rose Shopping Centre	Support 'South Leeds' within SC1 but need more clarity on each Regeneration Priority Area in terms of geographical extent, rationale, strategic objectives and likely delivery mechanisms.	Detail on regeneration areas to be expanded, which in part will emerge from Regeneration Plan.	Expand text
Turley Associates 1743	Barratt Strategic	No explanation in evidence base for these priority regeneration areas, and what different measures will be taken within them. Implies that other areas could be identified by the Council at any time, which undermines the concept of the currently identified areas taking priority and risks undermining any measures being taken in them. Concerned that refers to additional work required to define regeneration areas as they are key to the delivery of the CS vision and objectives. Their contribution to the delivery of housing and employment must be determined and justified now so that a proper assessment of what other land might be required for housing and employment can be made and whether this will entail review of the Green Belt. Also query what alternatives have been considered and arrangements in the event they fail to deliver the anticipated level of development?	The Core Strategy Issues and Alternative Options stage consulted on criteria used to identify regeneration areas. Agree explanation could be expanded. The timescale of the CS means that flexibility is required, especially as neighbourhoods change and regeneration work needs to adapt to this. Hence feel the policy approach is justified. Not considered that would undermine current regeneration areas as there is always a range of areas and regeneration measures underway across the District. Agree, and will be considered as part of a Housing Background Paper.	Reference in text None
Leeds HMO Lobby 26	Leeds HMO Lobby	Should add 'demographic imbalance' (i.e. where the local demographic profile departs significantly from the city norm) as a reason for regeneration, and especially where this includes high population turnover. A polarised, transient population is not a secure foundation for a sustainable community.	Agree that should add to paragraph 5.2.4 that transient populations can be one characteristic of an area in need of regeneration.	Reference in text
Barton Willmore Planning 45	Barton Willmore Planning	Not clear how themes on Map 2 have been defined and how they have informed the overall spatial approach. AAPs to be removed from Map 2.	The maps were intended to represent the spatial approach of each theme as well as inform it. They will be merged into a Key Diagram at the next stage.	None

Scott Wilson 414	Parlington Estate / Revera / Individual	Housing should be referenced as it forms a key part to the creation of a sustainable community. Suggest: "The promotion of the City Centre and the distinctive Leeds main urban area (as the key component) and settlement hierarchy (including the identification of town and local centres within them) as a focus for housing, shopping, economic development and local facilities, urban renewal and renaissance, mixed and cohesive communities, which maximise opportunities for walking and cycling."	The policy is location specific and so the suggested text is more appropriate to that already in the housing chapter.	None
Teaching Hospitals Trust 2819	Teaching Hospitals Trust	Support objective to link St James' Hospital with the City Centre at Mabgate.	Support welcomed.	None
British Waterways 338	British Waterways	Fully support the creation of a new Urban Eco Settlement focussed on the river and canal corridor.	Support welcomed.	None
Policy SC2 – Hierarchy of Centres				
Carter Jonas 5681	The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate	Agree no difference between historic centres and district centres in functional terms. Broadly support the hierarchy of centres set out in the diagram. Important that the historic roles of towns such as Wetherby, Otley, Morley and Pudsey are recognised in terms of their character and amenity.	Support welcomed. Will be reflected in evidence work for the settlement hierarchy.	None
Metro 1933	Metro	Support sequential prioritisation of development. Dispersed development could reduce the need or distance to travel on a local level, but proposed concentrations in city and town centres would encourage more use of public transport.	Support welcomed.	None
Planning Potential 5680 Natural England 58	Aldi / Natural England	Welcome the hierarchy.	Support welcomed.	None

Evidence Base and Clarity:				
Government Office 95	Government Office	SC2 adds little to PPS6 and RSS.	SC2 provides a definition of the network and hierarchy of centres as required by PPS4 Policy EC3, plus provides the context for the location specific diagram of centres. SC2 also expands on PPS4 by stating that Leeds has no 'district centre' level, and also defines 'smaller settlements with an aspiration for a cluster of local facilities.' Accept that it could be more locally specific by including a list of centres as an explicit part of the policy.	Include list of centres within the policy
Barton Willmore 57	White Laith / Templegate Developments	More clarity over which centres are existing and which are the ones that could be developed in the future. Should recognise that these local centres could be delivered as part of comprehensive proposals.	SC4 recognises the potential for creation of new town or local centres. Including the list of centres within the policy will give more clarity.	Include list of centres within the policy
David Lock Associates 787	Millshaw Property / White Rose Shopping Centre	Not based on quantitative or qualitative assessment of future growth needs, require retail and leisure study to ascertain whether the proposed hierarchy of centres and the planning strategy for town centre uses is justified.	Undertaking Town Centre Study to address these issues.	TC Study
Leeds Chamber of Commerce 1736	Leeds Chamber of Commerce	Should include scope for further expansion of centres to support growth, including when defining boundaries and primary shopping areas.	Undertaking Town Centre Study to address these issues. Boundaries will be identified in Site Allocations DPD.	TC Study
Savills 467	MEPC	No evidence base to explain how the list of smaller settlements with 'aspirations' for a cluster of local shopping facilities or neighbourhood shopping has been defined. This may unreasonably restrict local opportunities from settlements not identified coming forward. Either has to be justified with evidence or a more general policy approach should apply which supports an appropriate level of facilities in smaller communities but does not identify those settlements explicitly.	Agree that further explanation is required, and ensure that policy basis would not allow unsustainable dispersal of development and redirect away from existing centres.	To be confirmed through Growth Options Paper and TC Study
Barton Willmore Planning 45	Barton Willmore Planning	The Centre Hierarchy diagram doesn't align with other parts of the CS e.g. no need to single out Micklefield as a local centre 'only where linked to the growth and settlement strategy', as the CS does identify Micklefield as a Potential Housing Growth Area.	Noted. Will be reflected in evidence base for the settlement hierarchy.	None
Roundhay Planning Forum 5057	Roundhay Planning Forum	Support the maintenance of a retail hierarchy. Centres should be listed as part of the policy. Would also like to see a list of Neighbourhood Parades.	Support welcomed. Agree could be clearer reference in the policy. Neighbourhood parades are too detailed for the CS but could be shown on future Proposals Map.	Update text

Scott Wilson 414	Parlington Estate / Revera / Individual	<p>Overall agreement, and support consistency between the Settlement Hierarchy and the Hierarchy of Centres.</p> <p>However, this should not prevent retail, leisure, and business development opportunities in more rural settlements that is vital to their sustainability, such as rural diversification, as advocated by PPS7. Suggest an additional hierarchy tier which enables development in lower order settlements, to accommodate growth should there be an identified local need identified by the applicant. For example, Aberford contains many existing businesses which contribute to vitality, viability and thus its future sustainability.</p>	<p>Support welcomed.</p> <p>Text needs to be updated with reference to PPS4 (former PPS7). Also links to LCC responses to representations in relation to CS Policy SC6.</p>	<p>None</p> <p>Reference in text</p>
Carter Jonas 5681	The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate	<p>The approach is unduly negative, as 'maintaining' a hierarchy of centres expresses a static position and will stymie innovation and change contrary to (emerging) PPS4 and PPS6.</p> <p>Should seek a more positive approach which encourages enhancement of the centres to meet the needs of their catchment and reflects their function.</p>	<p>The hierarchy itself does need to be 'maintained'; this does not preclude individual centres moving levels if this complies with other policies. The Town Centre Study will identify the potential to move through the hierarchy.</p> <p>Agree that text needs to expand discussion of enhancement and catchment needs, in particular ref to PPS4.</p>	<p>None</p> <p>Update text</p>

Turley Associates 5670, 1743	Swayfields (Skelton) / Sainsburys	<p>Approach taken to maintenance of the hierarchy of centres is unclear. The diagram on pg 31 is too complicated, not user friendly, and is different to the hierarchy set out in Policy SC2. It is difficult to understand as to the order in which these centres are to be developed, for instance, what is the status of edge of centre sites in the context of the SC2 hierarchy? Should replace with a list against each of the headings in SC2.</p> <p>Inconsistent use of terms such as principal town centres (in Policy SC3), major settlements (diagrams on pages 7 and 31), town centres (paragraph 5.2.14) and major town centres (paragraph 5.2.15). Use of the terms should be consistent and relate to the RSS designations of Principal Towns, and Local Service Centres (RSS policies YH5 and YH6).</p>	<p>Will reconsider presentation of diagram.</p> <p>The RSS terminology for centres does not relate appropriately to the network and function of centres in Leeds (e.g. only Wetherby is identified as a Principal Town), although agree this should be clarified further in the text. Para 5.2.15 reads “any major town centre proposals” and therefore the ‘major’ implies the proposals rather than the town centre description. It is agreed that there needs to be greater clarity. ‘Principal’ should not be included in SC3.</p>	<p>Update diagram</p> <p>Reference in text / correct error</p>
Out of Centre Retail Parks:				
<p>Leeds Civic Trust 62 GVA Grimley 5661 CBRE 354 Richard Mills Counselling 2759 Metro 1933</p>	<p>Leeds Civic Trust / Rushbond / Hammerson / Richard Mills Counselling / Metro</p>	<p>Support that out of town retail parks should not be considered as town centres and further out of centre developments to be resisted. Such sites should not have policy or be a regeneration priority. Need additional policy that the expansion of retail floor space at existing out of centre retail parks will be resisted.</p> <p>LCC support for large hypermarkets and out of town shopping is bad for the sustainability of local community and therefore bad for the environment, so 'Vision for Leeds' is contradicted.</p> <p>Support that development of out of centre retail parks must be linked with development of public transport to encourage modal shift.</p>	<p>Support welcomed. Proposals to extend out of town centre locations would be judged against PPS4 and therefore an additional CS Policy is not required; the existing CS policies also control development in such locations.</p> <p>LCC does not support out of centre shopping. Promoting shopping choice through large supermarkets is in line with PPS4.</p> <p>Support welcomed, although it is not the intention to develop out of centre retail parks.</p>	<p>None</p> <p>None</p> <p>None</p>

<p>Indigo Planning 3010 Leeds Cycling Action Group 5644 Turley Associates 1743 David Lock Associates 787</p>	<p>Kirkstall Holdings / Leeds Cycling Action Group / Sainsburys / Millshaw Property Co.</p>	<p>Should contain a criteria based policy relating to out of town centre retail parks, recognising that they can provide employment benefits including creating sustainable communities and non-town centre uses, and will be acceptable subject to no adverse impact on any defined shopping centres.</p> <p>Neither national nor regional policy precludes out of centre development entirely, e.g. RSS E2 states expansions should be judged against PPS6 key tests. The supporting text on out of centre retail parks replicates national guidance, plus is too prescriptive as applications should be assessed on their own merits, compared against PPS4 emphasis that LPAs should plan positively and proactively to encourage economic development, in line with the principles of sustainable development.</p>	<p>Proposals to extend out of town centre locations would be judged against PPS4 and therefore an additional CS Policy is not required, although does need to be explicitly referenced for people are not aware of PPS4.</p>	<p>None</p>
<p>David Lock Associates 787</p>	<p>Millshaw Property / White Rose Shopping Centre</p>	<p>White Rose Shopping Centre and the adjoining office park and industrial estate are major attractors of people and major employers (approx 8000 jobs) and provide opportunity to take a pro-active approach in South Leeds to promote and secure further investment in deprived areas.</p> <p>Should identify WRSC, WR Office Park and Millshaw Park Industrial Estate areas as a 'Strategic Economic Sub-centre' and include a specific policy to cover the role and function of the centre in the context of the wider South Leeds regeneration area. Should include necessary physical interventions, transport and environmental improvements and regeneration requirements, along with acceptable land uses and development principles. Should specify the circumstances by which future expansion of retail and other town centre uses could occur, for instance the potential for significant enhancements to public transport.</p>	<p>PPS4 sets out the circumstances by which future expansion could occur. The role of individual out of town centre shopping locations will be considered further through the Town Centre Study, although LCC does not support expansion of out of centre shopping.</p> <p>This is not a recognised term in the settlement or town centre hierarchy.</p> <p>Regeneration priorities within the wider South Leeds area are being considered.</p>	<p>None</p>
<p>Indigo Planning 3010</p>	<p>Regent Retail Parks</p>	<p>Own Junction 1 Retail Park. Seek inclusion of J1RP in list of major out of town centre shopping centres, as no explanation is provided for its exclusion.</p>	<p>Agree that J1RP should be in the list of major out of town shopping centres (although its inclusion does not promote it for growth), and the Town Centre Study will create a comprehensive list of such centres.</p>	<p>Update text</p>
<p>Comments Regarding Specific Centres:</p>				

<p>Mosaic Town Planning 5672 Barton Willmore Planning 45 57 Carter Jonas 5681 Walker Morris 122 Peacock and Smith 5674 GVA Grimley 2996</p>	<p>Miller Homes / White Laithe Developments / The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate / Various clients / Morrisons / 45 Barton Willmore Planning</p>	<ul style="list-style-type: none"> - Support for Bramhope as a 'smaller settlement'. - Support Boston Spa as a town centre serving the needs of the village and adjoining Thorp Arch village. - Support Bramhope to be a local centre. - Support Harehills Lane elevation to town centre status - Support Whinmoor as local centre although location should be indicative to allow for ELE association. - Allerton Bywater should be a local centre within a Major Settlement. - Carlton should be identified as a local centre (smaller settlement) as part of the Leeds Centre Hierarchy. - Query inclusion of Bramhope. 	<p>Support welcomed.</p> <p>Location of Whinmoor reflects current grouping of facilities. Are reviewing policy position and list of centres in relation to retailing and services in smaller settlements.</p>	<p>None</p> <p>To be informed by Housing Background Paper.</p>
<p>GVA Grimley 5661</p>	<p>Rushbond</p>	<p>Richmond Hill (All Saints) should be clearly referenced as 'Newly Allocated Centres' in the key.</p>	<p>Submission CS will identify as a town centre rather than an aspiration. Town Centre Study will also look at potential for any other new centres.</p>	<p>Include list of centres within the policy</p>
<p>Teaching Hospitals Trust 5690</p>	<p>Teaching Hospitals Trust</p>	<p>The development of Lincoln Green as a local centre should look at the opportunities of locating on Beckett Street to open up its use as an amenity for staff and visitors attending St James' Hospital.</p>	<p>The Hospital should encourage patronage of the existing centre in order to assist its viability. Relocating the whole centre is not realistic, would not benefit the local community as much as its present location, and could impact on centres in Harehills. Opening of the NGT could also increase the patronage and subsequent viability of Lincoln Green, including potential links with the Hospital.</p>	<p>None</p>
<p>Micklefield Parish Council 122</p>	<p>Micklefield Parish Council</p>	<p>Concerns that Micklefield is being considered for major housing growth on the basis that it has a railway station, but it does not have a central retail core or group of community facilities which it could be extended around sustainably. Highlight the findings of the UDP Review Inspector who considered that Micklefield did not justify Phase 1 housing sites.</p>	<p>Need to address specifically in text in relation to sustainable extensions and infrastructure requirements, linked to work on the Housing Background paper.</p>	<p>Reference in text</p>

Peacock and Smith 5674	Morrisons	Object to the proposed town centre at All Saints as very little evidence has been provided to support its elevation. Furthermore, its close proximity to Richmond Hill Local Centre at Upper Accommodation Road has the potential to adversely impact upon the long term vitality of both centres.	EASEL and AVL Town and Local Centre Study provides capacity information, and regeneration benefits and supportive local consultation responses are also part of the evidence base. The CS will also consider recommendations from the District wide Town Centre Study in relation to any other new centres.	None
Workshop responses	Individuals	Concern that Gipton doesn't have many local shops.	Agree with concern, and CS promotion of current neighbourhood parades in Gipton to local centres aims to help address this. Regeneration aims will be included as an element of the Town Centre Study.	None
Miscellaneous:				
Leeds Chamber of Commerce 1736	Leeds Chamber of Commerce	Should reintroduce the District Centre designation, in accordance with the RSS hierarchy and PPS6 Annex A.	Have considered and rejected this option because there is no longer a distinction between them in relation to the Leeds context and network of centres.	None
Turley Associates 5670	Swayfields (Skelton)	Diagram on page 31 implies a tiered hierarchy which places town centres within the main urban area above the town centres of major settlements.	Noted, and will address in Submission version.	Update diagram
Turley Associates 5670	Swayfields (Skelton)	No reference to new centres in the AVL/UES in the Centres Hierarchy diagram. Strategy to address Aire Valley Leeds.	New centres are covered under SC4 and Para 5.2.20 although could be expanded, and will also be addressed through Town Centre Study.	Expand text
Roundhay Planning Forum 5057	Roundhay Planning Forum	Roundhay Neighbourhood Design Statement makes a number of recommendations for enhancement and action in relation to centres and Neighbourhood Parades.	If set out in a NDS it is too detailed for the CS.	None
Policy SC3 – Uses in Centres				
Government Office 95 Turley Associates 1743	Government Office / Sainsburys	Not locally specific and therefore does not add to national or regional guidance.	SC3 does provide more locational detail than PPS6/4 including a wider range of uses relevant to the Leeds context and LCC's commitment to clustering services. However, SC3 will be reviewed to provide more clarity and to bring in line with PPS4 rather than PPS6.	Update and clarify SC3
University of Leeds 846	University of Leeds	In relation to local centres and neighbourhood shopping parades, policy needs to be stronger than simply 'directing development to centres.'	The policy takes guidance from PPS6/4 which does require a measure of flexibility.	None

GVA Grimley 5661	Rushbond	Acceptable uses in centres should correspond to those uses described as acceptable within PPS6.	Uses do correspond, but go further to reflect the Leeds context and LCC ambition to promote sustainable centres. If there was no expansion on PPS6/4 then a CS policy would not be required. However, SC3 will be reviewed to provide more clarity and to bring in line with PPS4 rather than PPS6.	Update and clarify SC3
Walsingham Planning 5508	Whitbread Group	Agree in general, but policies should not be so prescriptive and where appropriate allow for limited expansion of existing premises outside those identified centres.	Other than where permitted under PPS4, this would not assist in sustaining vitality and viability of centres.	None
Carter Jonas 5681	The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate	Agree with approach, but the wording is too prescriptive, repetitive, and lacking flexibility. Should seek to encourage a range and scale of uses (public services, civic /administration, cultural, community, social, retail, entertainment and leisure) proportionate to the role and function of the centre, e.g. the market towns that serve catchments beyond the District.	Through setting out the range and scale of uses, the policy does seek to encourage a range appropriate to the role and function of centres. Agree that could potentially be more geographically specific, and this will be informed by the Growth Options Paper and Town Centre Study. SC3 will also be reviewed to provide more clarity and to bring in line with PPS4 rather than PPS6.	Update and clarify SC3
Clarity:				
GVA Grimley 5661	Rushbond	Reference to 'Principal Centres' is inconsistent with the hierarchy proposed in SC2.	Agree 'Principal' should not be included in SC3.	Correct error
GVA Grimley 5661	Rushbond	For town centres should use the term 'superstores' to be consistent with PPS6.	'Supermarkets' (less than 2,500 sqm) and 'superstores' (more than 2,500 sqm) are both appropriate in city and town centres subject to PPS4 tests.	Update policy text
GVA Grimley 5661	Rushbond	The policy/supporting text should emphasise that scale is implicitly linked to impact.	This will be addressed in the wider revisions needed to this Chapter to align with PPS4 rather than PPS6.	Reference in text
Planning Potential 5680	Aldi	The definition of acceptable uses within local centres should include small supermarkets as identified in Table 1 of PPS6. They provide a localised facility which can help reduce the need to travel, widen choice increase competition and assist in overcoming social exclusion.	'Supermarkets' is covered within the term 'retail' but agree can be specifically cited.	Reference in text

Teaching Hospitals Trust 5690	Teaching Hospitals Trust	No plans to relocate or build new facilities away from existing sites, so references about locating hospitals within town centres is misleading. SC3 should not be used to prevent the expansion of facilities at existing out-of-centre sites (i.e. all hospitals except the LGI) by applying any notion of disaggregation of services. The text should also be amended to healthcare facilities (which may be provided by the PCT rather than the Trust).	The policy is intended to direct uses visited by the public to centres, not to prevent the continuation of existing uses. This will be clarified through the review of SC3.	None
CBRE 354	Hammerson	Given the scale of the Eastgate and Harewood Quarter scheme and its importance to the future vitality and viability of the City Centre, it is of strategic importance and so the CS should make explicit reference to supporting its delivery, as it should not be undermined by ambiguous policies.	Agree, and will also be addressed further through the Town Centre Study.	Reference in text
Turley Associates 1743	Sainsburys	SC3 is too prescriptive, e.g. supermarket development over 2,500 sqm should only be within the Prime Shopping Quarter in City Centre. This contradicts the Council's objective of creating a walkable city. It is essential to provide easily accessible shopping to meet people's day-to-day needs which should be applied across the District.	SC3 states that for supermarket proposals within the City Centre, 2,500 sqm or above supermarkets should be within the PSQ. In town centre locations the whole centre is appropriate for locating a supermarket (although dependent on PPS4 compliance).	None
Savills 467	MEPC	Supports hierarchy as reflects Leeds' role as a regional centre. However, assumptions made in respect to the Settlement Hierarchy should be supported by evidence to this effect as it is this part of the document that influences many of the policies that follow on from it.	Settlement work addressed in other chapters and Growth Options Paper but will be underpinned by increased evidence, and as directed by PPS4.	None
Educational Facilities:				
Leeds City College 5653	Leeds City College	Should reference the acceptability of provision of Further Education uses in the City Centre, alongside universities and higher education providers. This is compatible with the future proposals of Leeds City College.	Agree.	Reference in text
J & J Design 5666	Brownberrie Education / Horsforth Gospel Hall	Strongly object that education facilities should be directed to town and local centres as they need adequate space for car parking, playing fields, and recreation. They also cannot compete with residential and town centre land values. New educational facilities should be allocated. Policy SC3 will fail to be effective in delivering the spatial requirements for education provision, contrary to the Vision for Leeds and the Leeds Strategic Plan.	It is unlikely to be possible to locate all new education facilities in town and local centres due to space constraints, and will make a stronger reference to this in the supporting text. However, centres do provide a sustainable location for educational uses and would therefore be acceptable locations in principle. Specific requirements where they are known, will be identified through the Site Allocations DPD.	Reference in text

J & J Design 5666	Brownberrie Education / Horsforth Gospel Hall	The CS should ensure adequate school provision and availability of land to cope with increases as a result of demographic changes and changes to national education policy which is likely to favour greater diversity and an increasing range of specialist schools.	Ongoing work with Education Leeds and will be addressed through Infrastructure Delivery Plan and Site Allocations DPD. Could expand text to reference this.	Reference in text
Leeds City College 5653	Leeds City College	<p>Emphasis should be on all types of education provision as this is in line with the Spatial Vision and the requirement to focus on skills and training as part of the Leeds City Region initiative. Should reference the acceptability of provision of Further Education uses in the City Centre, alongside universities and higher education providers. This is relevant also in the context of the changes in the FE sector in Leeds and the merger activity, which will require consideration of the physical estate.</p> <p>Should also referred to Leeds City College's merger and future investment plans in Para 5.2.29 to provide an inclusive approach to education provision and to recognise the important role that FE can play in the city, particularly in the current economic circumstances. Leeds City College has around 60,000 students both on campus and within the workplace, and employs 2000 staff across its diverse estate making it one of the largest FE colleges in the country. The college makes a significant contribution to the local economy, the skills and training agenda, lifelong learning and to sporting and cultural activities. The new estate strategy will aim to deliver significant investment in a new City Centre and city rim facilities alongside further estate development across the city to continue to deliver high quality FE provision.</p>	<p>Agree higher and further education, are appropriate in the City Centre and town centres.</p> <p>Agree that should make reference to this important element of education investment in Leeds. Details will be addressed through the Infrastructure Delivery Plan.</p>	<p>Reference in text</p> <p>Reference in text</p>
Miscellaneous:				
University of Leeds 846	University of Leeds	Learning, health, cultural and leisure facilities should wherever possible be co-ordinated and used as critical mass hubs to enable commercial activities to stand a better chance of survival. Wherever a civic or other public service building is due for replacement, opportunities should be taken to improve synergies between services and enhance mutual viability, support this CS aspiration.	Support welcomed, and agree that this is the approach the CS aspires to.	None

NHS 5693	NHS	Food access mapping in Leeds has identified issues with access to healthy food and prevalence of HFTAs in some areas, ongoing work by Leeds NHS to tackle obesity and directing HFTAs away from schools and parks. Must ensure there is access to healthy food within lower hierarchy centres. Policy SC3 could require and deliver a suitable balance of retail uses within local centres and ameliorate any identified deficiencies in provision and controlling proliferation of HFTAs in these areas. See example of Waltham Forest HFTA SPD.	Support the principle both in terms of reducing obesity and creating more vibrant centres. However, it is difficult to include such detailed policy in the CS. Retail mix is to some extent already dealt with through the saved shopping frontage policies of the UDP.	Review of saved policies
Workshop responses	Individuals	Great concern over the uses which can dominate shopping centres (i.e. HFTAs and charity shops) which don't provide a good range of services and choice and opportunities for residents. Lack of cash machines is also a major issue. Banks are of major importance to local communities, and especially to elder people as it increases their independence to have local facilities. Should protect them.		
University of Leeds 846	University of Leeds	Where retail units are no longer viable and are in secondary positions, should have flexible view about future change of use, e.g. to residential where there is housing need in a street with persistent retail vacancies.	Individual cases would be judged on local circumstances rather than through the CS.	None
Stanks and Swarcliffe residents Association 5052	Stanks and Swarcliffe residents Association	Regeneration funding has to stop building large supermarkets which will turn local high streets into ghost towns.	Promoting shopping choice through large supermarkets is in line with PPS4, and does take account of local impacts.	None
Individual 14	Individual	There should be a good mix of shops, offices, and leisure in urban areas so people can walk to them.	Centres provide a focus for urban areas with pedestrian visits a key element.	None
Individual 5151	Individual	Culture should also be encouraged in local centres not just City Centres.	Relates to scale and the amount of visitors that would be attracted, which is why such uses are not specifically encouraged in local centres although are encompassed within the policy wording.	None
Leeds Cycling Action Group 5644	Leeds Cycling Action Group	Disagree, directing the focus of office space into the city centre will exacerbate the rush hour transport congestion problems and create ghost towns.	Majority of consultation responses and policy approach is to direct into the City Centre and town centres. It allows the most sustainable and efficient travel choices while providing a range of locations of provision to minimise congestion.	None
BNP Paribas 56662	Telereal Trillium	Agree with proposed office locations in centres. Large scale out-of-centre office uses should be allowed to redevelop for alternative uses.	This primarily depends on landowner interests, but would generally be supported subject to the Employment Land Review.	None

Leeds and Harrogate Congregation of Jehovah's Witnesses 5657 J & J Design 5666	Leeds and Harrogate Congregation of Jehovah's Witnesses / Brownberrie Education / Horsforth Gospel Hall	Strongly object that religious facilities should be directed to centres, as their location should allow for the distinctive characteristic pattern of social grouping and access travel of the particular community, and so should be within residential areas/or urban fringe locations. Larger places of worship need adequate space for car parking and quiet contemplation. Faith facilities are also unable to compete with residential and town centre land values. Should include a 'positive' policy that supports the provision of places of worship where identified environmental constraints are not impacted upon to their detriment. There should be Class D1 allocations and/or release of employment land. A generic policy supporting community facilities is insufficient. Policy SC3 will fail to deliver the spatial requirements of the third sector generally and faith communities in particular. Up to 6 additional Gospel Halls for the Brethren's Christian fellowship will be required.	Access and travel from a local community is normally easiest and most sustainable to its town and local centres, and places of worship should aim to minimise travel by car. However, depending on the type of religious facility and its scale, alternative locations may be acceptable, and SC3 does state they will be considered on their merits and supports their provision. Will make a stronger reference to this in the supporting text. It is not appropriate to include land value issues into policy as this would be dealt with in assessing the viability of individual sites. Allocating D1 uses is not appropriate for the CS, but there may be scope to consider through the Site Allocations DPD.	Reference in text
Scott Wilson 414	Parlington Estate / Revera	Need to be careful that do not put barriers against developing strategic scale leisure offers within open settings, e.g. UDP Policy LT5B:3 (Parlington Estate), as leisure proposals can be very varied and city centre and urban locations will not always meet their needs. Leisure uses should be explicitly referred to in this policy.	Agree that need to include reference within this chapter that some facilities have specific locational requirements, however, PPS4 does only relate to intensive leisure uses.	Reference in text
Natural England 58	Natural England	Agree that directing key work and leisure resources to centres will help direct journeys to central points, allowing them to be served by public transport links.	Support welcomed	None
Workshop responses	Individuals	Providing retail space should not just be about national multiples but for independent retailers.	LCC supports independent retailers, and further aspects of this to input into the CS will arise from the Town Centre Study.	None
Workshop responses	Individuals	People like to have the choice whether to shop locally or in the city centre.	This is why a hierarchy is promoted through the CS.	None
Workshop responses	Individuals	More leisure and entertainment in town centres, particularly for children.	A broad aim of the CS is to promote such facilities in town centres.	None
Workshop responses	Individuals	If centres are promoted for activity generating uses, need to also consider safety on the streets. New development should be designed and orientated to promote natural surveillance and minimise opportunities for crime.	Minimising crime is addressed by CS Policy SC8.	None
Workshop responses	Individuals	Question locating the arena in the City Centre when it could be located in a more deprived area and create local jobs.	The City Centre is a very sustainable location and is most appropriate for this type of city-wide attraction.	None

Bury and Walker Solicitors 2527	Leeds Residential Property Forum	Important to emphasise walking cycling and public transport but essential to have proper provision for car parking as car is main form of transport. Where parking restrictions are imposed there is a loss of business and shops closing, e.g. Headingley, including from a reduction in passing trade. Declining centres impacts negatively on surrounding neighbourhoods. It gives residents less choice which means perversely they are forced to travel further to shop elsewhere.	We recognise the importance of short term parking to centres' vitality and viability, and parking will be assessed as part of the Town Centre Study. The recent LCC Parking Study identifies local issues and recommendations, as a balance needs to be sought in respect of each centre and in making decisions on new development, although the CS can only give strategic guidance.	Assess any input from Parking Study
Policy SC4 – Creation of New Centres				
Government Office 95	Government Office	Lists criteria for new centres but does not identify where they are needed.	The PPS4 Town Centre Study will define this further, although the aim of SC4 is to establish criteria. Boundaries will only be identified following more detailed work at the Site Allocations stage. Centres associated with strategic housing development will be developed using the criteria in this policy. Are likely to change the title of SC4 to incorporate 'expanded' centres as well as new, to reflect the changes proposed to SC5 and thereby make sure that all types of centre proposals will be covered by policy.	Potential location of new centres to be defined further through TC Study
Turley Associates 5670	Swayfields (Skelton)	Last bullet point is unclear, replace 'existing' with 'proposed.'	Agree the word 'existing' could be removed.	Change text
GVA Grimley 5661	Rushbond	Clarify that SC4 refers to new centres which may be identified after adoption of the CS, and not those centres indicated as aspirations within the Centre Hierarchy Diagram.	Agree that the policy refers to new centres which may be identified after the CS is adopted, although those new centres proposed in the CS are also based on these criteria.	Reference in text

ID Planning 5668 and 5671	Ben Bailey / Barwick Developments/ Persimmon / Taylor Wimpey / Edmund Thornhill / Great North Developments / Bracken Developments / Robert Ogden Partnership / Ringways Motor Group	Support the broad approach.	Support welcomed.	None
Metro 1933	Metro	Support the principal and welcome the inclusion of requirement to ensure sustainable communities are developed through good access to local facilities by public transport.	Support welcomed.	None
Planning Potential 5680	Aldi	Welcome a policy giving guidance on the creation of new centres, although the need can be not just as an increase in population, but the need for local investment, to provide consumer choice, and to address deficiencies in existing provision.	Identifying deficiencies in existing provision and the need for local investment to be addressed through Town Centre Study.	None
GVA Grimley 5661	Rushbond	Should give more weight to impact and qualitative need than quantitative need for additional floorspace (draft PPS4). Should acknowledge that quantitative need may be identified as surplus capacity as a result of growth in retail expenditure and the distribution of foodstores (PPS6).	Judgements on need will be based on PPS4 guidance, and the Town Centre Study will address capacity.	None
Pegasus Planning 4388	Individual	This is an appropriate mechanism for delivery of sustainable communities. However, the likely need to deliver new centres as part of large scale housing allocations adds strength to the argument for the identification of more, longer term strategic sites in the CS.	Addressed in housing chapter and through Infrastructure Delivery Plan.	None
Individual 4730	Individual	Need provision for corner shop and local facilities when new housing estates are built.	Where such elements are integral to sustainable new development, they will be specified through the Site Allocations DPD.	None

Policy SC5 – Edge of Centre Developments				
Government Office 95 Turley Associates 1743	Government Office / Sainsburys	Not locally specific and therefore does not add to national or regional guidance.	Substantially agree, although will be reviewing in light of PPS4 and the Town Centre Study. SC5 does go into more detail than PPS4 regarding previously developed land. The Town Centre Study will also assess any local impact criteria. The paragraph regarding offices in regeneration areas is likely to be deleted.	SC5 to be reviewed against PPS4 and TC Study
Indigo Planning 806	National Grid Property Holdings / Aviva Investors	Two points inconsistent with PPS6: A literal interpretation of the wording "no site or premises are available within the defined centre, or nearby centres within a reasonable catchments" could mean that development proposed in an edge of centre location could be opposed if there were a single vacancy unit in the centre, irrespective of whether it would be suitable or viable. Also, although development must have good pedestrian and cycle access the relevant criterion goes on to state that the site must also be within a high frequency public transport corridor. This is unnecessary and unreasonable.	It is likely that SC5 will be revised so its detailed wording is no longer relevant, although comments regarding clarity and consistency with PPS4 are noted. The Public Transport Improvements and Developer Contributions SPD sets out the City Council's accessibility standards.	SC5 to be reviewed
DC SC5 Carter Jonas 5681 73	The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate	Would be appropriate for criterion 7 to incorporate acknowledgement that a site can be made more accessible.	Agree.	Reference in text as part of review of SC5
Metro 1933	Metro	Support and are encouraged by the measures introduced to manage car parking in an attempt to encourage greater use of public transport. What level of service do the Council consider 'a high frequency public transport corridor' to be? Should enhancements to public transport be required to achieve the high frequency corridor, how long would the Council consider a reasonable time period be for such subsidy?	It is likely that SC5 will be revised so its detailed wording is no longer relevant, although comments regarding clarity are noted. The Public Transport Improvements and Developer Contributions SPD sets out the City Council's accessibility standards.	SC5 to be reviewed

Scott Wilson 414	Parlington Estate / Revera	Missing a reference to the natural environment. Suggested wording: "The conservation and enhancement of the historic and natural environment and built heritage of the District."	This point is a normal development management consideration, and is also incorporated within bullet 6 of the policy. However, it is likely that SC5 will be revised so its detailed wording is no longer relevant.	None
Policy SC6 – Health, Education, Culture, and Leisure				
Government Office 95 Carter Jonas 5681	Government Office / Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate	Not locally specific and is advocacy rather than delivery specific.	There is a place for advocacy policies in the Core Strategy and in order to be concise the different themes were merged into one policy. However, the CS Vision and overall policy suite is to be reviewed, and the need for this policy will be reviewed at that time.	Reconsider format of SC6 in wider context of revised CS
NHS 5693 Cllr Dillingworth 2703	NHS / Cllr Illingworth	Refers more to physical buildings, and so also need a general policy on health (along with learning, culture, and leisure) to scope the wider health and spatial planning issues and enable future work through the LDF. The Vision for Leeds and the Leeds Strategic Plan include a number of objectives and strategic priorities for health and wellbeing which link with spatial planning and these should be more drawn out, e.g. in 'Health and Wellbeing' states "we will improve how we measure health and make sure that we take account of any effect our other policies and plans may have on health." Could integrate Health Impact Assessments and identify S106 requirements for health. More content regarding health matters and a direct approach to tackling health issues/gap.	Agree could draw more from the Vision for Leeds, and is to be discussed more in CS Vision to highlight further the link between planning and health as the two aspects are so entwined. Infrastructure Delivery Plan is to include consideration of health facilities, and Health Impact Assessments are also being considered through the work to update the LCC Sustainability Appraisal process.	None relating to this chapter but expanded reference in Vision
Scott Wilson 414	Parlington Estate / Revera	Potential that the overall hierarchy of centres approach could reduce the weight given to such supportive policy.	The hierarchy of centres is the main priority, but consider that SC6 interlinks with and supports this. The review of SC6 will ensure clarity with the balance with SC4.	Reconsider format of SC6 in wider context of revised CS
Individual 5639	Individual	Although there is reference to 'Learning facilities' this is packaged with health, cultural and leisure facilities - education deserves a section of its own.	There is a place for advocacy policies in the Core Strategy and in order to be concise the different themes were merged into one policy. However, the CS Vision and overall policy suite is to be reviewed, and the need for this policy will be reviewed at that time.	Reconsider format of SC6 in wider context of revised CS

Carter Jonas 5681	The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate	Under the fourth criterion a reference is made to student housing under Policy H6, but H6 doesn't actually directly refer to this.	Noted.	Ensure consistent policies
Savills 467	MEPC	Important is underpinned by a robust, up to date evidence base, but also with enough flexibility to ensure they can be adjusted to reflect the particular circumstances of developments and the other substantial benefits they may bring to an area.	Noted, and consider the policy meets these points.	None
Teaching Hospitals Trust 5690	Teaching Hospitals Trust	Reference to the partnership should also include the Teaching Hospitals Trust.	Noted.	Reference in text
British Waterways 338	British Waterways	Should acknowledge the role inland waterways and towing paths can play in achieving sustainable community objectives, e.g. education and training (outdoor classroom facility and volunteering opportunities); health and well-being (actively promoted by stakeholders as encouraging and supporting physical and healthy outdoor activity); and cultural as an important part of the cultural and built heritage.	To be addressed in GI Chapter.	None for this chapter
Workshop responses	Individuals	Asian and BME communities have special needs in relation to sheltered housing in terms of food, languages, distance to places of worship, and within existing communities.	Can highlight further in this chapter that sustainable communities are for all sectors of the community. Specific housing needs are addressed in the Housing chapter.	Reference in text
Harewood House Trust 5645	Harewood House Trust	Need much more reference to important heritage assets, particularly art, heritage, and cultural offerings. Indeed many such assets are owned by LCC and have benefited from significant public investment in recent years, including heritage houses (Lotherton Hall and Temple Newsam), art galleries (Leeds Art Gallery and the Henry Moor Institute) and the new Leeds City Museum. Essential to give explicit support to future development and enhancement of places such as Harewood House and other places of historical and cultural significance.	Agree could provide more recognition of cultural facilities (in broad terms) to provide more of a context for this policy. Also links to SC3 which will acknowledge the role of assets which are already located outside of centres.	Reference in text
Workshop Responses	Individuals	CS to promote more visitor attractions for the City Centre (museums etc)? Leeds Central Market is a key asset for the city and should be better promoted.		

NHS 5654	NHS	Need greater emphasis on NHS policy to transform community services by providing more services closer to home and greater connectivity between community facilities. Policy should also direct greater integration (co-location) of e.g. education, social care, and leisure to allow better service integration.	Consider this is covered through the support in SC6.	None
Access to greenspace and playing pitches				
Individual 4754	Individual	Nothing being done to alleviate the problem of increasing allotment waiting lists.	Existing allotments currently protected, and quantity to be identified further through the PPG17 Audit & Needs Assessment. Also ongoing work by Parks and Countryside (City Development). Further detail is outside scope of CS.	None
Turley Associates 5670	Swayfields (Skelton)	Too detailed.	A consideration of the saved policies is being undertaken. Policies will be informed by the conclusions of the PPG17 Audit & Needs Assessment.	PPG17 Study to influence saved policies exercise
GVA Grimley 5661	Rushbond	Need to consider the use, function and quality of existing greenspace rather than retaining existing poor quality provision.	Addressed as integral aspect of the PPG17 Audit & Needs Assessment.	None
University of Leeds 5646	University of Leeds	Should be specific mention of small scale food growing, including additional allotments.	Agree, although in part depends on the conclusions of the PPG17 Audit & Needs Assessment.	Reference in text

<p>Individual 4754 Roundhay Planning Forum 5057 ID Planning 5668 and 5671 J & J Design 5666 Dacre Son & Hartley 480</p>	<p>Individual / Roundhay Planning Forum / Ben Bailey / Barwick Developments/ Persimmon / Taylor Wimpey / Edmund Thornhill / Great North Developments / Bracken Developments / Robert Ogden Partnership / Ringways Motor Group / Brownberrie Education / Horsforth Gospel Hall / Taylor Wimpey/ Persimmon/ Redrow / Individuals</p>	<p>Need PPG17 study to be completed in order to feed into CS as essential element of the evidence base as could impact on its overall delivery.</p> <p>Should be able to make further representations after publication of the PPG17 study.</p>	<p>Agree that PPG17 is important part of the evidence base and will help to update the CS greenspace policies and standards.</p> <p>At the detailed site level it will feed more into the Site Allocations DPD, where consultation will be possible.</p>	<p>PPG17 Study to influence saved policies exercise</p>
<p>Smiths Gore 5017 Drivers Jonas 5558 Carter Jonas 5681</p>	<p>Cannon Hall Estate / Horsforth Riverside / The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate</p>	<p>Greenspace policies need to be reviewed and updated to reflect more up-to-date policy advice, changes in circumstances, and evidence. Reference specific site at Fraser Avenue in Horsforth. Need flexibility to ensure balance between the protection of greenspace and that best use is made of existing derelict sites.</p> <p>Needs to be a clear link between open space policies and the proposals within the GI policies.</p>	<p>A consideration of the saved policies is being undertaken. Policies will be informed by PPG17 Audit & Needs Assessment. PPG17 and other information will also inform the Site Allocations DPD. Specific site discussions are too detailed for the CS.</p> <p>Will ensure there is clarity between these two areas and relevant saved policies.</p>	<p>PPG17 Study to influence review of saved policies</p> <p>Ensure CS signposts links between policies</p>
<p>Brownberrie Education / Horsforth Gospel Hall</p>	<p>Brownberrie Education / Horsforth Gospel Hall</p>	<p>Support, although saved Policy N11 should be more encompassing (possibly based upon N1). Object to the saved Policy N11 as protection of 'other open land' in the built up area should only be done through consultation.</p>	<p>Areas identified through PPG17 and brought forwards through the Site Allocations DPD would be granted a high level of protection after consultation. N11 will be addressed through the saved policy exercise.</p>	<p>Review of saved policies</p>
<p>Leeds Civic Trust 62 University of Leeds 846</p>	<p>Leeds Civic Trust / University of Leeds</p>	<p>Policies may need to be strengthened to ensure a more strategic approach to creation of larger areas of greenspace.</p>	<p>Noted, and will be addressed following PPG17 Audit & Needs Assessment and as part of the GI chapter.</p>	<p>None for this chapter</p>

Policy SC7 – Sustainable Design and Construction				
Representors in support		34		
Representors against		7		
Government Office 95	Government Office	SC7 would be better under the environment objective. It should be locally specific and SMART, and should not replicate regional policy without justifying that it is appropriate to Leeds.	Agree with move to environment chapter/ climate change section. SC7 is not included as a requirement in either national or regional policy and therefore does not replicate it.	Move SC7 and SC8 to Env section
General Support:				
Individual 5649 Leeds Civic Trust 62 Liberal Democrat Otley and Yeadon Councillors 4817 Individual 14, 4694, 4743, 88 Turley Associates 5670 Sigma Planning 4110 Natural England 58	Individual / Leeds Civic Trust / Liberal Democrat Otley and Yeadon Councillors / Individuals / Swayfields (Skelton) / Hallam Land Management / The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate / Natural England	Support but with stricter standards. Same standards should be applied to all buildings and developments not just major schemes. There is no need for such a distinction. It would create an unfair market. Smaller schemes should not be exempted from any commitment to sustainable design, and a viable policy approach covering such schemes should be investigated.	Standards need to be carefully set in order to avoid being too onerous. High standards of sustainability and design will be encouraged everywhere. However, economies of scale mean that it is likely to make smaller developments unviable. Building regulations apply to all sizes of buildings.	None
English Heritage 99	English Heritage	Support that recognises that there may be circumstances where the standards cannot be met (i.e. conversions), although should explain more fully, that meeting standards has to be reconciled with the need to ensure that those elements which contribute to the special character of the city's historic buildings are not adversely affected.	Agree could reference in text.	Reference in text
Scott Wilson 414	Parlington Estate / Revera	Support but should also refer to the new BREEAM Communities Assessment Framework to assess and certify the sustainability of an entire development proposal rather than focusing on the sustainability of individual buildings (i.e. by current BREEAM and CSH). Would help in understanding the opportunities and constraints to achieving a particular sustainability standard dependent on the characteristics of a particular site/development.	Will reference the BREEAM Communities Assessment Framework in the CS, and encourage its use and consideration of its principles, although as it is only at pilot project stage it would be too onerous and premature at this stage to require it as a part of policy SC7.	Reference in text

General Objections:				
Peacock & Smith 5665 White Young Green 420 GVA Grimley 5661 Advent Development 5686 ID Planning 5668 and 5671 Drivers Jonas 5558 Carter Jonas 5681 Bury & Walker Solicitors 2527 Dacre Son & Hartley 480 Turley Associates 1743 Aspinall Verdi 5689 Bury & Walker Solicitors 2527 GVA Grimley 5661	Stockheld Estate / Individual / LBIA / Harrow Estates / Leeds Trinity University College / Goodman International / Rushbond / Advent Development / Ben Bailey / Barwick Developments/ Persimmon / Taylor Wimpey / Edmund Thornhill / Great North Developments / Bracken Developments / Robert Ogden Partnership / Ringways Motor Group / Horsforth Riverside / Bury & Walker Solicitors / Taylor Wimpey/ Persimmon/ Redrow / Individuals / Barratt Strategic / Montpellier Estates / Bury & Walker Solicitors / Rushbond	<p>Object. Welcome principle and that Leeds should strive to be a forerunner, and generally reasonable short term objectives, but unreasonable and too prescriptive in longer term. This is particularly considering the current economic impact on house building, different site circumstances, and changing policy requirements.</p> <p>It would impact on viability (particularly in regeneration areas) and therefore delay delivery and reduce housing numbers. Would be uncompetitive against neighbouring authorities for development and investment; in the current market ideological policy positions must give way to what works on the ground. Should recognise that developers will respond to environmental 'drivers' as the market requires.</p> <p>Should therefore only reflect national targets, with any subsequent changes being introduced in the light of monitoring. Needs more flexibility. It is already difficult to achieve compliance with building regulations. Without further justification fails the soundness test. Should be addressed on a site by site basis, taking into account matters relating to an individual site's characteristics, e.g. land contamination, areas of undevelopable land, and the need to contribute towards other planning obligations (e.g. education, affordable housing, etc).</p> <p>A blanket requirement to achieve BREEAM Excellent will adversely affect refurbishment and conversion projects, and it is unrealistic and impractical for such projects.</p>	The changing national agenda underpins this approach. Viability can be assessed at application stage and considered alongside other policies e.g. affordable housing and other contributions. The policy will ensure the standards are achieved for some schemes, whereas without the policy no schemes would achieve them. Also, the CS is a long term document and over time the costs will come down. Evidence from the sustainability appraisal at the issues and options stage demonstrates that higher standards are required in order to mitigate the negative effects of growth, and SC7 provides the basis for negotiations.	None
Aspinall Verdi 5689 University of Leeds 846	Montpellier Estates / University of Leeds	Only requiring larger developments to meet higher standards could lead to developers purposefully staying below the threshold in order to save costs, which is ultimately inefficient in terms of land use. Need vigilance for developments that that are purposefully just below the threshold size (including developments split into phases).	Applications are considered on a site by site basis to ensure an efficient use of land. Changing the supporting text to cover number of units and size of site means it is much less likely that developers could purposefully stay below the threshold.	None

J & J Design 5666	Brownberrie Education / Horsforth Gospel Hall	The SoS has recently struck down regional policies seeking to impose local standards which exceed Building Regulation requirements.	SC7 is not a regional policy – there is a local need due to local circumstances as shown in Sustainability Appraisal evidence.	None
GVA Grimley 5661 Advent Development 5686	Rushbond / Advent Development	Requirement for a post construction review certificate should be deleted to allow greater flexibility in delivery, otherwise it will be too onerous on developers who may fall short of BREEAM requirements due to circumstances outside their control, e.g. loss of local post office and cash machine or change in bus route, where the developer can't mitigate these lost credits at a late stage.	Disagree, post –construction review certificate is required in order to know that the policy has been complied with. Locational points are only a small part of the BREEAM scoring and therefore the closure of a post office or similar is not likely to largely impact on achieving the Policy.	None
Sigma Planning 4110 Carter Jonas 5681 J & J Design 5666	Hallam Land Management / The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate / Brownberrie Education / Horsforth Gospel Hall	Unnecessary and confusing to have parallel planning requirements (i.e. national policy through the Building Regulations and the Code for Sustainable Homes), particularly where these only apply partially. The relationship between the Building Control function and Building Regulations should be made clear. Places of worship are currently exempt from Part L of the Building Regulations and should be explicitly referenced.	Sustainability appraisal demonstrates that higher standards are required in order to mitigate the negative effects of growth. Appropriate to have a locally specific target - Leeds has its own set of circumstances. There are a range of exemptions throughout the Building Regulations which are too detailed to be included in this Policy. The CS will further clarify the relationship of SC7 with Building Control and the Building Regulations.	None Clarify the relationship with Building Regulations
Miscellaneous:				
Savills 467	MEPC	Important is underpinned by a robust, up to date evidence base, but also with enough flexibility to ensure they can be adjusted to reflect the particular circumstances of developments and the other substantial benefits they may bring to an area.	Comments noted, and consider this will be fully achieved in the Submission version of the Core Strategy.	None
Sigma Planning 4110	Hallam Land Management	Larger developments have potential for a comprehensive approach taking advantage of economies of scale to provide local energy production, Sustainable Urban Drainage (SuDS), and more sustainable transport systems. The policy emphasis should be more clearly and directly focused on these elements.	Agree there are economies of scale with regard to energy production and sustainable transport. However, SuDs is not generally more costly for small developments to provide, as they need to provide drainage anyway even if not a comprehensive system. It may therefore even be cheaper than traditional drainage systems.	None
NHS 5693	NHS	Could link to SC6 to support integrating locally relevant health based design criteria into new/existing design and construction guides, to drive the adoption of standards (Lifetime Homes), locally developed space standards, or to enhance active transport (i.e. bike storage in flats).	SC6 is specifically about facilities rather than about design. The Lifetime Neighbourhoods for Leeds project seeks to achieve, as a minimum, Code for Sustainable Homes Level 4 on all new homes provided	None

Leeds City College 5653	Leeds City College	Policy wording needs to be amended as post construction review certificates are not available; the normal approach is 'post occupation' review certificates.	Planning has to control development before occupation. Discussions with Building Research Establishment indicate that post-construction certificates are available.	None
Individual 5151	Individual	All houses should have solar panels. All houses should have a duty to plant trees.	Solar panels are encouraged but this would be too prescriptive. It is not always technically viable to introduce solar panels, and can meet the Code through a range of measures. A tree requirement is too detailed for inclusion in a Core Strategy, although it is covered and encouraged through individual landscaping schemes.	None
Policy SC8 / SC9 – Design, Conservation and Landscape, and Disabled Access				
Merging Policies SC8 and SC9:				
Government Office 95	Government Office	SC8 and SC9 would be better under the environment objective. It should be locally specific and SMART, and should not replicate regional policy without justifying that it is appropriate to Leeds.	Consider that SC8 is locally specific, and has a beneficial place in the Sustainable Communities Chapter. SC9 is to be merged into SC8.	Merge SC9 into SC8
English Heritage 99 Carter Jonas 5681	English Heritage / The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate	SC8 and SC9 could be combined to a single policy as disabled access it should be an integral part of the design process. An overarching quality/design policy could include matters such as accessibility for all members of the community and the obligations under e.g. DDA legislation.	Agree will merge policies SC8 and SC9. The obligations under the DDA legislation are included implicitly within the policy.	Merge SC9 into SC8
English Heritage 99	English Heritage	There is no need for the caveat regarding 'exceptional circumstances' in SC9 for disabled access, particularly in relation to listed buildings (not exempt from the DDA). Concern for maintaining the valued elements of buildings whilst accommodating accessibility is not exceptional, and caveat will allow an easy 'cop out'. Need to be defined further if retained.	Will remove this caveat, and SC9 will be merged into SC8.	Merge SC9 into SC8
Additions to Policy:				
Coal Authority 1922	Coal Authority	Add additional bullet: "Ground conditions and land stability' to comply with the advice in PPG14 in dealing with unstable land, given the legacy of former mining operations present within Leeds."	Include 'ground conditions and stability' in 1 st bullet of SC8.	Include in policy

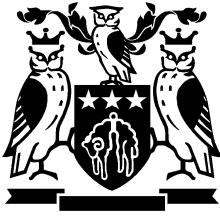
British Waterways 338	British Waterways	Should amend to “the topography, landforms, river and canal corridors.....”. Recommend that design fundamentals for waterfront development are specified, and reflect some of the principles in TCPA Policy Advice Note: Inland Waterways: Unlocking the potential and securing the future of inland waterways through the planning system (2009). e.g. waterways and water spaces need to be viewed as an integral part of a wider network; as a space and leisure and commercial resource in its own right; as the starting point for consideration of the development and waterside land; encouraging and improving access; enhancing environmental quality; and improve appropriate treatment for towpaths.	Will amend policy as suggested, and incorporate discussion of waterways in the CS although may be more appropriate in the GI section.	Reference in text
English Heritage 99	English Heritage	Support but are elements of the historic environment which neither SC8 nor national policy currently address. Need to address how assets might be managed, such as historic parks and gardens (of which Leeds has the highest amount in Yorkshire) and the registered battlefield at Adwalton (one of only 7 in the Region and which the latest Heritage at Risk Register has identified as being one of the most at risk in the country), also Thorpe Arch, the best preserved example in the country of a WW2 Royal Ordnance Filling Factory. Leeds has the greatest number of Buildings at Risk in the Region, of which 8 have been on the register since its inception in 1999 including the First White Cloth Hall on Kirkgate, and 13 of its 57 Scheduled Monuments have been identified as being at risk. Historic assets (including those which are not designated but which make an important contribution to the character of an area) could be managed through; improving understanding (e.g. Conservation Area Appraisals, archaeological assessments etc); identifying those which are most at risk and how they will be addressed over the plan period; identifying what approach might be used to enhance assets; through engagement with local communities; and establishing a local list of buildings (as has been done in a number of other authorities around the Region).	Noted and will include some of these details in text, including in the Vision section. However, historic assets are all implicitly encompassed within SC8.	Reference in text
Metro 1933	Metro	Additional requirements to consider when designing development schemes: ‘desire lines to public transport access points,’ and ‘the location and specification of quality of public transport infrastructure’.	The first point is already encompassed by bullet point 4 in policy SC8. the 2 nd point is not relevant to this design policy, although is addressed through policy in other chapters.	None

GVA Grimley 5661 Leeds Civic Trust 62	Rushbond / Leeds Civic Trust	SC8 is imprecise without reference to appropriate standards or guidelines and is likely to be difficult to enforce. It does not reflect all aspects of design i.e. psychology of design. Public realm would be a positive policy to encourage community involvement.	SC8 sets out the important considerations of Leeds' geography and character, but it is not possible to have specific standards for such a policy. Public realm is included within the policy under 'all development.'	None
Miscellaneous:				
Carter Jonas 5681	The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate	Appropriate to have an overarching design policy such as SC8 as it provides place-making principles, although it should be placed earlier in the CS.	Support welcomed.	None
Workshop responses	Individuals	Need SPD on design guidelines to address accessibility and disability issues.	These elements are incorporated in the emerging Sustainable Design and Construction SPD and the adopted Street Design Guide as well as other SPDs.	None
Workshop responses	Individuals	Great concerns of people with disabilities with the concept and use of shared space; CS needs to be updated from Executive Board and the Scrutiny Board.	The CS doesn't go into this level of detail. Consider that this issue has been determined to the agreement of relevant parties through the emerging Sustainable Design and Construction SPD and adopted Street Design Guide consultation process.	None
Little Woodhouse Community Association 3054 Inner NW Area Committee Planning Sub Group 5696	Little Woodhouse Community Association / Inner NW Area Committee Planning Sub Group	In order to preserve and enhance Leeds' historical heritage, should be able to have more control over older larger properties which developers want to demolish when become empty rather than reuse. More consideration for buildings of architectural interest and character not listed and not in a conservation area. More attention to highway materials and building maintenance associated with developments relating to conservation areas.	It is partly because the Code for Sustainable Homes does not include protection for reuse of buildings, that this has been encouraged through the emerging Sustainable Design and Construction SPD. Conservation area policies in the UDP which provide such detail, will be retained.	None
Natural England 58	Natural England	The design of all development should take into account the character and capacity of the landscape to accommodate it, and recommend that an up-to-date landscape character assessment would inform this.	This principle is addressed in SC8, and through the Green Infrastructure chapter. Determining the evidence required for individual applications is too detailed for the CS.	None

University of Leeds 846 English Heritage 99	University of Leeds / English Heritage	Should be a policy to deal with building height, as high densities can be achieved without being excessively tall. Tall buildings have too high energy and running costs, and create problems for pedestrians and block sunlight and views. But may need to make provision in industrial areas for tall urban farming structures before the end of the plan period. In the 3 rd bullet of second part of SC8, it is not clear what 'prominence' means, should instead refer to "skylines, key views, and vistas." The justification should set out those aspects which are likely to be amplified by subsequent DPDs or SPDs. How will people be able to ascertain which key views ought to be safeguarded? What is the strategy for tall buildings?	The Council provides a range of additional guidance that builds on these principles, e.g. adopted Tall Buildings SPD, Conservation Area Appraisals, Neighbourhoods for Living. These will, however, be more clearly referenced in the supporting text to SC8.	Reference in text
Individual 4754	Individual	All new build should be sympathetic with the surrounding buildings and not allowed as at present (a mix of new and old architecture).	Such an approach would unnecessarily constrict good design principles.	None
Individual 5632	Individual	There should be a stronger drive to improve disabled access.	Agree, and this is the intention of SC9 (although it will be merged with SC8).	None
Individual 5612	Individual	New builds have cramped inconvenient living spaces, few or no storage facilities, and inadequate access or parking. Design should be developed by architects, not high volume builders. Good design does not need to be more expensive but does lead to healthier communities and more beautiful and safer urban surroundings.	Agree that design is important to safe and healthy lifestyles. Aspects mentioned are all considered during determination of planning applications.	None
Turley Associates 1743	Barratt Strategic	Covers a level a detail not appropriate for a CS.	Disagree, detailed design policies and SPDs require a parent policy on design and disabled access.	None
Miscellaneous Comments				
Leeds Civic Trust 62	Leeds Civic Trust	Moortown Corner is not noted on the Sustainable Communities map.	Noted.	Amend map
Individual 5658	Individual	Appropriate sized eating and drinking venues are also important to local centres and shopping parades, such as cafes, small restaurants, and local public houses.	Agree, and consider these are supported by the CS as ancillary uses as part of the wider mix which would support the primary retail function of such centres.	None

Dacre Son & Hartley 480	Taylor Wimpey/ Persimmon/ Redrow / Individuals	Need separate reference within Sustainable Communities text to the role of Major Growth Areas/Strategic Land Allocations. Suggest policy wording to follow paragraphs 5.23-5.28; "Major growth areas and strategic land allocations will be required to deliver housing growth and will be identified, allocated and released in a manner that helps to provide the necessary housing and employment growth in sustainable locations in accordance with all other aims of the Core Strategy. These sites should include East Leeds Extension (UDPR Allocation H3-3A.33). These sites will be further defined in the LDF Site Allocations DPD where their release, infrastructure requirements and relationship with housing need regeneration and transportation links will be fully detailed. It is expected that the release of East Leeds Extension will be required in the early part of the plan and the Council will work closely with the developers in the production of a development brief."	It is not considered necessary to repeat this explanation in the Sustainable Communities chapter as these elements are fully covered in the Housing Chapter.	None
NHS 5693	NHS	Need to be explicit about ensuring cohesion and recognising the diversity of communities / population groups within these areas i.e. BME communities, new arrivals, European migrants etc, and their corresponding cultural needs.	Noted.	Reference in text
Workshop responses 809 85	Individuals	Aligning hierarchy centres with transport policies would help to ensure access between lower and higher hierarchy areas allowing better access to all facilities. Issues of centres have links to transport issues as is often hard to get to neighbouring centres by bus unless go via the city centre.	There is a link between the planned development in the CS and investment in infrastructure including transport, and the CS transport policies do aim to maintain the best access to the hierarchy of centres. However, it is acknowledged that individual journey patterns are complex and not all journey combinations can be accommodated by public transport routes, especially where not viable such as many orbital routes.	None
Barton Willmore 57 Keyland 2064	Templegate Developments / Keyland	New town and local centres within the eastern part of Leeds should tie in more closely with the EASEL and AVL Town and Local Centres Assessment, and should be clarified in respect of such designations in the AVL.	Centre locations have been based on recommendations in the EASEL / AVL Study. Will be further evidence from the District wide Town Centre Study and as the AVL AAP is developed further.	None
University of Leeds 846	University of Leeds	Physical retailing is likely to contract rather than expand in future.	Assumptions will be set out in the Town Centre Study and physical retailing is still a vital element of planning for centres.	None
Workshop responses	Individuals	Environmental improvements in centres are also important. Should set out how quality community parks can enhance and play key role in sense of the community.	Agree, and aim to bring out more emphasis on place making and enhancing viability and vitality, and what is a sustainable community.	Reference in text

Workshop responses	Individuals	Need to build new cultural facilities for when new migrants are placed in white working class areas.	This is too detailed for the CS although support promotion and retention of community facilities generally.	None
Workshop responses	Individuals	Groups using community facilities are being pushed out as job shops take over the space.	This is too detailed for the CS although support promotion and retention of community facilities generally.	None
Individual 5612	Individual	Map 2 is not legible. CS doesn't mention classes such as arts and crafts which are essential to maintain active life of older people.	The maps are required to be diagrammatic, although aim to be more user friendly in final versions. Support for such classes is inherently encompassed in the 'extended services' text.	None
Planning Potential 5680	Aldi	Should recognise the contribution of retail jobs towards the local economy and as a facilitator of economic development.	Already referred to in Economy chapter but could expand reference in Sustainable Communities section including the link with PPS4.	Reference in text
Other points to include in revisions to Sustainable Communities Chapter				
Needs to address new requirements and evidence base in PPS4; will in part be drawn out of Town Centre Study recommendations.				
RSS Paragraph 11.10: The uses listed in part A of policy E2 are those defined in PPS6. Other uses that need to be accessible to a wide area by public transport, such as large hospitals, universities or colleges may also be most appropriately located in or close to the centres of Regional and Sub Regional cities and towns in order to meet the accessibility criteria set out in Table 13.8.				
RSS Paragraph 11.11: Part C of the policy relates to out-of-centre regional and sub-regional shopping centres. The largest existing such centres in the region are Meadowhall and White Rose. There is no evidence to justify the large scale expansion of these, other sub regional shopping centres, or the development of new ones. What is "large scale" will need to be considered in the light of the particular circumstances, including the size and nature of the existing centre, taking account of the cumulative impact of extensions. A key determinant will be whether there would be a regionally or sub-regionally significant impact. Proposals for smaller scale extensions will be a matter for local planning authorities to determine taking account of PPS6.				
Use strategic level description of EASEL in regeneration section as no longer taking forwards an EASEL-wide document.				
SC3 needs more clarity on scale, and needs to separate out the 'acceptable uses' from the 'sequential approach.'				
SC4 – New centres are not necessarily as a result of regeneration (i.e. regeneration doesn't automatically mean increased population) but is also a need to address areas of acknowledged current deficiency.				
Need a new policy to set out the local impact considerations, as proposed under PPS4 (and identified in part through Town Centre Study).				



Report of the Director of City Development

Development Plan Panel

Date: 11th May 2010

Subject: Leeds LDF Core Strategy – ‘Preferred Approach’ Analysis of Consultation Responses: Green Infrastructure (Natural Environment) Theme

Electoral Wards Affected:

All

Ward Members consulted (referred to in report)

Specific Implications For:

Equality and Diversity

Community Cohesion

Narrowing the Gap

Executive Summary

1. At Development Plan Panel on 2 February, members received a report concerning the Leeds LDF Core Strategy ‘Preferred Approach’, setting out an initial report of consultation and a headline summary of the initial comments received.
2. Within this context, the purpose of this report, is to provide further detailed consideration of the comments received in respect of the Green Infrastructure theme.

1.0 Purpose of this report

- 1.1 At Development Plan Panel on 2 February, members received a report concerning the Leeds LDF Core Strategy ‘Preferred Approach’, setting out an initial report of consultation and a headline summary of the initial comments received. Within this context, the purpose of this report is to provide further detailed consideration of the comments received in respect of the Green Infrastructure theme.

2.0 Background information

- 2.1 As noted in previous reports to Panel, the Core Strategy is the overarching and central document of the LDF process. Government Guidance (PPS12, 2008), emphasises the key role of the Core Strategy in setting out an overall spatial vision for an area and how the places within it should develop, to provide a link to the Community Strategy (Vision for Leeds) and Local Area Agreements, and the provision of an Infrastructure Delivery Plan (IDP).
- 2.2 Following consideration of the ‘Preferred Approach’ document by Development Plan Panel on 30 September, a period of informal public consultation has been undertaken across the District (26 October – 7 December 2009). In support of this, a range of consultation activity has taken place. In response to this consultation activity 142 comments have been

received in response to the Green Infrastructure theme. These are summarised in section 3 below and a more detailed summary scheduled is attached as Appendix 1 to this report.

3.0 Main issues

Introduction

- 3.1 As regional capital, the Leeds district is facing significant development pressures; for housing, employment, community facilities and the infrastructure to support this growth. A key challenge is therefore to manage this growth in ways, which will maintain the setting of Leeds within an attractive network of connected greenspaces and enhance its environment and distinctiveness. This means that alongside the conventional infrastructure which is needed to support growth, (such as roads, public transport, schools and other community facilities), the amount of accessible and multi-functional greenspace must be kept at a level which keeps pace with the number of people living and working in the District to ensure that a decent quality of life can be provided for everybody. The term 'Green Infrastructure' has been coined to describe this.
- 3.2 The concept of Green Infrastructure is being adopted at a national level. In Leeds, the Council has applied it in consultation with English Nature and with neighbouring local authorities through the Leeds City Region initiative. This approach has defined Green Infrastructure as:
- "The network of multi-functional green spaces, both urban and rural, which includes protected sites, woodlands, nature reserves, river corridors, public parks and amenity areas, together with green linkages. It extends from urban centres through green corridors to open countryside and supports the natural, recreational and ecological processes which are integral to the health and quality of life of sustainable communities".*
- 3.3 This definition explains that many different uses take place in Green Infrastructure and, in that regard, it is different from Green Belt. Whereas the Green Belt essentially helps to prevent the uncontrolled spread of development and avoid the coalescence of settlements, by comparison, GI is the strategic networks of accessible, multi-functional sites (including playing fields, parks, woodlands, informal open spaces, nature reserves and historic sites) as well as linkages (river and canal corridors, floodplains, wildlife corridors and greenways that penetrate into and through the developed areas from the countryside).
- 3.4 This approach enables the City Council to consider 'greenspaces' as an overall, inter-connected system rather than as a collection of individual sites. In this way, the GI 'system' of linked greenspaces helps to shape the growth of Leeds alongside socio-economic 'drivers.'
- 3.5 Although GI is relevant at all spatial levels, in the context of the Core Strategy it is confined to strategic areas and sets the scene for the growth of Leeds to be based upon a sustainable approach to development.

Summary of Comments Received

- 3.6 Appendix 1, attached, sets out the comments received on the Green Infrastructure theme during public consultation on the 'Preferred Approach' and the recommended Council response on the issues raised. People were asked to agree/disagree with the statement "that the policies will sufficiently protect and enhance Leeds' green infrastructure?". A total of 54 respondents agreed with the statement and 25 disagreed. In relation to biodiversity, in response to the statement "that the policies will sufficiently protect and enhance habitats and biodiversity, including woodlands and wetlands?", a total of 47 respondents agreed and 16 disagreed. The comments can be summarised as follows:

Green Infrastructure

- The inclusion of Kirkstall Valley within the defined GI is welcomed
- The following areas should be included with the defined area: Hunger Hills, Rawdon Billing, Gipton Wood and the Morley-Middleton-Holbeck corridor.
- Policies should be flexible enough to allow limited expansion of existing development

- In relation to Policy G2, commuted sums could be used towards restoring areas of historic interest in the vicinity of development sites which are “at risk” (English Heritage).
- The important greenspace corridors in South Leeds, which are valuable to the sub-region and penetrate the built up areas, are not sufficiently protected, especially given that two (out of 8) potential housing growth areas are located in this area.
- Developer contributions for GI must be appropriate, proportional and directly mitigate impacts on the green network caused by development and not undermine viability. There is a danger that Policy G2 will place unreasonable burdens on development over and above that normally required. Consideration should be given to the introduction of a threshold and criteria to clarify the terms of any contributions. It may be better to have only one policy, which deals with developer contributions in the round.
- There is not a clear evidence base or detailed justification for the extent of the GI as proposed.
- The GI Policies are mainly about the protection and enhancement of greenspace, public access and the natural environment. Recognition should also be given to the principal role of agricultural land for the production of food.
- The policies and supporting text would benefit from a greater emphasis on the role that GI can play in boosting economic performance by providing a high quality environment, which helps to attract inward investors and retain existing businesses.
- The role of GI in helping to address Flood Risk should be emphasised more, including the importance of watercourses and opportunities for sustainable drainage systems.
- GI plays an important role in shaping the future pattern of growth in Leeds, in adapting to climate change and in conserving and enriching Leeds’ distinctive landscape character (Natural England). However, an up-to-date landscape character assessment is an essential part of the evidence base and Leeds should refresh and review this work to inform the Core Strategy.
- Housing growth areas should be genuine exemplars of sustainable development with networks of multi-functional green infrastructure providing a wide range of environmental and quality of life benefits at the outset. This should go beyond successfully assimilating proposals into adjoining green infrastructure and require developers to demonstrate how green infrastructure can be genuinely multi-functional and deliver sustainability objectives.

Natural Environment

- The need for an area specific policy for the Aire Valley is questioned given that specific strategies/policies are not included for other key corridors.
- The policies will only be effective if they are adhered to and are enforced.
- Contributions to the habitat network should be directly proportional to any adverse impact on identified species from new development and should not impact on viability, especially in regeneration areas. Where possible, mitigation should be through design and not via a financial contribution.
- The need to protect natural habitats must be carefully balanced against the need to make efficient use of brownfield land. Policies should be sufficiently flexible to allow solutions, which reflect individual site circumstances.
- Natural England suggest illustrating the habitat network on the Proposals Map when they become available. Natural England support efforts to increase woodland cover in Leeds and the intention to develop a network of wetland nature reserves in the Lower Aire Valley (Policy G6).

4. Key Issues arising from the consultation

Developer contributions

- 4.1 One of the key areas raised by the development industry and their consultants related to a concern that Policy G2 (developer contributions for GI) might place unreasonable burdens on development over and above that normally required and that this could undermine viability. The point was made that developer contributions must be appropriate, proportional and directly mitigate impacts on the green network caused by development.
- 4.2 In response it is proposed to re-word Policy G2 to clarify where and how the Policy would be applied and also to suggest to replacing saved UDP Policy N8 (Urban Green Corridors). The

key point is that the Council will seek developer contributions to improve the quality of the Green Infrastructure, where appropriate and in accordance with the advice contained in Circular 05/2005 (which advises on developer contributions). A policy framework of the kind proposed is needed to ensure that the development control process is able to deliver improvements to the wider GI network. The main objective is to ensure that greenspace is provided on site in accordance with established policies (e.g. saved policy N2) but, given its location within or adjacent to GI, there will be a requirement for developers, through the design process, to integrate the site with the surrounding GI and add value to its character and quality. This will necessitate developers linking up existing greenspaces where appropriate.

Greenspace Infrastructure in Housing Growth areas (Policy G3)

- 4.3 A number of developers argued that this policy requires clarification or that it should be deleted on the basis that it is not considered necessary to identify growth areas specifically for providing greenspace. A further criticism was that there was no reference to the location or size threshold to these sites.
- 4.4 Major Growth Areas will be defined elsewhere in the Core Strategy. The purpose of Policy G3 is to ensure that Green Infrastructure forms an integral part of dealing with areas subject to significant housing growth. Therefore, in addition to applying greenspace standards (and on site provision), developers within or close to areas defined as forming part of Leeds' Green Infrastructure network, will be expected link into it successfully, in seeking to ensure such areas can be genuinely multi-functional and deliver sustainability objectives, including sustainable drainage systems, where necessary.

Level of Policy detail consistent with the strategic nature of the Core Strategy

- 4.5 Whilst Policy G5 (the creation of new woodlands) received support, a number of representations expressed the view that the related Policy G5A (Tree Preservation Orders) and Policy G5B (Ancient Woodlands) were too detailed for the Core Strategy and were more development control type policies, which should therefore be deleted. Upon reflection, it is agreed that these two policies are not of a strategic nature and as the issues are covered in separate legislation, they are proposed to be deleted from the Plan.

Physical Extent of the Green Infrastructure in Leeds

- 4.6 Map 1 in the 'Preferred Approach Map Book' shows the physical extent of GI in the Leeds district. Given the strategic nature of the Core Strategy, the area covered by GI is intended to be diagrammatic, showing the broad swathes of land covered rather than be tied to identifiable boundaries. A number of representations received suggested that there were 'gaps' in the area covered and that additional areas be included. Whilst some of these suggestions are considered too detailed for the Core Strategy, it is accepted that a number of additions are justifiable on the basis of their current functions and/or their importance as links in GI corridors. The additional areas are:

- South Leeds corridor
- Morley-Middleton-Holbeck Corridor
- Woodland along the Outer Ring Road (Addyman Woods), linking in to Roundhay Park.

5.0 **Next Steps**

- 5.1 In the 'Preferred Approach' document the Green Infrastructure theme followed immediately after the overall 'Vision' for the Core Strategy. This was a deliberate attempt to signal the importance of Green Infrastructure to Leeds' distinctive character and to 'set the scene' for managing growth in a sustainable manner. However, in response to a representation from the Government Office, it is suggested that the Core Strategy needs to be reconfigured to give greater prominence to issues relating to 'managing the needs of a growing City', in particular meeting the housing challenge, developing Leeds' role in the City Region and supporting the local economy. Within this context, GI will still need to play an important role as part of the overall spatial strategy.

5.2 The chapter on the GI theme is also to be reconfigured to do the following:

- Add South Leeds, the Limestone Ridge, and the Lower Aire Valley (including the City Centre) to the list of the broad geographic areas of GI in Policy G1 in order to clarify the areas covered.
- Amend Appendix 6 of the Preferred Approach in order to list the key components of Leeds GI under each of the broad areas listed in Policy G1.
- Amend Policy G2, as detailed in the attached schedule, in order to clarify the Council's intentions and to explain that this will replace UDP Policy N8 Urban Green Corridors.
- Carry out a number of minor text changes as detailed in the attached schedule.
- Insert a paragraph to list the benefits of Green Infrastructure in order to assist in responding to detailed points made in some of the representations received.
- Amend the wording of Policy G3 to make it clearer that this applies to growth areas that lie within or on the edge of those areas defined as GI
- Amend Policy G5 to refer to "developer contributions" and to re-title the policy as 'Creating New Woodland.'
- Delete Policies G5A and G5B

5.3 In addition to the above, consideration needs to be given to Natural England's suggestion that the Council should carry out an up-to-date landscape character assessment to help strengthen the evidence base for the GI theme. It is most unlikely that the Council will have the resources (manpower and financial) to commission such a piece of work within an acceptable timeframe. However, the possibility of refreshing the work that was done for the UDP with the help of the Council's Sustainable Development Unit is to be considered.

6. Implications for council policy and governance

6.1 None, other than to reiterate that the LDF Core Strategy needs to be in general conformity with the adopted Regional Spatial Strategy (2008)

7 Legal and resource implications

7.1 A number of the consultation responses make reference to the City Council's evidence base in support of the Core Strategy. Following the detailed consideration of comments received, it may be necessary to undertake further technical studies and research, to underpin particular policy approaches where necessary. Subject to the scope of such work, it is likely that there may be resource implications in terms of staffing and the commissioning of technical work, as required. Such work and resource commitments will need to be addressed within the context of existing provision and the City Council's overall budget position and priorities.

8 Conclusions

8.1 This report has provided further analysis of the comments received in respect of Green Infrastructure, as part of the Core Strategy Preferred Approach consultation. In response to comments received the schedule attached as Appendix 1. details the changes and next steps in preparing the draft Core Strategy Publication document for Panel consideration in due course.

9 Recommendation

9.1 Development Plan Panel is recommended to:

- i). To note and comment on the contents of the report and the course of further action (as detailed in Appendix 1) in preparing a draft Publication Core Strategy.

APPENDIX 1

**LCC RESPONSES TO REPRESENTATIONS ON THE GREEN INFRASTRUCTURE
THEME**

CORE STRATEGY PREFERRED APPROACH

LCC RESPONSES TO REPRESENTATIONS ON THE GREEN INFRASTRUCTURE (& NATURAL ENVIRONMENT) THEME

Questions asked during consultation

Question 2	Do you agree that the policies will sufficiently protect and enhance Leeds' green infrastructure?
Question 3	Do you agree that the policies will sufficiently protect and enhance habitats and biodiversity, including woodlands and wetlands?

Name / Company	Representor Comment	LCC Initial Response	Action
General Comments			
GOYH	Agree that green infrastructure is an important part of the strategy but it should not lead it. The strategic policy areas covered in this section should inform the spatial strategy. The management policies would be better with other environmental policies.	Agree to reconfigure Chapter order but put some of this GI context (character of Leeds) in Spatial Vision.	Amend Spatial Vision to incorporate reference to importance of GI
LGYH	GI is an important component of ensuring that future development provides positive benefits for the region and helps to deliver sustainable communities. The RPB is encouraged that the issue of GI has been covered in the Core Strategy.	Comments noted	None
Sport England	A PPG17 compliant assessment is required to underpin all of the policies in the GI Section of the core Strategy to ensure that open space, sport and recreation are properly planned for in terms of type, location, quantity and quality and to provide for current and future needs.	Comments noted. A district-wide PPG17 Audit & Needs Assessment for Leeds is nearing completion. This will have more implications for the Site Allocations Development Plan than for the Core Strategy.	None

Natural England	<p>Supports the emphasis placed on GI, esp. the role it plays in shaping the future pattern of growth in Leeds, in adapting to climate change and in conserving and enriching Leeds' distinctive landscape character.</p> <p>However, an up-to-date landscape character assessment is an essential part of the evidence base and Leeds should refresh existing work in this area to ensure that it is useful in informing the objectives of this Core Strategy.</p>	<p>Comments noted</p> <p>As part of the Leeds UDP a comprehensive landscape assessment was completed. Since completion much of the landscape remains largely the same, consequently it is unlikely a comprehensive review is therefore needed. There maybe scope however, subject to resources to target selected areas for review, where key changes are apparent and the need arises.</p>	<p>None</p> <p>Review within context of the preparation of the Core Strategy Publication draft</p>
Drivers Jonas	<p>Acknowledge the principles of sustainable development and the contribution which GI can make. However, a realistic balance needs to be achieved between the provision of open space for well being and ensuring that the best use is made of previously developed land. In particular, consideration should be given to alternative types of GI (e.g. woodland areas, improved riverside connections etc) which could contribute towards achieving this objective.</p>	<p>Noted and agree. The Council is trying to make the best use of brownfield land as well as formulate GI policies. Consideration is already given to woodlands, wetlands, riverside connections etc which make up the component parts of Leeds GI</p>	<p>No change required</p>

Carter Jonas	<p>The overwhelming message from the GI Policies is that the countryside surrounding Leeds is a playground of greenspace, public access and the natural environment. The Core Strategy should equally recognise the principal role of agricultural land for the production of food.</p> <p>CS should reflect the principles of PPG17. It is not just the quantity that matters but also the accessibility and quality of the resource, particularly where it is 'public greenspace'.</p> <p>GI policies G1 to G6 should be revisited to ensure that they provide an overarching and strategic context. In doing so, balance the various pressures between statutory, local and non-statutory (nature conservation) designations, the competing uses of land and the interests of various stakeholders, user groups and the rights and responsibilities of landowners.</p>	<p>GI is concerned with multi-functional greenspace, not land solely in use for agriculture. However, a reference to the importance of agriculture to the rural economy could be included in the Local Economy section.</p> <p>Agree – Amend supporting text to reflect this.</p> <p>Agree that the GI Policies can be rationalised – see below - but reconciling the various interests as requested is too detailed for Core Strategy.</p>	<p>Include ref in Economy section</p> <p>Amend text</p> <p>Delete GI policies that are too detailed for CS</p>
Cllr John Illingworth	<p>Welcomes inclusion of Kirkstall Valley Park as GI but concerned that the blue line on the map follows a mill goit rather than the river which results in the omission of most of the valley floor from the designated area.</p> <p>Like to see a policy statement that, subject to protection of wildlife and sensitive habitats, the Council welcomes proposals for new waterside pedestrian access, will accept developer contributions to improve access and will itself seek to connect isolated segments into continuous waterside links through the district.</p>	<p>Noted. The blue line is intended to be a diagrammatic representation of the importance of the River and Canal corridor. It is important to recognise that this lies within a broader (green) GI corridor on the map.</p> <p>The need to provide access alongside waterways is already acknowledged in para 5.1.8.</p>	None
Horsforth Civic Society	Hunger Hills and Rawdon Billing should be included as part of the GI as they are important to communities in North Leeds	Hunger Hills is included in the area defined as GI on the map. Rawdon Billing is an important area of local open space but it is not considered to form part of the strategic area of GI.	None
Walsingham Planning	Agree in general terms but policies should be flexible enough to allow limited expansion of existing development.	Policies wouldn't preclude limited extensions of existing developments. Permitted development rights are unaffected.	None

Barwick in Elmet & Scholes PC	Particular support for GI in areas which are subject to regeneration. Parish Council agrees that there is a need to improve and enhance the PROW network.	Comments noted.	None
The Coal Authority	As part of proposals to enhance or create new areas of open space and GI, coal mining information should be considered and where necessary appropriate treatment/mitigation measures should be incorporated to ensure future public safety.	Comments noted. This point is covered in the Natural Resources and Waste DPD	None
Mrs Helen Longfield	The policies will not protect or enhance the most valuable areas to the south of the city. The south Leeds corridor and the sub regional green belt areas which penetrate the built up areas of south Leeds are highlighted as important components of the GI but two of the eight potential housing growth areas are located in this area. This demonstrates a weakness in these policies before they have been tested	Agree, we should look at extending the GI in these areas where this can be justified. However, it should be noted that there are other policies to protect greenspace other than GI.	Modify Map to include additional areas of GI in Sth. Leeds
Roundhay Planning Forum	Map 1 doesn't recognise the value of playing fields. Green spaces in existing suburban and urban areas are just as important as large swathes of Green Belt. The woodland belt along the A6120 Outer Ring Road, esp. Addyman Wood and Moortown Plantation should be included in the GI as it is an important link between the countryside north of Leeds and other green spaces such as Gledhow Valley Woods, Roundhay Park and Gipton Woods	The Core Strategy only looks at GI at a strategic level. The value of playing fields and smaller greenspaces that lie within the fabric of the urban area are recognised and will be addressed in a future Site Allocations DPD. Agree that Addymans Wood would be a logical extension to the GI corridor in this part of north Leeds. The value of Moortown Plantation further along the Leeds Outer Ring Road is acknowledged but this is not considered to be a logical part of the strategic GI and it will, instead be recognised in the more detailed Site Allocations DPD..	Modify Map to include Addymans Wood.

Peacock & Smith	<p>Whilst Map 1 is intended simply illustrate the broad areas of GI across the district, there does not appear to be any detailed justification as to the extent of these areas, nor does the Core Strategy define a hierarchy of GI as required by the RSS.</p> <p>Leeds City Region has only recently instructed consultants to develop a GI strategy which will inform planning policy across the region. Therefore Leeds GI will have to be reviewed in the light of the forthcoming GI regional strategy</p>	<p>Justification for the Strategic GI is provided in the CS Appendix. The table that was agreed with Natural England should be included in the Appendix or as part of a background paper or as part of the Sustainability Appraisal.</p> <p>The emerging Leeds GI is based upon the <u>existing</u> strategic ‘multi-functional’ greenspaces in the district and then representing these in a diagrammatic form to fit the strategic format of the Core Strategy. It therefore represents a generalised picture of what is important strategically and then adds aspirational GI where there are obvious ‘gaps’ or ‘opportunities’ to enhance Leeds’ GI. It is accepted that there needs to be a hierarchy of GI but the Core Strategy only deals with GI at a strategic level. The more detailed level of the GI hierarchy will be covered in a Site Allocations Plan. The GI work at the LCR level is not intended to provide a policy base or substitute the work in each Local Planning Authority to incorporate GI within Core Strategies. LCR work is geared to coordinating the work across the region and decide on priorities for funding bids. This is a two-way process with the Council informing and being informed by GI work at the regional level. The approach being followed in the Core strategy is entirely consistent with that being done at the City Region level.</p>	<p>Include Nat. England table of GI in SA or background paper.</p>
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Yorkshire Forward	<p>The policies and supporting text would benefit from including a greater emphasis on the role that GI can play in boosting economic performance by providing a high quality environment which helps to attract inward investors and retain existing businesses.</p> <p>It would also help for the GI section to highlight and give greater emphasis to the potential links to renewable energy which would help to support CO2 emission reduction and new employment opportunities. For example Policy G5 (woodland) is likely to increase the availability of waste wood resulting from the management of the woodland which could provide a valuable feed source for small and medium scale biomass plants.</p>	<p>Agree. Insert appropriate wording to supporting text. Also insert a short bullet point list of the benefits of GI to clarify the point made by Yorkshire Forward</p> <p>The links between woodland and renewable energy will be addressed in the Natural Resources and Waste DPD. The Sustainability Appraisal for the CS should also address this point.</p>	<p>Amend text</p> <p>Check link in the Nat. Resources & Waste DPD</p>
Weetwood Residents Association	Strongly support priority of improving people's access to GI. However, should commit to increasing the amount of greenspace in deprived areas in the inner city alongside that proposed in the city centre.	The PPG17 Audit will draw attention to areas deficient in greenspaces and the outcome of this work will be addressed in the Site Allocations DPD.	None
Leeds Local Access Forum	ROWIP has now been adopted, it is no longer draft.	Comments noted, amend text accordingly	Amend text
Aire Action Leeds	Request that fish passage and the return of migratory fish is included in the GI section. The R. Aire corridor is a real asset and with passage for migratory fish, it has the potential to deliver more for recreation and wildlife.	Include a brief reference to this in para 5.1.24	Amend text
POLICY G1			
Sport England	Paras 5.1.18 & 5.1.19 recognise that green networks are important "for wildlife but they also enable local communities to access greenspace for recreation and exercise close to where they live." However, this function has not been reflected in Policy G1.	Agreed. Suggest that the following is added to Policy G1: " <u>.....seek ways to enhance the following key corridors for wildlife, amenity and to enable local communities to access greenspaces for sport and recreation.</u> ".....	Amend text

<p>ID Planning and Dacre, Son & Hartley</p>	<p>It is inappropriate to identify areas of restraint in the absence of a full consideration of all land use requirements, including housing & employment land. GI would be more appropriate to an Allocations DPD where competing demands can be balanced appropriately.</p> <p>If GI policy is retained it should be made clear that GI notation doesn't preclude development and should set out a criteria based policy assessment for allowing development/allocations within green infrastructure corridors.</p> <p>Policy G1 is not sound and cannot be justified as it is not based on a sound and credible evidence base.</p>	<p>Para 5.1.20 already states that “the inclusion of an area within the defined GI does not necessarily mean that no development can take place in those areas.” The representation does not address the need to establish a hierarchy of GI <u>at all spatial levels</u>, as required by RSS. A Site Allocations DPD will consider GI at a much more detailed level where competing demands for other site-specific land uses will be taken fully into account. The strategic GI in the core Strategy is focussed upon broad areas and corridors which are not fixed to specific boundaries.</p> <p>It also states that each constituent part of the GI has its own individual character and tolerance to accommodate sympathetic development of an appropriate scale.</p> <p>The Core Strategy is effectively implementing the requirement in RSS (Policy YH8) to “define a hierarchy of GI, in terms of location, size and levels of use <u>at every spatial scale</u> (our underlining). In Leeds this has been done at a strategic level, in partnership with Natural England, by analysing existing natural, historic, cultural, sport and playing field, and river and landscape assets. This work has also included the identification of new assets required to deliver GI. The Appendix to the CS includes this evidence base.</p>	<p>None</p> <p>None</p> <p>None</p>
<p>Leeds Civic Trust</p>	<p>The Policy should include private gardens to prevent ‘garden grabbing.’</p>	<p>This is too detailed for inclusion in the Core Strategy</p>	<p>None</p>
<p>British Waterways</p>	<p>Support the policy as it promotes the canal network, including the canal towpath as part of the district's green infrastructure. However, the benefits of GI such as waterways should not be viewed purely in environmental terms as waterways have the ability to deliver economic and social benefits as well.</p>	<p>Agreed. The GI will not preclude the Council and British Waterways working together to enliven the waterfront and deliver schemes which are of economic and/or social benefits.</p>	<p>None</p>

Scott Wilson	<p>Important that designation as GI does not become a barrier to development as there will be situations where development will provide an opportunity to enhance its quality and improve access within it.</p> <p>Suggest that all areas to be designated as GI should be listed in Policy G1, rather than just the selected list. Using the 13 areas listed in Appendix 6 could be appropriate.</p>	<p>This is already accepted – see para 5.1.20</p> <p>Agree, it could be clearer. Within the context of the Core strategy, areas of GI are intended to be broad swathes and corridors. However, the Appendix should be amended to list the broad areas listed in Policy G1, adding South Leeds and the Limestone Ridge, and then list all the areas defined as GI under those broad headings.</p>	<p>None</p> <p>Amend list in Policy G1 and reconfigure the Appendix</p>
Dacre, Son & Hartley	<p>There is no evidence base to support the broad areas selected.</p>	<p>The areas selected are based upon existing strategic 'multi-functional' greenspaces which are represented in a diagrammatic form or broad swathes to fit the strategic nature of the Core Strategy (see Appendix). Added to this are obvious 'gaps' or 'opportunities' to enhance Leeds' GI.</p>	
Natural England	<p>Reference to seeking ways to strengthen GI links across the city centre should be incorporated into Policy G1. Also, reference to the north-south corridor running along the limestone ridge in the eastern part of the district should be identified as an area for enhancement due its importance as a habitat network at a national scale.</p> <p>Also, key corridors do not include corridors in South Leeds that have previously identified by Natural England i.e. Morley-Middleton-Holbeck corridor. Given the regeneration focus in this part of Leeds, a GI corridor would bring multiple benefits, such as improving quality of place and encouraging walking & cycling.</p>	<p>This is covered in Para. 5.1.9 and expanded on in the Appendix to show the links.</p> <p>All the GI is important and the importance of the Limestone Ridge is properly recognised. Leeds City Region is considering priorities for enhancement at the regional level.</p> <p>Agree - need to re-consider the South Leeds area. Also, amend Policy G1 to refer to the Lower Aire Valley (including the City Centre) and add Limestone Ridge and South Leeds</p>	<p>Amend main text (Policy G1) and Appendix</p>

POLICY G2			
Sport England	Is it the Council's intention to draw up a 'Developer Contributions SPD to further explain and implement this policy? If so, Sport England has a document which may be of assistance (Spatial Planning for Sport & Recreation: Sport and Recreation in Supplementary Planning Documents).	There has been no decision to draw up such an SPD but it is likely that existing SPG4 will need to be updated and replaced. Sport England's offer of support and advice is welcomed.	None
CB Richard Ellis	Policy G2 seeks to extend developer contributions to pay for green infrastructure provision in areas which may be completely unrelated to the development being proposed, contrary to Circular 05/05, as the enhancement of strategic sites cannot be reasonably viewed as necessary to mitigate the localised impact of a development.	<p>Suggest a re-wording of Policy G2 to make the Council's intentions clearer and to replace saved Policy N8 (new additions underlined):</p> <p>Policy G2 Where a level of development is considered to be acceptable within or <u>immediately</u> adjoining areas defined as Green Infrastructure on Map 1, <u>development proposals should ensure that:</u></p> <ul style="list-style-type: none"> - <u>any existing Green Infrastructure/corridor function of the land is retained and improved; and</u> - <u>where appropriate, the opportunity is taken to extend the GI by <u>linking greenspaces</u> or by filling in gaps in Green Infrastructure corridors, including (<u>where relevant</u>) extending green corridors into Leeds City Centre.</u> <p>The Council will, <u>where appropriate</u>, seek developer contributions to improve the quality of the Green Infrastructure, in accordance with the advice in <u>Circular 05/2005</u>.</p> <p>Also, make it clearer in supporting text that, in complying with policy requirements for residential schemes, the opportunity is taken to create greenspaces on site, which will enhance the quality and character of the surrounding GI.</p>	<p>Review boundaries of N8 and GI to see how they compare – amend as necessary</p> <p>Amend Policy G2 and supporting text</p>

GVA Grimley Ltd	Developer contributions for GI must be appropriate, proportional and directly mitigate impacts on the green network caused by development and not undermine viability, esp. in regeneration areas.	Any contributions /planning obligations would need to be consistent with guidance contained in Circular 5/2005.	None
Savills	Only developments that are directly related to the greenspace shown on the Map should provide a monetary contribution towards Green Infrastructure and the natural environment.	A development which is situated within an area of GI will require a different approach. A policy framework is needed to ensure that the development control process is able to deliver improvements to the wider GI network where this is appropriate rather than just standard on-site greenspace. This will necessitate developers linking up or connecting into existing greenspaces where appropriate.	
ID Planning	There is a danger that Policy G2 will place unreasonable burdens on development over and above that normally required that would be directly and fairly limited to the development itself. The policy is vague and consideration should be given to the introduction of a threshold and criteria to clarify the terms of any contributions. It may be better to have only one policy which deals with developer contributions in the round.	See proposed revised wording to Policy G2 above	
Barton Wilmore Planning	Agreed that contributions to improve the quality of GI or to fill in gaps should be sought where appropriate but there should be just one policy in the CS which deals with developer contributions in the round, which has regard to the five tests in Circular 5/05.		None
Aspinall Verdi	Object to Policy G2. Development control powers should be used to ensure that a proposal which is situated in an area of GI is designed with this in mind, and in such a way as to enhance the GI.		
Dacre, Son & Hartley	Policy G2 unreasonable. Developments outside Greenspace designation should not be required to have any regard to designation save for appropriate design & landscaping. The policy is not fully justified and is not founded on any robust and credible evidence base.		

Carter Jonas	<p>Whilst agreeing with this policy, it is not clear that how it will be delivered or enforced. Further it is not clear whether the green infrastructure requirements are in addition to or included within the broader requirements for open space.</p> <p>Greenspace/amenity open space which no longer serves a useful amenity/greenspace function should be considered for more efficient land uses including, but not limited to, development for housing where this is appropriate.</p>	<p>This policy specifically applies to sites <u>within</u> or <u>adjacent</u> to GI, therefore it does say where it applies. The main objective of the Policy is to ensure that greenspace is provided on site in accordance with established policies. However given its location within or adjacent to GI, there is clearly a presumption that developers, through the design process, will attempt to integrate the site with the GI and to give added value to its character and quality.</p> <p>This issue will be identified in the PPG17 Audit and will be addressed in a future Site Allocations DPD.</p>	<p>Amend Policy G2 as suggested.</p> <p>No further action needed at this stage</p>
English Heritage	<p>Support Policy G2 as a number of areas within the GI network are either designated as being of historic performance, contributing towards the character of Conservation Areas or provide a setting for listed buildings. Commuted sums could be used towards restoring areas of historic interest in the vicinity of development sites which are "at risk".</p>	<p>Comments noted</p>	<p>None</p>
Peacock & Smith	<p>Para 5.1.20 states that some parts of the GI have very limited or no potential for development, whereas in other areas such as the Lower Aire Valley, carefully considered housing growth may mean that GI can be delivered and/or enhanced. The appraisal seems to be highly selective and additional broad guidance would be beneficial, including that there are other locations closely related to the settlements within the GI that will be capable of development without adverse effects on the objectives of the GI.</p>	<p>The approach in the Core Strategy reflects the fact that the majority of the strategic GI is rural and by its very nature sensitive to development pressures. The Lower Aire Valley is specifically mentioned because it is a major regeneration and growth area for the city, where major structural greenspace will be required to ensure that such growth is sustainable and that green links along the river corridor are strengthened, particularly the wetland reserves/habitats.</p>	

British Waterways	Supports the use of the towing path as sustainable transport routes for both walking and cycling in line with 'Planning a Future for the Inland Waterways, 2001.' Also comment that whilst waterside developments and regeneration schemes benefit from their waterside location, they can place extra burdens on the waterway infrastructure, such as towpaths. Therefore policies should be framed to support the imposition of conditions or planning obligations to help mitigate such impacts.	Comments noted. The general point is covered by the clear desire to improve access to areas defined as GI. Developer contributions to GI are addressed in Policy G2	None
Policy G3			
GVA Grimley	Provision of greenspace must relate to existing provision and surroundings and consider the existing/proposed function, use and quality of greenspace alongside the use of national standards to maximise community benefit and use.	Comment Noted	
ID Planning	Absence of any definition as to what a major growth area is in terms of location, site size or other threshold. Policy therefore requires greater clarity and explanation.	This will be dealt with elsewhere in the Core Strategy once these have been identified. However, it is important that the amount of GI keeps pace with housing growth and we need to keep in mind the following: The District's housing target is 4,300 dwgs (net). As a frame of reference, applying existing UDP Policies N2-N4, this equates to an annual need for 17.2 ha of greenspace. Multiplying this by 16 years, the remaining life of the RSS (to 2026), this means that Leeds would need to plan for an additional 275 ha of new greenspace. By way of comparison, one would need the equivalent of Roundhay Park (180 ha.) Horsfall Hall Park (14.5 ha.). Golden Acre Park (42 ha.), Dartmouth Park, Morley (6.0 ha.), Churwell Park (2.0 ha. and Kirk Lane Park, Guiseley (24 ha.) to achieve an area close to this figure.	To be considered as part of the Housing Background paper.

Barton Wilmore	Not considered necessary to identify the major growth areas specifically for providing greenspace. Proposes that Policy G3 is deleted and that only saved policy N2 is applied.	<p>The representation misunderstands the purpose of the policy which is to ensure that <u>in addition to</u> applying greenspace standards, developers within or close to areas defined as forming part of Leeds' Green Infrastructure will be expected 'key into it' successfully. The key point is that GI forms an integral part of dealing with housing growth. Major Growth Areas will be defined elsewhere in the Core Strategy.</p> <p>Areas of Leeds proposed for significant longer term growth should, within the context of the Core Strategy, be exemplars of sustainable development. This will mean achieving environmental, social and economic objectives concurrently. Consequently, developers should go beyond simply applying saved policy N2. Developers should demonstrate how GI can be genuinely multi-functional and deliver sustainability objectives, including Sustainable Urban Drainage (SuDS).</p>	Need to be clearer that G3 applies to housing growth areas within or on the edge of areas defined as GI
Dacre, Son & Hartley	Major growth areas needs further clarification. There is no reference to the location or size threshold to these sites.	As above	
Natural England	Support the policy. Natural England sees such areas as helping to contribute to the emerging Leeds City Region GI Strategy. Growth areas should be genuine exemplars of sustainable development. Networks of multi-functional GI need to be designed into all major developments and regeneration schemes from the outset. This goes beyond "successfully assimilating" proposals into adjoining GI. Developers should be required to produce a site based plan to accompany a development proposal in order to demonstrate how GI can be genuinely multi-functional and deliver sustainability objectives. Policy G3 and supporting text should be amended to clarify this objective.	<p>Comments noted. However, it is important to note that GI work at the Leeds City Region level is not intended to provide a policy base or substitute the work in each Local Planning Authority. LCR work is geared to coordinating the work across the region and decide on priorities for funding bids.</p> <p>The suggestion of requiring developers to produce a site based plan to demonstrate how their schemes can be successfully assimilated into GI is too detailed for the Core Strategy and will be addressed at a more detailed master planning level.</p>	None
Policy G4			
Natural England	NE support the policy. They will send a copy of their Habitats Map when it becomes available.	Comments noted.	None

Leeds Civic Trust	Policy should be strengthened. The word “usually” in the context of the prevention of development with an adverse impact provides a significant get-out clause.	Disagree – the word ‘usually’ is appropriate	None
Turley Associates	Policy is too detailed for the Core Strategy which should focus on overall vision and strategic themes. Policy would be more appropriate to a DPD addressing development management policies	Disagree – the Policy is entirely consistent with strategic planning and the approach being adopted in the Core Strategy	None
Drivers Jonas	Broadly agree with the need to protect wildlife habitats and diversity but this must be balanced against the need to make efficient use of brownfield land.	Noted and agree. The Council is trying to make the best use of brownfield land as well as formulate policies to protect wildlife habitats.	None
Dacre, Son & Hartley	Where development sites are to be located within a habitat network of any significance, the mitigation of any impact should be through design and not via a financial contribution.	It would be the Council’s preference to mitigate potentially adverse effects through design rather than a financial contribution. However, this may not always be possible and the Council’s ability to secure financial contributions should be retained. In reality it could be ‘either/or’.	None
Carter Jonas	<p>Not clear how the policy seeks to give habitats and biodiversity a level of protection proportionate to their importance and status.</p> <p>The Site Allocations DPD will identify the physical extent of protected habitats. The CS should provide an appropriate overarching policy hook.</p> <p>There is a duplication of policy between G4 and biodiversity policies B1-B5. The linkage between these needs to be explained.</p>	<p>This is dealt with in the biodiversity section.</p> <p>Boundaries to nature conservation sites are defined by West Yorkshire Ecological Advisory Service and Natural England. These will be reflected in a Site Allocations DPD. The ‘policy hook’ for specific allocations is the habitat network.</p> <p>One is dealing with the details of biodiversity, the other (Core Strategy) is dealing with the broader ‘network.’</p>	None
GVA Grimley	Contributions to the habitat network should be directly proportional to any adverse impact on identified species from new development and should not impact on viability, especially in regeneration areas.	Comments noted. Any contributions /planning obligations would be consistent with Circular 5/2005	None

Univ of Leeds	Is Policy G4 strong enough in saying that development will not usually be permitted which would have a significant adverse impact on the integrity and connectivity of the habitat network.	The use of the word 'significant' is important as it requires an element of judgement and provides some form of flexibility in the application of the policy.	None
Policy G5			
Natural England	Policy G5 is wholly appropriate and NE support Leeds' efforts to increase woodland cover.	Comments noted. However, it might be a clearer intention of the policy if we titled Policy G5 as "CREATING NEW WOODLAND" Also, it might also be clearer if we referred to developer contributions in the policy as follows: "Policy G5: Creating New Woodland The Council will on its own initiative and through the development process, including developer contributions, work towards"	
Barton Wilmore	Policies G5A and G5B (and SC8) are development control type policies that should not be contained in the Core Strategy and should be deleted	Agree - Suggest that Policies G5A & G5B are deleted. Issues are covered in separate legislation and anything additional can be covered in the Site Allocations DPD.	Delete Policies G5A & G5B
Scott Wilson	Support this policy and Parlington Estate is a possible location to accommodate increased woodland cover as part of a leisure proposal. Suggest amendment to wording of Policy G5B as follows " <u>...will be resisted unless proposals can demonstrate a positive contribution to the habitat network.</u> " (suggested change underlined)	Comments noted Policy to be deleted	Delete Policy G5B
Carter Jonas	Not clear what the purpose of this policy is other than to increase tree cover for its own sake. Therefore question its soundness. May be better subsumed within a broader GI Policy. Policies G5A & G5B are not strategic matters and should be deleted	The CS is surely the correct place to articulate an aspiration to increase woodland cover over the whole district to address amenity, wildlife, biodiversity, recreational & climate change issues. The Core Strategy has an integrated approach which seeks to bring these issues together in a coherent way. Suggest that Policies G5A & G5B are deleted.	Delete Policies G5A & G5B

Barwick in Elmet & Scholes PC	Support policies to increase woodland cover throughout the district and preserve important ancient woodlands.	Comments noted	None
Turley Associates	Policies G5A and G5B are too detailed for the Core Strategy which should focus on overall vision and strategic themes. They would be more appropriate to a DPD addressing development management policies	Suggest that Policies G5A & G5B are deleted.	Delete Policies G5A & G5B
Policy G6			
Natural England	NE support the development of a network of wetland nature reserves and complementary greenspaces within the Lower Aire Valley. This will be a key resource for the community of Leeds as a whole.	Comments noted. Suggest that the word “reserves” is deleted from the policy as not all of them have this formal status. Instead, use the phrase “wetland areas”, i.e. Policy G6: Lower Aire Valley The Council will support the development of a network of wetland nature areas and complementary Greenspaces	None
Turley Associates	Policy is too detailed for the Core Strategy which should focus on overall vision and strategic themes. Policy would be more appropriate to a DPD addressing development management policies. Map 1 appears to indicate the majority of AVL to be within the GI network even though it contains commercial sites and brownfield sites with planning permissions in place. The GI notation should more closely follow existing areas of wildlife importance.	Disagree. The Lower Aire Valley is a strategic growth/regeneration area and proposed urban eco-settlement. As such, an appropriate and commensurate emphasis on the need to incorporate GI is essential part of this planned growth. This should not be restricted to existing greenspace/wildlife areas as it would weaken the Council’s aspiration to ensure that overall development is sustainable and to promote a green corridor along the whole of the Aire Valley corridor. This is not inconsistent with realising the area’s development potential.	None
Carter Jonas	No justification as to why an area specific policy is included or that specific strategies/policies are not included for other key corridors and areas.	Disagree. The Lower Aire Valley is a strategic growth/regeneration area and proposed urban eco-settlement. As such, an appropriate and commensurate emphasis on the need to incorporate GI is essential part of this planned growth.	None

Policy G7			
Natural England	Policy is supported. The PPG17 audit will help to identify the quantity and quality of greenspaces in the district and ensure that Leeds residents are able to benefit from access to such spaces, including improved physical and mental health.	Comments noted. May need to delete this policy prior to Publication once the PPG17 Audit & Assessment has been published.	None
Miscellaneous			
Stanks and Swarcliffe Residents Association	There is a need to invest in flood prevention in the Wyke Beck Valley	Noted. No amendments to GI Chapter required. The Environment Agency are doing this as part of the Flood Alleviation Scheme for the Wyke Beck Valley	None
Drivers Jonas	The wording of Policy SC8 should be amended to demonstrate that the retention of some natural features within the context of a comprehensive redevelopment or master planning of a site may be inappropriate and that their removal may in some instances be integral to a site's successful redevelopment. Request that the wording be altered to reflect that the need to retain such features should be made on a site by site basis.	Disagree. The emphasis should be on retaining natural features and their removal should be an exception to policy.	None

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