



DEVELOPMENT PLAN PANEL

Meeting to be held in Civic Hall, Leeds on
Tuesday, 22nd June, 2010
at 1.30 pm

MEMBERSHIP

Councillors

J Lewis
R Lewis
L Mulherin
N Taggart (Chair)

S Smith

B Anderson
C Fox

T Leadley

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 11th May 2010</p> <p>(Minutes attached)</p>	1 - 6
7	All Wards;		<p>LEEDS LDF CORE STRATEGY - THE CHANGING CONTEXT POST ELECTION</p> <p>To consider a report of the Director of City Development setting out details of the Government's intention to abolish the Regional Spatial Strategies and to consider the implications of the proposed changes to the Leeds Core Strategy.</p> <p>(Report attached)</p>	7 - 10

Item No	Ward	Item Not Open		Page No
8	All Wards;		<p>LEEDS LDF CORE STRATEGY - 'PREFERRED APPROACH' ANALYSIS OF CONSULTATION RESPONSES: VISION FOR LEEDS AND SPATIAL VISION CHAPTER</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 which provides further detailed consideration of the comments received in respect of the Vision for Leeds & Spatial Vision Section</p> <p>(Report attached)</p>	11 - 38
9	All Wards;		<p>LEEDS LDF CORE STRATEGY - 'PREFERRED APPROACH' ANALYSIS OF CONSULTATION RESPONSES: MANAGING ENVIRONMENTAL RESOURCES CHAPTER</p> <p>Further to minute 34 of the meeting held on 2nd February 2010, to consider a report of the Director of City Development which provides further detailed consideration of the comments received in respect of the Managing Environmental Resources theme</p> <p>(Report attached)</p>	39 - 76
10	All Wards;		<p>LEEDS LDF CORE STRATEGY - 'PREFERRED APPROACH' ANALYSIS OF CONSULTATION RESPONSES: MANAGING THE NEEDS OF A GROWING CITY</p> <p>Further to minute 34 of the meeting held on 2nd February 2010, to consider a report of the Director of City Development which provides further detailed consideration of the comments received in respect of the theme “Managing the Needs of a Growing City”</p> <p>(Report attached)</p>	77 - 184

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11	All Wards;		<p>NATURAL RESOURCES AND WASTE DEVELOPMENT PLAN DOCUMENT - 'POLICY POSITION' DOCUMENT: ANALYSIS OF CONSULTATION RESPONSES</p> <p>Further to minute 46 of the Development Plan Panel held on 11th May 2010, to consider a report of the Director of City Development providing further detailed consideration of the comments received and the proposed Council response</p> <p>(Report attached)</p>	185 - 290
12			<p>DATE AND TIME OF THE NEXT MEETING</p> <p>To note that the next meeting will take place on Tuesday 13th July 2010 at 1.30pm in the Civic Hall, Leeds</p>	

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Agenda Item 6

Development Plan Panel

Tuesday, 11th May, 2010

PRESENT: Councillor C Fox in the Chair

Councillors B Anderson, T Hanley,
D Blackburn, T Murray and R Lewis

42 Late items

There were no formal late items, however Panel Members were in receipt of supplementary information in respect of a summary of the community engagement on the Residual Waste Treatment project (minute 46 refers)

43 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:

Agenda items 8 and 9 – Leeds LDF Core Strategy – Analysis of consultation responses: A well connected city (transport) theme and Sustainable Communities theme – Councillor Anderson declared personal interests through being a member of West Yorkshire Integrated Transport Authority as Metro had commented on these matters (minutes 47 and 48 refer)

44 Apologies for Absence

Apologies for absence were received from Councillors Gruen, Leadley and Smith

45 Minutes

RESOLVED- That the minutes of the Development Plan Panel meeting held on 9th March 2010 be approved.

46 Leeds LDF Natural Resources and Waste Development Plan Document - 'Policy Position' Consultation (initial report of consultation)

Further to minute 23 of the Development Plan Panel meeting held on 13th October 2009 where Panel considered a report on the scope and content of the Natural Resources and Waste Development Plan Document prior to a period of informal consultation, Members considered a report of the Director of City Development setting out a summary of the responses received to that consultation. The report also set out the current position on the preparation of the documents for independent examination

The Head of Forward Planning and Implementation presented the report and informed Members of the various events which had been arranged as part of the

Draft minutes to be approved at the meeting
to be held on Date Not Specified

consultation which had resulted in over 100 responses, some of which were very detailed. He also referred to the document which had been tabled to the Panel setting out the consultation by colleagues in Waste Management as part of the PFI procurement process for a Residual Waste Treatment facility

Arising out of the consultation of the DPD, Members were informed that whilst there was a measure of support for the emerging 'policy position' there were a number of key issues to consider. These included planning issues associated with the residual waste treatment proposals and the representations received from the Coal Authority regarding the presentation Minerals Safeguarding Areas. These matters would need to be covered in further detail as part of the more detailed analysis of responses at the next stage of the process

Members commented on the following matters:

- the number of responses which had been received; that this was disappointing and that not everyone had responded to all of the questions which were posed
- the number of non-answers which could be interpreted either as an acceptance of or rejection of the issues
- that some of the events were held in supermarkets which perhaps should have yielded a higher response rate
- that the impression from the information in the report was that the general public had not really been consulted

The Head of Forward Planning and Implementation gave the following responses:

- regarding the number of responses received, that the LDF process differed from the UDP process and was about more engagement at an earlier stage in order to try and address issues before policies were drawn up and submitted for final consultation
- that the consultation had given a sense of what the reaction to proposals would be
- that much information had been available; that many people had expressed an interest in the consultation and had taken away leaflets etc and where specific sites were being looked at, Officers had contacted the landowners/tenants, where individual sites were specifically affected by the proposals

RESOLVED – To note the report, 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

47 Leeds LDF Core Strategy - 'Preferred Approach' Analysis of consultation responses : A Well Connected City (Transport) theme

Further to minute 34 of the Development Plan Panel meeting held on 2nd February 2010 where Panel considered a report on the initial feedback on the consultation exercise for the Leeds LDF Core Strategy ' Preferred Approach', Members considered a report of the Director of City Development setting out further detailed consideration of the comments received in respect of the transport theme

Officers presented the report and stated that the main theme of the transport chapter was a 'well-connected city' based on the delivery of a sustainable and integrated transport strategy to support economic growth and the RSS housing

targets, whilst seeking to address climate change issues; safety; security and health; equality of opportunity and quality of life

The four main policy areas in this theme were:

- Transport investment and management priorities
- Accessibility requirements and new development
- Freight
- Managing the growth of Leeds Bradford Airport

A total of 150 individual responses had been received and that in general there was support for the majority of the policies. Members were informed of the main areas of concerns which were:

- the need to integrate the location of transport infrastructure and potential housing growth areas
- increased traffic at Leeds Bradford Airport
- that there were insufficient proposals contained in the document
- concerns about the availability of funding for the existing proposals and that the economic downturn could mean that some of the proposals could not now be delivered

Members were informed that Transport Leeds were looking at transport requirements for the next 20 years; that subject to further commissioning by the Government, that ongoing work would be undertaken on delivering a sustainable transport system and that a new transport model would be available for use in the next few months

Members commented on the following matters:

- provision for roadside services and whether this referred to formal or informal facilities. Officers stated that this related to formal services and that they were of the view that the current services were sufficient to meet the needs of road users
- the comments received on the inadequacy of transport to the airport and where the thrust of these comments emanated from. Members were informed these were largely responses from individuals and that in terms of funding new infrastructure for Leeds Bradford Airport, it was expected that the airport would make a significant contribution to this
- the tram train; the view that the situation on this had moved on and that there was no intention of increasing the frequency of the tram train
- regarding carbon emissions, that there was a policy for a 40% reduction across the Leeds economy and that the document had to take this into account. Officers stated that the proposals would help to reduce carbon emissions
- that the strategy should be more ambitious
- the importance of ensuring that the proposals could be funded and would be capable of being delivered and that this could lead to some difficult decisions having to be made
- that the current economic situation could not be ignored but that the ambitions in the transport proposals had to be retained to ensure Leeds was ready when the recovery began. Whilst Officers were supportive of this, it was stated that it would be challenging to match ambitions with the resources which were available

Regarding funding, Officers stated that the Department of Transport

Programme looking at the delivery of a sustainable transport system was looking at funding up to 2019. However, future funding provision was currently uncertain, within the context of wider reductions in public spending. Despite this difficult context, the City Council and its partners were committed to delivering sustainable transport initiatives

RESOLVED - To note the report, the comments now made and the course of further action as set out in appendix 1 of the submitted report in preparing a draft Publication Core Strategy

48 Leeds Local Development Framework Core Strategy - 'Preferred Approach' Analysis of consultation responses : Sustainable Communities Theme

Further to minute 34 of the Development Plan Panel meeting held on 2nd February 2010 where Panel considered a report of the initial feedback on the consultation exercise for the Leeds LDF Core Strategy 'Preferred Approach', Members considered a report of the Director of City Development setting out further detailed consideration of the comments received in respect of the sustainable communities theme

Officers presented the report and stated that this theme was a wide ranging one to reflect community needs

Arising out of the consultation there would be an expansion of the information in respect of regeneration areas. For the AAPs which were not now being taken forward some of the information from these documents would be placed in the Core Strategy where appropriate. Aire Valley Leeds would also be highlighted to a greater degree in the Core Strategy, possibly with its own chapter

Members were informed that there had been general support for uses in centres and edge of centres, but that more specific information was needed. There was a need to balance appropriate uses to each centre and the need for the retention of Post Offices had been highlighted. However, it had to be accepted that some uses were not able to be situated in local centres, eg schools, hospitals and some leisure facilities

In respect of Sustainable Design and Construction, there had been a wide range of responses received with many people asking for stricter regulations for new development. Members were informed that higher standards for development would be encouraged but that these should not be too onerous. The Panel was informed that this particular chapter would be moved to sit with environmental policies as it was thought this was a more appropriate place for this information

Members discussed the following matters:

- whether West Leeds Gateway would still be given high priority in view of the withdrawal of the AAP
- the siting of offices; that the steer was to locate this use in centres and how applications for out of centre offices would be dealt it
- the impact of large supermarkets and Tesco in particular, on local centres and that the document did not seem to address this problem

Officers provided the following responses:

- that West Leeds Gateway (as a Supplementary Planning Document) would be given as high a priority as possible and that the main thrust of the aspirations to regenerate West Leeds had been retained

- regarding the location of office accommodation, that in terms of the Core Strategy offices should be located in centres, but applications would be judged by Officers in Development Control on a site by site basis and on the individual merits of the application
- that a Town Centre Survey was to be undertaken which would look at the most suitable locations for any further supermarket retailing

RESOLVED - To note the report, the comments now made and the course of further action as set out in appendix 1 of the submitted report in preparing a draft Publication Core Strategy

49 Leeds Local Development Framework Core Strategy - 'Preferred Approach' - Analysis of consultation responses: Green Infrastructure (and Natural Environment) theme

Further to minute 34 of the Development Plan Panel meeting held on 2nd February 2010 where Panel considered a report of the initial feedback on the consultation exercise for the Leeds LDF Core Strategy 'Preferred Approach', Members considered a report of the Director of City Development setting out further detailed consideration of the comments received in respect of Green Infrastructure - the natural environment theme

Officers presented the report and stated that the concept of Green Infrastructure had been put forward by Natural England with whom Officers had worked closely alongside other authorities in the Leeds City Region. Members were informed that Leeds City Council was viewed by the Leeds City Region to be an pioneer in respect of Green Infrastructure

Members were informed that 142 responses had been received and overall the ideas put forward in the consultation had been well received

Concerns had been raised from developers and advisers in relation to developer contributions as these were seen as potential burdens which could undermine viability, however it was important for the Council to continue to seek such contributions

In respect of Policy G3 – Housing Growth Areas, developers were of the view that this required further clarification or should be deleted

Policy G5 – the creation of new woodlands was well received however the policies in respect of TPOs and Ancient Woodlands were considered to be too detailed and Officers were of the view that these should be deleted from the Core Strategy and be picked up in more detail elsewhere

A plan showing the extent of the Green Infrastructure had been provided as part of the consultation and several further suggestions for possible areas had been received, ie the South Leeds corridor and the Morley/Middleton Corridor as well as the woodland on the Outer Ring Road

Natural England had suggested the Council carry out an up-to-date character assessment to help strengthen the evidence base for this theme, however there were resource issues associated with this. Officers considered that some of the work done for the UDP could be revisited and updated for the Core Strategy

RESOLVED - To note the report, the comments now made and the course of further action as detailed in appendix 1 of the submitted report in preparing a draft Publication Core Strategy

50 **Date and time of next meeting**
Tuesday 8th June 2010 at 1.30pm



Originator: S. P. Speak

Tel: 2478086

Report of the Director of City Development

Development Plan Panel

Date: 22 June 2010

Subject: Leeds LDF Core Strategy – The changing context post election

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. The Coalition government has recently indicated that it plans to rapidly abolish Regional Spatial Strategies. RSS for Yorkshire and the Humber (2008) currently provides the context for the Leeds Core Strategy.
2. This report considers the implications of this proposed change and concludes that current progress on the Leeds Core Strategy should be maintained.

1.0 Purpose of this report

- 1.1 To inform Members of the new government's proposals for changes to the planning system and to consider their implications for the Core Strategy.

2.0 Background information

- 2.1 On 20 May 2010 the new government published "The Coalition: our programme for government". Among many proposals is the clearly stated intention to "rapidly abolish Regional Spatial Strategies and return decision making powers on housing and planning to local councils". The proposals also herald a radical reform of the planning system in the longer term, a simple and consolidated national planning framework, abolition of the Infrastructure Planning Commission and protection of the green belt and green spaces. This is broadly consistent with the proposals set out in the Conservative Party publication "Open Source Planning".
- 2.2 Members will be aware that the context for the Leeds Core Strategy has been the Regional Spatial Strategy for Yorkshire and the Humber, published in May 2008. This established a wider planning framework of spatial principles and objectives, including setting targets for housing growth. Section 24 of the Planning and Compulsory Purchase Act 2004 requires that local development documents, such as the Core Strategy, must be in general conformity with RSS and that the local planning authority must request an opinion on conformity from the regional planning body. The Leeds Core Strategy has thus been prepared with this in mind.

3.0 Main issues

- 3.1 Section 10 (5) of the Planning and Compulsory Purchase Act 2004 authorises the Secretary of State at any time to revoke an RSS. Although the Coalition publication is very clear on the intent to abolish RSS there is no indication of what transitional arrangements (if any) will be put in place until the "radical reform" of the system is delivered, presumably through a new planning act.
- 3.2 However, it seems clear that the Coalition government expect plans to be developed at a local level and unless and until the system is replaced that means the LDF, including the Core Strategy.
- 3.3 Notwithstanding the present uncertainty this would suggest that we need to press ahead with work on the Core Strategy and other LDF documents. Following the abolition of RSS many of the principles established in the Core Strategy will remain valid. The concentration on urban transformation and the established regeneration priorities; climate change and sustainability; and protection of green belt and green spaces are likely to remain the cornerstones of any plan.
- 3.4 One of the most contentious issues in the emerging Core Strategy has been the scale and location of housing growth. The Core Strategy Preferred Approach anticipated a possible change in the housing targets. Paragraph 5.3.30 provides that

"...The Council is aware that the targets may be reviewed either through the Integrated Regional Strategy or a change in national policy. The spatial approach, priorities and phasing of the Core Strategy are considered to be sufficiently flexible to accommodate changed circumstances. In the event that the housing target is reduced this would have the effect of extending the life of the identified supply in the sequentially preferable locations and would mean that less PAS and Green Belt land would be needed or conceivably none at all."

- 3.5 Given that a potential change to housing targets was anticipated and that the principles and priorities of the plan are likely to remain valid in the absence of RSS abolished, there is a strong basis for progressing the Core Strategy. The current phase of reviewing consultation responses allows some time for further national guidance to emerge.
- 3.6 Members need to be aware of this changing context when considering the Council's response to the representations. This will be particularly relevant when dealing with "Managing the Needs of a Growing City".

4.0 Implications for council policy and governance

- 4.1 None. Members will be updated on the changing policy context as details emerge. The impact of any changes will be considered by the Panel prior to proposals being submitted to Executive Board for Publication and Submission.

5.0 Legal and resource implications

- 5.1 The Council will need to respond to any new requirements that arise from the changes being promoted by the new government. This could give rise to new areas of work, including technical studies and research. Any such work and resource commitments will need to be addressed within the context of the overall budget and priorities.

6.0 Conclusions

- 6.1 Notwithstanding the anticipated abolition of RSS and expected changes to the planning system the need for strategic planning at the local level remains. At present this will be encompassed in the Local Development Framework of which the Core Strategy is the key document. The emerging approach in the Core Strategy is sufficiently flexible to accommodate emerging changes, particularly the removal of the RSS housing targets, which was anticipated in the previous consultation draft. In the circumstances it is considered important that work on the Core Strategy is continued. The further impact of any further changes to the system will be reported to Panel as they become clear.

7.0 Recommendations

- 7.1 Development Plans Panel is recommended to note the contents of this report.

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Report of the Director of City Development

Development Plan Panel

Date: xx June 2010

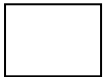
Subject: Leeds LDF Core Strategy – ‘Preferred Approach’ Analysis of Consultation Responses: Vision for Leeds & Spatial Vision Chapter

Agenda Item:

Originator: David Feeney
Tel: 247 4539

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 Vision for Leeds & Spatial Vision section.
3. Particular topics covered include the overall vision and spatial approach, the scope of the emerging themes and individual objectives. Overall, it can be noted that there was a large measure of support for the broad approach but a series of points regarding the need for clarity, greater emphasis and further detail in specific areas. These include the housing strategy and the interrelationships of development with neighbouring authorities.

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 Vision for Leeds & Spatial Vision section.

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 Vision for Leeds & Spatial Vision section. 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 "Vision for Leeds" chapter of the Core Strategy 'Preferred Approach', sets out the overall 'Vision for Leeds' & Spatial Vision for the Core Strategy and linked to these, a series of Strategic Themes and Spatial Objectives. This framework in turn, provides a structure for the remaining document as part of an integrated approach. The requirement for an overall 'Vision' stems from national guidance (PPS12), which also emphasises the need for Core Strategies to give 'spatial expression' to Community Strategies (the Vision for Leeds). In the Leeds context it should be noted that the Vision for Leeds is currently undergoing review, with further consultation planned later in the year. Within this context the Publication and Submission drafts of the Core Strategy, will need to reflect any subsequent changes. In addition, following the decision of the Coalition government to rapidly abolish Regional Spatial Strategies (RSS for Yorkshire and the Humber - 2008), it will be necessary to 'take stock' of any further guidance, in seeking to progress the Core Strategy through its subsequent phases.

Spatial Vision & Strategy

- 3.2 The key headline issues and comments received in relation to the Spatial Vision and Strategy can be summarised as follows:
- Broad support for overall approach,
 - Support for the definition of the settlement hierarchy as a basis to plan for future growth,
 - the need for greater clarity and consistency between the Spatial Vision and subsequent Themes,
 - the need to give greater emphasis to health issues,
 - the need to ensure integration of Core Strategy with Community Strategy priorities and related Strategies including the emerging Agenda for Improved Economic Performance & Regeneration Strategy,

- Where possible, make individual objectives more locally specific to Leeds (especially the delivery of long term Housing requirements) & go beyond the current Vision for Leeds,
- Some concern that the Core Strategy is being advanced prior to the publication of the Strategic Housing Land Availability Assessment,
- The need to more explicitly take into account a range of cross boundary issues between Wakefield and Bradford and to give greater emphasis to the City Region role of Leeds.

4.0 Next Steps

- 4.1.1 Comments received in relation to the Spatial Vision & Strategy, provide a useful basis upon which to advance the Core Strategy to the Publication stage. Next Steps will however need to take into account the consequences of the abolition of the RSS (see Panel report 'new Coalition proposals'), the update of the Vision for Leeds and the ongoing preparation of City Council strategies (including the Regeneration Strategy & the Agenda for Improved Economic Performance). Integral to this approach also, will be the need to continue to work with a wide range of partners in the preparation of the Core Strategy, including neighbouring authorities via the Leeds City Region.

5.0 Implications for Council policy and governance

- 4.1 None, other than to reiterate that the LDF Core Strategy needs to reflect the strategic objectives of the Council Plan and give spatial expression to the Community Strategy.

6.0 Legal and resource implications

- 6.1 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.

7.0 Conclusions

- 7.1 This report has provided an overview and analysis of the comments received in respect of the Vision for Leeds & Spatial Vision section, 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.

8.0 Recommendation

- 7.1 Development Plan Panel is recommended to:

- 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 VISION FOR LEEDS & SPATIAL
VISION SECTION**

CORE STRATEGY PREFERRED APPROACH

LCC RESPONSES TO REPRESENTATIONS ON THE VISION FOR LEEDS & SPATIAL VISION SECTION

Representor	Those Represented	Representor Comment	LCC Initial Response	Action
Cllr Illingworth 2703	Cllr Illingworth	CS policies need to be focused on narrowing the health gap in Leeds, and most people would argue that this is more important than any other subsidiary objectives. If people disagree, please could they identify which other objective is more important? Deeply disappointing that health differentials do not appear in the vision at all.	The public health agenda is integral to the LDF, the LDF & the Core Strategy in particular, must take into account a wide range of economic, social & environmental issues. It is not the role of the Core Strategy however to duplicate national guidance or related strategies but to complement them and give 'spatial expression' in addressing identified issues, through relevant strategic objectives and policy approaches. The Core Strategy will therefore seek to give spatial expression to the importance of public health via the need to tackle deprivation in priority areas, the need to retain and enhance the quality of the physical environment (including Green Infrastructure & greenspace provision and connectivity), promotion of walking and cycling and through the provision of health care facilities in appropriate locations.	Retain health as integral component of the Core Strategy Spatial Vision & objectives

<p>Wakefield Metropolitan District Council 104</p>	<p>Wakefield Metropolitan District Council</p>	<p>It is considered that the proposed strategy is consistent with Wakefield Council's own Core Strategy, regeneration and growth ambitions. Consequently, there is broad agreement with the preferred approach, but attention should be drawn to the following issues that may present cross boundary opportunities and issues for Wakefield district.</p> <p>Under the strategic theme of 'Green infrastructure' there are a number of opportunities for cross boundary working for enhanced networks for green infrastructure and the natural environment, such as habitat networks, wetlands and the integrity of the Green Belt.</p> <p>Under the strategic themes of 'Sustainable communities' and 'Managing the needs of a growing city' a significant amount of additional development and investment for regeneration is proposed in south Leeds, including housing and employment land. This provides the opportunity to strengthen the regeneration links between Wakefield and Leeds, but may also have knock on effects for the capacity of transport and infrastructure between the two districts.</p> <p>Under the strategic theme of a 'Well connected city' a number of transport improvements are proposed which present opportunities for cross boundary links to address these issues in the interest of sustainability of transport in the sub-region.</p> <p>Under strategic theme 'Sustainable communities' a significant amount of new development is proposed in the Lower Aire Valley in Flood Zones 2, 3a and 3b. In addition, potential for hydro-electric power generation is identified along the Rivers Aire and Calder. These developments may have implications for flooding down stream in Wakefield district. A flood alleviation scheme is proposed along the River Aire under the strategic theme 'Managing environmental resources'. The implications of this scheme for the Wakefield catchments downstream should be established, to ensure that they are acceptable. Wakefield Council would encourage Leeds City Council to consider the adopted policies in the Wakefield Local Development Framework to facilitate a joined up, cross boundary, strategic approach.</p>	<p>The comments of support are welcomed.</p> <p>Comments relating to cross boundary issues and the need for continued joint working are noted and consistent with the City Council's own commitments to work with a wide range of partners and local authorities (including via Leeds City Region).</p> <p>Comments noted & see above. The City Council will also need to prepare an Infrastructure Delivery Plan (IDP) to support the preparation of the Core Strategy.</p> <p>Comments noted, see above.</p> <p>Comments noted, sees above.</p>	<p>Continue to work with neighbouring authorities in the preparation of the draft Publication Core Strategy (and Infrastructure Delivery Plan).</p>
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Coal Authority 1922	Coal Authority	Comments received relate to a series of detailed points regarding the need for the Core Strategy to include an overarching strategic policy for minerals (including coal) and include a policy for Mineral Safeguarding Areas (as required by national guidance MPS1) - and for such areas to be identified on the Key Diagram.	As noted in the representors comments, the City council is also preparing a Natural Resources & Waste DPD in parallel to the production of the Core Strategy. It is envisaged that the preparation of the NR&WDPD, will provide an opportunity for a more detailed policy approach to relevant topics than can be covered in the Core Strategy. However, it is accepted that the relationship and content of the two documents needs to be clearer. Comments on the recent consultation on the NR&WDPD are also currently being reviewed.	Review scope & content of the Core Strategy & NR&WDPD regarding minerals.
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<p>English Heritage 99</p> <p>Roundhay Planning Forum 5057</p> <p>Helen Longfield 5647</p> <p>Scott Wilson 414</p>	<p>English Heritage,</p> <p>Roundhay Planning Forum,</p>	<p>Comments received relate to a series of detailed points and suggested wording revisions in relation to the approach of the overall Vision, the need for a strategic theme to cover the natural & built environment and the concern that this is too generalised and more specific to Leeds (as distinct from other cities). It is felt also that greater emphasis needs to be given to the desire to retain those elements of the City's character, which contribute to the distinct identity of Leeds and its surrounding communities.</p> <p>Broad support for support in Para 4.1 but would benefit from an addition to more clearly relate to the proposed Vision. Support for Strategic Theme of enhancing Leeds' role as a distinctive place, and welcome Objective SC.5. Leeds has a distinctive, and in some cases, unique, set of assets, which help to define the character of the City. It is wholly appropriate therefore that the management of these assets is one of the key objectives of the CS. Para 3.11 ought to set out more specifically the key elements of the city's historic and natural environment and thus set the context / rationale for the approach taken towards the management of the area's environmental assets within the CS and other DPDs. At present, this paragraph could describe the environmental assets of virtually any authority in the country and therefore needs to be more specific.</p> <p>Concern is expressed also regarding the potential conflict between the growth of Leeds and its role as the economic engine for the Region, and the protection of its significant historic assets.</p>	<p>The supportive comments are welcomed.</p> <p>The desire to retain and enhance the unique character of the District is integral to the Core Strategy. Consequently, sufficient emphasis and clarity needs to be made, without duplicating the role of other related strategies and key documents (including Conservation Area Appraisals and Action Plans).</p> <p>See above.</p> <p>The need to maintain and enhance existing character and achieving the need for longer term economic development is both a challenge and opportunity for the city. In policy terms the Sustainability Appraisal provides a basis to consider the application of the policy framework and make recommendations on the need for adjustments.</p>	<p>Review detailed policy wording & supporting text in preparation of Publication draft & strengthen references to the unique character of the district and the need to make this more Leeds specific where necessary.</p>
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<p>Government office for Yorkshire and the Humber (GOYH) 95</p>	<p>Government office for Yorkshire and the Humber (GOYH)</p>	<p>Comments include: the need for the strategy to deal with key issues in specific places across the district, together with the scale and distribution of development. Greater emphasis needed to be given to the economy, transport issues and the link between economic development & travel needs. The "Vision for Leeds" needs to be more locationally specific, setting a clear picture (in words) of how Leeds will develop over the next 20 years (physically, economically, socially and environmentally). The document should be redrafted and ordered to follow the above key issues accordingly.</p> <p>It is felt also that the Core Strategy should contain policies to define Green Belt boundaries and for PAS, replacing the UDP policies. The approach therefore needs to be reviewed following the completion of the Strategic Housing Land Availability Assessment (SHLAA). With regard to the 'Preferred spatial approach' - concern is expressed that the 'urban areas only' approach may turn out not to be realistic given the amount of housing and employment land with associated infrastructure that is likely to be required. It is noted that a strategy that is so focused on regeneration may not lead to a sound plan in the Leeds City Region growth context.</p>	<p>It is accepted that where possible the Core Strategy needs to be more 'place' and locationally specific. An appropriate balance has to be made however between the level of prescription and the broad strategic direction and necessary flexibility for the plan period. The document needs to be read as a whole but it is accepted that there is scope to improve the 'flow' and sequence of the document and the presentation of the thematic chapters, to improve clarity and emphasis.</p> <p>The points regarding the SHLAA are noted and following completion this information will form part of the evidence base, in informing the strategic approach to housing provision and distribution.</p> <p>With regard to comments on development in relation to urban areas and major regeneration, the adopted Regional Spatial Strategy gives particular emphasis to the need for the regeneration of such areas as a priority. With this context the lower Aire Valley & East & South East Leeds (EASEL) are specifically mentioned. Such an approach is consistent with the City Council's stated priorities, which also include emerging proposals for an Urban Eco Settlement and continued joint working in relation to the Leeds Bradford corridor. In terms of sustainability these areas present major challenges and opportunities for Leeds and the region as a whole and there are concerns that their longer term potential is not fully recognised through the Core Strategy. Subject to appropriate phasing and infrastructure, it is accepted that longer term growth requirements need to be addressed as part of an overall 'package'. Consistent with GOYH's advice, it is felt that the need for place making is integral to this approach, consistent with the principles of sustainable development.</p>	<p>Review the vision and detailed policy wording & supporting text in preparation of Publication draft to improve the flow and sequence of the document and the presentation of the thematic chapters.</p>
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Steve Harris 5658	Steve Harris	Policy 18 and the proposed Waste Transfer Site at Evanston Avenue conflicts with / contradicts the Spatial Vision.	Comment noted but this is a very specific matter relating to the City Council's Residual Waste Treatment project.	None
Yorkshire Water 948	Yorkshire Water	General support for the aim to manage natural resources and waste in an efficient and sustainable manner with the support of the necessary local infrastructure; managing and adapting to the consequences of climate change including improved surface water management; and the use of renewable energy technologies.	Comments of support welcomed.	None.
GVA Grimley 5661	GVA Grimley	The Spatial Vision for Leeds and associated objectives are not easily identifiable within the document. More emphasis on the provision of locally accessible goods and services should form a key objective in achieving the vision. It is recommended that 'local access to high quality retailing and fresh food' is added to the 2nd bullet point under 'Narrowing the Gap'	The Sustainable Communities thematic chapter, seeks to address issues associated with access to goods & services via the policy approach to the retail hierarchy / town centres.	Amend Sustainable Communities thematic chapter.

<p>Rob Smith Peacock & Smith 5665</p>	<p>Peacock & Smith 43837/43825/</p>	<p>The themes of 'going up a league as a city', developing Leeds as the regional capital and narrowing the gap' between disadvantaged areas/people and the rest of the city are generally to be welcomed, as are the more specific aims of providing for good quality homes and a range of choice of high quality affordable housing.</p> <p>However, it is felt that, the vision and objectives fail to recognise the importance of meeting housing demand in all areas of the District, and reflect an over-emphasis on the identified priority regeneration areas. Whilst a phased approach to longer term housing development and growth may assist regeneration and renewal to some extent, account also needs to be taken of the choices [in terms of housing type and location] that need to be provided to meet housing demand. To ignore this factor will be to undermine the ability of the Core Strategy to deliver the vision that is identified. These factors need to be recognised and included in the objectives, in order to provide a balanced approach that is consistent with the Government's policy objectives for housing.</p>	<p>Comments of support welcomed.</p> <p>With regard to comments in relation to regeneration & longer term housing growth, the adopted Regional Spatial Strategy gives particular emphasis to the need for the regeneration of such areas as a priority, as well as promoting the need for longer term housing growth. With this context the lower Aire Valley & East & South East Leeds (EASEL) are specifically mentioned. Such an approach is consistent with the City Council's stated priorities, which also include emerging proposals for an Urban Eco Settlement and continued joint working in relation to the Leeds Bradford corridor. In terms of sustainability these areas present major challenges and opportunities for Leeds and the region as a whole and there are concerns that their longer term potential is not fully recognised through the Core Strategy. Subject to appropriate phasing and infrastructure, it is accepted that longer term growth requirements need to be addressed as part of an overall 'package'. The detailed approach to the overall housing strategy will be covered as part of the thematic housing chapter and embedded within the Spatial Vision & Objectives.</p>	<p>Review detailed policy wording & supporting text in preparation of Publication draft in relation to longer term phasing and housing growth in the 'Spatial Vision' and Housing thematic chapters.</p>
<p>Leeds Civic Trust 62</p>	<p>Leeds Civic Trust</p>	<p>Support for the overall approach of the spatial development of the city. However it is considered that para 4.4 is anodyne and does not further the vision. Para 4.5 expands on the vision but is centred on places not people. The city should be aiming for:- mixed communities- pride in the local community. Public transport - feel safe in the city section 4.5 why specific reason to the Lower Aire Valley 4.6 potential for strategic objectives - SC6 promotion of pride of place MER5 reduce overall carbon emissions.</p>	<p>Comments of support are welcomed. It is noted above that further opportunities need to be taken to make the vision and spatial approach more Leeds specific. With regard to the relationship to the policy topics noted, an overall inattention of the Core Strategy, is that an interrelated approach is taken to 'people, 'place', connectivity and the delivery of environmental objectives as part of sustainable communities.</p>	<p>Improve clarity in preparation of Publication draft to make more Leeds specific where possible.</p>

<p>Jonathon Dunbavin ID Planning 5671</p>	<p>Barwick Developments Persimmon Homes (West Yorkshire) Ltd Edmund Thornhill Great North Developments Ltd Bracken Developments Ltd Robert Ogden Partnership Ltd Ringways Motor Group Taylor Wimpey</p>	<p>Broad support for Strategic Themes and Spatial Objectives. However, considers that further clarification is required regarding to narrowing the gap, and spatial objectives SC1 and MNGC3 Para 4.5 - Narrowing the gap objectives should apply to all parts of the District.</p> <p>Broad support for OBJ SC1 but the objectives also needs to identify that growth will occur throughout the city centre, main urban area and within the settlements at the same time throughout the plan period. OBJ MNGC3 - Broadly supported but should emphasise that this is not a sequential approach to brownfield development.</p>	<p>Comments of support are welcomed.</p> <p>In addition to the delivery of key regeneration priorities, subject to appropriate phasing and infrastructure, it is accepted that longer term growth requirements need to be addressed as part of an overall 'package'. The detailed approach to the overall housing strategy will be covered as part of the thematic housing chapter and embedded within the Spatial Vision & Objectives.</p>	<p>Review detailed policy wording & supporting text in preparation of Publication draft in relation to longer term phasing and housing growth in the 'Spatial Vision' and Housing thematic chapters.</p>
<p>Mosaic Town planning 5672</p>	<p>Mosaic Town planning</p>	<p>Concern with the spatial vision, particularly with regard to the direction of growth within Leeds, the distribution and phasing of housing development, and the provision of affordable housing in the location in which it is needed.</p>	<p>In addition to the delivery of key regeneration priorities, subject to appropriate phasing and infrastructure, it is accepted that longer term growth requirements need to be addressed as part of an overall 'package'. The detailed approach to the overall housing strategy will be covered as part of the thematic housing chapter. Integral to this approach is the need to meet identified Affordable Housing requirements.</p>	<p>Review vision & detailed policy wording & supporting text in preparation of Publication draft in relation to longer term phasing and housing growth in the 'Spatial Vision' and Housing thematic chapters (including Affordable Housing).</p>

<p>Pegasus Planning Group 4388</p>	<p>Pegasus Planning Group</p>	<p>Comments received relate to a series of detailed points regarding support for the Settlement Hierarchy and the scope of Garforth to accommodate future growth (and for the settlement in turn to be identified as a “principle town”, consistent with the RSS). Comments emphasise the need for the Core Strategy to plan for growth as part of a longer term spatial approach, provide certainty and to ensure that such areas of growth are ‘woven’ into the city’ and help to provide ‘mixed & sustainable communities’.</p> <p>It is commented also that that delivering the level of growth required by the RSS will by necessity involve some degree of change to the main urban area and the major settlements through urban extension. The emphasis should therefore be on avoiding significant adverse impacts to areas of high landscape value and those parts of the district, which are especially sensitive to change.</p>	<p>In addition to the delivery of key regeneration priorities, subject to appropriate phasing and infrastructure, it is accepted that longer term growth requirements need to be addressed as part of an overall ‘package’. The detailed approach to the overall housing strategy will be covered as part of the thematic housing chapter. Integral to this approach is the need to deliver mixed and sustainable communities. The detailed approach to the overall housing strategy will need to be covered as part of the thematic housing chapter but the overall approach set out as part of the spatial vision.</p>	<p>Review detailed policy wording & supporting text in preparation of Publication draft in relation to longer term phasing and housing growth in the ‘Spatial Vision’ and Housing thematic chapters.</p>
<p>Bradford Metropolitan District Council 100</p>	<p>Bradford Metropolitan District Council</p>	<p>Comments note a desire for a stronger emphasis on the role of Leeds as ‘part of the LCR’ and recognition of the complex relationships and complementarity within the region and sub region. Within this context it is felt that emphasis is needed to the importance/roles/functional relationship of adjoining districts/areas, particularly Bradford, e.g. in providing a labour force for the future economic prosperity of Leeds, linked to housing provision/markets and wider transport connectivity issues and how the Leeds LDF will address/support coordinated cross boundary delivery.</p>	<p>The Core Strategy will need to recognise & reflect the wider role of Leeds within the City Region. The detailed interrelationships emerging from the conclusions of the evidence base will in turn need to be addressed through the overall strategy and specific policies where appropriate. As noted above, the City Council will continue to work with partners and neighbouring authorities in the preparation and delivery and the Core Strategy.</p>	<p>Within the context of the developing evidence base, review detailed policy wording & supporting text in preparation of Publication draft (and Infrastructure Delivery Plan).</p>

Barton Willmore Planning Partnership Northern 45	Barton Willmore Planning Partnership Northern 43847	<p>Comments received include the need for the Core Strategy to include a specific policy dealing with the Green Belt (and mechanism for local reviews). It is noted also that the Strategic Themes and Spatial Objectives are considered to be broadly in alignment with the RSS. However, it is felt that they need to go further in directing opportunities to promote the growth of Leeds in accordance with that identified in the RSS, especially in relation to levels of housing. Within this context additional wording is suggested to reflect this. In relation to the strategic pattern of growth, it is felt that there needs to be more explicit reference to the 'Leeds Renaissance Programme' (the Leeds 'petals' diagram and the connectivity to the City Centre and Rim). It is felt that these concepts should transfer to the Core Strategy Key Diagram & supporting maps.</p> <p>It is commented also that with regard to housing growth, the accompanying text should define and explain the rationale behind such areas and include framework policies that will enable the level of housing growth needed in the District in the period to 2026. It is considered that such an approach is necessary given that there are a range of phasing and deliverability issues associated with the larger expansion areas such as the Aire Valley.</p>	<p>In addition to the delivery of key regeneration priorities, subject to appropriate phasing and infrastructure, it is accepted that longer term growth requirements need to be addressed as part of an overall 'package' (including any selective Green Belt review). The detailed approach to the overall housing strategy will be covered as part of the thematic housing chapter but the overall approach set out as part of the spatial vision. It is noted that major regeneration initiatives present many challenges & opportunities and delivery issues. However, significant progress is being made with Aire Valley Leeds through a range of initiatives including the proposals for an Urban Eco Settlement. The overall spatial strategy will also need to be presented as part of the Key Diagram (supporting maps/information will be used where necessary).</p>	<p>Review & update where necessary, detailed policy wording & supporting text in preparation of Publication draft in relation to longer term phasing and housing growth in the 'Spatial Vision' and Housing thematic chapters (and their presentation via the Key Diagram).</p>
Leeds Chamber of Commerce 1736	Leeds Chamber of Commerce	<p>The vision "For Leeds to be a distinctive, competitive and inclusive city, for the benefit of its communities, now and in the future" is broadly supported.</p> <p>It is felt however in ensuring that the competitive and successful aspects of this vision are met, through the City Council taking a flexible approach, supportive of innovative development. The Core strategy needs to give a long term strategic steer, but allow for encouragement of opportunity in the current market conditions.</p>	<p>Comments of support are welcomed.</p> <p>It is important that the Core Strategy allows for innovation and recognises the impact of current market conditions as part of a longer term approach. In supporting this process the City Council is working with a wide range of partners and agencies to secure funding and to develop infrastructure to meet current and future needs.</p>	<p>Review detailed policy wording & supporting text (including cross references to the preparation of the Infrastructure Delivery Plan) in preparation of Publication draft.</p>

DLP PLanning 2657	DLP PLanning	It is felt that specifying numerous, objectives and themes within the Core Strategy are considered unnecessary and add another layer of complexity. The key policies of the plan should be the main components of the Strategy.	The comments are noted but national guidance (PPS12) requires Core Strategies to identify a “Spatial Vision” and objectives, which are in turn amplified by the Core Strategy policies. It is accepted however that opportunities to improve clarity and brevity should be taken where necessary.	Review detailed policy wording & supporting text in preparation of Publication draft and take opportunities to improve overall clarity and brevity where possible.
Barton Willmore planning Partnership- Northern 57	Barton Willmore planning Partnership- Northern 44456/44470	<p>Strategic Theme: Sustainable Communities:SC1 - there is no reference to the provision of housing. This is inconsistent given the main urban area is identified for a focus for housing growth.</p> <p>SC4 - there is a need for flexibility with regards to zero carbon development to ensure that objective is deliverable. Strategic Theme: Managing the Needs of Growing City MNGC3 - support is given to making the best of previously developed land, but it is considered that there is a need to include Strategic Sites.</p> <p>MNGC4 - supports emphasis on providing affordable housing where this is justified and does not undermine viability. A flexible approach is recommended.</p>	<p>The comments are noted but it needs to be emphasised that the policy approach of the Core Strategy needs to be considered as a whole. Policies for housing have been included within a specific section, which is intended to be complementary to the Sustainable Communities theme but it is accepted that appropriate cross references would improve clarity.</p> <p>The need for flexibility is recognised and is discussed further in responses to detailed Sustainable Communities comments (Policy SC7). to be consistent with national guidance and the local evidence base, the Core Strategy needs to meet a range of sustainability objectives at the same time including, Eco-homes standards, reducing carbon and Affordable Housing.</p>	Amend ST: SC1 to refer to housing.

<p>Carter Jonas 5681</p> <p>Savills Northern Branch</p> <p>467</p>	<p>Carter Jonas</p> <p>Savills Northern Branch</p>	<p>The relationship to the Community Strategy (its status and priorities) and implications of the current review, need to be made more explicit and reflected in the Core Strategy. In addressing these particular concerns we would suggest that a diagram and/or narrative is included within this section which explains hierarchy of documents and strategies and how these feed into, influence and inform (the preparation of the) Core Strategy.</p> <p>It is felt that the objectives themselves, they appear robust and comprehensive towards the needs of the City and District as whole. There is concern however, and that issues (including regeneration – including specific reference to rural diversification) in rural areas need to be given more emphasis and therefore integral and important part of the City and regional economy (and the provision of local facilities). It is noted that Policy EC7 later in the document refers to the rural economy; however, it is felt that there is a sufficient and discrete reference for this policy in the objectives. As a result it is considered that the priorities and objectives should make reference to the role of the rural areas to the setting of the City and the importance of maintaining a vibrant and prosperous rural economy for creating that setting.</p> <p>It is considered also that further clarity is needed to identify which strategic objectives specific policies are intending to address.</p>	<p>It is not the purpose of the Core Strategy to repeat or duplicate existing strategies (including the Community Strategy). It is noted however that appropriate cross references and the relationship between documents needs to be clear.</p> <p>The Core Strategy applies to the Metropolitan District as a whole. Consequently, the overall approach needs to take into account the characteristics, issues, challenges and opportunities facing the District. Within this context, Leeds MD has a unique character comprised of both urban and rural areas. This therefore needs to be reflected in the Spatial Vision & Objectives and as appropriate within the thematic chapters.</p> <p>It is agreed that the relationship between strategic objectives and individual policies should be expressed more clearly.</p>	<p>Review detailed policy wording & supporting text in preparation of Publication draft, to amplify the unique characteristics of the district (including urban/rural areas).</p>
<p>Turley Associates 1743</p>	<p>Turley Associates</p>	<p>The aspirations are agreed with but it is not agreed that the Core Strategy embodies these aspirations and importance of key themes. It is felt therefore that the document needs to be reordered as follows : Managing the need of a growing City; Sustainable Communities; A Well Connected City; Green Infrastructure; Managing Environmental Resources.</p>	<p>Comments of support are welcomed.</p> <p>As noted above, the document needs to be read as a whole but it is accepted that there is scope to improve the 'flow' and sequence of the document and the presentation of the thematic chapters, to improve clarity and emphasis.</p>	<p>Review structure in the preparation of Publication draft, to improve the flow and sequence of the document and the presentation of the thematic chapters.</p>

Dacre Son & Hartley 480	Dacre Son & Hartley	<p>Whilst broadly supportive of the strategic themes and spatial vision there are a number of concerns raised. Paragraph 4.1 refers to the end date of the Plan being 2026. This may be insufficient time should Green Belt revisions be required and suggest the Plan looks towards a minimum end date of 2030. While this date goes beyond the RSS end date, 2026 will not provide sufficient long term guidance for the emerging Allocations DPD.</p> <p>Specific concerns are raised in relation to detailed wording under paragraph 4.5 'Narrowing the Gap' and the need to this to be revised (as follows - 'have a managed and responsive delivery plan for the supply of new housing to ensure the right type of housing deliver in the right locations at the right time to meet the needs of all communities; assist in urban renaissance and renewal and avoid longer commuting journeys, especially from the outside in to the District. Ensure that where new housing sites are needed, they are appropriately planned in the most suitable and sustainable locations to make best use of existing community facilities and public transport and green infrastructure networks). It is noted also that MNGC1 needs to be amended cover 'all of its needs'. It is commented also that MNGC 3 places a 'strategic' emphasis upon making best use of previously developed land (PDL). It is not clear why this PDL emphasis needs to be strategic when the RSS requires it to be a 'priority'. The text hints towards the old style PPG3 sequential approach which is clearly not present in PPS3 or RSS. - MNGC 4 needs to refer to PDL as a priority to help.</p>	<p>Comments of support are welcomed.</p> <p>The detailed policy wording comments are noted. With regard to the plan period, it is intended to plan to 2026 to be consistent with the RSS. Detailed issues relating to housing phasing & delivery will be addressed as part of the Housing theme but embedded as part of the Spatial Vision and objectives.</p> <p>The City Council is committed to the delivery of a housing strategy the meets the District's overall housing needs as part of an integrated spatial strategy. This needs to take into account a range of issues including priorities for regeneration, the phasing of development and the need for infrastructure. In taking this forward the policy approach will need to take into account national guidance and its application, within the local context.</p>	<p>Review & update where necessary, detailed policy wording & supporting text in preparation of Publication draft in relation to longer term phasing and housing growth in the 'Spatial Vision' and Housing thematic chapters.</p>
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<p>Natural England 58</p>	<p>Natural England</p>	<p>Natural England welcomes the spatial vision, particularly its references to climate adaptation and protecting and enhancing the distinctiveness of the natural environment.</p> <p>However, the vision fails to capture the need to reduce the amount of resources required for Leeds communities to achieve sustainable development (including rising fuel, land and carbon costs will penalise the least resource efficient communities and reward those that are most resource efficient. Whilst wider sustainability concerns are recognised later in the spatial objectives, emphasis on resource efficiency in the vision itself will ensure that developers place this at the heart of their proposals. Resource efficiency needs to be emphasised. Suggest re-wording 'For Leeds to be a distinctive, competitive, inclusive, resource efficient and successful city, for the benefit of its communities, now and in the future'. Natural England welcome the priorities, which include further reference to adaptation to climate change. It is critically important that steps are taken to adapt to climate change, and that the services provided by the natural environment play a key role in our adaptive response to climate change. It is essential that any adaptation action is 'sustainable'. Pg 15 - Recommend that the priority "continue to manage and adapt to the consequences of climate change, is changed to read 'continue to sustainably manage and adapt to the consequences of climate change.'</p>	<p>Comments of support are welcomed.</p> <p>The suggested wording changes are noted and the comments in relation to delivering sustainable development are recognised but to some extent relate to issues (such as fuel prices) which are outside the scope of the Core Strategy or spatial planning. However, it is integral to the approach of the Core Strategy that where opportunities can be taken to improve sustainability within the scope of the document, these need to be taken (including the development of the Urban Eco Settlement proposals, encouraging walking & cycling, sustainable design and construction and regeneration initiatives with an emphasis upon 'place making' and sustainable communities). As part of the City Council's Local Development Framework and in complementing the Core Strategy, the City Council is also preparing a Natural Resources and Waste Development Plan Document and a range of environmental initiatives. Integral to these is the desire is to effectively and efficiently manage the use of natural resources (and resource flows) across the district and as a consequence mitigate the environmental impact of Leeds beyond its own boundaries.</p>	<p>Review and update where appropriate the detailed wording & supporting text in preparation of Publication draft re, the Spatial Vision & Objectives and within the scope of the Managing Environmental Resources ' theme.</p>
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NHS Leeds 5693	NHS Leeds	<p>Comments include coverage of issues relating to Health & Wellbeing and to reduce inequalities and the need for these to be incorporated with the introduction, Vision and Objectives. It is suggested also that stronger links need to be made to the Community Strategy's commitments to these issues and initiatives. It is felt that this approach could be further enhanced by including a spatial objective on health i.e. 'health & well-being' 'healthier communities' or specifically including health with sustainable communities i.e. "healthy sustainable communities" This would strengthen health in the strategy and would act as a driver for health based policy(s) within the core strategy.</p> <p>It is noted that HUDU guidance 'Integrating Health Into the Core Strategy' suggests a number of objectives for health policy in Core Strategies: Ensuring that health inequalities are addressed through equal access for all to homes, jobs, sports and leisure facilities, open and green spaces, as well as social, community and healthcare facilities. Ensuring that the potential health impacts of development and regeneration are identified and addressed at an early stage in the planning process through the use of Health Impact Assessment (or Equality Impact Assessment). Ensuring that the design and management of new developments and regeneration schemes promote and maintain healthy lifestyles. Encouraging physical activity e.g. through the provision of opportunities to walk and cycle in the design of new developments and regeneration schemes. Providing opportunities to improve physical and mental well-being through the provision of high quality open and green spaces and sports and recreation facilities. To avoid mental illness arising from exposure to crime or from the fear of crime through appropriate design in new developments and regeneration schemes. To avoid the public health impacts related to climate change, such as overheating, through adaptation and mitigation measures.</p>	<p>The public health agenda is integral to the LDF, the LDF & the Core Strategy in particular, must take into account a wide range of economic, social & environmental issues. It is not the role of the Core Strategy however to duplicate national guidance or related strategies but to complement them and give 'spatial expression' in addressing identified issues, through relevant strategic objectives and policy approaches. The Core Strategy will therefore seek to give spatial expression to the importance of public health via the need to tackle deprivation in priority areas, the need to retain and enhance the quality of the physical environment (including Green Infrastructure & greenspace provision and connectivity), promotion of walking and cycling and through the provision of health care facilities in appropriate locations. In taking this forward, the City Council will have regard to the Healthy Urban Development Unit – "Integrating health into the Core Strategy", in liaison with the NHS.</p>	<p>Retain health as integral component of the Core Strategy Spatial Vision & objectives and improve clarity and cross references as appropriate.</p>
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<p>Environment Agency 46</p>	<p>Environment Agency</p>	<p>No reference to how the Sequential Test (PPS25) has been applied to the broad locations identified for development. Not immediately clear as to how saved policies will be brought forward through this Evidence base makes no mention of PPS25, PPS23 and the updated PPS25 Practice Guide (December 2009).</p> <p>The spatial objectives outlined within 'Managing Environmental Resources cover most of the EA's interests and provide an adequate framework for policy development around this theme. However, within the detailed strategic theme of "Managing Environmental Resources" the EA is concerned that water has not been specifically hi-lighted as an important natural resource and there are no policies targeted at the effective management of water within the Leeds District.</p>	<p>The 'sequential test' as advocated by PPS25, has been incorporated as part of the development of the broad locational strategy for housing and as part of technical assessments in the preparation of the Strategic Housing Land Availability Assessment (SHLAA). With regard to 'saved' policies, these are currently being reviewed as part of the Core Strategy and preparation of the Publication draft.</p> <p>As noted above the City Council is also preparing a Natural Resources and Waste DPD in parallel to the Core Strategy. Within this context, the Core Strategy will need to include key strategic policies and cross references to more detailed polices as part of the NR&WDPD.</p>	<p>Continue to incorporate the 'sequential test' in the preparation of the Core Strategy draft Publication document and ongoing work on the SHLAA.</p>
<p>Caddick Developments 83</p>	<p>Caddick Developments</p>	<p>The document should address the potential of AVL to contribute to the key objectives of the City of Leeds to 'go up a league', to develop its role as the regional capital, and to 'narrow the gap'</p>	<p>The key strategic role of the lower Aire Valley is recognised as a key priority with the emerging Core Strategy and the development of an Urban Eco Settlement. Given the ongoing development of this work, it is accepted that further emphasis needs to be given to this priority in the preparation of the draft Publication document.</p>	<p>Review structure in the preparation of Publication draft, to improve the flow and sequence of the document and the presentation of the thematic chapters, to give greater emphasis and clarity to the role of the lower Aire Valley and Urban Eco Settlement.</p>

Knight Frank 409	Knight Frank	<p>The Spatial Vision of the Core Strategy, “for Leeds to become a distinctive, competitive, inclusive and successful city, for the benefit of its communities, now and in the future” is generally supported. Section 4.4 of the Core Strategy advises how this vision will be achieved such as through adapting to climate change, provision of physical and community infrastructure and protecting and enhancing the distinctiveness of the built and natural environment. It is considered that greater emphasis needs to be placed on meeting the need for homes and economic development than is currently stated. Delivering new homes should be a fundamental part of achieving the overall vision across Leeds.</p> <p>The continued regeneration and renaissance of the main urban area (including the city centre) and settlements is identified as a mechanism to achieve the Spatial Vision. This should be re-worded to reflect the needs of areas that may not be in need of vast regeneration and renewal but through additional development and investment can still contribute to achieving the Spatial Vision. Paragraph 4.5 of the Core Strategy Preferred Approach advises of priorities the Core Strategy should deliver, which in turn relate to the Spatial Vision. Generally, these priorities are supported, but in relation to ‘Going up a League and Developing Leeds’ Role as the Regional Capital’, there should be a balance between regeneration areas and other areas of Leeds that are also in need of new development. In relation to ‘Narrowing the Gap’ priorities, the Core Strategy advises that there should be a phased approach to longer term housing development and growth to ensure that priorities for urban renaissance and renewal and the need for mixed and balanced communities are met. It is felt that this priority should be re-worded to reflect the housing needs of other communities outside the regeneration and renaissance areas. The phasing of housing should respond to the whole of the housing market, not just key regeneration areas.</p>	<p>Comments of support are welcomed.</p> <p>The desire to deliver new homes and regeneration priorities is integral to the Core Strategy. Consistent with the delivery of key regeneration priorities and linked to appropriate phasing and infrastructure, it is accepted that longer term growth requirements need to be addressed as part of an overall ‘package’. The detailed approach to the overall housing strategy will be covered as part of the thematic housing chapter. Integral to this approach is the need to deliver mixed and sustainable communities. The detailed approach to the overall housing strategy will need to be covered as part of the thematic housing chapter but the overall approach set out as part of the spatial vision</p>	<p>Review & update where necessary, detailed policy wording & supporting text in preparation of Publication draft in relation to longer term phasing and housing growth in the ‘Spatial Vision’ and Housing thematic chapters.</p>
Roger Davis 4754	Roger Davis	<p>The summary leaflet makes no mention of extending the social green space, such as allotments. It gives no indication of preserving either council owned or privately owned existing allotments.</p>	<p>Emerging policies for Greenspace and cross references to the preparation of a (PPG17) Greenspace Audit & Needs Assessment, where set out in the main Core Strategy ‘Preferred Approach’ document.</p>	<p>Reflect the strategic conclusions of the Greenspace Audit, in the draft Publication document once completed.</p>

Signet Planning 5039	Signet Planning	<p>In general the spatial vision is supported, particularly the identified settlement hierarchy which places Rothwell as a major settlement second to the Leeds Main Urban Area.</p> <p>It is accepted that regeneration areas should be given a degree of priority, however, it must be recognised that development within Leeds over the plan period will have to extend beyond these areas, and therefore locations for future growth need to be identified as part of the Local Development Framework process.</p> <p>The identification of land for growth should be broadly in accordance with the proposed settlement hierarchy that has been set out and in this respect Rothwell offers the opportunity for further additional growth of an appropriate scale within a major settlement.</p>	<p>Comments of support are welcomed.</p> <p>The desire to deliver new homes and regeneration priorities is integral to the Core Strategy. Consistent with the delivery of key regeneration priorities and linked to appropriate phasing and infrastructure, it is accepted that longer term growth requirements need to be addressed as part of an overall 'package'. The detailed approach to the overall housing strategy will be covered as part of the thematic housing chapter. Integral to this approach is the need to deliver mixed and sustainable communities. The detailed approach to the overall housing strategy will need to be covered as part of the thematic housing chapter but the overall approach set out as part of the spatial vision</p>	<p>Review & update where necessary, detailed policy wording & supporting text in preparation of Publication draft in relation to longer term phasing and housing growth in the 'Spatial Vision' and Housing thematic chapters.</p>
Savills Northern Branch 467 32	Savills Northern Branch	<p>MEPC supports the vision.</p> <p>It is noted that although the Wellington Place masterplan and subsequent related planning applications have also been approved in relation to the current UDP, the development also largely accords with the vision outlined in the draft Core Strategy. As a result of this MEPC seek assurances that the planning phases of the development will receive continued support once the Core Strategy is adopted.</p>	<p>Comments of support are welcomed.</p> <p>The key economic and strategic role of the City Centre is integral to the Core Strategy. In broad terms, proposals which are consistent with these strategic objectives and meet related policy requirements, will be supported. In principle the development of major office development in the City Centre is consistent with national guidance and local policy objectives.</p>	<p>None</p>
Drivers Jonas 1971	Drivers Jonas	<p>Broadly agree with this vision, which has been prepared in accordance with the RSS and Community Strategy and the intention that it will be implemented through strategic themes supported by a series of inter-related spatial objectives.</p> <p>It is considered that sites such as the Riverside Mill site offer the potential for Leeds to deliver this vision by making best use of previously developed land to deliver new housing development. This approach to regeneration will benefit the community by meeting the need for housing in Leeds, and bringing currently derelict sites back into active use.</p>	<p>Comments of support are welcomed.</p> <p>The role of such sites, as part of an overall approach to regeneration is noted and consistent with the overall strategic approach of the Core Strategy and Sustainable Communities theme.</p>	<p>None</p>

British Waterways 338	British Waterways	The inland waterways are a multi-functional resource. Apart from their traditional role as a system of travel or transport they serve in a variety of roles which can assist in meeting the strategic themes and spatial objectives, including: an agent of or catalyst for regeneration; a contributor to water supply and transfer, drainage and flood management; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape, open space and ecological resource; sustainable modes of transport; and routes for telecommunication.	The important role of waterways is recognised as part of the Core Strategy and related documents (Natural Resources & Waste DPD).	Continue to recognise the key strategic role of waterways in the preparation of the draft Publication document.
Yorkshire Forward 2597	Yorkshire Forward	<p>Consider the CS approach to be generally well aligned with the RES.</p> <p>Support stated aims of; aspiration to make Leeds a place of first choice for investors; aim to secure the renaissance of the City Centre Rim; proposals to create an integrated network of GI; and the hierarchy of centres. Spatial links: Some links between Leeds and neighbouring authorities are mentioned, but might be benefit in considering in more depth some of the interdependencies which exist between Leeds and nearby settlements.</p>	<p>Comments of support are welcomed.</p> <p>The Core Strategy will need to recognise & reflect the role of Leeds and its wider role within the City Region. The detailed interrelationships and interdependencies emerging from the conclusions of the evidence base will in turn need to be addressed through the overall strategy and specific policies where appropriate. As noted above, the City Council will continue to work with partners and neighbouring authorities in the preparation and delivery and the Core Strategy.</p>	Continue to work with neighbouring authorities in the preparation of the draft Publication Core Strategy (and Infrastructure Delivery Plan).
ARUP 397	ARUP	There does not appear to be a coherent strategy for the definition, development and delivery of the urban eco settlement in the Core Strategy. For example, there is no Strategic Theme or Spatial Objective in the Core Strategy which highlights and supports the unique role of the Aire Valley as the District's only urban-eco settlement, which is expected to accept a significant proportion of the District's future housing growth. AVE considers that it would be beneficial to set a framework for the development and delivery of the urban eco-settlement in the next iteration of the Core Strategy. This will support the early delivery of schemes in the Aire Valley which confirm with the aspirations of the urban-eco settlement and also provide clarity as to what uses are appropriate and the options for supporting these uses with low carbon and renewable technologies.	The key strategic role of the lower Aire Valley is recognised as a key priority with the emerging Core Strategy and the development of an Urban Eco Settlement. Given the ongoing development of this work, it is accepted that further emphasis needs to be given to this priority in the preparation of the draft Publication document.	Review structure in the preparation of Publication draft, to improve the flow and sequence of the document and the presentation of the thematic chapters, to give greater emphasis and clarity to the role of the lower Aire Valley and Urban Eco Settlement.

Turley Associates 5670	Turley Associates	<p>It is felt that the document fails to meet the criteria set out at para 4.1 of PPS12, as a spatial planning document. In particular; the CS document contains a vision, but this is not spatially expressed. The actual spatial strategy is buried within detailed policy with no explicit spatial expression as to where and how future growth will be accommodated within the District; despite the scale of growth called for, the CS does not identify any strategic sites. Even Aire Valley Leeds, which is identified in RSS and the Leeds UDP as a site of regional significance is not treated as a strategic site and its delivery is relegated to an Area Action Plan. Bearing in mind the Council's bid for recognition of AVL as an Accelerated Development Zone and identification as an Urban Eco Settlement, it is strongly considered that the whole of AVL should be treated as a strategic site; there are numerous priorities and objectives within the document; however these appear to relate to a wide range of issues without focusing on the key choices and decisions that need to be made. Indeed a number of key decisions that are the meat of the CS are not addressed or are deferred for subsequent DPDs.</p> <p>The "key diagram" is simply a reproduction of the UDP proposals map, with limited spatial expression of the emerging strategy. No testing of alternative options has been undertaken as part of this document, nor is any detail given in respect of why alternative options were discounted.</p> <p>There is little detail on strategies for delivery of the strategy or monitoring its progress.</p>	<p>It is felt that the emerging Core Strategy is consistent with the requirements of PPS12 but (within the context of the above comments) accepted that the draft Publication document will need to be more spatially specific and expressed clearly and concisely as part of the Key Diagram.</p> <p>As emphasised above, The key strategic role of the lower Aire Valley is recognised as a key priority with the emerging Core Strategy and the development of an Urban Eco Settlement. Given the ongoing development of this work, it is accepted that further emphasis needs to be given to this priority in the preparation of the draft Publication document.</p> <p>Subsequent drafts of the Core Strategy will need to include further details of a monitoring framework, which will in turn need to be incorporated as part of the Infrastructure Delivery Plan and LDF Annual Monitoring Report (where appropriate).</p>	Review structure in the preparation of Publication draft, to make the strategy more spatially specific and to give greater emphasis and clarity to the role of the lower Aire Valley and Urban Eco Settlement.
Rachel Unsworth 846	University of Leeds	Very detailed comments regarding punctuation & cross references.	Comments noted.	Check punctuation & cross references in Publication document.

	15 th October, Leeds Initiative Strategic Group, Carriageworks	<p>Need to ensure the City Region context is fully appreciated</p> <p>Importance of the Infrastructure Plan as a means of connecting the sustainable community strategy (Vision for Leeds) and the Leeds Strategic Plan with the Core strategy. Challenge of different timescales.</p>	<p>The Core Strategy will need to recognise & reflect the wider role of Leeds within the City Region. The detailed interrelationships emerging from the conclusions of the evidence base will in turn need to be addressed through the overall strategy and specific policies where appropriate. As noted above, the City Council will continue to work with partners and neighboring authorities in the preparation and delivery and the Core Strategy.</p> <p>Agree that the Core Strategy needs to be co-ordinated with the Community Strategy and Leeds' Strategic Plan</p>	<p>Within the context of the developing evidence base, review detailed policy wording & supporting text in preparation of Publication draft (and Infrastructure Delivery Plan).</p> <p>Ensure integration of Core Strategy with Community Strategy priorities and related Strategies including the emerging Agenda for Improved Economic Performance & Regeneration Strategy</p>
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	2 nd November, Civic Hall, Housing / Regeneration / Infrastructure / developers, 'drop in' session.	Need to make more explicit links to the Economic Strategy, regeneration strategies, Core Cities work etc. Is clever signposting within the document possible	The Core Strategy needs to have regard to the City Council's 'Economic Strategy' (Agenda for Improved Economic Performance).	Review structure in the preparation of Publication draft, to make more explicit the cross references to the City Council's 'Economic Strategy' (Agenda for Improved Economic Performance).
Cllrs Fox, Anderson, and Parker	3 rd November – Members Briefing	Need to make sure the CS shows the linkages with neighbouring authorities' Core Strategies. Need to identify the tensions and aspirations, for instance, proposed uses across the orders could lead to increased pressure on Leeds' infrastructure.	Comments relating to cross boundary issues and the need for continued joint working are noted and consistent with the City Council's own commitments to work with a wide range of partners and local authorities (including via Leeds City Region).	Continue to work with neighbouring authorities in the preparation of the draft Publication Core Strategy (and Infrastructure Delivery Plan).

Cllrs Kendall, Immingham, Campbell	6th November – Member’s Briefing	<p>How do we prioritise between the five spatial themes – what policies will set out what is more important?</p> <p>How do the surrounding districts feed into the plan, given that what they do greatly affects Leeds?</p>	<p>It is intended that the various themes across the Core Strategy are considered as a whole and are therefore interrelated. The scope and nature of individual policies is determined by the evidence base and have appropriate emphasis, linked to local circumstances.</p> <p>Neighbouring local authorities have all been consulted on the emerging Core Strategy and as noted above the City Council will continue to work with a range of partners in the preparation of the strategy, including Leeds City Region.</p>	<p>None</p> <p>Continue to work with neighbouring authorities in the preparation of the Core Strategy</p>
	16 th November Otley Library Event	Lack of local distinctiveness in the Core Strategy. North of the district is largely ignored and each community should have a community plan to ensure the needs of the people are understood and dealt with	Within the context of national guidance, the Core Strategy is set at a broader strategic level (but which tackles matters of ‘place’ & people’, rather than providing a level of detail that may be associated with a ‘community plan’. In parallel to the Core Strategy, the City Council is facilitating a range of initiatives at a community level, including working through Area Committees and the development of a Regeneration Strategy.	None
	26 th November Plans Panel West	The Leeds City Region is becoming increasingly important. Can more of the growth be apportioned to other LCR authorities	As noted above the City Council is working closely	Continue to work with neighbouring authorities in the preparation of the Core Strategy

Disability and Access Groups	7 th December Planning Aid Session	No joined up thinking between departments – housing, social services, metro, the Post Office – no integrated thinking – e.g. elderly people’s developments need post box near by as can’t walk far.	These concerns are noted but the City Council is aiming to work in an integrated way as part of a ‘one Council’ approach and to work closely with partners. The delivery of individual social services and provision of post boxes is a level of detail beyond the scope of the Core Strategy. Where appropriate, the Core Strategy will however shape the scope and provision of infrastructure via the Infrastructure Delivery Plan.	Continue to promote a ‘One Council’ approach in the development of the Core Strategy and the preparation of the Infrastructure Delivery Plan (IDP).
Leeds Tenants Federation	26 th November Planning Aid Session	Should separate out city centre from the main urban area – don’t class them as one category Development should be spread more evenly across the district – not just in south	As noted above the role of the City Centre is key to the development of the Core Strategy as a whole. The scale and distribution of development, needs to be consistent with the overall strategy, including links to the availability of infrastructure and in areas of potential.	Give greater emphasis to the role of the City Centre in the preparation of the draft Publication document and review the scale & distribution of development, consistent with on going technical work (including the Housing Background paper and Infrastructure Delivery Plan.



Report of the Director of City Development

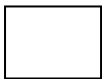
Development Plan Panel

Date: 22 June 2010

Subject: Leeds LDF Core Strategy – ‘Preferred Approach’ Analysis of Consultation Responses: Managing Environmental Resources 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. The purpose of this report, is to provide further detailed consideration of the comments received in respect of the Managing Environmental Resources 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. The purpose of this report, is to provide further detailed consideration of the comments received, in respect of the Managing Environmental Resources theme.

2.0 Background information

- 2.1 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 managing Environmental Resources 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 Managing Environmental Resources chapter has four main objectives:
MER 1. Protect natural habitats and take opportunities to enhance biodiversity,
MER 2. Promote development that respects environmental limits, mitigates and adapts to climate change, protects the high quality built and natural environment and protects air and water quality,
MER 3. Promote opportunities for low carbon and energy efficient power supply,
MER 4. Make efficient use of natural resources and the effective minimisation and management of waste.

A summary of the main comments received is given below, and full details and responses are included in Appendix 1. The number of specific objections received, slightly out-weigh supports, although consultation responses are on the whole generally supportive of the broad thrust of the Managing Environmental Resources chapter. Within this context, the majority of respondents on this section are developers, who have expressed concern, regarding, the number of policy requirements.

Biodiversity

Biodiversity is an essential element of a quality environment and helps make Leeds unique. Policies are designed to not only protect but also to improve our biodiversity. Comments range from support and reinforcement of biodiversity policies to the view that biodiversity policies are not needed in a Core Strategy. Government Office for Yorkshire and the Humber (GOYH) consider that the policies are not locally specific enough but it is difficult to see how this could be achieved without specifically naming the sites, which would be lengthy as there are hundreds. A number of respondents asked for the policy approach to distinguish between nationally designated sites and locally designated sites. This is not straight forward as the

process that we go through for considering development that may effect either of these designations is the same. However, it will be helpful to explain that there is a hierarchy of designations.

Carbon Reduction

The carbon reduction policy seeks a further 20% reduction in CO2 beyond what is required by the building regulations. A key issue for this policy is the need to set a standard, which whilst challenging, will not impact detrimentally upon the viability of housing delivery. GOYH have suggested that we look for examples of what has been achieved locally. In Leeds, the Yarn Street development is being built to meet Code for Sustainable Homes level 4, however it has had the benefit of grant subsidy. It is likely that CO2 reduction will have an additional cost associated with it but over time it must be expected that land values will reflect the range of planning policies set out at national and local level. The difficulty arises where developers have already purchased the land at a time when the values were higher and in those circumstances it is inevitable that meeting this policy requirement will affect viability. As costs come down over time, then the impact on viability will be less of an issue and therefore it is appropriate to include this policy in our Core Strategy (which is a long term document). In terms of carbon reduction also, a number of responses have cited the lack of an evidence base to support the policy, however the Sustainability Appraisal carried out at Issues and options stage demonstrates that the policy is required in order to mitigate the negative effects of growth. Finally, there is some confusion between the carbon reduction policy (CC1) and the sustainable construction policy (SC7), which can be found in the sustainable communities chapter. Consequently, it makes sense to move the latter so that it follows on from CC1.

Renewable Energy

Guidance recommends that the Core Strategy gives an indication of how we might increase renewable energy in the District. Comments are generally supportive of the policy but a number of respondents have asked for it to be more spatially specific, particularly with regard to indicating suitable areas of search for wind turbines. It would be appropriate to include this within the Natural Resources and Waste Development Plan Document.

Green Infrastructure and Climate Change

The Core Strategy currently contains two suggested policies with regard to green infrastructure and climate change specifically in the city centre. Responses are split between support for the policies and a request for them to apply across the whole District and concerns about the impact on viability of delivery. There are also concerns that the Policy is not strategic enough. It is proposed to combine the two policies together to create a new CC2 policy, which will apply District-wide and will contain a broad range of measures, which then allows the developer flexibility to choose the actions which are most suited to their circumstances and thereby help to improve viability of delivery. This would then form part of our strategy for adapting and mitigating climate change.

Managing Flood Risk

There was general support for the flood risk policy, which provides a broad statement of intent. Further detailed policies on flood risk are included in the emerging Natural Resources and Waste DPD. Some minor word changes have been received (proposed by Yorkshire Water and the Environment Agency) and these are largely accepted as improvements to the policy wording. GOYH have asked us to demonstrate how flood risk has been taken into account in selecting

the locations for growth. It is recognised that this is needed and is being included as part of the housing evidence base. Finally, some reservations are expressed about the proposed Leeds Flood Alleviation Scheme (FAS), however this is not specifically a proposal in the Core Strategy, the intent of the Policy is to give guidance on how we would treat applications for development that are protected by the FAS either before or after construction.

Natural Resources and Waste Management

The Council is preparing a separate Natural Resources and Waste Development Plan Document and at the time of preparing the Core Strategy Preferred Approach it was considered appropriate to defer all detailed issues regarding waste and minerals to this DPD. However, a number of respondents have asked for strategic policies to be included in the Core Strategy and it is therefore recommended that for completeness, broad arching policies for waste and minerals should be included in the Core Strategy.

- 3.2 The consultation responses are on the whole supportive of the broad thrust of the Managing Environmental Resources chapter. It is evident however, that policies will need to skilfully strike a balance between those who want higher, more challenging standards and those who want more relaxation and fewer standards. A key issue continues to be the viability of housing delivery. This is a difficult issue in the current economic climate, however, as the Core Strategy will extend till 2026 it is appropriate to include policies which stretch beyond the current economic circumstances. Over time it must be expected that land values will reflect the range of planning policies set out at national and local level. If land values ignore planning requirements, then it becomes self-fulfilling that such requirements will render schemes non-viable. It is anticipated that there may be particular scrutiny surrounding the viability issue at Examination in Public and further work may be needed to help justify the introduction of energy efficiency measures which go beyond the building regulations requirement.

Next Steps

4.0 Implications for council policy and governance

- 4.1 None, other than to reiterate that the LDF Core Strategy needs to reflect the strategic objectives of the Council Plan and give spatial expression to the Community Strategy.

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 Managing Environmental Resources, 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). 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 MANAGING ENVIRONMENTAL
RESOURCES THEME**

CORE STRATEGY PREFERRED APPROACH

LCC RESPONSES TO REPRESENTATIONS ON THE MANAGING ENVIRONMENTAL RESOURCES CHAPTER

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
Policy B1: Protection of Designated sites				
Government Office (GOYH) 95	Government Office	This policy should be locally specific. Currently it does not add to national guidance.	Policy B1 relates to designated sites within the Leeds District, including local sites and therefore is locally specific.	Seek Clarification from GOYH
Turley Associates 5670	Swayfields (Skelton) Limited	The biodiversity policies are not needed in the Core Strategy. These policies do not relate to the critical strategic issues that the Core Strategy is intended to address.	Disagree, biodiversity is a strategic issue which is integral to the Core Strategy, see the Strategic Themes, S.T.4.	None
Carter Jonas 5681	The Diocese of Ripon and Leeds, the Hatfield Estate, lady Elizabeth Hasting Charity Estate, the Ledson estate, AR Briggs & Co, Symphony Group Ltd.	The policy should ensure a proportionate level of protection of designated sites and their importance. The policy should make a distinction between sites which are recognised to be of national and international importance and those which are so protected at the discretion of the Council	Create distinction between sites by making reference to the biodiversity hierarchy, as nationally designated sites will come higher up the biodiversity hierarchy than locally designated sites.	Add reference to the biodiversity hierarchy and then add to Policy B1 the words "with regard to its status within the biodiversity hierarchy."
Lister Haigh Ltd 5533	D Parker & Son	Guidelines for settlement growth, regard should be had to the physical and landscape features in determining development limits, e.g. roads, railways, woodland, hills, existing structures and the existing nature of the settlement.	These factors will be considered in the work on housing growth issues but are not specific to the biodiversity policy.	Review and revise as appropriate.
Natural England	Natural England	Support. Biodiversity policies consistent with PPS9	Support Welcomed	Comments noted

Policy B2: Protection of Important (Biodiversity Action Plan) Species and Habitats				
Government Office 95	Government Office	This policy should be locally specific. Currently it does not add to national guidance.	PPS9 requires this type of policy. Policy is locally specific because it refers to the Leeds Biodiversity Action Plan.	Cross reference to evidence base and revise to make more locally specific.
Turley Associates 5670	Swayfields (Skelton) Limited	The biodiversity policies are not needed in the Core Strategy. These policies do not relate to the critical strategic issues that the Core Strategy is intended to address.	Part of Leeds' vision is for the District to have a rich and varied biodiversity. Therefore it is essential to have biodiversity policies in the Core Strategy to ensure that this strategic objective can be delivered.	Comments noted
Lister Haigh Ltd 5533	D Parker & Son	Guidelines for settlement growth regard should be had to the physical and landscape features in determining development limits, e.g. roads, railways, woodland, hills, existing structures and the existing nature of the settlement.	These factors will be considered in the work on housing growth issues but are not specific to the biodiversity policy.	Review and revise as appropriate.
Scott Wilson 414	PPL c/o Revera	<p>The first bullet point in Policy B2 should be deleted. This bullet point requires the applicant of a development that would have a potential adverse impact on important species and habitats to demonstrate that 'that there is no alternative site to accommodate'.</p> <p>This requirement is unreasonable and unnecessary and would prove very difficult to fulfil for many development proposals. Bullet points 2 and 3 provide adequate means of protecting important species and habitat to meet the policy aims.</p>	Agree.	Revise policy wording
Natural England	Natural England	Support. Biodiversity policies consistent with PPS9	Support welcomed	Comments Noted

Policy B3: Submission of Ecological Information in Support of planning Applications				
Government Office 95	Government Office	This policy should be locally specific. Currently it does not add to national guidance.	It is helpful for developers to know early on what info. Leeds requires. It helps avoid delay later on.	Revise supporting text and make reference to evidence base, RSS and Green Infrastructure.
Turley Associates 5670	Swayfields (Skelton) Limited	The biodiversity policies are not needed in the Core Strategy. These policies do not relate to the critical strategic issues that the Core Strategy is intended to address.	Part of Leeds' vision is for the District to have a rich and varied biodiversity. Therefore it is essential to have biodiversity policies in the Core Strategy to ensure that this strategic objective can be delivered.	Comments noted
Lister Haigh Ltd 5533	D Parker & Son	Guidelines for settlement growth regard should be had to the physical and landscape features in determining development limits, e.g. roads, railways, woodland, hills, existing structures and the existing nature of the settlement.	These factors will be considered in the work on housing growth issues but are not specific to the biodiversity policy.	Review and revise as appropriate.
Turley Associates 1743	Barratt Strategic	Policy should be deleted. The inclusion is contrary to the advice in paragraph 4.1 of PPS12 which advises that the main concern of a CS should be overall vision, strategic objectives and a delivery strategy. This policy is, essentially, development control policies and should be included in a Development Policies DPD.	It is an essential part of Leeds' vision to have a rich and varied biodiversity. This must be included in the Core Strategy in order to ensure that this strategic objective can be delivered. Key principle in PPS 9 para 1 (i) requires that LPAs base decisions on the most up-to-date info. therefore we have a duty to request this info. be submitted with the planning application. Natural England have emphasized that they are particularly supportive of this Policy.	Review order of Core Strategy to make policy approach clearer.
Natural England	Natural England	Support. Biodiversity policies consistent with PPS9. They are particularly supportive of the stated standards for ecological assessments, which will ensure that development proposals are accompanied by good quality information.	Support welcomed	Comments Noted

Policy B4: Biodiversity Improvements				
Government Office 95	Government Office	This policy should be locally specific. Currently it does not add to national guidance.	Suggest linking this Policy in the supporting text to the Leeds specific biodiversity opportunities in the evidence base.	Expand supporting text
Turley Associates 5670	Swayfields (Skelton) Limited	The biodiversity policies are not needed in the Core Strategy. These policies do not relate to the critical strategic issues that the Core Strategy is intended to address.	Part of Leeds' vision is for the District to have a rich and varied biodiversity. Therefore it is essential to have biodiversity policies in the Core Strategy to ensure that this strategic objective can be delivered.	Revise Appendix 6
Carter Jonas 05681	The Diocese of Ripon and Leeds, the Hatfield Estate, lady Elizabeth Hasting Charity Estate, the Ledson estate, AR Briggs & Co, Symphony Group Ltd.	This policy is unclear requiring development proposals to demonstrate a net gain for biodiversity. Does this apply equally to dormer windows as much as to a development for 200+ dwellings?	Add the wording 'commensurate with the scale of the development'.	Revise as necessary.
Lister Haigh Ltd 5533	D Parker & Son	Guidelines for settlement growth regard should be had to the physical and landscape features in determining development limits, e.g. roads, railways, woodland, hills, existing structures and the existing nature of the settlement.	These factors will be considered in the work on housing growth issues but are not specific to the biodiversity policy.	Review and revise as appropriate.
Turley Associates 1743	Barratt Strategic	Policy should be deleted. The inclusion is contrary to the advice in paragraph 4.1 of PPS12 which advises that the main concern of a CS should be overall vision, strategic objectives and a delivery strategy. This policy is, essentially, development control policies and should be included in a Development Policies DPD.	It is an essential part of Leeds' vision to have a rich and varied biodiversity. This must be included in the Core Strategy in order to ensure that this strategic objective can be delivered.	Review order of Core Strategy to make policy approach clearer.
Natural England	Natural England	Support. Biodiversity policies consistent with PPS9	Support Welcomed	Comments Noted

Policy B5: Monitoring and Management for Biodiversity				
Government Office 95	Government Office	This policy should be locally specific. Currently it does not add to national guidance.	It is important to flag up early on to developers that Leeds requires them to factor in long term maintenance of biodiversity sites.	Cross reference to evidence base and Appendix 6.
Turley Associates 5670	Swayfields (Skelton) Limited	The biodiversity policies are not needed in the Core Strategy. These policies do not relate to the critical strategic issues that the Core Strategy is intended to address.	It is an essential part of Leeds' vision to have a rich and varied biodiversity. This must be included in the Core Strategy in order to ensure that this strategic objective can be delivered.	Review order of Core Strategy to make policy approach clearer.
Lister Haigh Ltd 5533	D Parker & Son	Guidelines for settlement growth regard should be had to the physical and landscape features in determining development limits, e.g. roads, railways, woodland, hills, existing structures and the existing nature of the settlement.	These factors will be considered in the work on housing growth issues but are not specific to the biodiversity policy.	Review and revise as appropriate.
Turley Associates 1743	Barratt Strategic	Policy should be deleted. The inclusion is contrary to the advice in paragraph 4.1 of PPS12 which advises that the main concern of a CS should be overall vision, strategic objectives and a delivery strategy. This policy is, essentially, development control policies and should be included in a Development Policies DPD.	It is an essential part of Leeds' vision to have a rich and varied biodiversity. This must be included in the Core Strategy in order to ensure that this strategic objective can be delivered.	Review order of Core Strategy to make policy approach clearer.
Natural England	Natural England	Support. Biodiversity policies consistent with PPS9	Support welcomed	Comments noted

Policy CC1: Climate Change – CO₂ Reduction

<p>Government Office 95</p>	<p>Government Office</p>	<p>Transport is one of the major CO₂ emitters. GO expected sustainable transport to be mentioned and the following topics to be discussed – sustainable travel, demand management, car parking policy, low emission zones, car clubs, car sharing, electric car charging points, travel plans, school travel etc.</p> <p>The local requirements should be justified on the basis of specific local evidence and viability considerations. The targets may not be ambitious enough in light of the RSS. There is no evidence of what is achievable locally.</p>	<p>Alter supporting text to cross refer to LTP3.</p> <p>Alter supporting text to mention the three main emitters – Transport, new development and existing development. Signpost to new TP policy , Policy CC1 and the Climate change Strategy.</p> <p>Low emission zones are covered in the Natural Resources and Waste DPD, Air Quality Chapter.</p>	<p>Alter supporting text where appropriate to signpost other policies and documents.</p> <p>Create a new strategic policy on sustainable travel, between TP1, TP2 or TP3.</p>
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Leeds Teaching Hospital 5690	Leeds Teaching Hospital	<p>The targets set out in Policy CC1 are noted. In this regard, the NHS is implementing its own targets on carbon reduction seeking to reduce by 80% by 2050. Work being done currently may well lead to the target date being brought in from 2050. The NHS also has its own BREEAM code (BREEAM Healthcare) which affects all new-build projects. Collectively this is a considerable undertaking with huge implications for the NHS estate and much of the work which may well be required will require planning permission. A planning policy framework should exist to support projects which directly support carbon reduction.</p> <p>It is important from the Trust's viewpoint that the objectives of the main public sector bodies should work in tandem and should not produce contradictory requirements through planning policy.</p> <p>Sustainable design and building regulation requirement on carbon need to consider the unique issues of hospital provision where types of care and treatment can require a significant use of energy. Whilst this can be mitigated to a degree in new buildings the opportunities are less so in existing hospital buildings.</p>	<p>Comments noted, The BREEAM Healthcare code to be included in the text for Policy SC7.</p> <p>Alter text to state ' where specialist BREEAM standards have been developed, such as BREEAM Healthcare and BREEAM Education, then these are recommended'.</p> <p>Policy SC7 is generic to residential and commercial development and we do not have a wish to rule out other BREEAM standards that have been developed for other uses, e.g. schools.</p> <p>To detailed for Core Strategy, revise policy text for clarification, remove brackets.</p>	<p>Move policy SC7 to follow on from the Climate Change section</p> <p>Revise supporting text to cross reference to the Climate Change SPD and explain that other BREEAM standards applies as appropriate e.g. BREEAM Healthcare and BREEAM Education.</p>
Stanks and Swarcliffe Residents Association 5052	Stanks and Swarcliffe Residents Association	<p>CO2 emissions are a cause for concern for all future generations. Manufacturers should be answerable in the way they transport goods to destinations.</p>	<p>Comments noted, existing policies regarding non-road based freight are included in LTP2. Freight is encouraged in Core Strategy policy T3. Detailed policy on non road- based freight is being developed in the Natural Resources and Waste DPD.</p>	<p>Revise supporting text to signpost to other initiatives and documents.</p>

Liberal Democrat Otley and Yeadon Councillors 4817	Liberal Democrat Otley and Yeadon Councillors	These approaches should be integral to all developments	Economies of scale mean that these approaches are more likely to be more viable when applied to major developments.	Comments noted.
Scholes Community Forum 20	Scholes Community Forum	The suggested contribution of 10% for off site renewable energy schemes is not considered as adequate. A figure of 20% is thought to be more appropriate.	10% reflects the RSS policy as a minimum, developers have options to go higher as they wish. CO ₂ reduction requirement is set at 20% and there is flexibility for the developer as to how they achieve that.	None
Individual 5632	Individual	Supports. Implementation should be urgent and a strong campaign is needed to stress the importance of this.	Support welcomed	Comments noted
English Heritage 99	English Heritage	Support the principle of requiring all new development to meet a target for on site renewable energy generation, and support wording of Policy CC1 as it recognises that there may be circumstances where the requirements of the policy might not be able to be met. In the case of historic buildings or Conservation Areas, this would be where the objectives of the designation would be compromised through provision on-site. It would be helpful to explain this aspect of the policy more fully in the supporting text.	Recent guidance has come out from the Prince's Trust to demonstrate ways to incorporate energy efficiency measures in historic buildings. We would expect developers to show they have attempted to do this in the first instance however, where it can be shown that measures might compromise heritage objectives then the policy allows for off site contribution instead.	Alter text to explain this point more fully.
GVA Grimley Ltd 5661	City East Limited (Rushbound Group)	Provision of low carbon and renewable resources must be considered on a site by site basis with reference to the viability of development and regeneration effects. The 10% contribution should be waived or reduced if this shown to be unviable through an economic assessment, particularly where viability issues would impact the delivery of regeneration; such benefits should not be undermined by prescriptive environmental standards.	Need policy basis so that developers can factor it in from an early stage. The Core Strategy provides a strategic context for issues relating to sustainability, renewables and CO ₂ reduction.	Comments noted

ARUP 397	ARUP	Support objective of CC1, however, would like it to be more specific about how will apply a definition of 'on site or near site', as a tight definition of generation of energy in new developments is likely to preclude the progress of more strategic low carbon and renewable energy generation projects, which have the ability to serve multiple users. The Aire Valley provides a significant opportunity for sources of low carbon and renewable energy generation that can serve multiple developments, including new housing provided as part of the Urban Eco Settlement designation and existing industrial uses and business.	The specific renewable energy/low carbon initiatives are dealt with in the Natural Resources and Waste DPD and not in this policy. The 10% renewable energy is about self sufficiency for individual developments.	Revise text. Make reference to the Aire Valley AAP, Urban Eco Settlements and the Climate change SPD.
Leeds Civic Trust 62	Leeds Civic Trust	Policy CC1 should be rewritten on the lines of 10% of the predicted energy needs of the development from either site or neighbourhood scale renewable energy, the policy should extend to smaller developments and should be required to meet the 20% less than building regs target.	RSS and Draft PPS1 supplement suggest decentralised means 'local' rather than neighbourhood scale renewable energy. In practice this will also depend on opportunities as they arise. 10% reflects the RSS policy as a minimum, developers have options to go higher as they wish. CO ₂ reduction requirement is set at 20% and there is flexibility for the developer as to how they achieve that.	Comments Noted
Turley Associates 5670	Swayfields (Skelton) Limited	Policy CC1 - No evidence is presented as to why policy seeks to introduce a more rigorous CO ₂ reduction target than is established in national guidance and no consideration is given to the potential impacts of setting a higher target on the viability of development and therefore the delivery of the CS's objectives. In the absence of evidence that such standards can be adopted without impacting on delivery the policy should be removed.	Evidence from the Sustainability appraisal at issues and options stage demonstrates that higher standards are required in order to mitigate the negative effects of growth.	Comments noted

<p>Barton Willmore Planning Partnership – Northern 45</p>	<p>Ashdale Land and Property Company Ltd.</p>	<p>Policy CC1 is unclear. The way the policy is worded at present could mean that developments will be expected to provide under the current target. Given the supporting text relating to ‘challenging targets’, this is not believed to be the intention of the Policy. The Policy should therefore be reworded to reflect this current confusion.</p> <p>The Policy makes reference to the Building Regulations Target Emissions Rate. It does not appear that this target is stated anywhere in the policy or supporting text. This should be clarified so developers are easily able to understand what is expected of them. Whilst the RSS does indeed note that the target for the reduction of carbon emissions should be at least 10%, it is not clear why the CSPA seeks a higher target. Whilst the RSS seeks that ambitious targets it should be put into the context of wider housing and economic objectives. Given the high levels of housing growth needed in Leeds, higher targets may restrict delivery of this growth. RSS seeks higher targets where this is feasible and viable. Policy CC1 does take into consideration the feasibility of such requirements, but not viability. The policy should be reworded to enable flexibility based on a consideration of viability in addition to feasibility.</p>	<p>Respondent has misinterpreted the intent of the policy. Focus of the policy is to provide self-sufficiency for individual developments.</p> <p>The Building Regulations Target Emissions Rate is constantly changing therefore the target is for 20% beyond whatever is the current rate.</p> <p>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.</p> <p>Growth should not be at the expense of sustainability.</p>	<p>Clarify policy wording.</p> <p>Clarify policy wording around policy text point a)</p>
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Leeds Chamber of Commerce 1736	Leeds Chamber of Commerce	The overall ambition of addressing climate change issues is acknowledged, however the specific targets set within the draft Core Strategy policy go further than those outlined in the RSS. Requiring both a reduction in carbon dioxide emissions of 20% and a minimum of 10% of energy generated from renewable or low carbon energy is excessive and the viability of achieving these levels, particularly at the lower end of the development scales, needs to be considered. The policy needs to be more closely aligned to the RSS.	This policy is Leeds specific and therefore goes beyond the RSS. The Core Strategy is a long term document and it is appropriate to include policies which stretch beyond the recession. Over time it must be expected that land values will reflect the range of planning policies set out at national and local level. If land values ignore planning requirements then it becomes self-fulfilling that such requirements will render schemes non-viable. Government policy sets a strong commitment to addressing climate change through the planning system and such a policy is entirely correct and appropriate. To improve overall levels of sustainability to secure long-term economic prosperity as well as social and environmental benefits.	Comments Noted
Savills (Northern Branch) 467	Harewood Estate	We support in general terms the need to mitigate against climate change, however, this clearly has to be relative to the scale and size of development proposed. The policy should reflect other similar adopted policies in neighbouring Local Authorities and include reference to the fact that the % figures are required unless it can be demonstrated that it is not technically feasible or financially viable to do so.	Leeds has a much higher level of growth than any of the other LPAs in the Region therefore mitigation needs to be set accordingly. The intent of this policy is to be proportionate to the size and scale of a development, it also conforms with RSS Policy ENV5.	Comments noted
Drivers Jonas LLP 5683	McAleer and Rushe Group	Object to blanket provision in policy and request that the wording be altered to demonstrate that this requirement be the subject of sustainability assessments and site specific viability testing.	Policy applies to major developments and not all development. Major development is being directed to key growth areas in the Core Strategy and in practice the policy will be driven towards those areas identified for growth.	Comments noted

<p>Turley Associates 1743</p>	<p>Barratt Strategic</p>	<p>here is a distinct lack of clarity in these paragraphs. It is unclear exactly what they are trying to achieve and how their objectives as expressed in Policy CC1 relate to Policy SC7 which requires development to comply with the relevant part of BREEAM or Code for Sustainable homes.</p> <p>It is unclear what the 20% CO₂ reduction referred to in paragraph 5.4.17 relates to. What is the baseline against which the reduction is being measured? How does this reduction relate to the carbon savings implicit in the BREEAM and CSH standards. The confusion is compounded by Appendix 7 which also seems to be asking for improvements beyond part L of the building regulations.</p> <p>If the requirement is to achieve 20% CO₂ reduction above CSH and BREEAM, then this should be more explicitly stated. However, as presented, this part of the plan fails the 'justified' test of soundness as it fails to consider the viability of what is being required. Paragraph 33 of the PPS1 climate change supplement is quite clear that requirements for decentralised energy supply should be evidence-based and viable, having regard to the overall costs of bringing sites to the market. Furthermore, in the case of housing development and when setting development area or site-specific expectations, the Council must demonstrate that the proposed approach is consistent with securing the expected supply and pace of housing development shown in the housing trajectory required by PPS3, and does not inhibit the provision of affordable housing.</p>	<p>Agree, better links between CC1 and SC7 are needed.</p> <p>The baseline refers to the energy needs of the building, which the applicant has to provide anyway – in order to satisfy building regs.</p> <p>The Buildings Regulations Target Emissions Rate is constantly changing therefore the target is for 20% beyond whatever is the current rate.</p> <p>This is not the intention, it is 20% CO₂ reduction based on current building reg targets.</p> <p>Government is committed to adopting mitigating climate change through the planning system. We have to have this policy.</p> <p>The Core Strategy is a long term document and it is appropriate to include policies which stretch beyond the recession. Over time it must be expected that land values will reflect the range of planning policies set out at national and local level. If land values ignore planning requirements then it becomes self-fulfilling that such requirements will render schemes non-viable.</p>	<p>Move policy SC7 to follow on CC1</p> <p>Clarify policy wording</p>
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Cont...	Con...	<p>The issue is relatively straightforward:</p> <ol style="list-style-type: none"> 1. Identify the aspirational CO2 reduction requirement; 2. Confirm what Cos reduction the relevant level of BREEAM or CSH in force at the time will achieve, 3. Assess the viability of requiring new development to meet the difference between 1 and 2. 4. Assess the viability of requiring decentralised or on site renewable energy. 		
Dacre son & Hartley 480	Individuals, Redrow Plc, Taylor Wimpey, Persimmon Homes	Policy CC1 and the supporting text appear to duplicate several elements of SC7.	Improve and explain the links between SC7 and CC1.	Move policy SC7 to follow on from CC1
CB Richard Ellis 354	Hammerson PLC	Policy CC1 as rigidly worded could have a significant adverse impact on the viability of current pipeline schemes. Flexibility should be introduced here to allow for the sustainability merits of a scheme to be negotiated on an individual basis having regard to site specific constraints and development costs.	The Core Strategy is a long term document and it is appropriate to include policies which stretch beyond the recession. Over time it must be expected that land values will reflect the range of planning policies set out at national and local level. If land values ignore planning requirements then it becomes self-fulfilling that such requirements will render schemes non-viable.	Comments Noted
Natural England 58	Natural England	Natural England welcomes the commitment to achieving carbon reduction at a rate of 20% less than the Building Regulations Target Rate. Also welcome the commitment to ensuring major development derive at least 10% of energy from renewable sources.	Support welcomed	Comments Noted
Highways Agency 5604	Highways Agency	The Strategy does not, however, include any consideration of the traffic impact of transporting the fuels to such facilities and the potential overall negative impact (in CO2 terms) of such types of energy sources.	Refer to Policy SC7, Code for Sustainable Homes, BREEAM achievements factor this in. The Core Strategy promotes development in sustainable locations to reduce the need to travel by car.	Comments Noted

University of Leeds 846	University of Leeds	Wording/punctuation of policy is ambiguous: 'decentralised, renewable or low carbon energy' could be interpreted such that decentralised carbon-intensive energy supply could be acceptable! The only acceptable forms of energy generation will be low carbon ones so the policy should simply read: either on site or neighbourhood scale (low Carbon) renewable energy.	RSS and Draft PPS1 supplement suggest decentralised means 'local' rather than neighbourhood scale renewable energy. Need to define decentralised and other terms used in the policy. Refer to Policy SC7, Code for Sustainable Homes, BREEAM achievements factor this in. The Core Strategy promotes development in sustainable locations to reduce the need to travel by car.	Comments noted. Add 'decentralized' to the glossary.
Knight Frank 409	McInerney Homes Ltd	The Core Strategy should only aim to secure contributions and requirements (of new developments) in accordance with national standards and guidelines. Any contribution and requirement beyond this should take a flexible approach, be subject to site specific details and viability and not hinder development.	It's important to include the policy - to ensure that developers do their best to try to achieve CO2 reduction. The Core Strategy is a long term document and it is appropriate to include policies which stretch beyond the recession. Over time it must be expected that land values will reflect the range of planning policies set out at national and local level. If land values ignore planning requirements then it becomes self-fulfilling that such requirements will render schemes non-viable. Government policy sets a strong commitment to addressing climate change through the planning system and such a policy is entirely correct and appropriate and necessary to improve overall levels of sustainability to secure long-term economic prosperity as well as social and environmental benefits.	Comments noted
Spawforths 2663	Chapman Family Discretionary Trust, Individual, Individual	Support development control style policies which deal with the spatial direction of managing environmental resources and climate change.	Support Welcomed	Comments noted

Policy RE1: Renewable Energy				
Government Office 95	Government Office	Really pleased with the range of renewable opportunities the Council have looked at. The policy would benefit from some spatial explanation, including where the areas of opportunity for the different types of energy are.	Support Welcomed Policy is seeking to achieve renewable energy provision across the district where opportunities exist.	Comments noted Clarify the scope of the policy. Cross reference policy with other documents and policies Examine the potential to revise the policy to be specific about the sustainability of areas within the District.
Individual 5610	Individual	The measures mentioned are very expensive to set up, maintain and run, and some require other energy. Also can you see the 2 or 3 car families managing with one car? Of course not.	Costs will reduce over time and the benefits will eventually out weigh the costs. Other issues addressed in the Sustainable Communities and the Sustainable travel sections.	Comments noted.
Individual 4756	Individual	More support should be given for local power generation such as community wind turbines where appropriate. Help to householders to sell surplus generated electricity to the national grid.	Policies CC1, RE1 and SC7 all support local power generation and do not preclude community schemes.	Revise wording to factor in community gains for local RE.

Liberal Democrat Otley and Yeadon Councillors 4817	Liberal Democrat Otley and Yeadon Councillors	These approaches should be integral to all developments	RE1 is about grid connected and therefore not appropriate for all development.	None
Scholes Community Forum 20	Scholes Community Forum	The Forum has a preference and supports Solar and Photo-Voltaic methods of renewable energy projects but consider that "Wind Farm" projects particularly within less than One kilometre of residential developments should only be supported where there is no clear evidence that alternative proposals have been considered.	All forms of renewable energy are being encouraged. The Natural Resources and Waste DPD (NR&W DPD)has a specific locational criteria policy on wind energy development.	Comments noted Improve links in the text to the NR&W DPD.
Individual 5632	Individual	Supports. Implementation should be urgent and a strong campaign is needed to stress the importance of this.	Support welcomed	Comments noted
English Heritage 99	English Heritage	Map 4 and Para 5.4.22 it is not clear what basis the weir points have been identified, and in policy terms what they might mean for the spatial planning of the city.	Map 4 is illustrative to demonstrate the potential for hydro-power. It is not the intention to allocate.	None
Individual 4694	Individual	More emphasis in supporting retrofitting of technologies in homes.	The planning system will address this if it needs planning permission, through CC1.	None
Individual 5658	Individual	Energy from waste can lead to incinerating materials that could be recycled just to maintain the viability of the Energy from Waste scheme	Policies in the Natural Resources and Waste DPD reflect the waste hierarchy. We support the waste hierarchy and to enable it we will identify appropriate sites in the Natural resources and Waste DPD.	Add a strategic policy on waste in the core Strategy.
Yorkshire Water 948	Yorkshire Water	The use of renewable energy is an essential component of ensuring a sustainable and effective LDF.	Support welcomed	Comments noted
Leeds City Council 5660	Chief Recreation Officer	Wind energy is already used at John Charles Centre for Sport and some additional Leeds City Council Leisure Centres would provide good sites. Additionally renewable sources of energy are likely to play a role in powering leisure provision during the duration of this plan.	Support welcomed	Comments noted

ARUP 397	ARUP	<p>Disappointed that the Core Strategy does not set a strategic direction for the provision of electricity and heat from waste, but defers to the Aire Valley AAP and the NR&W DPD. Energy from waste is a source of renewable and low carbon energy, and as LCC is clearly committed to the procurement of a residual waste management facility in the Aire Valley, this should be supported in the strategic policy direction of the CS. Identifying the Aire Valley as a potential location for new energy source would provide clear support for the wider eco-vision for the Aire Valley and would also contribute to the physical infrastructure required to support the delivery of an urban eco settlement.</p> <p>The Core Strategy makes little reference to the existing energy demands of industrial users and the resultant infrastructure demands which will be exacerbated by the additional levels of development proposed. Large industrial users require certainty of energy supply and the Aire Valley offers the potential to incorporate new energy generating technologies which should be supported by a strategic policy framework in the CS.</p>	<p>Discuss the Aire Valley within this policy</p> <p>Energy demands need to be reflected as part of the preparation of the Infrastructure Delivery Plan</p>	<p>Revise policy RE1 to indicate Aire Valley has potential for Energy from Waste.</p> <p>Incorporate energy demands as part of the Infrastructure Delivery Plan.</p>
Turley Associates 5670	Swayfields (Skelton) Limited	Support in Principle the opportunities to deliver renewable and low carbon energy generation Aire Valley Leeds.	Support welcomed	Comments noted
British Waterways 338	British waterways	The role that waterways can play should be recognised and supported, as appropriate, through the policy framework especially in relation to Policies RE1 and MFR2.	Dealt with in the Natural Resources and Waste DPD.	<p>Revise text to acknowledge the importance of canals in the spatial vision</p> <p>Cross reference to Policy T3, SC8 and the Green Infrastructure section.</p>

Carter Jonas 5681	The Diocese of Ripon and Leeds, the Hatfield Estate, lady Elizabeth Hasting Charity Estate, the Ledson estate, AR Briggs & Co, Symphony Group Ltd.	Policies which promote resource efficiency and forms of renewable energy generation are consistent with sustainable development objective	Support welcomed	Comments noted.
Scott Wilson 414	PPL c/o Revera	This principle is supported and the Parlington estate is promoted as a potential location to accommodate a number of renewable energy sources. A specific allocation for renewable energy development would make such a scheme easier to deliver, given that the estate is within the green belt.	Possible areas of search for wind energy to be included in the Natural Resources and Waste DPD.	Identify areas of search for wind energy in the NR&W DPD
AGFA 5664	AGFA	LCC should pro-actively encourage business to move to renewable energy by identifying zones where planning permission is likely to be given for wind turbines.	Possible areas of search for wind turbines to be included in the Natural Resources and Waste DPD.	Identify areas of search for wind energy in the NR&W DPD.

Policy GR1: Green Roofs within the City Centre				
Liberal Democrat Otley and Yeadon Councillors 4817	Liberal Democrat Otley and Yeadon Councillors	These approaches should be integral to all developments	<p>Create new CC2 policy to be about buildings and how they intend to adapt and mitigate to climate change, this policy should list Green Roofs and street trees as possible measures.</p> <p>CC2 should apply across the whole district. However policy GR1 is particularly relevant in the City Centre where the evidence base shows that there are gaps in the GI and opportunities for Green Infrastructure are limited.</p>	<p>Amend text to create new CC2 policy which will provide a broad range of measures from which the developer can choose which is the most appropriate</p> <p>Explain evidence base in the supporting text.</p>
Individual 5632	Individual	Supports. Implementation should be urgent and a strong campaign is needed to stress the importance of this.	Support Welcomed	Comments Noted
Robert Halstead Chartered Surveyor 5649	Binks Executive Homes	Policy GR1 will be detrimental to large scale industrial/business development (new buildings)	A study by the North West Regional Development Agency has shown a link between land value and green infrastructure, see 'The Economic Value of Green Infrastructure'.	More links to evidence base in the supporting text.
GVA Grimley Ltd 5661	City East Limited (Rushbound Group)	Further research is needed into the environmental benefits of green roofs as well as the operational and financial viability of their installation and maintenance. As above, such requirements should be waived if shown to be unviable.	Policy now contained in CC2. However the measures in GR1 and ST1 are critical in the city centre to link to Green Infrastructure are to be stressed in the text.	Link to evidence base

Leeds Civic Trust 62	Leeds Civic Trust	<p>Agree with policy but feel that it should cover the whole district.</p> <p>Why are roofs measured in ha and not m.</p>	Covered by revised policy CC2 which should apply across the whole district	Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choose which is the most appropriate
Turley Associates 5670	Swayfields (Skelton) Limited	Policy GR1 - No evidence is presented as to why policy seeks to introduce a requirement for green roofs on certain buildings and no consideration is given to the potential impacts of setting a target on the viability of development and therefore the delivery of the CS's objectives. In the absence of evidence that such an approach can be adopted without impacting on delivery the policy should be removed.	The supporting text to the policy CC2 will explain the evidence base more thoroughly i.e. street survey and Green Infrastructure mapping.	Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choose which is the most appropriate

Carter Jonas 5681 Spawforths 2663	The Diocese of Ripon and Leeds, the Hatfield Estate, lady Elizabeth Hasting Charity Estate, the Ledson estate, AR Briggs & Co, Symphony Group Ltd. Chapman Family Discretionary Trust, Individual, Individual	Policy not suitable for the Core Strategy. This policy could be incorporated into sustainable design policy SC8.	Policy to be incorporated into Policy CC2	Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choose which is the most appropriate
Turley Associates 1743 CB Richard Ellis 354	Barratt Strategic Hammerson PLC	Policy GR1 is unsound as it fails to set out either the feasibility or viability of requiring new development with more than 0.25 ha roof area to incorporate green roof technology in their roof covering. Whether this policy can be delivered is unclear. What are the green roof technologies referred to? Are they suitable and practical for the type of development envisaged by the CS	The supporting text to the policy CC2 will explain the evidence base more thoroughly i.e. street tree survey and Green Infrastructure mapping.	Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choose which is the most appropriate
Natural England 58	Natural England	This policy is useful in complementing the wider green infrastructure network and ensuring that vital ecosystem services such as urban cooling are delivered across the city.	Support Welcomed	Comments Noted
Policy ST1: Street Trees in the City Centre				
Individual 5610	Individual	Support, as street trees look nice.	Support Welcomed	Comments Noted

Individual 5632	Individual	Supports. Implementation should be urgent and a strong campaign is needed to stress the importance of this. Also keen on more parks and trees in the City Centre.	Support Welcomed	Comments noted
Roundhay Planning Forum 5057	Roundhay Planning Forum	Would like to see Policy ST1 applied to the rest of Leeds. There are parts of Roundhay ward which could benefit from replacement and new street tree planting (see Roundhay NDS). Should plant 100,000 street trees between now and 2026 across Leeds. Tree Planting would be an effective way of repairing green infrastructure.	Policy is intended to address gaps in the green infrastructure across the city centre. However this may also apply to other parts of the district as well, there is no evidence at present for this.	Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choose which is the most appropriate
Turley Associates 5670	Swayfields (Skelton) Limited	Policy is of a detailed nature and not appropriate for inclusion in the Core Strategy. It should be removed.	It is one of the few ways that we can join up the gaps in the Green Infrastructure across the city centre therefore it is fundamental to the delivery of the core strategy objective.	Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choose which is the most appropriate
Carter Jonas 5681	The Diocese of Ripon and Leeds, the Hatfield Estate, lady Elizabeth Hasting Charity Estate, the Ledson estate, AR Briggs & Co, Symphony Group Ltd.	Policy not suitable for the Core Strategy. As planting 1,000 trees could be subsumed in to the woodland cover policy; however it is not a significant enough issue to deserve a unique policy reference and should be deleted.	It is one of the few ways that we can join up the gaps in the Green Infrastructure across the city centre therefore it is fundamental to the delivery of the core strategy objective. A specific need has been identified in the city centre Street Tree Survey 2009	Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choose which is the most appropriate

CB Richard Ellis 354	Hammerson PLC	Support the principle behind Policy ST1 but it is not a strategic policy for a CS. The supporting text also seeks to introduce the principle of a further developer contribution where tree planting cannot be secured within a City Centre scheme. This requirement and the policy duplicates existing SPD for public realm improvements and developer contributions and also has no regard to the difficulties and costs associated with securing tree planting in the City Centre (where, for example, significant service diversions may be needed to accommodate trees). Tree planting should therefore be considered as part of the landscaping proposals of individual schemes.	<p>One of the few ways that we can join up the gaps in the Green Infrastructure across the city centre therefore it is fundamental to the delivery of the core strategy objective.</p> <p>The Public Realm Contributions SPD maybe one way of collecting this contribution.</p> <p>Leeds City Council has researched practical techniques regarding city centre tree planting and is satisfied that it is feasible.</p>	Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choice which is the most appropriate
Natural England 58	Natural England	This policy is useful in complementing the wider green infrastructure network and ensuring that vital ecosystem services such as urban cooling are delivered across the city.	Support Welcomed	Comments Noted
Individual 5151	Individual	All well saving 1000 trees to be planted but need policies to deliver this.	Policy will help secure deliver, support funding bids etc.	Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choice which is the most appropriate

Spawforths 2663	Chapman Family Discretionary Trust, Individual, Individual	CS should not contain detailed matters such as street trees which could be within their own DPD.	It is one of the few ways that we can join up the gaps in the Green Infrastructure across the city centre therefore it is fundamental to the delivery of the core strategy objective.	Amend text to create new CC2 policy which will provide a broad range of measures which the developer can choose which is the most appropriate.
Policy MFR1: Managing Flood Risk				
Government Office 95	Government Office	The requirement of Policy MFR1 should already be taken into account in the strategic location of development. As a development management policy it does not add significantly to PPS25.	Agree. The Growth Options Paper will include a clear statement to demonstrate how flood risk has been taken into account. MFR1 provides a parent policy hook for detailed policies in the Natural Resources and Waste DPD	None
Individual 4730	Individual	Further restrictions on development are needed adjacent to the River Wharfe, particularly in the light of predicted effects of climate change.	Issue addressed in the Natural Resources and Waste DPD.	None
Stanks and Swarcliffe Residents Association 5052	Stanks and Swarcliffe Residents Association	Flooding is a major issue in the City Centre. Flood risk should be minimised by raising all electricity sub stations around the city centre and place them on higher ground as soon as possible.	Not within our remit to move all existing sub stations to higher ground, but future sub stations should avoid flood risk areas. See point 1 of Policy MFR1. Decentralised energy will help reduce the potential risk of electricity sub stations flooding.	None
Individuals 4694, 4685	Individual	Also need to consider the Wharfe Valley and its adjacent watersheds. Askwith in N Yorks Near Otley suffered flooding in 2009.	Policy MFR1 applies equally to the River Wharfe within the Leeds District and takes account of surface water run off.	None
Individual 5659	Individual	We need to work with nature and preserve our natural flood plains, we can not hold back the forces of nature with constructed walls and barriers.	See point 5 in Policy MFR1. A balance is needed between space for development and a space for water.	None

Yorkshire Water 948	Yorkshire Water	<p>Is the drainage report that was commissioned part of the Strategic Flood Risk Assessment or a separate document? Appendix 2 does not refer specifically to a drainage report as part of the evidence base.</p> <p>Yorkshire Water supports the need to mitigate flood risk when designing a scheme. This should include surface water management in accordance with PPS25.</p> <p>Yorkshire Water supports the inclusion of this policy and Leeds' aim to manage flood risk across the district. The policy could be made more robust through the amendment of points 3 and 4, our suggested additions are shown in bold.</p> <p>3. Requiring flood risk to be considered and mitigated for all development commensurate with the scale and impact of the proposed development.</p> <p>4. Reducing the speed and volume of surface water run-off as part of new build developments.</p>	<p>Seek clarification from Yorkshire Water as to what drainage report this is.</p> <p>Support Welcomed</p> <p>Agree but with suggested amendments: 'Requiring flood risk to be considered for all development commensurate with the scale and impact of the proposed development and mitigated where appropriate.</p> <p>Agree, accept wording.</p>	<p>Comments Noted</p> <p>Amend policy text.</p>
Leeds Civic Trust 62	Leeds Civic Trust	<p>Continue to support the councils in ensuring any measures implemented add to rather than detract from the amenity of waterfront – we feel that the importance of the riverside to the amenity of the city is such as to require the introduction of innovative approaches such as moving barriers, overflow channels and up/downstream storage. Policies should be extended to ensure sustainable drainage systems are employed throughout the city to restrict outflows at peak rain periods.</p>	<p>Support Welcomed</p> <p>We recognise the importance of the waterfront throughout the Core Strategy, e.g. CS8.</p> <p>This is dealt with in the Natural Resources and Waste DPD.</p>	<p>Comments noted</p>

Carter Jonas 5681	The Diocese of Ripon and Leeds, the Hatfield Estate, lady Elizabeth Hasting Charity Estate, the Ledson estate, AR Briggs & Co, Symphony Group Ltd.	It is appropriate to deal with the issue of flood risk and drainage in a proactive manner and the approach set out within Policy MFR1 is generally appropriate for dealing with direct and residual effects.	Support Welcomed	Comments Noted
Natural England 58	Natural England	Natural England welcomes the approach to managing flood risk, which will have benefits for biodiversity, as functional floodplain can be a significant resource for wildlife.	Support Welcomed	Comments Noted
Environment Agency 46	Environment Agency	<p>Policy MFR1 – Further justification of how the saved policies (Appendix 3) will be incorporated is requested. It is unclear as to how the core strategy incorporates issues of Culverting and Sustainable Urban Drainage Systems. The EA would like to recommend the following wording to be placed under policy MFR1:</p> <ul style="list-style-type: none"> •Not Culverting and not building over watercourses wherever practicable •Encouraging the removal of existing Culverting •Requiring the use of sustainable drainage systems or sustainable drainage techniques on all sites where feasible and practicable. <p>Para 5.4.35 - misquotes that there “are 1500 homes and 50 businesses at significant risk of flooding”. There are over 3,862 dwellings and nearly 700 businesses at risk of a 1:200 flood from the River Aire alone. When the River Wharfe and all the other becks and streams are added, it would come to a much higher figure. It would be useful at this stage if the Core Strategy provides some background as to how the figures were concluded.</p>	<p>Addressed through saved policies exercise.</p> <p>Agree wording, however there may be instances where removal of culverts increases flood risk or creates an unacceptable hazard and therefore we suggest the wording should read ‘Encouraging the removal of existing Culverting where practicable and appropriate’.</p> <p>Agree – Correct figures to reflect EA figures.</p>	<p>Add wording to Policy MFR1.</p> <p>Correct figures</p>
Individual 2977	Individual	Flood planning must be part of any development	Support Welcomed.	Comments noted

Policy MFR2: Managing Flood Risk – Leeds Flood Alleviation Scheme (FAS)				
Leeds Teaching Hospital 5690	Leeds Teaching Hospital	Draw attention to the problem flooding creates to patients and staff regarding access across the city to and from the hospital sites when key transport routes are inundated. There is also an issue of key utilities being threatened by flooding and the impact on the hospitals.	This is an Emergency Planning Issue. MFR1, MFR2 and CC2 all seek to minimise future problems.	None
British Waterways 338	British Waterways	The role that waterways can play should be recognised and supported, as appropriate, through the policy framework especially in relation to Policies RE1 and MFR2.	Will incorporate discussion of waterways in the Core Strategy although may be more appropriate in the Green Infrastructure section. Para 5.4.22 looks at hydro power potential and the Core Strategy acknowledges the value of canals throughout.	Amend Core Strategy text.
Carter Jonas 5681	The Diocese of Ripon and Leeds, the Hatfield Estate, lady Elizabeth Hasting Charity Estate, the Ledson estate, AR Briggs & Co, Symphony Group Ltd.	Specific reference to the LFAS as Policy MFR2 is appropriate as it is strategic affecting a swathe of the City. It would be useful for the policies on Flood Risk to make reference to the role of green infrastructure is mitigation rapid run –off and the provision of surface water storage.	Should cross reference to Green Infrastructure policies.	Alter supporting text and signpost to the Green Infrastructure Section.
CB Richard Ellis 354	Hammerson Plc	Policy MRF2 should be deleted as it falls outside of current Government guidance to secure developer contributions needed to mitigate the actual impact of a development proposal. Additionally it does not have regard to the costs of the FAS, the availability of public funding, the impact on development viability, or the individual circumstances of the proposal. We consider that this requirement and that a scheme of this magnitude should be publicly funded.	Development within the extent of the 1 in 200 year event will benefit from the FAS and must mitigate flood risk in any case – therefore it is appropriate to ask for a contribution. Developers will benefit from FAS and therefore it is right that it should not be entirely publicly funded. Further information on the FAS can be found on the EA factsheet.	None

Environment Agency 46	Environment Agency	<p>Policy MFR2 – In principle the EA supports this policy. Some concern that this may restrict contributions to the Flood Alleviation Scheme (FAS) from riverside development only. The EA are trying to get an agreement with Leeds Council to use the Community Infrastructure Levy or some other mechanism such as Accelerated Development Zones in the Aire Valley Area Action Plan to secure financial contributions from potentially all development in the flood zone (1:200). Whilst no agreement has been reached it is important that Leeds is aware of the current situation.</p> <p>Para 5.4.37 – The EA suggest a change in wording to state the FAS is intended to provide a 1:200 year standard of protection, (including freeboard) with a managed adaptive approach to dealing with climate change</p>	<p>Discussions will continue with the Environment Agency.</p> <p>This wording is largely included, just add a reference to ‘ managed adaptive approach’.</p>	<p>Alter text to include area of contribution as being the extent of the 1 in 200 year flood and include map.</p> <p>Alter supporting text to the reflect the changes suggested.</p>
University of Leeds 846	University of Leeds	<p>Reservations about the City Centre flood defences and consider that it would be more cost effective and less damaging to the amenity of the waterfront to encourage flood proofing of activities and internal fixtures and fittings at potential flood level in conjunction with effective plans for evacuation of people and belongings when flooding is likely. Some buildings that still have no waterfront walkway could be protected with walkway structures that double as flood defences by turning up through 90 degrees when the river rises above a certain level. Other building owners could replace existing walkways with such structures. It is very important to consider the suggestion for the overflow channel along Hunslet Road in conjunction with increasing channel capacity downstream from the city centre.</p>	<p>The decision whether or not to have raised defences is not the purpose of this policy. Policy MFR2 is intended to describe how we will deal with development effected by the FAS.</p> <p>Policy MFR2 is about new development, but your comment is about retro fitting.</p> <p>The FAS decision has already been made, Policy MFR2 is about development effected by the FAS.</p>	<p>Comments Noted</p>

Individual 2608	Individual	flood mitigation in the long term Leeds will flood! All the measures taken will only delay the event and make the event more sudden when a dike fails!. A sustainable approach would be short term minimal measures of flood control until the infrastructure / buildings etc can be relocated to higher low risk sites. Then let the flood plains flood as appropriate and be green.	The decision whether or not to have raised defences is not the purpose of this policy. Policy MFR2 is intended to describe how we will deal with development effected by the FAS. Much of the city centre is covered by floodplain and it would not be practical or sustainable to allow it to flood.	Comments noted.
Natural Resources and Waste Management				
Government Office 95	Government Office	Overarching waste policy is required in the Core Strategy to provide a spatial context for the detailed policies in the NR&W DPD. To assist in site identification in the DPD, the Core Strategy should provide details of volumes for capacity and requirement for waste disposal that take account of the RSS requirement for additional waste capacity. A strategic minerals policy is needed to provide a spatial context for the detailed policies in the NR&W DPD. Mineral Safeguarding policies need to be defined and shown on the key diagram.	Advice from PINS is that it is acceptable to defer to Waste DPD because both documents are being prepared at the same time. Further signposting is needed to The Natural Resources and Waste DPD.	Amend text and create a new waste policy. Further Discussions needed into the level of detail that needs to be included in the Core Strategy.
Individual 5658	Individual	Conflicts with the proposed Waste Transfer Site at Evanston Ave.	Waste transfer is one aspect dealt with in the Natural Resources and Waste DPD.	None

ARUP 397	ARUP	<p>RSS policy ENV14 states that the identification of sites for facilities should take into account established and proposed industrial sites which have the potential for the location of waste management facilities and the co-location of complementary activities. Such as 'recourse recovery' or sustainable growth' parks. Knostrop Wastewater Treatment Works offers this co-location opportunity. This would also enable the CS to provide a clear steer on how some of these infrastructure challenges can be solved, including the physical infrastructure required to support the urban eco-settlement. There are synergies to be gained from the co-location of a potential EfW facility in the Aire Valley which could also provide a source of CHP linked to the new eco settlement.</p> <p>The CS does not provide an adequate strategic policy direction for the minimisation and management of the District's current and future waste arisings, and so does not conform to PPS12 and PPS10. Waste is a strategic issue in the future growth and development of Leeds and a policy direction is essential to ensure that appropriate waste infrastructure is provided to treat waste in the most sustainable means reasonable available and reduce the amount of wastes sent to landfill. Waste policy is also a crucial element in ensuring a low carbon and sustainable future for Leeds.</p> <p>The CS should identify the need for a Residual Waste Facility to enable the District to minimise the amount of residual waste sent to landfill and enable the District to meet its eventual objective of zero waste to landfill.</p> <p>The CS should identify the broad locations suitable for such a facility and should consider making a strategic allocation for this facility.</p> <p>The CS, the Aire Valley AAP and the NR&W DPD need to plan coherently and consistently for waste and energy infrastructure required in the Aire Valley.</p>	<p>Allocating sites is dealt with in the Natural Resources and Waste DPD.</p> <p>Advice from PINS is that it is acceptable to defer to Waste DPD because both documents are being prepared at the same time.</p> <p>Allocating sites in the Natural Resources and Waste DPD</p>	Expand and explain in supporting text and create a new waste policy.
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Stanks and Swarcliffe Residents Association 5052	Stanks and Swarcliffe Residents Association	The issues of incineration and Land is still is a concern. There are still waste and pollutants from incineration.	The issue of waste disposal is addressed in the Natural Resources and Waste DPD.	None
Individual 5634	Individual	Supermarkets with large car parks should be forced to have at least one recycling container on their land.	This is too detailed for the Core Strategy and recycling should be considered in the early design process.	None
Highways Agency 5604	Highways Agency	The Strategy also includes forecasts for an increase in municipal and commercial / industrial waste. Although there is a recognition that there is a need to find ways to reduce the amount of waste going to landfill sites, provision still needs to be made for more large scale strategic facilities and for small-scale local facilities. The sustainability appraisal showed that locating waste management facilities in accessible commercial/industrial areas is the best option environmentally. Although there are some significant commercial/industrial areas located in close proximity to the SRN, no mention is made of the potential traffic impact on the SRN.	Addressed in with in the Natural Resources and Waste DPD and potential traffic impact is integral to the site selection process.	None
Other Issues/ General				
Government Office 95	Government Office	There is scope for a locally distinctive strategic sustainability policy in the Core Strategy that could signpost policies for a low carbon community in the AAP along the lines suggested for ecotowns in PPS1. Consideration should be given to including a locally specific policy link to provide a hook for the Aire Valley AAP to PPS1. This could set higher targets for dealing with waste and consider the use of locally generated waste as a fuel source for combined heat and power generation.	The evidence base for any higher targets will be developed in the Aire Valley Leeds AAP, which will be signposted to throughout the Core Strategy.	Create new CC2 policy
English Heritage 99	English Heritage	Welcomes the recognition of the importance of a high quality environment and the acknowledgement that the continued protection and enhancement of the Leeds' environmental assets is fundamental to the future competitiveness, quality of life and the creation of a liveable city.	Support welcomed	Comments noted

Yorkshire Water Services 948	Yorkshire Water services	Surprised to see a lack of policy on natural resources and waste management contained within the Core Strategy. The LDS states that the Waste DPD will follow a chain of conformity that includes the Core Strategy. As the Core Strategy does not contain a policy related to waste management we are unsure how the NR&W DPD will be able to conform to the Core Strategy as there is nothing to Conform to.	Advice from PINS is that it is acceptable to defer to Waste DPD because both documents are being prepared at the same time.	Expand and explain in supporting text and create a new waste policy
Savills (Northern Branch) 467	MEPC	<p>MEPC feel that the policies contained in this chapter are entirely laudable in so much as they help to minimise the environmental and ecological impact of future developments and help tackle the wider threat of climate change. The major concern of MEPC however is again the lack of an up to date and robust evidence base that would support the majority of these presumptions, thresholds and targets outlined in the policies in this section.</p> <p>The justification for some of the policies appears to emanate from the RSS. MEPC would contend that this is not an appropriate evidence base as it only considers these issues on a regional, rather than local basis. The RSS makes it clear than when formulating policies regarding the environment, that whilst policies should have regard the content of the RSS, they also need to reflect local circumstances and be based on a local study covering these issues.</p> <p>It is therefore MEPC's opinion that this section needs to be re-examined with fresh evidence and to take a flexible and pragmatic view when looking at managing environmental resources to ensure that policies are not too onerous and unviable that they could discourage some areas of the city from being regenerated</p>	<p>Support welcomed</p> <p>Agree</p>	<p>Comments noted</p> <p>Alter text to make more Leeds Specific</p>
NHS Leeds 5693	NHS Leeds	We would fully support the proposals to manage resources and recognise the positive contribution this makes to health in improvement of air quality, supporting the retention of open space and the protection of the natural environment	Support welcomed	Comments noted



Report of the Director of City Development

Development Plan Panel

Date: 22 June 2010

Subject: Leeds LDF Core Strategy – ‘Preferred Approach’ Analysis of Consultation Responses: Managing the Needs of a Growing City 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 theme “Managing the Needs of a Growing City”. This divides into two sections: The Housing Challenge and The Leeds Economy. The Report sets out headline comments and officers’ suggested responses. The full list of comments are addressed in the appendix tables.
3. Particular housing topics covered include housing land supply, housing mix, affordable housing and specialist housing. Particular economy topics include economic development priorities, the economic role of the city centre, provision of employment land and premises, office development, industrial and distribution development, protection of existing sites and the rural economy.

1. **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 chapter "Managing the Needs of a Growing City".

2. **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 was undertaken across the District (26 October – 7 December 2009). In support of this, a range of consultation activity took place. In response to this consultation activity a number of comments were received in response to the chapter "Managing the needs of a growing city". These are summarised in section 3 below and more detailed summary schedules are attached as Appendices 1-5 to this report.

3. **Main issues**

- 3.1. The theme "Managing the needs of a Growing City" divides into two sections: "The Housing Challenge" and "The Leeds Economy". The Housing Challenge includes policies on overall housing supply, housing mix, affordable housing and specialist housing. The section on The Leeds Economy has policies setting out economic development priorities, the economic role of the city centre, provision of employment land and premises, location of office, industrial and warehousing development, protection of existing employment land/buildings and the rural economy.
- 3.2. A summary of the main comments received is given below, and full details and responses are included in Appendices 1-5.

3.3. **The Housing Challenge.**

Housing Land Supply

- 3.3.2. The following headline issues were raised and recommended officer responses are provided:
 - i. The absence of the Strategic Housing Land Availability Assessment (SHLAA) at this stage, makes the consultation unsound, as it was not possible to understand the housing land approach. As a result of this comment, officers offered opportunity for those who made this comment to make further representations in April 2010 when the SHLAA 2009 was available.
 - ii. The "step-up" of the housing requirement will store up a massive undersupply of housing and is contrary to national and regional guidance. Officers consider that the step-up conforms with regional guidance and higher rates of delivery in

the later years (beyond 2017) will be possible with release of urban extensions and a return to buoyant economic conditions

- iii. The focus on urban areas and on previously developed land (PDL) is out of step with national planning policy which no longer contains a sequential approach. Officers consider that the “core approach” of regional policy still seeks to focus housing development on the main urban areas. It is accepted that the strict brownfield before greenfield policy of PPG3 is absent from PPS3, but PPS3 still has targets for brownfield land development and a plan-monitor-manage approach. Further research to consider strategic options (to be incorporated as part of a Housing Background Paper) will test the sustainability of the urban focus against other approaches.
- iv. The strategy lacks clarity in terms of locations for growth. Officers accept that the Publication Core Strategy will need to be clearer.
- v. The focus on urban areas will fail to deliver sufficient housing, particularly family housing with gardens. Greenfield land in a variety of sustainable locations must be released in tandem with PDL in urban areas. Strategic sites should be designated. Officers believe that the Core Strategy Preferred Approach policies on housing supply and housing mix will deliver sufficient housing including family housing with gardens.
- vi. A selective Green Belt review may be required and the Core Strategy should provide more direction on where and how this should be conducted. Officers agree that a selective Green Belt review may be required for the Site Allocations DPD but that the Core Strategy will need to give direction as appropriate. The position on this matter will however need to be reviewed in the light of the decision of the coalition government to abolish the RSS and associated housing targets.
- vii. Protected Areas of Search (PAS) land needs to be tested to sieve out the least sustainable locations. Officers agree that this will be a matter for the Site Allocations Plan (DPD).
- viii. The PDL target of 75% over the plan period (85-95% in early years) is too high relative to the Regional Spatial Strategy (RSS) target of 65% and will unduly restrict development contrary to national guidance. Officers believe that the targets conform with RSS policy.
- ix. The preference for the southern half of the district goes beyond the encouragement given in RSS. It will be difficult to define what the preference means in practice. Officers consider that this preference accords with RSS policy.
- x. The “windfall” allowance of 11% cannot be justified in terms of national planning guidance. There is no reason why Leeds cannot identify sufficient land. Also, Policy should not preclude windfall development on greenfield sites. Officers consider that Leeds has special reasons to warrant use of a windfall allowance.
- xi. It is wrong to say that “Quality of Place” takes priority over numerical targets. They are both necessary. Officers agree that we need to safeguard “Quality of Place” as far as possible.

- 3.3.3. The SHLAA released for a target period of consultation, once available, following the close of the Core Strategy Preferred Options consultation. Within this context, the following “post SHLAA” comments were received in April/May 2010:
- i. Even with the SHLAA, the CSPA lacks clarity on where housing is to be located. The plan needs to be more “place” orientated. Officers agree that the Core Strategy does need to be clearer about where new housing is to be focussed.
 - ii. The “suitability” category of developability which is defined in PPS3 and CLG’s Practice Guidance on SHLAAs has been misinterpreted and other criticisms of the SHLAA methodology are made. Officers believe the SHLAA’s use of

“suitability” accords with national definitions and that the SHLAA methodology is sound.

- iii. The Highways Agency submitted analysis of the impact of the CSPA housing growth proposals on the strategic highway network. Officers will need to maintain dialogue with the Highways Agency to explore how the negative impacts might be mitigated (for example by promoting public transport solutions) or alternative locations introduced.

3.3.4. Further research is underway to provide evidence to support the housing policy approach of the Core Strategy. Work is currently underway to consider strategic options (to be incorporated as part of a Housing Background Paper) as a basis to consider the sustainability of the distribution of new housing of the Core Strategy Preferred Approach (against distributions which were consulted upon as concepts in 2007 and as a basis to review the Preferred Approach in the light of consultation responses received) The “Strategic Housing Land Availability Assessment” 2009 is being updated to an April 2010 base date to provide up-to-date evidence of housing land supply opportunities.

Housing Mix

- 3.3.5. The following headline issues were raised and recommended officer responses are provided:
- i. A policy requirement is too inflexible and not justified. A non-binding aspiration to improve mix would be preferred. The market should determine what mix of dwellings is needed. Factors such as location and site circumstances should be taken into account. Officers consider that the policy is not prescriptive because it uses target bands rather than specific requirements, is to be judged through annual monitoring and will be applied on a “need to act” basis rather than to every scheme. The explanatory text to the policy makes clear that surrounding townscape and location specific needs will need to be taken into account.
 - ii. The evidence lacks consideration of demand, points to no clear conclusions and fails to account for elderly people wishing to stay in larger houses. Officers believe that the evidence informing Policy H4 at a strategic level is extensive, including OPCS household projections, the Council’s Strategic Housing Market Assessment (SHMA) 2007, past trends of housing delivery in Leeds going back to 1991 and data on the mix of Leeds’ existing dwelling stock. Nevertheless, the Council is updating the SHMA. Also, the Council is aware of policy and practice to help enable elderly people remain in their own homes for longer.
 - iii. The policy should also advise on housing mix for city and town centres. Officers agree that this is necessary for the city centre and expect the update of the SHMA to provide evidence.
 - iv. The split between sizes of dwelling by number of bedrooms (i.e. 1 and 2 bedroom dwellings as one category and 3+ bedroom dwellings as another) is inappropriate and should be reviewed. Officers agree and propose to use the SHMA update to inform the most appropriate split.

Affordable Housing

- 3.3.6. The following headline issues were raised and recommended officer responses are provided:
- i. The policy requirement for up to 40% affordable housing is considered too onerous and prescriptive. Officers consider that the policy is not prescriptive because it does not set 40% as a specific figure to be applied universally. However, the policy will be rewritten to set out a range of targets applicable

- under different scenarios. The detail will be set out in a Supplementary Planning Document (SPD) as this can then be responsive to up to date evidence on housing markets, need for affordable housing and the viability of delivering targets.
- ii. The policy is not based on an up to date evidence base. Officers have based the policy on RSS policy which estimates 30-40% affordable housing for Leeds. The figure is supported by the local evidence base; the Strategic Housing Market Assessment 2007 identifies a vast need for affordable housing (1889 affordable units per annum over a 15 year period) and the Economic Viability Appraisal (EVA) outlines that targets of 40% should be achievable in certain areas in certain market conditions. Both the SHMA and EVA are being updated and will be published prior to the revisions to the Core Strategy. Policy H5 will be revised as necessary to take account of up to date evidence.
 - iii. Applicants should be able to negotiate affordable provision on a site by site basis. Officer response: it is established practice that where there are viability issues an applicant may chose to submit an individual viability appraisal. Where this is verified by Leeds City Council affordable provision may be reduced accordingly. Policy H5 will be amended to incorporate wording to explain this. It should be noted that the strategic Economic Viability Assessment work involves modelling different scenarios and the effects of different levels of affordable housing upon the viability of development. This does not mean that individual viability assessments would no longer be needed or acceptable in future – each case should still be judged on its own merits, and there will always be pockets within the areas modelled in the EVA where more or less affordable housing could be achieved.
 - iv. Thresholds and tenure mix should be referred to in the policy. Officers agree that thresholds and tenure mixes should be included in the range of targets applicable under different scenarios, and that policy H5 should be amended to include reference to this.
 - v. The SPD should not be progressed in advance of the Core Strategy. The affordable housing policy should be examined by an Inspector. Officers will align the production of the SPD with the Core Strategy. A draft SPD went out for public consultation in September 2008, but, as the viability testing was carried out pre-recession, this work (the EVA) is being re-done. Once completed, the SPD will be redrafted to reflect a more up to date evidence base. The redrafting of the SPD will be tied in with or follow on from production of the Core Strategy to enable a full examination of all issues. The SPD will set out detailed policy for the current time period, and can then be revised as necessary as evidence (including need and viability) change. The Core Strategy will set out the range of targets which could be sought in different circumstances throughout the longer Core Strategy period.

Specialist Housing

- 3.3.7. The following headline issues were raised and recommended officer responses are provided:
- i. There was general criticism of the lack of evidence base to support policies of dispersal of specialist forms of housing (student, HMOs and elderly). Officers consider that Policy H6 should be re-written to separate out the different forms of specialist housing and applicable policies, for clarity. Further evidence needs to be gathered, as detailed below.
 - ii. Policy H15 of the UDP should be retained. There has been an increase in houses in multiple occupation (HMOs) in Headingley area. Need an SPD not just an overall strategy. There is also a contrary view to this, that student areas

have fewer problems than areas with a large proportion of HMOs elsewhere, and that student numbers are declining, and the massive amount of purpose built accommodation has meant less pressure on traditional areas. Officers consider that evidence needs to be gathered, including from the universities, HMO licensing authorities and the Strategic Housing Market Assessment update. In addition, officers need to assess implications of new legislation 2010 which introduced a new use class for HMOs, meaning that change of use from a dwelling house to a HMO will now need planning permission. (It should be noted that this cannot be applied retrospectively to existing HMOs). SPDs will need to be produced where further expansion of the Core Strategy policy is required. The Site Allocations DPD will identify development opportunities for specialist forms of housing, or areas where there is potential to restrict/control development.

- iii. A policy on housing for the elderly is generally welcomed, but there should also be reference to independent living and Lifetime Homes. Many elderly people do not want 1 bedroom accommodation as they need a 2nd bedroom for a carer or relative, so there should be less emphasis on 1 bedroom accommodation for the elderly. There should also be a specific definition and reference to 'disabled'. Officers will amend Policy H6 to separate out the different forms of specialist housing and the section on elderly housing will include reference to housing needs, independent living and Lifetime Homes.

3.4. The Leeds Economy

3.4.1. The following issues were raised and recommended officer responses are provided:

- i. General support for economic priorities, although whether it is necessary for these to be expressed in the form of a policy is questioned. Officers consider it important that the Core Strategy clearly expresses the economic priorities for the city. This can be achieved using a policy format like EC1 in the Preferred Approach or as part of a revised spatial vision. A final decision will need to be taken as the Draft Core Strategy document begins to take shape.
- ii. General support for retaining the primacy of the city centre as the main location for retail and leisure development but some concern from developers that the economic development potential of other town centres and existing business and office parks is not being fully considered. There is general support for the emerging city centre park proposals. Officers consider it is important that the City Centre is identified as the main location for retail, leisure and office development serving a wide catchment area. The Preferred Approach also allows for such development in town and local centre where it meets a local need. Out of centre development is not excluded entirely but options in the city centre or town centres need to be explored first. A number of planning permissions for business and office park remain in place and the potential for these sites to be developed out has been taken into account.
- iii. Some support for the identified employment land requirement but also a number of concerns that the requirement is insufficient to support the growth of Leeds as the main economic driver of the City Region. Also concern that the requirement is based on an out of date evidence base, which should be updated to align with RSS figures. Officers agree that there is a need to update the evidence which supports the identification of the employment land requirement but disagree that the RSS figures should be used as they are also based on pre-recession economic forecasts. The Employment Land Review (ELR) is being updated and a revised version will be published over the summer. The RSS does allow for

more up to date forecasts to be used. Overall, it is important that a flexible supply of employment land is identified and the ELR update is being undertaken with this in mind.

- iv. Mixed opinions regarding employment land around airport. Some concerns about extending airport related development but also views that the range of acceptable uses should be widened to include hotel development and car parking. Officers note the concerns from both sides and accept that Policy EC5 needs to be clarified and revised. There are existing employment allocations close to the airport and their retention or potential for other uses will need to be considered as part of the preparation of the Site Allocations DPD.
- v. Policy EC6 should adopt a positive approach to the redevelopment of existing employment land for other uses. Officers note that changes to national policy brought in by PPS4 (released in December 2009 after the consultation) requires a more flexible approach to be taken to other economic development uses on employment land but this does not apply to housing development. The policy will need to be revised to be consistent with PPS4 but there still needs to be protection of existing employment sites and premises where a clear strategic or local need is identified.
- vi. Some support for rural economy policy (EC7) but also concerns that the policy does not go far enough to encourage diversification of the rural economy e.g. by being overly-restrictive toward large scale leisure and tourism development and economic development in the smaller settlements. Officers consider there is a balance to be struck between allowing diversification of the economy in the countryside on the one hand and protecting it from inappropriate development and promoting a sustainable pattern of development on the other. The role of market and other towns in serving their local rural catchment, is therefore important. The policy will be reviewed to ensure it strikes the right balance. Evidence from the ELR and City, Town and Local Centre Study will assist this process.

4. **Next Steps**

- 4.1. To take the Housing Challenge forward research is underway on a number of fronts. The preparation of the Housing Background paper is underway and the “Strategic Housing Land Availability Assessment” (SHLAA) 2009 is being updated to an April 2010 base date (to provide up-to-date evidence of housing land supply opportunities). The “Strategic Housing Market Assessment” (SHMA) of 2007 is being updated to provide supporting evidence for policies on housing mix, affordable housing and specialist housing. The implications of the “Economic Viability Assessment” is being considered to help determine the affordable housing targets.
- 4.2. The Employment Land Review is being updated to provide evidence on the scale of economic growth that needs to be planned for, particularly in terms of new office floorspace and land for industry and distribution.

5. **Implications for council policy and governance**

- 5.1 None, other than to reiterate that the LDF Core Strategy needs to reflect the strategic objectives of the Council Plan and give spatial expression to the Community Strategy.

6. **Legal and resource implications**

- 6.1. 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.

7. **Conclusions**

- 7.1. This report has provided further analysis of the comments received in respect of the "Managing the Needs of a Growing City" theme, as part of the Core Strategy Preferred Approach consultation. In response to comments received the schedules attached as Appendices 1-5 detail the changes and next steps in preparing the draft Core Strategy Publication document for Panel consideration in due course.

8. **Recommendation**

- 8.1. 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 (1 – 5)

LCC RESPONSES TO REPRESENTATIONS ON THE THEME “MANAGING THE NEEDS OF A GROWING CITY”

CORE STRATEGY PREFERRED APPROACH APPENDIX 1
LCC RESPONSES TO REPRESENTATIONS ON HOUSING SUPPLY

LCC Responses to Representations on the Preferred Approach, Feb 2010

30 respondents agreed with the sequential preferences for the location of new housing (Q9) and made no comments
99 respondents made written comments as listed in the table below
Verbal comments recorded at consultation events are also included

Representor (include agent)	Those Repe-sented	Representor Comment	LCC Initial Response	Action
Absence of SHLAA during consultation period				
Barton Willmore Planning (57)	White Laith Dev, Templegate	Lack of evidence for the consultation makes the Core Strategy unsound. In particular, the apportionment of housing to different areas of Leeds in Table H2 and the windfall allowance of 11% cannot be justified.	Agree that without the SHLAA, it would be difficult to understand the spatial distribution of housing inherent in Policies H1 and H2 and Table H2.	Notify those consultees who raised the issue offering a 4 week opportunity for further comments to be made (this exercise has now been completed).
Bradford Council (100)		Evidence is needed to justify the proposed approach		
Carter Jonas (5681)	Diocese of Ripon & Leeds	The SHLAA should be available to help inform representations.		
DLP Planning (2657)	Ben Bailey Homes Stamford Homes	Policies H1 & H2 lack evidence for justification. Unclear whether sites have been tested for deliverability and developability.		
GMI Property (5682)		The SHLAA is needed to understand Table H2.		
Government Office for Yorkshire & the Humber (GOYH) (95)		Inability to make meaningful comment without the SHLAA.		
Highways Agency (5604)		Full details of the SHLAA are needed for the Highways Agency to properly model CS proposals		
Keyland (2064)	AVL Investors Forum	Serious weakness in the evidence base		
Mosaic TP (5672)	Miller Homes	Lack of evidence for how the housing requirements will be met		
Pegasus Planning (4388)	Mr C Makin	The lack of land supply evidence make it difficult to know whether aspects of housing policy are credible. Further opportunity to comment on Policies H1 & H2 should be given when the SHLAA is published.		

Roundhay Planning Forum (5057)		Inability to make meaningful comment without the SHLAA.		
Savills Northern (467)	Harewood Estate	The Core Strategy lacks a sound evidence base. The SHLAA is needed to understand Table H2.		
Spawforths (2663)	Mr Ramsden, Langtree Group Plc, Mr Saville, Chapman Family Discretionary Trust, Mr Lindley	Makes Table H2 unjustified. Makes approach to use of Green Belt land unjustified.		
Turley Assocs (5670)	Swayfields (Skelton) Limited	Inability to make meaningful comment without the SHLAA. Alternative approaches cannot be tested.		
Turley Assocs (5673)	The Warmfield Group	Evidence is needed to justify the focus on urban areas		
WYG (420) + (5648)	Harrow Estates, Yoo Invest, Rockspring Hanover property Unit trust	CS unsound without a SHLAA		
Civic Hall Event 2/11/09		Difficult to comment on the Core Strategy without the SHLAA		
Accuracy of Housing Number Calculation – Paragraphs 5.3.6 – 5.3.9				
Barton Willmore Planning (45,57)	Ashdale Land and Property Company LTD, White Laith Developments,	The Core Strategy should not ignore the requirement for 2008-9 which adds another 4,300 dwellings to the requirement creating a total of 77,400 dwellings to 2026.	The requirement for 2008-9 was taken into account in arriving at the total housing requirement	Clarify in draft Publication document.

ID Planning (5668 ,5671)	Ben Bailey (South Yorkshire) Ltd, Barwick Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Edmund Thornhill, Great North Developments Ltd, , Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Robert Ogden Partnership Ltd, Ringways Motor Group, Persimmon Homes and Taylor Wimpey	The carry over of oversupplied dwellings from the 2004-08 period is inappropriate in the context of the RSS expecting step-up from 2008. Delivery targets should not be viewed as ceilings.	Disagree. A residual calculation is an acceptable approach.	No change
Alternative Spatial Approaches				
Spawforths (2663)	Mr A Ramsden, Langtree Group Plc, Mr Saville, Chapman Family Discretionary Trust, Mr Lindley.	Short term focus: allocations, white land and PAS in the urban area, Leeds as well as Morley, Churwell, Guiseley & Yeadon. Renaissance of Principal Towns, to include Otley, Wetherby, Boston Spa, Garforth, Micklefield, Rothwell, East Ardsley & Drighlington. Medium term focus: Expansion of Leeds & Principal Towns and areas associated with coalfield regeneration. Villages to only accommodate local need	These alternative options needs to be examined against transport, flood risk, physical and visual criteria. Boston Spa, East Ardsley and Drighlington clearly do not have the scale to justify designation as Principal Towns. The other settlements will need further assessment.	Assess through the Housing Background Paper. Further clarity on Spawforths proposals will need to be sought.
ID Planning (5671)	Barwick Developments Ltd	Paragraphs 5.3.1 and 5.3.2 need revising to be consistent with RSS. Balanced growth is required across the settlement hierarchy of a different scale and type to reflect the scale of settlement and specific local needs.		
Clarity of Spatial Approach				
Bradford Council		Not clear how much new housing is being directed to places close to the Bradford boundary such as Otley, Yeadon, Guiseley, Pudsey and Morley	Agree. Partly a consequence of the SHLAA not being available during consultation and a lack of clarity in the CSPA.	Clarify. See also response to "Absence of SHLAA"
Barton Willmore	Ashdale Land and Property Company LTD	The red stars of Map 3 lack quantification & explanation of justification.		

GOYH		Policy H1 lacks direction in terms of locations for new housing		
GOYH		Policy H2 lacks detail of where new housing is planned. It should be broken down by places or neighbourhoods		
Pegasus Planning (4389)	Mr Makin	Policy H1 lacks direction in terms of locations for new housing. Combining Policies H1 and H2 could help clarify the overall spatial approach		
Helen Longfield (5647)		Inconsistent description of "Potential Housing Growth Area" (Map 3) and "locations for urban extensions" in main document (para 5.3.29) and Summary. Also the Summary does not mention PAS sites.	Agree to clarify description of urban extensions. It may not be possible for a summary to cover all issues. The main document must be regarded as the definitive guide to what is being advanced.	Ensure consistency in Publication Plan
Banks Developments		Policy should be more explicit as to where in the main urban area housing will be directed. In particular it should mention the city centre and regeneration areas	It is not clear what planning benefits would be achieved by sub-dividing the MUA into smaller areas. It would only add to the complexity of the plan.	No change.
Employment land and Greenspace Parameter of Policy H1				
Turley Assocs (5670)	Swayfields (Skelton) Limited	Policy H1's parameter to avoid use of employment or greenspace shown to be needed pre-empts the conclusions of the SHLAA. This is inappropriate. Alternative scenarios need to be tested.	The findings of the SHLAA, Employment Land Review and PPG17 Audit & Needs Assessment will be considered together in order to make decisions about re-allocation.	No change
WYG (5648)	Yoo Invest, Rockspring Hanover property Unit trust	An assessment should be made of the market viability of using redundant employment sites for housing	The SHLAA has already tested the market readiness of land for housing development.	No change
BNP Paribas (5662)	Telereal Trillium	More priority to use of employment land, ahead of greenfield land	The first parameter of Policy H1 prefers PDL over greenfield. In the sense that employment land is one category of PDL, more priority is given. However, it is important to safeguard employment land which is shown to be needed by the Employment Land Review (ELR). The ELR will indicate which sites are not currently suitable or viable for employment which may become available for other uses.	Release conclusions of the Employment Land Review and the PPG17 Audit & Needs Assessment.
Spatial Approach Focus on City Centre and Main Urban Areas				
DLP Planning (2657)	Ben Bailey Homes, Stamford Homes	Policy H1 unsound because the sequential approach in PPG3 has been superseded by stress on deliverability. The urban focus on PDL is failing to deliver sufficient housing.	The Core Strategy needs to plan for sufficient housing overall, but focussed in the right locations and preferably on	No change. Assess through the Housing Background Paper.

GVA Grimley (2996)		The sequential preferences in Policy H1 is out of step with PPS3 which no longer advocates a brownfield first approach. If retained, "Locations/infills within smaller settlements" should be added as the third preference after locations in major towns.	PDL This is in line with PPS3 and RSS which support Plan, Monitor and Manage, strategies to promote PDL. Land can be brought forward if there is found to be insufficient supply. PPS3 and RSS still carry PDL targets of 60% nationally and 65% for Yorkshire and Humber. The RSS also expects the more urban areas to achieve higher than 65%.
ID Planning (5668 , 5671)	Ben Bailey (South Yorkshire) Ltd, Barwick Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Edmund Thornhill, Great North Developments Ltd, Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Robert Ogden Partnership Ltd, Ringways Motor Group, Persimmon Homes and Taylor Wimpey	The parameter of preference for PDL before greenfield in paragraph 5.3.13 and Policy H1 is inconsistent with PPS3	
Peacock & Smith (5665)	The Stockeld Estate, Mr Newby	The sequential approach is too rigid. Other land needs to be allowed to come forward to meet needs. So contrary to national policy that further consultation will be needed prior to submission.	
Sigma Planning (4110)	Hallam Land Management	Policy H1 unsound because the sequential approach in PPS3 has been superseded by stress on deliverability. It is counter intuitive for greenfield urban extensions to be released at the end of the plan period as they are needed now. The SHLAA does not confidently show sufficiency of PDL. A mix of housing types & locations is required to optimise prospects of delivery. Some small urban extensions including PAS land should be released as these can be delivered early.	
Signet Planning (5039)	Kebbel Homes	Policy H1 unsound because the sequential approach in PPS3 has been superseded by stress on deliverability. The urban focus on PDL is failing to deliver sufficient housing. PAS sites should be released in the short to medim period to help meet current needs.	

Scott Wilson (414)	PPL c/o Revera, Jonathon Hague	Too much focus on the city centre. Expansion of smaller settlements should be elevated in the sequential order of preference. In terms of Table H2, Major and smaller settlements should contribute more in the medium term.		
Banks Developments (5121)		The focus on city centre and MUA will not delivery affordable and family housing	Policies H2, H4 and H5 aim to deliver a range of types and sizes of dwellings across the District	No change
Carter Jonas (5681)	The Diocese of Ripon & Leeds	This focus is likely to generate land suited to high density apartment schemes rather than family housing which is needed.		
DLP Planning (2657)	Ben Bailey Homes, Stamford Homes	Urban development tends to produce a limited mix of dwellings which will not meet the full range of housing needs		
GMI Property (5682)		Too much emphasis on the city centre which can only deliver high density housing which is only capable of meeting one category of need. There are also questions of the market appetite for more housing of this type.		
Signet Planning (5039)	Kebbel Homes	The focus on city centre and MUA will not deliver affordable and family housing with gardens that is needed. A broader range of sites – starting with UDP allocations and suitable PAS land – is needed with appropriate phasing to safeguard regeneration objectives.		
Signet Planning (5039)	Kebbel Homes	Lack of suitable sites outside of regeneration areas for family housing including executive homes could thwart efforts to expand the economic role of Leeds.		
Core Strategy Wetherby Morisons Event 12/11/09		Too many empty flats being built		
Core Strategy Merrion Centre Event 17/11/09		Schools and family housing near the City Centre		
Plans Panel East 19/11/09	Cllr Marjoram	What role for apartments? We need places that people want to live in. Better to look at PAS land and GB extensions where places can be properly planned to achieve a better quality of place, than high density apartment solutions.		
Aspinall Verdi (5689)	Montpellier Estates	The sequential approach is supported subject to gearing other housing policies to secure investment in the improvement of the older housing stock and the environment in the most deprived areas of Leeds.		

GMI Property (5682)		Inappropriate for extensions to smaller settlements to be last in the sequential order. There may be occasions where extensions to smaller settlements will be more sustainable than options higher in the sequential order.	The Core Strategy needs to plan for sufficient housing overall, but focussed in the right locations and preferably on PDL, including some limited extensions to smaller settlements as is acknowledged in Table H2. Also, Policy H3 will allow for limited development of windfall sites.	No change. Assess through the Housing Background Paper.
Mosaic TP (5672)	Miller Homes	Insufficient stress given to the needs of smaller outlying settlements such as Bramhope and to help them retain some self sufficiency		
Barton Willmore Planning (45)	Ashdale Land and Property Company LTD	The sequential approach is contrary to RSS policies YH4, 5 and 6. Instead, development should be acceptable in a variety of locations in tandem.	The focus on urban areas accords with RSS policies YH1 and 4. CSPA Policy H3 distributes smaller proportions of housing to towns and villages in line with YH5 and 6.	No change
Barton Willmore Planning (45)	Ashdale Land and Property Company LTD	Policy H1 should identify land for each tier of the settlement hierarchy, rather than an order of preference. In particular, the role of Micklefield needs to be reconciled with the general focus on urban areas. Table H2 should be deleted from the Core Strategy and included in the Site Allocations DPD	Land is apportioned to different tiers of the settlement hierarchy as evident in Table H2, but according to priorities set in Policy H1. However, it is agreed that further locational clarity would be helpful.	Clarify. Assess through the Housing Background Paper
British Waterways (338)		Support for the approach could be improved by mention of the importance of inland waterways which can unlock urban potential and contribute to the principles of paragraph 5.3.2	Too much of a detailed issue for Policies H1 & H2. To be covered elsewhere in the LDF.	No change
Carter Jonas (5681)	The Diocese of Ripon & Leeds	The locational preferences of Policy H1 should not give weight to the local landscape designation as these are often arbitrary.	The areas of special landscape in Policy H1 refer to the Policy N37 designation in the UDP which was subject to examination.	Clarify. Assess through the Housing Background Paper.
DLP Planning (2657)	Ben Bailey Homes, Stamford Homes	The approach lacks flexibility to deal with unforeseen circumstances.	The quantity of land associated with the Potential Housing Growth Areas exceeds the housing requirement and could be brought forward if necessary. The LDF will continue to plan, monitor and manage delivery with trigger points to adjust release of sites according to actual performance.	No change
DLP Planning (2657)	Ben Bailey Homes, Stamford Homes	The approach expects too much housing delivery in the later years. Small urban extensions are needed in the early years which can be brought forward without extensive infrastructure.	The Core Strategy needs to plan for sufficient housing overall, but focussed in the right locations and preferably on PDL. Leeds has to plan to meet the RSS PDL target and assess the need for infrastructure	No change. Assess through the Housing Background Paper.

Drivas Jonas (5558)	Horsforth Riverside LLp	Agree that the focus on urban areas and PDL concurs with the RSS Core Approach. But given the pressure to deliver increased levels of housing, it is important for the Council to bring forward brownfield sites such as Riverside Mills, which is deliverable in the short term.	Support welcomed.	No change.
Drivas Jonas (5683)	McAleer and Rushe Group	Support for prioritising the city centre & MUA. Given proximity of local services, this is the most sustainable option	Support welcomed	No change
Environment Agency (46)		The parameter of sequential preference to avoid areas of flood risk is supported but it is not apparent whether avoidance of flood risk forms part of the locational direction set out in Table H2 and Map 3. The evidence needs to be demonstrated.	Flood risk areas have been accounted for in the land assumed in Table H2 and Map 3. The SHLAA makes this clear.	Clarify
GMI Property (5682)		The objectives of housing growth and regeneration need to be recognised as complementary to be delivered side by side. This is recognised in the Leeds City Region strategy and investment framework.	The sequential preferences for urban areas and PDL are designed to complement regeneration	A cross reference to the City Council's Regeneration Plan will be made.
GMI Property (5682)		The approach is sound, but housing supply will need to be regularly updated through the SHLAA and AMR. Otherwise, the sequential preferences may be used inappropriately to restrict supply. The policy mechanism must allow for new sites to be brought forward when supply is demonstrably low.	The LDF will continue to plan, monitor and manage delivery with trigger points to adjust release of sites according to actual performance.	The CS should set the context for a PMM mechanism in the Site Allocations DPD
GOYH (95)		Quantity of PDL in urban areas may not be sufficient to meet housing needs	The SHLAA will provide the evidence base to determine sufficiency of urban PDL supply. Whilst the focus is on urban PDL, Policy H2 can introduce further land as necessary.	No change
GVA Grimley (2996)		Allocations, PAS land and Green Belt Opportunities need to be reviewed to contribute to supply in the early years of the plan.	The Core Strategy needs to plan for sufficient housing overall, but focussed in the right locations and preferably on PDL. Greenfield sites will be needed where the supply of PDL is insufficient to meet the housing requirement	No change. Assess through the Housing Background Paper.
GVA Grimley (2996)		"Locations/infills within smaller settlements" should be added as the third preference after locations in major towns.	Infills would be dealt with as windfall proposals under Policy H3	No change. Assess through the Housing Background Paper..
Individual (5151)		No greenfield sites should be developed because there is so much PDL left in Leeds	Greenfield sites will be needed where the supply of PDL is insufficient to meet the housing requirement	No change

ID Planning (5668 , 5671)	Ben Bailey (South Yorkshire) Ltd, Barwick Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Edmund Thornhill, Great North Developments Ltd, Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Robert Ogden Partnership Ltd, Ringways Motor Group, Persimmon Homes and Taylor Wimpey	Should clarify in para 5.3.11 & Policy H1 that development in major towns does not have to wait until development in the MUA has ceased. Otherwise it will continue to contradict Table H2	It needs to be clarified that Policies H1, H2 and H3 would operate in tandem. This means that allocations would have to be found to broadly correlate with the proportions in Policy H2 & Table H2. It means that schemes on non-allocated PDL sites and exceptional greenfield sites (meeting criterion H3ii) could also be advanced within Major Settlements at any time, providing it has sufficient infrastructure.	Clarify as part of draft Publication document.
Keyland (2064)	AVL Investors Forum	The key role of AVL not recognised. In the sequential order of Policy H1, AVL should be on a par with Leeds city centre.	The housing policies need to be made more spatially specific, which should include the role of AVL, including the Urban Eco Settlement	Clarify through the text and Key Diagram that the entirety of AVL will be considered part of the Main Urban Area.
LCC Mandy Spry (5066)		Should note the biodiversity value of PDL on a case by case basis. Some PDL has a high biodiversity value.	Agree. This is noted in policies B1 and B2 of the CSPA	No change
Metro (1933)		Metro are supportive of the sequential prioritisation approach which will generally match the existing pattern of public transport services with greater concentration of service in the main centres.	Welcome support	No change
Metro (1933)		Metro are supportive of the need for any new/expanded settlement to be adequately served by public transport in Policy H1 and paragraph 5.3.17, but question how “adequate” will be defined. It needs to consider cumulative impact of different developments along routes of public transport.	Welcome support and advice. Accessibility standards are defined in the CSPA appendices. LCC will continue discussions with Metro to consider adequacy of infrastructure.	Assess through the Housing Background Paper and Infrastructure Delivery Plan
Micklefield PC (122)		Support the sequential order of Policy H1 which puts extensions of smaller settlements as lowest priority. However, the designation of Micklefield as a Potential Housing Growth Area is at odds with the sequential order	The housing policies need to be made more spatially specific, which will clarify the role of Micklefield as a housing growth area.	Clarify & Assess through the Housing Background Paper.

NHS Leeds (5654)		Insufficient capacity of healthcare facilities in the city centre	There is opportunity to provide further facilities or expand existing and the Infrastructure Delivery Plan (IDP) will be used to address shortfalls	No change. The Infrastructure Delivery Plan will be used to address shortfalls.
NHS Leeds (5693)		The choice of locations for new housing should be informed by Health Impact Assessment, which is proposed as a requirement in the Sustainable Communities section of the CS.	Agree. Health Impact Assessments will form part of the Sustainability Appraisal of the Core Strategy	Assess through the Housing Background Paper and Infrastructure Delivery Plan.
NYCC (2613)		Unlikely to provide the type of housing offer attractive to those looking to North Yorkshire as a place to live	Policies on housing mix and affordable housing will ensure delivery of family and affordable housing. Locations will need to be sustainably located. Some locations suited for lower density housing are identified in Table H2, particularly in the later years.	No change. Evidence will be provided through the update of the SHMA and dialogue with the Leeds City Region
Roundhay Planning Forum (5057)		Should give particular priority to regeneration areas.	The CSPA approach does focus investment in urban areas which contain most of the regeneration areas and most of the older housing stock in need of improvement	A cross reference to the City Council's Regeneration Strategy will be made.
Savills Northern (467)	Harewood Estate	The sequential preference of Policy H1 should include "infill locations within smaller settlements"	Development of PDL infill sites within smaller settlements would be supported by Policy H3 subject to availability of infrastructure	No change
Savills Northern (467)	Harewood Estate	Policy H2 & Table H2 cannot be properly examined without the SHLAA. 1% for smaller settlements seems too low	The Core Strategy needs to plan for sufficient housing overall, but focussed in the right locations and preferably on PDL. The RSS Core Approach expects housing to be focussed on the main urban areas. It should be noted that the 1% only covers the short term period.	Assess through the Housing Background Paper and the SHMA update.
Scholes Community Forum (20)		Support Policies H1, H2 and H3	Support welcomed	No change
Sigma Planning (4110)	Hallam Land Management	A professional assessment of the impact of releasing a limited number of urban extensions on market activity and regeneration should be undertaken.	Urban extension releases must be for housing supply reasons, not to test impact on regeneration	No change.

Sigma Planning (4110)	Hallam Land Management	Policy H2 is a phasing policy in disguise. It should not restrict housing site release in the early years of the Plan	Policy H2 is plainly a phasing policy needed to inform the Allocations Plan. Phasing is entirely appropriate as part of a plan, monitor and manage approach in accordance with paras 62-67 of PPS3.	No change.
Tenants Federation Workshops 26/11/09		All the groups supported the phased approach to housing land release.	Support noted	No change
Signet Planning (5039)		In terms of Table H2, more extensions to urban areas are needed earlier on in the plan period to compensate for deliverability issues affecting urban sites.	The Core Strategy needs to plan for sufficient housing overall, but focussed in the right locations and preferably on PDL	Assess through the Housing Background Paper and SHLAA.
Spawforths	A Ramsden., Langtree Group Plc,Mr Saville, Chapman Family Discretionary Trust, Mr Lindley	An implementation strategy with mechanisms to address over/under supply is required, as expected by PPS3 & RSS	Agree	The CS will set the context for a PMM mechanism in the Site Allocations DPD
Spawforths (2663)	A Ramsden., Langtree Group Plc,Mr Saville, Chapman Family Discretionary Trust, Mr Lindley	Table H2 is too prescriptive – could be used inflexibly in decisions on planning applications (see Wakefield CS inquiry). Too much growth in smaller settlements. Better to direct 65% growth toward the urban area and 35% toward the Principal Towns (as per Spawforths' alternative settlement hierarchy).	Core Strategies are expected to provide a locational steer on where housing growth is to be accommodated. The overwhelming drift of comment received is toward greater specificity about locations for growth. In any case, Policy H2 clarifies that Table H2 sets out an <i>indicative</i> apportionment and it is designed primarily to influence the distribution of allocations, rather than deal with planning applications	Apportionment will be considered as part of the Housing Background Paper.
The Oulton Society (42)		It is not clear whether the sequential avoidance of areas of special landscape importance would include the 5 areas of SLA to the East and South East of Leeds. These need protection.	The parameter of Policy H1 refers to all areas of special landscape importance.	No change
CB Richard Ellis (5571)	Marshalls plc	Preferences in Policy H1 ignore green belt	If selective GB boundaries need to be reviewed, to accommodate housing	Consider any changes subject to the

Smiths Gore (5017)	Cannon Hall Estate, Bramham Estate	The need to use Green Belt land for housing should be explicit in Policy H1	growth This will need to be consider in the preparation of the Publication document.	completion of the Housing Background paper & abolition of the RSS housing targets
Tenants Federation Workshop 26/11/09		<p>Group 1 agreed with policy H1, subject to greater distinction between the main urban areas and the city centre. The city centre has individual circumstances and is not suitable for families because of lack of infrastructure (medical centres and schools) and unsuitability of the dwellings. The group believed that the modern family likes to stay within the same area requiring the provision for all forms of dwellings including properties suitable for first time buyers to accommodation for the elderly. They believed that families could be encouraged to locate to the edge of centre if the right properties were developed.</p> <p>Group 2 agreed that the city centre should treated as a separate category.</p> <p>Group 3 made the following observations:</p> <p>i) a new settlement should be higher priority to deliver an 'ideal settlement' to encourage people to the area similar to the Milton Keynes effect.</p> <p>ii) brownfield sites may be more appropriate for business and enterprise rather than housing although it was recognised that there might not be demand. Locations with brownfield land tend to lack services such as schools. The Council should demonstrate if this policy model has in other cities.</p>	The Core Strategy Preferred Approach does treat the city centre as a separate part of the settlement hierarchy so that distinctive needs can be addressed	No change

<p>Leeds Youth Council Event 19/11/09 Groups 1 and 3</p>		<p>Pros:</p> <ul style="list-style-type: none"> • Efficient use of land • Concentration in the city centre will keep Leeds attractive • People generally want to live nearer to the city centre • City centre houses generally attract wealthier, more educated and highly skilled people • Good balance between the urban settlement and countryside is important • More population, means more groups that bring people together i.e. more support for people • Larger work force in the area • The architecture will keep up with modern times. • Keeps Leeds individual. • More houses means more taxes and can therefore put money back into services / hospitals • Using brownfield land is a good idea – use old buildings first and conserve land • Special projects – Leeds is up there <p>Cons:</p> <ul style="list-style-type: none"> • Agriculture – Farm land will be lost to housing development, therefore food prices will go up. • Roads will be busier, strain on bus services • Need more investment in public transport and expand road network • Review the drainage system. More houses will create more flooding issues. • The City Centre also needs good quality houses • The Council's sequential approach by building new houses in existing settlements would segregate existing communities 	<p>Comments will be noted</p>	<p>Assess through the Housing Background Paper and SHLAA.</p>
<p>Leeds Youth Council Event 19/11/09 All Groups</p>		<p>Building in rural areas was discussed. A majority suggested that rural areas should be protected totally, but around a quarter proposed that a balance would be more appropriate. The problem of where to put houses if not in the countryside was raised by the facilitator. After more discussion, most agreed that there should be a balance rather than complete protection of rural areas.</p>		

<p>Voluntary Action Leeds Event 4/12/09</p>		<p>If the empty and disused houses are renovated and put into use the housing target could be met.</p> <p>Areas of flood risk should be avoided</p> <p>Should deprived areas be targeted to help meet the housing targets?</p> <p>Statistics should be used in the development of the strategy</p> <p>A participant wanted to know why BME settlements are not shown on the maps, and if there were plans to map out BME needs, for example - refugees require bigger houses</p>	<p>Comments will be noted</p>	<p>Assess through the Housing Background paper and SHLAA.</p>
<p>BME Apda Day Housing Workshop 17/12/09</p>		<ul style="list-style-type: none"> • What's the reason for population increase? Why Leeds? • Encroachment of Green belt. Make use of empty and derelict buildings before using green belt and country side. • Why is development focused on south of Leeds as opposed to developing the wealthy areas north of the city? • Concerns of New houses being too expensive for first time buyers, young people etc. • Concern at figures for city centre expansion of 30,000 dwellings, haven't we gone back to the 1960s, new high rises could be slums of tomorrow. • People in East Leeds (BME minorities) like multi cultural areas and are happy with it. Want to live there. Might not want to move away to predominately white working class areas with racial prejudices and lack of cultural amenities. • When new migrants are placed in white working class areas problems have arisen due to racial tension, language barriers etc. Distance from family in East Leeds, need to provide cultural amenities in new development zones. 	<p>Comments will be noted</p>	<p>Assess through the Housing Background paper and SHLAA.</p>

Leeds City College Event 9/12/09		<ul style="list-style-type: none"> Proposed homes should be built in other cities/towns and not in Leeds. They thought that the Government is not listening by dictating the amount of homes which are required Existing empty houses and other buildings should be used rather than building on green /open space. Greenspace and flood plains need to be protected to avoid problems Additional houses will mean busses become more congested. For the additional housing to be located in rural areas, roads would have to be widened resulting in loss of agricultural land No one wanted the houses built in their areas as the infrastructure was not capable of providing for the people who already lived in the area. Doubt developers will provide additional infrastructure. It would be a cost saving policy to build houses within Leeds urban area as facilitates are already in place. A new town should be built in preference to building the housing elsewhere. It may be more expensive because of infrastructure requirements High rise isn't the answer as flats aren't as popular as houses. Squeezing houses into urban areas would also make the areas worse and therefore reduce the house prices. 	Comments will be noted	Assess through the Housing Background paper and SHLAA.
Green Belt				
Barton Willmore Planning (45)	Ashdale Land and Property Company LTD,	A GB review is required	It is unnecessary to review the entirety of the Green Belt. Leeds is preparing a Housing Background paper, which will assess the appropriateness of broad locations for future development and give clear direction to the Site Allocations DPD. (especially in the light of the abolition of the RSS	Prepare Housing Background paper
DLP Planning (2657)	Ben Bailey Homes, Stamford Homes	Selective GB review required. Use of discrete parts of the GB could be more sustainable than development in urban areas. They could also help facilitate urban renewal cross subsidising the regeneration programme. Possible locations include the Leeds-Bradford Corridor, New Farnley and Meanwood.		

ID Planning (5668 , 5671)	Ben Bailey (South Yorkshire) Ltd, Barwick Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Edmund Thornhill, Great North Developments Ltd, Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Robert Ogden Partnership Ltd, Ringways Motor Group, Persimmon Homes and Taylor Wimpey	A commitment to undertake a GB review is needed. As a bare minimum diagrams should identify the broad locations where GB review will be necessary.	housing targets)	
J&J Design (5666)	Horsforth Gospel Hall	The CS needs to provide a clearer lead on GB review		
Natural England (58)		The review should be selective only, retaining the general extent of the green belt. It should consider the role of the GB in contributing to landscape character and its role in delivering recreational, agricultural and biodiversity resources and opportunities.		
Pegasus Planning (4388)	Mr C Makin	Not enough detail about GB review. It should be specified how and when the GB will be reviewed. It is not clear whether the housing growth areas shown on Map 3 illustrate the locations for selective GB review.		
Scott Wilson (414)	PPL c/o Revera	Selective GB review required and can identify potential expansion of major and smaller settlements.		
Spawforths (2663)	Mr A Ramsden, Langtree Group Plc, Mr G Saville, Chapman Family Discretionary Trust, Mr Lindley	A localised review is required. Many areas of GB close to urban areas do not perform GB functions (as per PPG2) are more sustainable than locations within urban areas. Certain GB land could help unlock difficult PDL in urban areas.		
The Oulton Society (42)		GB Review should ensure that special landscape areas are protected.		

Turley Assocs (5673)	The Warmfield Group	A GB review is necessary.		
Barton Willmore Planning (45)	Ashdale Land and Property Company LTD	A GB review is required		
Signet Planning		A selective review of GB to ensure growth is in sustainable locations is required as part of the evidence for the Core Strategy. It is too late to defer this to the Allocations DPD		
Walker Morris (3042)	Various	More clarity is needed on how much GB land will be required. Table H2 suggests 48% on urban extensions; how much would be GB?	Agree. Table H2 of the CSPA will be made more spatially specific and shown in map form. This, in combination with the SHLAA will clarify the approximate quantum of Green Belt land required for housing development, if required.	Clarify. See also response to "Absence of SHLAA"
DLP Planning (2657)	Ben Bailey Homes, Stamford Homes	Selective GB review required. Use of discrete parts of the GB could be more sustainable than development in urban areas. They could also help facilitate urban renewal cross subsidising the regeneration programme. Possible locations include the Leeds-Bradford Corridor, New Farnley and Meanwood.	If required, selective Green Belt releases would need to be justified on the basis of housing supply and will need to be in sustainable locations.	No change
Leeds City College (5653)		A GB review is necessary. PDL opportunities in the GB should be identified, such as the campus of Leeds City College	Major developed sites in the GB would be identified in the Site Allocations DPD.	Consider as part of the Site Allocations DPD
GMI Property (5682)		Para 5.3.5 is confusing in conflating the purposes of GB with the function of Green Infrastructure which is potentially confusing.	The difference is explained carefully in paragraph 5.1.6 of the CSPA	No Change
Civic Hall event 2/11/09		Do the red stars on Map 3 represent comprehensive or selective green belt review?	The red stars indicate those broad locations where future long term growth may be needed. The detail of this will need to be incorporated as part of the Site Allocations DPD. The appropriateness of the red star locations will be assessed in the Housing Background paper.	Prepare Housing Background paper.
Gypsy and Traveller Accommodation				
GOYH (95)		There should be a separate policy for G&T sites reflecting circular 1/2006	The policy for Gypsy and Traveller and Travelling Showpeople accommodation is integral to Policies H1 and H3	No change.

NHS Leeds (5693)		Small sites supported. However, the proposal that transit provision is available within permanent sites could make it more difficult for the settled Gypsy & Traveller community to build positive relationships with the wider local community. There are also concerns that Transit sites will become permanent.	Agree that this needs further consideration. Early consultation suggested that dedicated transit sites were problematic because in situations of shortage, they become permanent sites. However, it is agreed that incorporation of transit provision into permanent sites brings other problems, so further solutions need to be explored	Re-consider the approach to transit provision.
GATE (2739)		The proposal to incorporate transit provision into permanent sites is a cause for concern. It will mean that police will direct Travellers “passing through” to transit provision on permanent sites. This means established families on permanent sites would have to accept total strangers and this could undermine efforts to integrate with the local community. Better alternative solutions include allocation of a site specifically for the purpose of transit accommodation or through “negotiated” stopping places where families are allowed to stay on unused ground for short periods subject to terms and conditions. The problem with a dedicated transit site is that if there is an overall shortage of permanent sites, such transit sites will soon become permanently occupied.		
Leeds Primary Care Trust (5204,3003)		Very pleased with the small sites option for Gypsies and Travellers as this provides the best likely health outcomes. Max 8 units per site would be better.	Welcome support for small sites option. No evidence is available that a maximum of 8 units per site would be better.	No change
Crossgates Shopping Centre Event 4/11/09	Justice for Travellers	There are a range of issues which can only be solved by allocating sites for Gypsy and Traveller accommodation	The Core Strategy will guide where new sites should be provided, but actual allocations will be made by the Site Allocations DPD.	No change
Planning Aid Workshop: Hunslet 4/12/09		Gypsies and travellers para.5.3.10 – include reference to facilities to be provided for each pitch	Too much detail for the Core Strategy. The level of facilities to be provided for each pitch will be a matter for the site developer in consultation with Gypsy and Travellers	No change
Infrastructure				
Bradford Council (100)		How are Leeds planning infrastructure for the scale of housing required?	Infrastructure needs will be clarified through the Leeds Infrastructure Plan and the City Centre, Town and Local Centres study	Clarify in the Infrastructure Plan and CCTLC study
GOYH (95)		Unclear what “appropriate levels” means in para 5.3.2		
Leeds Civic Trust (62)		Costs should be more onerous for greenfield development. Infrastructure is needed to support family housing on the edge of the city centre.		

Location Specific Suggestions				
Barton Willmore Planning (45)	Ashdale Land and Property Company LTD	The designation of Micklefield as a housing growth area is supported except the scale of growth should be set and the growth of this smaller settlement needs to be reconciled with the focus on urban areas. Allerton Bywater should also be promoted for housing growth.	Greater spatial clarification is required. Table H2 will be made more spatially specific and illustrated in map form.	Clarify the spatial distribution of Table H2
Barton Willmore Planning (57)	White Laith Developments	Because of its size and significance, reference to the East Leeds Extension should be made in the Core Strategy. It should be allocated as a strategic site.	LCC does not plan to allocate any strategic sites in the Core Strategy because the Site Allocations DPD will be the best means of determining all allocations in the round.	No change
Civic Hall Event 2/11/09	Persimmon Homes	Because of its size and significance, reference to the East Leeds Extension should be made in the Core Strategy. The orbital road needs to be dealt with too.		
Barton Willmore Planning (57)	Templegate Developments Ltd	Land to the south and east of the M1 at J.45 should be included with the MUA and designated as a strategic site within Aire Valley Leeds.		
Civic Hall Event 2/11/09	Persimmon Homes	The East Leeds Extension will help enhance the prospects for East Leeds by raising the profile of East Leeds. This will help not hinder efforts to regenerate EASEL	The concern about impact of East Leeds Extension on EASEL is one of timing	No change
CB Richard Ellis (5571)	Marshalls plc	Support housing development of green belt land at Dewsbury Road, Woodkirk	The choice of preferred locations to make up the strategic distribution of housing growth in the Core Strategy Preferred Approach was determined systematically with reference to all of the factors set out in Policy H1 and taking account of land availability as identified through Leeds' Strategic Housing Land Availability Assessment. Infrastructure availability and needs will need to be considered	Prepare Housing background paper. Make cross references to Leeds' Regeneration Strategy in the Publication document..
CB Richard Ellis (5571)	Marshalls plc	Support housing development of green belt land Leadwell Lane, Robin Hood		
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."		
Dacre Son & Hartley (480)	Taylor Wimpey/Persimmon/Excel	The East Leeds Extension is needed imminently and LCC should help to facilitate its early development		

Dacre Son & Hartley (480)	Persimmon Homes	Support for land at Morley including allocation H3-2A.05		
Dacre Son & Hartley (480)	Taylor Wimpey	Support for PAS land at New Lane, East Ardsley		
Dacre Son & Hartley (480)	Taylor Wimpey	Support for PAS land at Moseley Bottom, Cookridge		
Dacre Son & Hartley (480)	Taylor Wimpey	Support for GB release south of the M62 at Tingley/W. Ardsley		
Dacre Son & Hartley (480)	Taylor Wimpey	Support early release of Churchfields UDP Ph III site at Boston Spa		
Dacre Son & Hartley (480)	Taylor Wimpey	Support early release of Queen St, Woodend UDP Ph III site at Allerton Bywater		
Dacre Son & Hartley (480)	Redrow Plc	Support early release of proposed greenspace at Outwood Lane, Horsforth.		
Dacre Son & Hartley (480)	Mrs BE Henderson, Mr DA Longbottom, Mrs OM Midgley	Support for GB release to the north western edge of New Farnley		
DLP Planning (2657)	Ben Bailey Homes	Selective GB releases needed at Meanwood and New Farnley		
Drivas Jonas (5558)	Horsforth Riverside LLp	Support for Riverside Mills		
Leeds Youth Council Group 1 Workshop 19/12/09		Growth area identified in Horsforth: this will bring more resources, reduce unemployment and bring better transport links to the area. But at present there is a good balance between the countryside and urban areas. Fear that large scale development would undermine the existing quality of the area.		
Leeds Youth Council Group 2 Workshop 19/12/09		<ul style="list-style-type: none"> • Building should take place on Greenfield sites but it needs to be at the right correct balance with construction on Brownfield sites as well (80% of Group agreed) • Greenfield development needs to match the area well. • Green roofs could help. • Back to back housing was favoured as a form of dense housing. Back to backs are "efficient and attractive." 		
Mr Dunstall (4743)		Support use of PAS land at Kippax		
Tenants Federation Workshop 26/11/09		Towns such as Kippax, Garforth and Gipton would be viable options for further development		

Janet & Geoffrey Hare (5512, 5631)		Confirm inclusion of farm yard land at the southern end of Micklefield		
ID Planning (5671)	Persimmon Homes (West Yorkshire) Ltd	PAS sites at Churwell and Kippax should be allocated.		
Leeds Youth Council Group 3 Workshop 19/12/09		<ul style="list-style-type: none"> • Pudsey – Development near train station but on Greenfield site which is bad • Carlton – Development here will destroy strawberry fields and agricultural land. Small farming village and destroy the character. • Colton – Already developed Thorpe Park, too many traffic lights. The area has reached capacity. Old people live there and economic development will bring noise. 		
ID Planning (5668,5671)	Ben Bailey (S Yorks) Ltd, Barwick Developments Ltd, Persimmon Homes (W Yorks) Ltd	Support new housing around High Royds & Menston		
ID Planning (1186)	Abraham Moon & Sons Ltd	Support new housing at Netherfield Rd, Guiseley (UDP H3-3A.9)		
ID Planning (5671)	Edmund Thornhill	Support ne housing at Kirklees Knowl, Farsley		
ID Planning (5671)	Edmund Thornhill	Support new housing at Bagley Lane, Farsley		
ID Planning (5671)	Great North Developments Ltd	Support new housing at Micklefield		
Member Briefing 3/11/09	Cllr Parker	Would accept new housing in Micklefield and Scholes, but need to make sure that the new children attended the local primary school (which has capacity), and the secondary school in Garforth doesn't have capacity. Infrastructure needs to be a part of new development.		
ID Planning (5671)	Edmund Thornhill	Support new housing at Calverley. Calverley has a good range of local services & is part of the main urban core according to the RSS settlement study. It should therefore be identified as an area of housing growth.		
ID Planning (5671)	Persimmon Homes (West Yorkshire) Ltd	Support housing at East of Otley		

Core Strategy Event Otley Library 16/11/09		Concern raised in relation to the inclusion of the East of Otley phase 3 extension particularly given it has apparently previously been thrown out at appeal		
ID Planning (5671)	Robert Ogden Partnership Ltd	Support development at Tingley PAS site		
ID Planning (5671)	Ringways Motor Group	Support housing development at Whitehall Road		
ID Planning (5671)	Persimmon Homes and Taylor Wimpey	Support housing development at Grimes Dyke, Whinmoor		
Lister Haigh (2905)	D Parker & Sons	Support housing on land north of Wetherby racecourse		
Mosaic TP (5672)	Miller Homes	Support housing development at Bramhope		
Nathanial Lichfield & Partners (5677)	Steven Parker and Family	Support the release of rural land for housing land at Sandbeck Lane, Wetherby to meet the housing needs of Wetherby		
Core Strategy Event White Rose Centre 23/11/09		South Leeds suffers compared to North Leeds – Why not have more housing sites in North Leeds?		
Roundhay Planning Forum (5057)		The East Leeds Extension should be resisted as an unsustainable location which would have a detrimental impact on the setting of Roundhay Park and villages of Shadwell & Scholes		
Banks Developments	43228			
Mr England (5678)		The East Leeds Extension will harm Scholes by depressing house prices, spoiling the Green Belt and putting a burden on local schools and public transport.		
Scott Wilson (414)	PPL c/o Revera	Support housing growth at Aberford because it contains a substantial number of businesses and services and has proximity to a range of transport infrastructure. It should be elevated to status of a smaller settlement		
Scott Wilson (414)	Mr Hague	Support Barwick in Elmet for housing growth as it has suitable sites available.		
Signet Planning		Rothwell garden centre is an excellent site which would provide a well related extension to a major settlement which is well served by public transport and in flood risk zone 1.		
Smiths Gore (5017)	Bramham Estate	Support housing growth at Boston Spa, Clifford and Bardsey		

Smiths Gore (5017)	Cannon Hall Estate	Support housing growth at Horsforth		
The Oulton Society (42)		The SLA north and south of the A639 near Oulton should be protected. It is critical for the setting of Oulton.		
Turley Associates (5670)	Swayfields (Skelton) Limited	Give more prominence to use and regeneration of the Aire Valley to deliver the Growth of Leeds. Also, set out proposals for the Eco Settlement as a key aspect of the Core Strategy giving clarity on what standards are expected.		
University of Leeds (5690)		The Leeds General Infirmary would be suitable for mixed use development, although should not form part of any targets until a site development plan has been agreed		
BME Apna Day Women's Workshop		Beeston already has enough houses.		
Core Strategy Morrisons Event 12/11/09		Wetherby needs to be promoted in its own right (shouldn't have turned down 1500 houses) new housing. Employment, shops. Then can attract people who go to the White Rose as don't want to go into Leeds.		
Resident (ref: 5636)		New housing badly needed in Wetherby. It should be promoted as an area for new housing, shops and businesses with improved public transport.		
Review of Protected Area of Search Land				
Banks Developments (5121)		PAS sites which are sustainable should be brought forward. An assessment is needed alongside the GB review	Agreed that PAS land needs to be assessed to determine which land is needed to contribute to housing supply. However, it will only be the role of the Core Strategy to identify the general distribution of housing to be provided including the quantum to be delivered in different locations and at different phases. It will be the role of the Site Allocations DPD to determine which PAS land fits the distribution	The Core Strategy needs greater clarity on the preferred spatial distribution, but will not identify specific pieces of PAS land.
Barton Willmore Planning (45)	Ashdale Land and Property Company LTD	A review of PAS sites is required to assess which sites should be released early		
Barwick & Scholes PC (111)		Only PAS sites which are sustainable should be brought forward. Remainder deleted.		
Carter Jonas (5681)	The Diocese of Ripon & Leeds	Housing allocations and PAS sites should be reviewed to sieve out inappropriate sites		

ID Planning (5668,5671)	Ben Bailey (South Yorkshire) Ltd, Barwick Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Edmund Thornhill, Great North Developments Ltd, Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Robert Ogden Partnership Ltd, Ringways Motor Group, Persimmon Homes and Taylor Wimpey	A commitment to undertake a review of the sustainability credentials of PAS sites is needed. PAS land should be made available in tandem with PDL not sequentially.	expected by the Core Strategy.	
Pegasus Planning (4388)	Mr C Makin	A commitment to undertake a review of the sustainability credentials of PAS sites is needed.		
Signet Planning (5039)	Kebbel Homes	The suitability of PAS sites should be reviewed.		
Previously Developed Land Target				
Banks Developments (5121)		The CS target should not be higher than the RSS target of 65%	The RSS states "Districts with Regional Cities...are likely to be able to deliver above the regional average of 65%." As such Leeds is justified in proposing a higher target.	Examine evidence for a higher PDL target in the Housing Background paper.
GVA Grimley (2996)		The early years target of 85-95% is unrealistic and out of step with the RSS target of 65%		

ID Planning (5668,5671)	Ben Bailey (South Yorkshire) Ltd, Barwick Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Edmund Thornhill, Great North Developments Ltd, Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Robert Ogden Partnership Ltd, Ringways Motor Group, Persimmon Homes and Taylor Wimpey	The target – higher than the RSS target – lacks any evidence base or justification	It should be noted that the 85-95% of PDL referred to in CSPA paragraph 5.3.14 is not a target but a reflection of expected delivery A Housing Background paper is being prepared which will explore more recent evidence to reconfirm or modify the PDL targets.	Revise wording of paragraph 5.3.14 to clarify that 85-95% is a reflection of expected delivery in the 1 st 5 years.
Peacock & Smith (5665)	The Stockeld Estate	The 75% target exceeds that of the RSS. The higher targets in the early years is vague. These targets conflict with national & regional policy as they will serve to constrain housing development from meeting housing needs.		
Roundhay Planning Forum (5057)		The CS target should be at least 90% to get developers to focus on regeneration		
Spawforths (2663,467)	Mr Ramsden, Langtree Group Plc, Mr Saville, Chapman Family DiscretionaryTrust, MEPC	Lacks justification. A balanced approach is suggested of dual phasing of PDL along with sustainable greenfield sites		
Spawforths (2663,5672)	Mr Ramsden, Langtree Group Plc, Mr Saville, Chapman Family DiscretionaryTrust, Miller Homes	Reduce to RSS 65%		

Walton & Co (5510)	University of Leeds, Thorpe Park Developments Ltd	The target of 85-95% in the first 5 years is unrealistic. It will not enable a sufficient range of house types to be delivered to meet family needs.		
Leeds Youth Council Group 1 Workshop 19/12/09		<ul style="list-style-type: none"> • Agree with prioritising brownfield development over Greenfield • There may be insufficient supply of brownfield land to meet the target • New housing has to have adequate services 	Support welcome. Historic trends suggest that a 75% target should be achievable over the life of the plan	No change
Quality of Place				
GMI Property (5682)		It is wrong to say that quality of place should take priority over numerical targets. Quality of place <i>and</i> delivery of growth can be achieved together. In fact, housing development often provides opportunity to improve quality of place.	Agree that quality of place should be achieved as part of housing growth.	Reword paragraph 5.3.2, in Publication document to say that housing delivery and achievement of numerical targets should not be at the expense of quality of place.
GOYH (95)		Unsound to say Quality of Place takes priority over numerical targets		
ID Planning (5671)	Barwick Developments Ltd	Link is inappropriate		
Pegasus Planning (4388)	Mr C Makin	It is wrong to say that Quality of Place should take priority over numerical targets. Quality of Place <i>and</i> delivery of growth are required; they are not mutually exclusive. Large strategic sites will be better equipped masterplan and deliver quality of place than piecemeal scattered smaller sites.		
Turley Associates (5670)	Swayfields (Skelton) Limited	Wrong to say Quality of Place takes priority over numerical targets		
Walker Morris (3042)	Various Clients	Odd that LCC feels the need to outline this. Quality of place should be expected for any development.		
Safeguard Greenfield Land				
Barwick & Scholes PC (111)		Against use of the Green Belt. Unconvincing case of future needs	However, any potential selective review of the Green Belt would need to be carefully assessed as part of the Housing Background paper.	No change.
Individual (4754)		Against use of the Green Belt		
Core Strategy Wetherby Morrisons event 12/11/09		Housing on brownfield sites not Greenfield sites		
Individual (4754)		PDL before Greenfield at all times	Policy H1 gives preference to PDL but acknowledges that greenfield land will be required to meet the RSS housing requirement	No change

Individual (4754)		Safeguard playing pitches	Policy H1 does not expect any playing pitches to be used for housing which are concluded to be needed by the PPG17 Audit & Needs Assessment..	No change
Settlement Hierarchy				
GMI Property (5682)		Should be recognised that housing growth may lead to the status of settlements being redefined in the settlement hierarchy	Agree	Once the preferred spatial distribution of new housing is clarified, any consequences for the settlement hierarchy should be recognised
Preference for the southern half of the District				
BNP Paribas (5662)	Telereal Trillium	Should not restrict housing growth in the north of the district	This preference is derived from Policy LCR1E of the RSS which states, "Encourage growth across the south of the city region (broadly south of Bradford and Leeds city centres)....". Setting a "preference" is one means of "encouraging" growth and not necessarily stronger. The preference is justified on the basis that housing should be accessible to jobs and significant job growth is expected to the south side of Leeds city centre and in the lower Aire Valley. The Infrastructure Development Plan is assessing what additional infrastructure will be required to support housing growth across the district. The preference is not quantified in Policy H1, but the combination of the percentages in Table H2 and the "Potential Housing Growth Areas" shown on Map 3 provides a means to quantify and deliver the preference. The Publication version of the Core Strategy will need to provide greater clarity on this point.	Clarify the preferred settlement pattern spatially. Liaise with the Highways Agency
Carter Jonas (5681)	The Diocese of Ripon & Leeds	Unclear what this preference means.		
Banks Developments	43228	Support focus on the southern half of the district. Housing development in the northern half should be restricted.		
GMI Property (5682)		Where is the evidence for this? Assessments for Leeds City Region conclude that the east of the District has the greatest potential to accommodate housing growth which preserves & complements regeneration initiatives. New housing would also benefit from planned public transport improvements and proximity of areas of employment growth.		
Highways Agency (5604)		The likely traffic increase on the M621 and M1 needs to be modelled & LCC will need to work in partnership with the Highways Agency to address issues and agree appropriate mitigation.		
NYCC (2613)		Unlikely to provide the type of housing offer attractive to those looking to North Yorkshire as a place to live		
Peacock & Smith (5665, 2996)	The Stockeld Estate,	No justification. Contrary to PPS3 & RSS		
Spawforths (2663,467)	Mr Ramsden, Langtree Group Plc, Mr G Saville, Chapman Family Discretionary Trust, MEPC	No justification. Lacks a demarcation of this type across the District. "Preference" is unquantifiable therefore unimplementable.		
Turley Assocs (5670)	Swayfields (Skelton) Limited	Vague preference. Area not defined. Preference has no dwelling target nor assessment of infrastructure delivery		

Walker Morris (3042)	Various	It will be difficult to interpret what this means in practice. This type of preference should be set out in the Allocations DPD.	Since south Leeds contains considerable amounts of PDL, the preference is compatible with the preference to use PDL	
Walton & Co (5510,5660)	University of Leeds,	The wording “preference for the southern half of the district” is stronger than RSS Policy LCR1 which merely says growth should be encouraged in the south and managed in the north		
WYG (420)	Harrow Estates	Not sustainable if the priority is to make best use of PDL		
WYG (5648)	Yoo Invest	Not sustainable if the priority is to make best use of PDL		
WYG		Not sustainable if the priority is to make best use of PDL		
Mrs Longfield 5647		Not appropriate because transport improvements are programmed for the north. Growth in the southern half will exacerbate existing infrastructure inadequacies.		
Core Strategy White Rose Event		South Leeds suffers compared to North Leeds – Why not have more housing sites in North Leeds?		
Tenants Federation Workshop 26/11/09		Group 2 agreed that the city centre should be treated as a separate category. Some group members suggested that there was a bias towards development in the south of the city with limited development proposed for the more affluent north. It was accepted that there are more brownfield sites located within the south due to higher levels of industrialisation. The group believed that the core strategy should give greater consideration to development in the north.		
Stepping-up of the Housing Requirement in Table H1				
Barton Willmore Planning (57)	White Laith Developments, Templegate Developments Ltd	Does not accord with national or regional policy	The stepped requirement of Table H1 is entirely consistent with regional policy and national policy is silent on the matter. RSS Policy H1B and Table 12.2 allows Leeds’ requirement to start from below the annual average rising to above the average in later years. The actual requirement remains at 4300pa only as an annual average. It is agreed that LCC must meet the	Explore further evidence to reinforce or revise Table H1
Carter Jonas (5681)	The Diocese of Ripon & Leeds	It is not appropriate to place constraints on housing delivery in the early part of the Core Strategy period		
GVA Grimley (2996)		Inappropriate for such a slow step up storing up an undersupply.		
ID Planning (5671)	Barwick Developments Ltd	Paragraphs 5.3.1 and 5.3.2 need revising to be consistent with RSS. It needs to commit to delivering 4300 net dwellings year on year.		

ID Planning	Ben Bailey (South Yorkshire) Ltd, Barwick Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Edmund Thornhill, Great North Developments Ltd, Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Robert Ogden Partnership Ltd, Ringways Motor Group, Persimmon Homes and Taylor Wimpey	Misinterpretation of RSS Table 12.2. This only accepts under-provision where the Council is doing its best to increase supply. The stepping up in Table 12.2 has no rationale based on evidence.	requirement but taking account of other policy requirements including the “Core Approach” or RSS It is acknowledged that there is an evident need for new housing and that there is a need to significantly increase supply in Leeds (RSS 12.14). However, it will take time for housing delivery to step up to the RSS annual average, particularly given the effects of the recession. When the housing market fully recovers in later years, buoyant delivery on PDL accompanied by significant land releases will ensure that the higher than average levels of housing delivery will be achieved in later years.	
Peacock & Smith (5665,2996)	The Stockeld Estate,	The approach in Table H1 is contrary to RSS para 12.14 – it is essential to significantly increase housing supply in Leeds in order to meet needs and reduce longer distance commuting	Table H1 was based on knowledge of the housing market at the time. Further evidence will be explored – including the SHLAA and the new Local Area Agreement target – to refine the rate of step-up as appropriate.	
Pegasus Planning (4388)	Mr C Makin	Table H1 lacks evidence of justification. That the weight of housing falls in the long term means that the CS needs to provide more detail about major growth in the long term.		
Signet Planning (5039)	Kebbel Homes	There is a need for new housing now. Table H1 “backloads” housing provision		
Turley Assocs (5673)	The Warmfield Group	Approach accepted. However, figures are unsupported by evidence.		
Walker Morris (3042)	Various Clients	Table H1 is unsound and not in conformity with RSS as it could lead to a massive undersupply of housing. Similarly, Table H2 shows 54% of housing being delivered in the last 6 years of the plan. This does not reflect Leeds’ ambitions to “Go up a League” and develop as the regional capital.		
Walton & Co (5510,1933)	University of Leeds,	The actual requirement remains 4,300pa or 21,500 over the 1 st 5 years.		

WYG (420,5648)	Harrow Estates, Yoo Invest, Rockspring Hanover property Unit trust	There is a need for new housing now		
Civic Hall Event 2/11/09	Dacre Son Hartley	Do the Table H2 percentages relate to the time periods in Table H1?	Broadly yes	No change
Strategic Sites				
Barton Willmore Planning(57,5 686)	White Laith Developments,	Because size and significance, reference to the East Leeds Extension should be made in the Core Strategy. Both it and housing land in the Aire Valley should be allocated as a strategic site.	LCC does not plan to allocate any strategic sites in the Core Strategy because the Site Allocations DPD will be the best means of determining all allocations in the round. Housing growth is illustrated by CSPA Table H2 and Map 3, which need to be made more spatially specific to show the scale of growth in different locations.	Clarify spatial growth proposals, as part of Housing Background paper.
Pegasus Planning (4388)	Mr C Makin	Strategic sites should be identified for the longer term with detail of implementation. This is necessary because of the scale of growth expected (Table H2 envisages 48% of new housing) to be delivered through urban extensions.		
Dacres		Major growth areas and strategic allocations need to be identified, allocated and released in sustainable locations to meet the needs for employment and housing growth. The East Leeds Extension should be included and released in the early years. More details on release, and infrastructure should follow in the Allocations DPD.		
Support for Previously Developed Land				
WYG (420,5648)	Harrow Estates, Yoo Invest, Rockspring Hanover property Unit trust	The sequential preferences in Policy H1 should include PDL	The parameters of Policy H1 – including the preference for PDL – have to be overlaid on the sequential spatial preferences. It would be too complicated to create one sequential order of the spatial preferences and all the parameters of preference.	No change
Viability				
DTZ (5679)		House prices and land values have fallen dramatically with the effect of reducing the amount of housing development. The Core Strategy should promote engagement with residential developers to discuss the costs & challenges involved with bringing forward residential development generally & on particular sites.	Agree	No change. LCC continues to engage with house-builders in updating the SHMA and other research.

Villages and Rural Areas			
Spawforths	Mr Ramsden, Langtree Group Plc, Mr Saville, Chapman Family DiscretionaryTrust,	Clarification needed of policy for housing development in villages & rural areas. It should be limited to meeting local needs and regeneration, in accordance with RSS	In terms of distribution of allocations, the Core Strategy is clear in indicating approximately 1% of total housing supply in rural areas including villages smaller than those identified as Smaller Settlements in the Settlement Hierarchy. Policy H3 would allow any size of housing development subject to infrastructure.
Windfall Allowance			
Barton Willmore Planning (45)	Ashdale Land and Property Company LTD	The windfall allowance should be replaced by identified deliverable sites.	The City Council is not seeking to rely upon windfall in its overall supply of housing land. Paragraph 5.3.26 of the CSPA explains that the identified housing land that makes up supply in Table H2 exceeds the 73,900 requirement for the plan period. The final sentences of paragraph 5.3.24 conclude that if windfall does come forward, less of the identified housing land in the medium and long time periods would be needed. Nevertheless, paragraph 59 of PPS3 allows Local Authorities to demonstrate exceptional local circumstances to justify a windfall allowance. Leeds only suggests 11% which is significantly lower than the 95% proportions which have been
Barton Willmore Planning (57)	White Laith Developments, Templegate Developments Ltd	No allowance for windfall should be made	
DLP Planning (2657)	Ben Bailey Homes, Stamford Homes	Sites can be identified in Leeds to provide sufficiency of supply for the first 10 years of the plan.	
GMI Property (5682)		Doesn't really accord with national policy, but if retained, it is essential that housing supply is regularly updated through the SHLAA & AMR	
GOYH (95)		Questionable whether there is evidence to justify the 11% windfall allowance against PPS3 policy	
GVA Grimley (2996)		Dangerous to rely on windfalls when housing supply in Leeds is demonstrably short. The RSS requirement is at the lower end of forecast requirements. Allocations should be brought forward.	
Highways Agency (5604)		The 11% allowance is considerably lower than previous years. If actual windfall is much higher, mechanisms need to be clarified as to what would happen to allocated sites in the 1 st 5 years.	
			Review Policy H3 in the light of comments received.
			Clarify the role of windfall

ID Planning	Ben Bailey (South Yorkshire) Ltd, Barwick Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Edmund Thornhill, Great North Developments Ltd, Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Robert Ogden Partnership Ltd, Ringways Motor Group, Persimmon Homes and Taylor Wimpey	Leeds lacks circumstances to justify a windfall allowance in terms of PPS3 paragraph 59. The lack of a SHLAA means that the 11% allowance cannot be justified. The text of paragraph 5.3.24 obfuscates the issue & should be deleted.	generated since 2005. It is justified on the basis that this accounts for the smaller sites which Leeds' SHLAA found too small and numerous to consider for identification. In terms of mechanisms for dealing with the release of allocations depending on the rate of actual windfall development, these will be a matter for the Site Allocations DPD.	
Sigma Planning		Leeds is no different from other large cities. PPS3 still expects sites to be identified for cities		
Spawforths (2663,5668)	Mr Ramsden, Langtree Group Plc, Mr Saville, Chapman Family Discretionary Trust,	11% based on trend analysis. Contrary to PPS3. Windfall should be part of the 10% flexibility allowance applicable to SHLAAs as indicated by national best practice guidance.		
Turley Assocs(5670)	Swayfields (Skelton) Limited	The allowance is at odds with PPS3, particularly as 11% proportion gives such a scale of dwellings (over 8100)		
Turley Assocs (5673)	The Warmfield Group	Contrary to PPS3. No allowance should be made for windfall provision.		
Walker Morris (3042)	Various Clients	PPS3 says windfall should not be relied upon. Leeds is capable of identifying enough land to meet the RSS requirement.		
Windfall Criteria of Policy H3				
DLP Planning (2657)	Ben Bailey Homes, Stamford Homes	The approach is unsound because sites are not being identified when they should be. A criterion is needed to sequentially steer development away from sites at risk of flooding in line with PPS25	It is appropriate to have a policy to deal with housing development on land not identified for that purpose. PPS25 would be considered in any proposed development in areas of flood risk	No change

GVA Grimley (2996)		Development of greenfield sites should be allowed where the PDL target is exceeded and where a 5 year supply of deliverable housing land cannot be identified	In line with PPS3, Leeds is providing a 5 year supply of deliverable housing land. The consequences of not doing so are set out in paragraphs 69 and 71 of PPS3 and include the favourable consideration of greenfield site proposals. The City Council's LDF plans will be adopted on the basis that they do identify sufficient housing land, so Policy H3 should not need to deal with the eventuality that a 5 year supply of housing land cannot be identified	No change
Peacock & Smith (5665,3046)	The Stockeld Estate,	Restriction on greenfield sites is not justified. Policy H3 should acknowledge the possibility of different approaches if a 5 year supply of deliverable housing land is not available.		
Walton & Co (5510,5660)	University of Leeds,	Restriction on greenfield sites is not justified. Policy H3 should accept development of greenfield sites for housing within urban areas which are not subject to other designations.		
Roundhay Planning Forum (5057)		Define "small in size". Include a criterion for land which contributes to the setting of historic buildings.	Agree. What is meant by "small in size" needs clarification. One option is to use 0.4ha as this is the threshold for sites considered in the SHLAA. Also agree that the criteria to sanction exceptional development of greenfield land should preclude land which contributes to the setting of historic buildings.	Revise Policy H3
Scott Wilson (414)	PPL c/o Revera	Too harsh against greenfield development. Proposals submitted after the Allocations DPD has been adopted should be judged against the methodology used in the DPD to allocate greenfield sites and against offers of planning gain.	The more major greenfield sites which go beyond the scale allowable under Policy H3 should be allocated through the Site Allocations DPD. If such land is suggested after adoption of the DPD, it will have to wait until the DPD is reviewed.	No change
Turley Assocs (5670)	Swayfields (Skelton) Limited	Greenfield sites shouldn't form part of windfall, according to PPS3	Disagree. PPG3 said that there was no role for greenfield windfall development. PPS3 does not say this.	No change
University of Leeds (5690)		What does capacity of health infrastructure mean? Does it include acute hospital care? The potential to seek contributions from housing development toward healthcare facilities should be explored.	Agree. If capacity of infrastructure remains a test of acceptability of development it will need to be defined.	Re-consider whether Policy H3 should set limits for scale of development in different categories of settlement. Define capacity of infrastructure if retained as a criterion.
WYG (420)	Harrow Estates, Rockspring Hanover property Unit trust	Policy guidance is needed on how to deal with windfall development outside of settlement boundaries.	Agree. Policy H3 ignores windfall development outside of settlement boundaries	

Walker Morris (3042)	Various Clients	"Small in size" is not defined in part ii) of Policy H3	Agree. What is meant by "small in size" needs clarification. One option is to use 0.4ha as this is the threshold for sites considered in the SHLAA.	Revise Policy H3 in draft Publication document.
Miscellaneous				
Sarah McMahon (857)		Typo in second sentence of paragraph 5.3.2	Agree	Should read: "...characteristics and <i>be</i> directed and phased..."

LCC RESPONSES TO REPRESENTATIONS ON HOUSING SUPPLY

The CSPA is under providing for housing growth				
Barton Willmore	White Laith Developments	The CSPA is not planning to meet the RSS housing requirement including long term growth.	Leeds' housing supply for the short term (years 1-5) is sufficient when measured against the RSS housing requirement which follows the step-up trajectory of Table H1 of the CSPA	No change
Turley Associates	Swayfields (Skelton) Ltd (SHLAA site 1295), Taylor Wimpey UK Ltd (PAS site 23), Eshton Estates Ltd (SHLAA site 1237)	The release of the SHLAA confirms that the CSPA is planning to under-deliver against RSS housing requirements. The 14883 short term total in the SHLAA represents a shortfall of 6617 units.		
Spawforths	Langtree Group PLC, Andrew Ramsden, Geoffrey Saville, Richard Lindley	The Council lacks a 5 year supply of housing land (as confirmed by Appeal Inspectors) and should therefore release green field, Green Belt and Protected Area of Search (Safeguarded) sites.		
Government Office	Rachel Wigginton	There is a significant undersupply for years 1-5 and the SHLAA lacks a risk assessment of whether identified sites will come forward	Section 8 of CLGs Practice Guide on SHLAAs does expect a risk assessment to be undertaken. The short term supply identified in the SHLAA comprises of many small to medium sized sites rather than particular significant sites. Therefore the risk of non-delivery is spread and dependent on the wider market.	
Clarity of Spatial Approach is still lacking even with the SHLAA				
Pegasus Planning Group	Chris Makin	There is no explanation of how the percentages in Table H2 have been arrived at. Further information is required to support and explain.	Agree. The growth proposals need to be more "place" based and give an indication of the scale of growth envisaged in different locations.	Clarify in draft Publication document.
Carter Jonas	Dartmouth Estate, Diocese of Ripon & Leeds, Hatfield Estate, Lady Elizabeth Hastings Church Charity, Ledston Estate, AR Briggs Co Ltd, Symphony Group	Lack of transparency on how the SHLAA has informed CSPA Table H2 and generated the potential housing growth areas (red asterixes on Map 3)		

Carter Jonas	Dartmouth Estate, Diocese of Ripon & Leeds, Hatfield Estate, Lady Elizabeth Hastings Church Charity, Ledston Estate, AR Briggs Co Ltd, Symphony Group	No detail on the scale of Green Belt releases in potential housing growth areas. Harrogate's urban extension study is the type of exercise that Leeds needs to undertake to justify the appropriateness of approach.		
Government Office	Rachel Wigginton	The SHLAA update should break down the distribution of sites into geographical "places" rather than according to the settlement hierarchy. Otherwise it will be difficult to assess whether there are sufficient sites where they are needed and to develop a place-based Core Strategy.		
SHLAA site "Suitability" has been misapplied				
Turley Associates	Swayfields (Skelton) Ltd (SHLAA site 1295), Taylor Wimpey UK Ltd (PAS site 23), Eshton Estates Ltd (SHLAA site 1237)	Lack of a policy neutral stance in respect of site suitability. The SHLAA applies policy variables to determine site suitability; this is wrong as the SHLAA should judge suitability according to technical evidence and statements of fact. CLG Practice Guidance for SHLAAs (para 21) regarding types of land or areas says, "...the scope of the assessment should not be narrowed by existing policies designed to constrain development..."	It should be noted that the test of site suitability is defined in the CLG practice guidance and includes planning policy as a factor to be considered.	No change
Page 191	Langtree Group PLC, Andrew Ramsden, Geoffrey Saville, Richard Lindley	The SHLAA exercise should be largely policy neutral. As part of the evidence base the SHLAA should indicate "...the unconstrained capacity for the city and to indicate where the greatest capacity exists, or where development or policy constraints might render sites unsuitable or undeliverable." In this sense, all SHLAA sites should be "LDF to determine". It is inappropriate for the SHLAA to favour certain deliverable sites over others. This is a role for the Core Strategy. The SHLAA should not be used to re-assess the appropriateness of greenfield, Green Belt, and UDP allocated sites and avoid the scrutiny of a development plan review.	The intention of the "LDF to determine" category of site suitability was to ensure that the SHLAA exercise did not take policy decisions.	
Spawforths			At the base date of the SHLAA (1/4/09), the UDP allocated Phase II and III sites were still held back from development by the phasing of UDP Policy H3 and release tests of paragraph 7.2.10. Hence, it was appropriate to categorise all Phase II and III allocations as "LDF to determine". It was also appropriate to assign safeguarded land (UDP Policy N34) and Green Belt sites the same category.	
Carter Jonas	Dartmouth Estate, Diocese of Ripon & Leeds, Hatfield Estate, Lady Elizabeth Hastings Church Charity, Ledston Estate, AR Briggs Co Ltd, Symphony Group	Lack of a policy neutral stance towards UDP Allocations.	As the situation changes, it may be appropriate to re-assign site categories in future updates of the	

Government Office	Rachel Wigginton	Planning policy which is constraining housing development needs to be revisited to see if more sites can be brought forward. This should include UDP sites. The SHLAA needs to be reviewed to identify additional deliverable sites in years 1 to 5.	SHLAA.	
Government Office	Rachel Wigginton	The Review of the SHLAA should look at intensifying the survey by i) reducing the minimum size threshold and ii) increasing the geographical coverate.	The Leeds SHLAA Partnership agreed to apply a 0.4ha minimum size threshold (outside of the City Centre). Resource pressures & other priorities do not permit such an assessment at this time. No geographical constraint was placed on the scope of the SHLAA.	No change
SHLAA methodology or assumptions are unrealistic				
Turley Associates	Swayfields (Skelton) Ltd (SHLAA site 1295), Taylor Wimpey UK Ltd (PAS site 23), Eshton Estates Ltd (SHLAA site 1237)	The release of "City Living: Beyond the Boom" edited by Dr Rachel Unsworth suggests the SHLAA is unrealistic about delivery of schemes in the city centre and that housebuilders are now preferring to build houses rather than flats, which has consequences for density assumptions.	The conclusions about delivery dates for housing on SHLAA sites were taken by a Partnership of housing professionals and interests using best knowledge at the base-date (1/4/09).	No change. The 2009 SHLAA will be updated to 2010.
Barton Willmore	White Laith Developments	Concern that "build-out-rates" were not applied to larger sites and blocks of apartments	Whilst no standardised formula was adopted for larger sites and blocks of apartments, build-out-rates were assessed and agreed by the SHLAA Partnership on a case by case basis	No change.
Spawforths	Langtree Group PLC, Andrew Ramsden, Geoffrey Saville, Richard Lindley	Standard densities of the SHLAA are too high at a minimum of 40dph for urban areas, and over-inflate expected housing delivery. The background assumptions are ambiguous and unclear.	The standard densities were agreed by the SHLAA Partnership and were considerably lower than actually achieved densities for previous years	No change
Spawforths	Langtree Group PLC, Andrew Ramsden, Geoffrey Saville, Richard Lindley	Inappropriate to classify sites as "Dormant" when larger sites overshadow them. Such smaller sites may be developed independently, so should be recognised.	The category of "Dormant" was required to avoid double counting of dwellings. There is nothing to stop a smaller parcel of a SHLAA site being advanced for development	No change

Other comments				
Turley Associates	Swayfields (Skelton) Ltd (SHLAA site 1295), Taylor Wimpey UK Ltd (PAS site 23), Eshton Estates Ltd (SHLAA site 1237)	Table H1 of the CSPA remains unsound and should be revisited to plan positively for the RSS housing requirement	The step-up of Table H1 reflects Policy H1 of the Regional Spatial Strategy (RSS). For Leeds and other authorities named in column 1 of RSS Table 12.2, stepping-up the housing requirement is an integral part of RSS Policy.	No change
Spawforths	Langtree Group PLC, Andrew Ramsden, Geoffrey Saville, Richard Lindley	The step up of the housing requirement set out in CSPA Table H1 is unconvincing and is not supported by any evidence base, calculation or reasoning, as concluded by the Inspector to the Farsley Appeal Decision.	Evidence for the rate of step-up comes from economic and job growth forecasts (the Regional Econometric model) and from trends in levels of housing completions.	
Spawforths	Langtree Group PLC, Andrew Ramsden, Geoffrey Saville, Richard Lindley	The 11% windfall assumption of the CSPA is unjustified as Leeds has not provided robust evidence of why sites cannot be identified. The Inspector to the Farsley Appeal is not convinced of the City Council's case. Instead, the Council should re-run the SHLAA using a lower threshold than 0.4ha.	Leeds believes it can provide robust evidence of genuine local circumstances that prevent specific sites being identified. Staff/time resources did not allow a lower size threshold for the SHLAA to be used. This was agreed by the SHLAA Partnership.	No change
Government Office	Rachel Wigginton	There is not a sufficiently informed view on the need for a windfall allowance. Therefore, it is necessary for more SHLAA sites to be brought forward		
Turley Associates	Swayfields (Skelton) Ltd (SHLAA site 1295)	How can Skelton Business Park be classified as "LDF to determine" in the SHLAA when it is already an employment allocation and identified for mixed use in the Draft Aire Valley Area Action Plan? The site should be classified as "Yes", suitable. Also, the planning permission for road access etc has already been commenced, so will not lapse.	Policy GP1 of the UDPR prevents employment allocations being used for housing development. The proper place for assessing changes to existing allocations is the LDF.	No change
Turley Associates	Eshton Estates (SHLAA Ref 1237)	SHLAA site 1237 is suitable in principle for housing (potentially including some employment land.	A matter for the Site Allocations DPD to be informed by the Core Strategy preferences for housing growth and need and supply issues	No change
Pegasus Planning Group	Chris Makin	Inconsistency between CSPA Table H1 setting 17650 dwellings as the short term requirement and the SHLAA's results showing a short term capacity of 14883 (short term = 2009/10 to 2014/15).	Leeds' housing supply relies on a windfall allowance of 250 dwellings pa to bridge the gap between the SHLAA identified supply and CSPA Table H1's short term requirement	No change
Pegasus Planning Group	Chris Makin	Inconsistency in that the SHLAA says at paragraphs 4.7 – 4.8 that the UDP allocations are categorised as "LDF to determine" and assigned to the medium term; the CSPA says UDP allocations are anticipated to provide the first source of housing land supply.	The UDP housing allocations will be the first source of new land to be identified as the housing land supply.	No change

Pegasus Planning Group	Chris Makin	The totals of CSPA Table H2 do not add up.	Some of the figures are rounded up which accounts for why some totals appear not to add up.	Clarify in draft Publication document.
Government Office	Rachel Wigginton	The Council needs to use the SHLAA data to identify broad locations for growth in the Core Strategy	Broad locations are identified by the red stars on Map 3 of the CSPA	Clarify in draft Publication document.
Government Office	Rachel Wigginton	The need and extent of a Green Belt review needs to be assessed through the Core Strategy.		
Highways Agency	Louise Wright	Around 90 SHLAA sites will have major impacts on the Strategic Highway Network (SHN). The Potential Housing Growth Areas (denoted by red stars on the CSPA Map 3) will have impacts on certain stretches of the SHN.	Agree that the City Council needs to continue dialogue with the Highways Agency to properly test the Preferred Approach	Share work on the Housing Background paper with the Highways Agency

CORE STRATEGY PREFERRED APPROACH APPENDIX 2
LCC RESPONSES TO REPRESENTATIONS ON HOUSING MIX

Representor (include agent)	Those Repe-sented	Representor Comment	LCC Initial Response	Action
Requirement too prescriptive				
Ms A O'Brien (5639)		Agree that there must be some control on the mix of new dwellings e.g. excessive numbers of flats, but builders should not be forced	National Planning Policy on housing (PPS3) aims to create mixed communities expects the planning system to deliver a variety of housing, particularly in terms of price and a mix of different households (paras 9 and 10). Paragraphs 20 and 21 explain that mixed communities should include variety of housing with a mix of different households and that we should plan for a mix of housing on the basis of the different types of households needing housing over the plan period. PPS3 also states that local development documents should set out the likely profile of household types requiring market housing e.g. multi-person, including families and children (x%), single persons (y%), couples (z%). It expects developers to bring forward proposals for market housing which reflect demand and the profile of households requiring market housing in order to sustain mixed communities. Paragraph 24 of PPS3 states: In planning at site level, Local Planning Authorities	Incorporate any relevant findings of the update of the Strategic Housing Market Assessment (SHMA) into the targets and bandings of Table H4 and its supporting evidence. Results of the SHMA should also be used to provide a target mix and banding for housing mix in the city centre.
White Young Green Planning (420,5648)	Harrow Estates Goodman International Yoo Invest Rockspring Hanover property Unit trust	Target mix should not be more than aspirations in the supporting text. The market should decide mix.		
Mr M Dunstall (4743)		There should be a greater emphasis placed on market factors rather than control through the LDF.		
Beacock & Smith (6665)	The Stockeld Estate Mr Newby	The mix targets (Table H4) are considered unreasonable and difficult to apply through development control. There is clear potential [para 5.3.40] for the attempted imposition of a particular mix at the application. The mix of housing should reflect demand & the profile of households requiring market housing.		
Leeds Civic Trust (62)		Concern over the practicality of housing mix as this will be market led.		

ID Planning (5671,5632)	Barwick Developments Persimmon Homes (West Yorkshire) Ltd Edmund Thornhill x3 Great North Developments Ltd Bracken Developments Ltd Persimmon Homes (West Yorkshire) Ltd Robert Ogden Partnership Ltd Persimmon Homes and Taylor Wimpey	Policy too prescriptive to determine the mix of housing at a point in time & lacks flexibility	<p>should ensure that the proposed mix of housing on large strategic sites reflects the proportions of households that require market or affordable housing and achieves a mix of households as well as a mix of tenure and price. For smaller sites, the mix of housing should contribute to the creation of mixed communities having regard to the proportions of households that require market or affordable housing and the existing mix of housing in the locality.</p> <p>Developers are expected to bring forward housing schemes with a mix which reflects demand & the profile of households requiring market housing in order to sustain mixed communities (paragraph 23). The Core Strategy needs to set policy for judging whether the housing mix of proposed schemes meets the profile of anticipated households. Otherwise there will be no proper means for assessing development schemes.</p>	
Turley Associates (5670,1743)	Swayfields (Skelton) Limited Miller Homes Ltd Barratt Strategic	The policy is overly prescriptive. Market trends and demand will be the prime driver of housing mix. Paragraph 22 of PPS3 only requires LPA's to set out the likely proportions and profile of households likely to require market housing	<p>Policy H4 is flexible and not too prescriptive. It only seeks to manage the <i>annual</i> dwelling mix. Also, it only seeks to influence whether mix falls within percentage <i>bands</i>. In this way, the City Council will not be applying prescriptive targets to individual sites, but taking a longer term overview of whether market choices are reflecting demand and the profile of households requiring market housing. If market choices measured on an annual basis depart from what is required, there is legitimate case for intervention. Inevitably, intervention will have to involve negotiations on planning applications. But given the non-prescriptive nature of the policy, the Council would only intervene where it had strong grounds to do so.</p>	
Pawforths (2663)	43952 Langtree Group Plc Mr G Saville Chapman Family DiscretionaryTrust Mr Lindley	It is appropriate for the CS to set out housing mix aspirations and policy basis but it should not dictate the housing mix of all schemes. The expectation to achieve a broad mix is too prescriptive and cannot be achieved in practice. The reference to "expected to conform" should be replaced with "should reflect", Flexibility is needed for developers to respond to changing patterns of demand.	<p>The text also states that exceptions will be accepted where exceptional local needs are evident and where the surrounding townscape dictates a particular form of housing. It is considered that this provides additional site specific flexibility.</p>	
Drivers Jonas (5558)	Horsforth Riverside LLp	Policy should not dictate mix of dwellings, particularly in this depressed economic climate. Flexibility is required.	<p>As a consequence of the withdrawal of the City Centre</p>	
Barton Willmore (57,45)	White Laith Developments Templegate Developments Ltd Ashdale Land and Property Company LTD	Policy is overly restrictive. Flexibility is needed to respond to changing market forces. Ranges should be indicative only.		

SIGMA Planning Services (4110)	Hallam Land Management	The policy could undermine the viability of development. Less risk is required to boost the housing market	Area Action Plan, Table 4 of the Core Strategy will need to be extended to provide guidance on mix of dwellings needed to achieve a balanced community in the city centre.	
Lister Haigh Ltd (5533)	D Parker & Sons	The planning system should encourage development to satisfy demand.		
Dacre Son & Hartley (4180)	Taylor Wimpey/Persimmon/Excel Persimmon Homes Taylor Wimpey x5 Redrow Plc Mrs BE Henderson, Mr DA Longbottom, Mrs OM Midgley	Policy H4 is overly prescriptive		
Aspinall Verdi (5689)	Montpellier Estates	Maxima and minima should not be required. The supporting text should set out evidence with a rationale for targets to provide helpful guidance to housebuilders. Market excesses should be left to correct themselves, as is happening with 1 bedroom sized flats in Leeds City Centre		
Carter Jonas (5681)	The Diocese of Ripon & Leeds The Hatfield Estate Lady Elizabeth Hastings Charity Estate The Ledston Estate AR Briggs & Co. Ltd Symphony Group Ltd	We agree that the Core Strategy should seek to avoid excesses of particular housing types (para 5.3.39); the Annual Monitoring Report provides the appropriate mechanism for this.		
Drivers Jonas LLP (5683)	McAleer and Rushe Group	Support is given to the need to provide a balance of housing types outside of the City and main urban areas. However, it is recommended that details of the required housing mix within urban areas are alluded to within this policy including the continued appropriateness of delivering apartments within the City Centre		

Dr Rachel Unsworth University of Leeds (846)		Policy H4 should be attempted but in conjunction with monitoring of take up/vacancy levels to ensure that adjustments can be made to the mix if supply and demand are getting out of kilter. Wherever possible, sites should be mixed in terms of dwelling types, sizes and tenures		
Scholes Community Forum (20)		Supports the principles and objectives of Policy H4		
University of Leeds (5676)		It is imperative for our students and other residents that future developments include a mix of dwelling types and that these are monitored and amended according to residents' housing requirements.	Agree	No Change
The Policy lacks satisfactory evidence & justification				
GVA Grimley Ltd (5661)	City East Limited (Rushbond Group)	Evidence of housing demand should inform the mix of housing types within major developments	At a strategic level, the evidence informing Policy H4 is extensive, including OPCS household projections, the Council's Strategic Housing Market Assessment (SHMA) 2007, past trends of housing delivery in Leeds going back to 1991 and data on the mix of Leeds' existing dwelling stock. The single firm overall conclusion that can be reached from varying individual conclusions is that excesses of provision of particular categories or sizes of dwelling ought to be avoided.	Update SHMA
Peacock & Smith (5665)	The Stockeld Estate Mr Newby	The policy justification (paras 5.3.35 to 5.3.40) fails to refer to housing demand and its implications for the mix and type of housing that is proposed and delivered on new housing developments. The justification highlights the fact that the prior determination of what might be an 'appropriate' mix is inherently difficult		

Turley Associates (5670,1743)	Swayfields (Skelton) Limited Miller Homes Ltd Barratt Strategic	<p>Whilst the SHMA provides a useful starting point for an estimate of future housing needs, it is by its nature a snapshot in time. It is erroneous to assume that housing requirements are determined by household size and that for e.g. single person households will only require small 1 bed units. The principal determinant of the size of residential unit is income. A single person household will, generally occupy the same amount of residential space as say a five person household at the same income level.</p> <p>There is a tension. Urban brownfield sites cannot deliver the lower density family housing that is needed.</p>	<p>Given the change to the housing market caused by the economic recession the SHMA 2007 is being updated. In particular, the SHMA update will need to bring together the different strands of evidence on housing mix & reach some overall conclusions.</p> <p>Regarding the point that the historic trend data is skewed by dominance of flat provision in the later years, it should be noted that house provision dominated in the early years, so the long term average is a reasonable reflection of need and demand.</p>	
Spawforths (2663)	Langtree Group Plc Mr G Saville Chapman Family Discretionary Trust Mr Lindley	Approach is inflexible and not based on robust evidence No firm conclusions can be reached on housing mix. The SHMA is unclear on how its conclusions have been reached.		
Drivers Jonas (5558)	Horsforth Riverside LLP	Accept the evidence outcome from the Council's SHMA (2007) which outlines the need for a mix of size and dwelling types. Except trends indicate a mix of 65% houses and 35% flats permitted (1991 - 2007) but the latter period was dominated by flats. Therefore, to properly meet the overall need, more housing is required to compensate.		
Barton Willmore (45)	Ashdale Land and Property Company LTD	The figures are based on a Strategic Housing Market Assessment which is out of date. A more up-to-date assessment is needed.		
Drivers Jonas LLP (5683)	McAleer and Rushe Group	Acknowledgement is given to the evidence provided in Paragraphs 5.3.35 to 5.5.39 relating to housing mix requirements		

Dacre Son & Hartley (480)	Taylor Wimpey/Persimmon/Excel Persimmon Homes Taylor Wimpey x5 Redrow Plc Mrs BE Henderson, Mr DA Longbottom, Mrs OM Midgley	There is insufficient evidence base to support the approach taken and it therefore fails the tests of soundness and should be re-written		
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Mix needs to take account of surrounding density & character

GVA Grimley Ltd (5661)	City East Limited (Rushbond Group)	House types should be considered on a case by case basis and consideration given to specific circumstances and regeneration benefits. The promotion of a balanced mix of housing types is supported but needs flexibility with regard to local needs and the surrounding townscape character.	Paragraph 5.3.39 states that where the surrounding townscape requires a particular form of housing, that will be reason for accepting housing mixes outside of the bands in Table H4.	No Change
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Spawforths (2663)	Langtree Group Plc Mr G Saville Chapman Family DiscretionaryTrust Mr Lindley	The policy could require developers to show how they have taken into account local housing market characteristics in their proposals for larger sites. housing	Developers will only be expected to show how they have taken into account local housing market characteristics if they believe there is a case to depart from the policy.	No Change.
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Lack of advice on housing mix in city and town centres

GVA Grimley Ltd (5661)	City East Limited (Rushbond Group)	It is unclear what the dwelling mix is expected to be within town centres.	Agree that Policy H4 leaves a vacuum of guidance for the city centre and town centres. Now that the City Centre Area Action Plan has been abandoned, the Council believes that guidance ought to be provided, at least for the city centre. Any policy will need to be influenced by further evidence of need/demand.	SHMA update to explore evidence of housing mix for city and town centres.
Leeds Civic Trust (62)		Extending the city centre to the south of the river could provide an opportunity for larger homes in hubs.		
Turley Associates (5670,1743)	Swayfields (Skelton) Limited Miller Homes Ltd Barratt Strategic	Mix should be determined according to site characteristics.		
Spawforths (2663)	Langtree Group Plc Mr G Saville Chapman Family DiscretionaryTrust Mr Lindley	The LDF should facilitate an appropriate level of new housing for each specific settlement through its distribution policies.		

Barton Willmore Planning (57)	White Laith Developments Templegate Developments Ltd	There is an unrealistically high percentage of apartments targeted in certain parts of the city.		
Dacre Son & Hartley (480)	Taylor Wimpey/Persimmon/Excel Persimmon Homes Taylor Wimpey x5 Redrow Plc Mrs BE Henderson, Mr DA Longbottom, Mrs OM Midgley	Any policy on mix should consider the role of the City and Town Centres within the wider mix		
Miscellaneous				
Stanks and Swarcliffe Residents Association (5052)		Sustainable communities need to serve community needs but building flats is not the answer. There are 20,000 empty properties. Families require houses with gardens, senior citizens require ground floor accommodation i.e. bungalows.	Policy H4 should help achieve a balanced provision of houses and flats and avoid excesses of new flats being built.	No change
Core Strategy Event Owlcotes Shopping Centre		Too many flats		
Core Strategy Wetherby Morisons Event 12/11/09		Too many empty flats being built		

<p>Planning Aid Consultation Report: Disability Group Workshop 7/12/09</p> <p>Page 132</p>		<ul style="list-style-type: none"> • The group looked at the targets for the proportion of flats and houses. They note that the recent trend has been to build many 1-bed flats, but they suggest that many remain empty. The group feel that houses and particularly family houses are needed, so they support a higher target for houses than flats. • The group doubt whether the minimum/maximum percentages will deliver the right housing mix. They expect that developers would rather build flats and would seek to build the minimum number of houses i.e. 50%. The group do not feel that 50% flats and 50% houses will produce the mixed neighbourhoods that are needed and that the Core Strategy says it intends to deliver. • “We want the regenerated areas to be successful, we do not want to see acres of empty 1 bed flats.” 		
<p>Leeds Youth Council Workshop 19/12/09</p>		<ul style="list-style-type: none"> • Apartments should be concentrated more in the city centre; houses should be concentrated on the edge of the city • There needs to be a mix of homes for single professionals and families. The city centre should have family homes as well as one person flats <ul style="list-style-type: none"> ○ 40% said they want to live in a flat ○ 20% said they want to live in a house <p>Houses suit ‘old people’ whereas flats suit ‘young people’, especially students..</p>		

<p>Leeds City College Event 9/12/09</p>		<ul style="list-style-type: none"> • More bungalows should be built due to the ageing population. • A variety of housing types should be built (flats/houses/bungalows), although high rise should be limited to around 4 stories. The majority preferred to live in a house rather than a flat 		
<p>Core Strategy Merrion Centre Event 17/11/09</p>		<p>Schools and family housing should be provided near the City Centre</p>		
<p>Voluntary Action Leeds Event 4/12/09</p> <p>Page 133</p>		<p>Flexibility is needed to implement 74,000 dwellings</p> <p>3 bedrooms houses should be viewed as standard. 2 bedroom houses are odd. There is limited demand for 1 bedroom flats.</p> <p>There are not enough small houses in the city for people to get on to the property ladder.</p> <p>Four plus bedrooms houses are needed e.g. by the BME communities and others with extended families wanting to live together.</p>		

Group 1 and 2 concluded that flats outside of the city centre have a place in the mix. Low rise apartments are acceptable and can work in places such as Seacroft and where they suited the character of the locality.

Group 1 tenants' experience is that very few people want 1 bedroom dwellings Young and elderly generally want a spare room.

The group proposed a different mix:

- 1 bedroom
- 2 and 3 bedrooms
- 4 plus bedrooms

This would allow a smaller percentage to be allocated to 1 bedroom dwellings, with development concentrated on 2 and 3 bedroom dwellings.

Group 2 felt there should not be less than 70% homes and more than 30% flats per annum but this would be too prescriptive for the market.

1 bed dwellings shouldn't account for more than 0-5% of the total. 3 bed dwellings should be promoted as they enable families to grow without having to move.

Group 3 proposed the following:

- 10% 1 Bedroom
- 35% 2 Bedroom
- 45% 3+ Bedroom

This mix would provide adequate stock for the market.

The Council will reconsider whether the policy needs to give a more detailed split of dwelling sizes including 1 bedroom units and 4 and larger units. The update of the Strategic Housing Market Assessment (SHMA) will need to provide evidence.

Update the SHMA to and consider recasting the split between dwelling sizes.

<p>Planning Aid Workshop: Hunslet 4/12/09</p>		<p>Housing mix Policy H4– consider needs of individual communities. Important to make provision for 1 bedroom units for vulnerable people (preferred to 2 beds). Suggest that Policy H4 splits the bedroom numbers to individual numbers e.g. 1 bed, 2 bed, 3 bed, 4+ bed. Consider need for larger sized houses to accommodate extended families (not just for Asian families, but to reflect the ageing population, cost of social care)</p>		
<p>Plans Panel East 19/11/09</p>	<p>Cllr Marjoram</p>	<p>What role for apartments? We need places that people want to live in. Better to look at PAS land and GB extensions where places can be properly planned to achieve a better quality of place, than high density apartment solutions.</p>	<p>There will still be a role for policy intervention to promote a balanced mix of apartments and houses related to household need on all sites</p>	<p>No change</p>
<p>Miss A Balchin (5651) Page 135</p>		<p>Delighted to see elderly provision specifically addressed. As well as accessibility to services, a pleasant outlook can be important for the house-bound - this should be included in the criteria.</p> <p>There is often a preference for people to remain in the family home for as long as possible. Modern technology and current policy supports this choice. The result is a large number of small 1/ 2 persons households living in 3 or more bedroom for longer periods before the family home is 'recycled' back into the market. More family homes are needed to make up for the shortfall.</p> <p>Concern over the 40/60% split. Too many small houses could result in too many young families struggling to bring up children in cramped conditions. Need to allow more flexibility for more family homes.</p>	<p>Agree that design and outlook of residential properties is important. However other policies in the CS and supplementary policy provide relevant guidance on environment, landscaping and design. (see "Neighbourhoods for Living" and emerging Sustainable Design and Construction SPD).</p> <p>Encouragement to be given to life time homes – the ability to adapt homes to the occupiers through their life time for their changing needs.</p> <p>The 2006 household projections forecast a 43% growth (net increase) in single person households. Allied to this is that in 2008, approximately 80% of Leeds' housing stock of 320,000 comprised houses, therefore we believe that the split is appropriate</p>	

<p>British Waterways (338)</p>		<p>People living on a boat as their main place of residence are recognised by the Government as a separate household group. 'Strategic Housing Market Assessments – Practice Guidance (DCLG, March 2007) refers to barges used for residential purposes as a different type of accommodation and a minority and hard to reach household group (Ch.6 'Housing Requirements of Specific Household Groups').</p> <p>BW as the navigation authority is willing to work with LCC to ensure that people living afloat are taken into account as part of any housing needs assessment. Where the supply of moorings for residential use is identified as an issue within a particular housing needs assessment, it is important that the associated land use implications are addressed within the statutory development plan as part of the plan preparation process.</p>	<p>Agree – need to address this minority housing need in the CS.</p>	<p>Officers will explore with British Waterways to quantify the number of residential moorings in Leeds and whether more are needed.</p>
<p>North Yorkshire County Council (2613)</p>		<p>Reducing the housing pressure in N. Yorkshire generated by Leeds requires more than simply the allocation of land to meet RSS requirements. It will be necessary to ensure that new development provides choice, in terms of location, type and size of dwellings, as well as a high standard of new housing in terms of its physical and social environment. The proposals in the Core Strategy to provide higher proportions of both houses (rather than flats) and 3 or more bedroom dwellings are therefore welcomed. This needs to be supported by sufficient flexibility to meet the demand for high quality residential development which would otherwise add to the housing pressures in N Yorkshire.</p>	<p>Noted</p>	<p>No change.</p>

Woodbine Terrace Residents Assoc (5688)		The provision of special supplementary advice for Inner NW Leeds is sought with the object of arriving at a balanced housing mix.	Policy H4 is concerned about the mix of standard house types and sizes. The distribution of student and other specialist housing is addressed through Policy H6	No change
Highways Agency (5604)		The eventual mix of housing types would affect the total transport impact of the new development, for example, larger houses tend to have a greater impact than smaller houses and flats. The Core Strategy document suggests potential high level measures to mitigate this transport impact. However, when these measures are explored in more detail, they should be considered against the overall impact of the new development, and sensitivity tests should be undertaken with a lower proportion of affordable housing to assess the maximum potential impact.	<p>It is noted that different types of housing generate different demands on transport infrastructure, but the purpose of Policy H4 must remain to ensure that housing mix broadly matches up to the anticipated profile of households.</p> <p>Planning applications for new housing will continue to be assessed in terms of transport impacts and mix of dwellings may be a material factor, but it would not be appropriate to revise Policy H4 to seek to control such issues.</p> <p>However, officers will still seek to work with the Highways Agency to model the traffic impacts of proposed housing growth and distribution. The mix of dwelling sizes and types anticipated by Policy H4 will be a factor in the modelling exercises.</p> <p>The Council's Infrastructure Delivery Plan will also need to take account of housing mix in arriving at what new transport infrastructure needs to be planned in Leeds.</p>	No change
Keyland Developments Limited (2064)	AVL Investors Forum	Without the SHLAA no strategic sites have been identified / allocated (e.g. AVL) to create sustainable mixed communities. The CS should establish a new planning framework for future development establishing a long term strategy and vision on a strong evidence base.	Policy H4 does not rely on the identification of strategic sites to implement housing mix.	No change
Dr Rachel Unsworth University of Leeds(846)		Live/work space may be increasingly required in future and this should be considered at this stage.	Policy H4 does not preclude live/work units.	No change
Mr Ian Cyhanko (5151)	Individual	Having a policy stating a certain percentage of new homes must have 3 bedrooms is pointless as builders would get round this by providing a box room. There is a need to define what a bedroom is!	Agree that clarity is required on definition of "bedroom"	Need to provide glossary definition of "bedroom"

CORE STRATEGY PREFERRED APPROACH APPENDIX 3
LCC RESPONSES TO REPRESENTATIONS ON POLICY H5 AFFORDABLE HOUSING

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
40% TARGET				
Mr Robert Tyrell 05632		Affordable housing is critical. Not enough affordable housing is being built. Can the 40% quota be enforced?	40% is an appropriate target for buoyant market conditions, if the evidence base (the Strategic Housing Market Assessment (SHMA) which outlines the need for affordable housing, and the Economic Viability Assessment (EVA), which considers what can viably be provided) supports such a target.	Revise policy H5 wording to provide more clarity
Mr Alex Willis, BNP Paribas 05662	Telereal Trillium	Support subject to 40% being maxima & subject to viability.		
Mr Dave Trimmingham, Turley Associates	Swayfields (Skelton) Limited			
Mr Giles Chaplin, Lister Haigh Ltd 05533	D Parker & Sons	Agree with requirement.		
4th December 2009: Planning Aid Workshop – Voluntary Action Leeds, Hunslet		Take out reference to “up to” 40% and vary percentage across the city to reflect local circumstances		
7.12.09: Planning Aid - Disability and Access Groups		40% is required. City Centre and adjoining areas, such as Holbeck Urban Village, have a greater need for affordable housing, particularly since the construction of large numbers of expensive apartments, so a lower requirement in these areas is not supported.		
4th December 2009: Planning Aid - Voluntary Action Leeds		The Policy needs more clarity. Why does the policy state up to 40% - why not just 40%? Does 40% apply to the whole of Leeds or just some areas?		
19th December 2009: Leeds Youth Council		100% of the members were in favour of the affordable housing policy		

Mrs Mary Teal, Barwick in Elmet & Scholes Parish Council 00111		Requirements in H5 conflicts/inconsistent with SPD Sept 2008. A more defined figure is appropriate as this would provide more certainty for communities and developers.	<p>The Core Strategy is for a long time period. As such, it is impractical to set specific defined figures for affordable housing. The Core Strategy will set out a range of targets applicable under different scenarios with the evidence to support this, but the detail will be set out in a Supplementary Planning Document (SPD) as this can then be responsive to up to date evidence on housing markets, need for affordable housing and the viability of delivering the targets.</p> <p>40% is derived from RSS policy and supported by the local evidence base. The SHMA 2007 identifies a vast need for affordable housing and the EVA outlines that targets of 40% should be achievable in certain areas, in certain market conditions.</p>	<p>Revise policy H5 wording. The SHMA and EVA are being updated and will be published prior to revisions to the CS.</p>
Sam Thistlethwaite,Banks Developments 05121		An affordable housing requirement of 40% is too onerous and prescriptive and will render many currently viable sites unviable and discourage housing developers.		
Mr Tom Cook, ID Planning (X12) 05668	Ben Bailey (South Yorkshire) Ltd	Flexibility should be recognised in the policy.		
Mr Jonathan Dunbavin, ID Planning 05671	Persimmon Homes (West Yorkshire) Ltd Edmund Thornhill x3 Great North Developments Ltd Bracken Developments Ltd Persimmon Homes (West Yorkshire) Ltd Robert Ogden Partnership Ltd Persimmon Homes and Taylor Wimpey Ringways Motor Group Barwick Developments Ltd			
Mr Andrew Rose, Spawforths (x 5) 02663	Langtree Group Plc Mr G Saville Chapman Family DiscretionaryTrust Mr Lindley			
Mr John Weir, Drivers Jonas LLP 05683	McAleer and Rushe Group			
Mr Nathan Smith, Barton Willmore 00057	White Laith Developments Templegate Developments Ltd	There is no robust evidence to justify blanket 40% target. Clarification is required on anticipated affordable housing percentages across the LDF period. Suggested rewording of policy H5: "The level of affordable housing will be considered on a site by		

Mr Dan Mitchell, Barton Willmore 00045	Ashdale Land and Property Company LTD	site basis, taking into consideration the following: a) economic viability; b) potential risks to delivery c) the levels of finance available and an up to date SHMA".		
Mr Paul Leeming, Carter Jonas (x 6) 05681	The Diocese of Ripon & Leeds The Hatfield Estate Lady Elizabeth Hastings Charity Estate The Ledston Estate AR Briggs & Co.ltd Symphony Group Ltd	Flexible policy required		
Mr Andrew Smith, Savills 00467	MEPC	Unclear what evidence base has been used to justify 40% target. Although policy states it will be subject to market conditions, the starting point will be 40% which is unrealistic in current climate.		
Mr David Colley, Bury & Walker Solicitors 02527	Leeds Residential Property Forum	The continuing imposition of affordable housing obligations, especially as much as 40% makes developments non viable.		
17th December 2009: Leeds Voice BME Network Event - Housing Workshop		Concerns with targets for affordable housing, core strategies say up to 40% but in reality could this be low as 5% etc.		
M Dunstall 04743		40% is unlikely to be attained in current economic climate. In the 2007 options one option was exploring the possibility for public sector land for affordable housing. This should continue to be explored.	As above. The Council established a Strategic Affordable Housing Partnership Board to deliver affordable housing on public sector land. This is another way, in addition to delivery through the planning application process, of delivering affordable housing.	As above. Both options will be pursued and the Core Strategy amended accordingly.
Mr Alex Willis, BNP Paribas 05662	Telereal Trillium	The requirement should be lower on previously developed land than for greenfield sites because of additional site costs.	The EVA has to standardize costs to arrive at viability conclusions for broad areas and scenarios. It would be expected that proposals on PDL with exceptional site costs would have to submit individual viability appraisals.	No change.
Dr Rachel Unsworth, University of Leeds 00846		In areas of lower house prices it does not make sense to require affordable housing when all dwellings would theoretically be affordable to a wide range of households	Low cost market housing is not by definition affordable housing – see definitions in PPS3. There is still a need for a variety of tenures to enable people to have access to a variety of	Revise policy H5 wording to provide more clarity.

Mr Ian Williams, Leeds Chamber of Commerce 01736		The Council has not demonstrated the need for 40% provision in the current housing market, and further, at para 5.3.44 recognises that the district already has a good stock of modest low cost market housing in many areas. Opportunity to stimulate the housing market will be prejudiced by 40%. There should be recognition of LCCs willingness to stimulate the market through a flexible approach to delivery.	housing products (different 'rungs' on the 'housing ladder'). Low cost market housing may still not be affordable to many who still have to have large deposits to secure finance. Other products, such as intermediate tenures (shared ownership etc) help ease this problem.	
Ben Aspinall, Aspinall Verdi 05689	Montpellier Estates	Flexibility needed to waive intermediate S106 requirements to stimulate the house building industry and ensure all policies are aligned to provide investment into the existing stock of houses to deliver the low cost housing required to meet the need on a district wide basis.	The Core Strategy will set out a range of targets applicable under different scenarios with the evidence to support this, but the detail will be set out in a Supplementary Planning Document (SPD) as this can then be responsive to up to date evidence on housing markets, need for affordable housing and the viability of delivering the targets. By doing this, a flexible approach to delivery will be achieved. LCC are working to produce a standard template for 'recession proofing' S106 agreements where appropriate to help actively stimulate house building. PPS3 emphasises the need for on site affordable housing in relation to planning applications for private developments in preference to investment in existing stock.	
I Cyhanko 05151		Policies on affordable housing should not be applicable in deprived areas where private investment is required. Some areas would benefit hugely from housing – new owner occupiers rather than more social housing.	The objective in PPS3 is for sustainable mixed communities. This involves a mix of tenure types – open market, intermediate and social rented on development sites. The requirements for affordable housing are likely to vary depending on where a site is, and targets may be less in inner areas, depending on results of the updated EVA, currently awaited.	No change to policy

EVIDENCE BASE – VIABILITY TESTING (THE ECONOMIC VIABILITY APPRAISAL (EVA))				
Mrs Sue Ansbro, White Young Green Planning & Design 00420	Harrow Estates	There is no clarity as to the evidence base in Leeds to require up to 40%. The outcome of Wakefield’s high court challenge may affect the direction of such policy. PPS3 identifies need for evidence base – SHMA and economic viability (para 29).	The evidence is derived from the SHMA and the Economic Viability Assessment (EVA) originally published in 2007 and 2008 respectively. The EVA concludes that targets of 40% should be achievable in certain areas, in certain market conditions.	The EVA is being updated and will be published prior to revisions to the Core Strategy. Policy H5 will be revised as necessary to take account of up to date evidence.
Mr Paul Thornton, White Young Green Planning & Design 05648	Yoo Invest Rockspring Hanover property Unit trust			
Ms Carol Stenner GOYH 00095				
Robert Halstead Chartered Surveyor 05649	Binks Executive Homes LTd			
Mr Dave Trimmington, Turley Associates 05670	Swayfields (Skelton) Limited			
Mr Dave Trimmington, Turley Associates 05670	Swayfields (Skelton) Limited			
Mr Richard Baxter, Turley Associates 01743	Swayfields (Skelton) Limited Barratt Strategic			
Mr Andrew Rose, Spawforths (x 5) 02663	Langtree Group Plc Mr G Saville Chapman Family DiscretionaryTrust Mr Lindley	PPS3 para 29 states that targets should reflect economic viability so this should be included within H5. Each site should be assessed on its own merits with continual monitoring to establish up to date housing needs for an area. There is no viability assessment to justify 40% as SHMA is out of date.	The SHMA and the Economic Viability Assessment (EVA) are 2 separate pieces of evidence. The SHMA was produced in 2007 and is being updated. The EVA was published in 2008. The revised/updated EVA considers the current market scenario and others.	
Mr Andrew Rose, Spawforths 02663	Mr G Saville Mr Lindley	Little regard to proper and robust and credible evidence base – could be unsound on this basis as leads to a CS which is weak and unjustified. No evidence that current economic climate has been taken into full account. SHMA 2007 is not robust and does not contain PPS3 compliant viability assessment.		

Mr Matthew Jones, Drivers Jonas 05558	Horsforth Riverside LLP	Previously submitted representations to the SPD, particularly in terms of the impact affordable housing can have on the viability of a scheme. Affordable housing should be provided on the basis that it can be demonstrated through periodic assessment that its provision does not adversely restrict development viability to the extent that the potential to deliver housing is frustrated. In current economic climate, need to adopt a flexible approach to requirements	The Core Strategy will set out a range of targets applicable under different scenarios with the evidence to support this, but the detail will be set out in SPD as this can then be responsive to up to date evidence on housing markets, need for affordable housing and the viability of delivering the targets. The evidence is derived from the SHMA and the Economic Viability Assessment. In addition, whatever the affordable housing targets, applicants may choose to submit individual viability appraisals to verify that the affordable housing target cannot be met and provision may be reduced accordingly.	
Mr Nathan Smith, Barton Willmore 00057	White Laith Developments Templegate Developments Ltd	Not clear where the evidence for this figure comes from, especially as the last assessment dates to 2007. There is no robust evidence to justify blanket 40% target. Levels of affordable housing should be assessed on a site by site basis and on the financial viability of the proposed development (PPS3 para 29). Policy H5 should be reworded to say: "The level of affordable housing will be considered on a site by site basis, taking into consideration the following: a) economic viability; b) potential risks to delivery c) the levels of finance available and d) an up to date SHMA". Such an approach will meet the requirements of PPS3 & RSS.		
Mr Dan Mitchell, Barton Willmore 00045	Ashdale Land and Property Company LTD			
Mr Paul Leeming, Carter Jonas (x 6) 05681	The Diocese of Ripon & Leeds, The Hatfield Estate, Lady Elizabeth Hastings Charity Estate The Ledston Estate AR Briggs & Co. ltd Symphony Group Ltd	A flexible approach to the provision of affordable housing is required based upon market viability & the SHMA. As per para 29 of PPS3 any targets must undergo viability testing for it to be considered deliverable and robust. No such testing of this target has been undertaken.		
Mr Tom Cook, ID Planning 05668	Ben Bailey (South Yorkshire) Ltd	Policy should recognise the effect of providing affordable housing upon the economics of		

Mr Jonathan Dunbavin, ID Planning (x11) 05671	Persimmon Homes (West Yorkshire) Ltd Edmund Thornhill x3 Great North Developments Ltd Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd Robert Ogden Partnership Ltd Persimmon Homes and Taylor Wimpey Ringways Motor Group Barwick Developments Ltd	development.		
Mr Mark Johnson, Dacre Son & Hartley (x 9) 00480	Taylor Wimpey x4 Mrs BE Henderson, Mr DA Longbottom, Mrs OM Midgley Redrow Plc Persimmon Homes Taylor Wimpey/Persimmon/Excel	Recommend H4 and supporting text be amended to say starting point for affordable housing will be in a Developer Contributions DPD supported by a fully consulted evidence base & industry agreed viability test. S106 requirements should be in a single DPD which can be viability tested through the DPD process. Object to H5 in current form.	Presume reference to H4 should be H5 in this context. Any affordable housing policies will be supported by evidence base in the form of both the SHMA and Economic Viability Assessment (EVA) in accordance with para 29 PPS3.	As above. It is not appropriate to commence a 'Contributions DPD' in advance of a decision being made on the Community Infrastructure Levy.
EVIDENCE BASE – STRATEGIC HOUSING MARKET ASSESSMENT				
Suzanne Phillipson, GVA Grimley Ltd 05661	City East Limited (Rushbond Group)	Policy H5 is not precise regarding provision or how demand is to be periodically assessed	The evidence is derived from the SHMA and the Economic Viability Assessment originally published in 2007 and 2008 respectively. The SHMA 2007 identifies a vast need for affordable housing (1889 affordable dwellings per annum over a 15 year period, which amounts to way over 40%).	The SHMA is being updated and will be published prior to revisions to the Core Strategy. Policy H5 will be revised as necessary to take account of up to date evidence.
Mrs Sue Ansbro, White Young Green Planning & Design 00420	Harrow Estates	There is no clarity as to the evidence base in Leeds to require up to 40%. A fresh needs assessment should be undertaken that reflects the state of the current housing market.		
Mr Paul Thornton, White Young Green Planning & Design 05648	Yoo Invest Rockspring Hanover property Unit trust			
Mr Andrew Smith, Savills 00467	MEPC			

Mr Tom Cook, ID Planning (x12) 05668	Ben Bailey (South Yorkshire) Ltd	Increased targets should only be promoted where there is an up to date and robust housing need assessment that demonstrates the exceptional circumstances that warrant the increase.		
Mr Jonathan Dunbavin, ID Planning 05671	Barwick Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Edmund Thornhill x3 Great North Developments Ltd, Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Robert Ogden Partnership Ltd, Persimmon Homes and Taylor Wimpey Ringways Motor Group Barwick Developments Ltd			
Ben Aspinall, Aspinall Verdi 05689	Montpellier Estates	Not demonstrated current need for affordable housing of 40% since the last SHMA in 2007 which was before the credit crunch. Since 2007 house prices have fallen dramatically.		
Mr Ian Williams, Leeds Chamber of Commerce 01736				
Mr Nathan Smith, Barton Willmore 00057	White Laith Developments Templegate Developments Ltd	Not clear where the evidence for this figure comes from, especially as the last assessment dates to 2007. There is no robust evidence to justify blanket 40% target. Levels of affordable housing should be assessed on a site by site basis and on the financial viability of the proposed development (PPS3 para 29). Policy H5 should be reworded to say: "The level of affordable housing will be considered on a site by site basis, taking into consideration the following: a) economic viability; b) potential risks to delivery c) the levels of finance available and d) an up to date SHMA". Such an approach will meet the requirements of PPS3 & RSS.		
Mr Dan Mitchell, Barton Willmore 00045	Ashdale Land and Property Company LTD			

Mr Mark Johnson, Dacre Son & Hartley (x 9) 00480	Taylor Wimpey/Persimmon/Excel Persimmon Homes Taylor Wimpey x5 Redrow Plc	Recommend H4 and supporting text be amended to say starting point for affordable housing will be in a Developer Contributions DPD supported by a fully consulted evidence base & industry agreed viability test. S106 requirements should be in a single DPD which can be viability tested through the DPD process. Object to H5 in current form.	Presume reference to H4 should be H5 in this context. Any affordable housing policies will be supported by evidence base in the form of both the SHMA and Economic Viability Assessment (EVA) in accordance with para 29 PPS3.	
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INDIVIDUAL VIABILITY APPRAISALS

Suzanne Phillipson, GVA Grimley Ltd 05661	City East Limited (Rushbond Group)	Policy should recognise the effect of providing affordable housing upon the economics of development and should be framed to allow negotiation on a site by site basis in the context of site costs/individual viability testing.	Applicants may choose to submit individual viability appraisals to verify that the affordable housing target cannot be met and provision may be reduced accordingly	Policy H5 will be amended to incorporate wording to this effect.
Mr Alex Willis, BNP Paribas 05662	Telereal Trillium			
Mr Tom Cook, ID Planning (x12) 05668	Ben Bailey (South Yorkshire) Ltd			
Mr Jonathan Dunbavin, ID Planning05671	Persimmon Homes (West Yorkshire) Ltd Edmund Thornhill x3 Great North Developments Ltd Bracken Developments Ltd Persimmon Homes (West Yorkshire) Ltd Robert Ogden Partnership Ltd Persimmon Homes and Taylor Wimpey Ringways Motor Group Barwick Developments Ltd			
Mr John Weir, Drivers Jonas LLP 05683	McAleer and Rushe Group			
Barton Willmore (00045 Ashdale Land and Property Company LTD)				

Mr David Colley, Bury & Walker Solicitors 02527	Leeds Residential Property Forum			
Mr Andrew Rose, Spawforths 02663	Mr G Saville Mr Lindley	Appendix 9 – delivery – text relating to obligations is inflexible and prescriptive – every scheme should be considered on its merits, including viability.	As above. Furthermore Appendix 9 does state that 'Planning obligations will be negotiated on a case by case basis'	Policy H5 will be amended to incorporate wording about individual viability appraisals. No change to Appendix 9.
Mr Andrew Rose, Spawforths (x 5) 02663	Langtree Group Plc Mr G Saville Chapman Family DiscretionaryTrust Mr Lindley	Each site should be assessed on its own merits with continual monitoring to establish up to date housing needs for an area.	Leeds City Council does not have resources to update housing needs information on a site by site basis. We do have the SHMA which includes housing needs information, and this is to be updated on a regular basis in accordance with CLG Good Practice Guidance. Applicants may choose to submit individual viability appraisals to verify that the affordable housing target cannot be met and provision may be reduced accordingly.	Policy H5 will be amended to incorporate wording to this effect.
THRESHOLD OF 15				
Cllr C Campbell Liberal Democrat Otley & Yeadon 04817		All developments should make a contribution (Perhaps financial) not just residential 15 +	The Affordable Housing SPD will be aligned with the production of the Core Strategy (CS) and targets and thresholds will be included in the CS policy. Proposed thresholds will have regard to the Economic Viability Assessment evidence base.	Revise policy H5 wording
Mr Paul Leeming, Carter Jonas (x 6) 05681	The Diocese of Ripon & Leeds, The Hatfield Estate, Lady Elizabeth Hastings Charity Estate The Ledston Estate, AR Briggs & Co. Ltd, Symphony Group Ltd	Object to detailed aspects such as thresholds, specific targets & viability being within SPD as such matters should be tested through public consultation & examination		
Mr Andrew Rose, Spawforths (x5) 02663	Langtree Group Plc Mr G Saville Chapman Family DiscretionaryTrust Mr Lindley			

TENURE SPLIT				
GVA Grimley Ltd (05661)	City East Limited (Rushbond Group)	Further detail should be provided on the types of housing considered eligible as affordable	Definitions of affordable housing are contained within PPS3 and explained in the CS text. Any further explanation of types of affordable housing will be detailed in the SPD	No change to CS policy. SPD to explain types of affordable housing (tenures) in more depth.
Mr Tom Cook, ID Planning (x 12?) 05668	Ben Bailey (South Yorkshire) Ltd	Should also be flexibility on tenure as social rented accommodation is more financially onerous than submarket units for sale.	The revised/updated Economic Viability Assessment (EVA) tests a range of different tenure splits across different housing areas. Affordable housing policy will have regard to this evidence base.	The EVA is being updated and will be published prior to revisions to the Core Strategy. Policy H5 will be revised as necessary.
Mr Jonathan Dunbavin, ID Planning 05671	Persimmon Homes (West Yorkshire) Ltd Edmund Thornhill x3 Great North Developments Ltd Bracken Developments Ltd Persimmon Homes (West Yorkshire) Ltd Robert Ogden Partnership Ltd Persimmon Homes and Taylor Wimpey Ringways Motor Group Barwick Developments Ltd			
Mr Leon Armstrong, Mosaic Town Planning 005672	Miller Homes			
SPD/DPD CLARITY				
Mrs Sue Ansbro, White Young Green Planning & Design 00420	Harrow Estates	The approach to determining the specific requirements for affordable housing should be set out in a DPD not SPD. There is no clarity as to the status of the current SPD.	The Core Strategy will set out a range of targets, thresholds and tenure mixes applicable under different scenarios with the evidence to support this, but the detail will be set out in SPD	Revise policy H5 wording. The Affordable Housing SPD will be aligned

Mr Paul Thornton, White Young Green Planning & Design 05648	Yoo Invest Rockspring Hanover property Unit trust		as this can then be responsive to up to date evidence on housing markets, need for affordable housing and the viability of delivering the targets.	with the production of the Core Strategy
Mr Dave Trimington, Turley Associates 05670	Swayfields (Skelton) Limited	The approach of setting a target & mix of types of affordable housing for each phase of the CS is appropriate, particularly in current economic circumstances, but should be subject to viability testing & open to public consultation and examination by an independent inspector. It is not appropriate for these matters to be dealt with through SPDs		
Mr Andrew Rose, Spawforths (x 5) 02663	Langtree Group Plc Mr G Saville Chapman Family DiscretionaryTrust Mr Lindley	Object to detailed aspects such as thresholds, specific targets & viability being within SPD as such matters should be tested through public consultation & examination.		
Mr Paul Leeming, Carter Jonas (x 6) 05681	The Diocese of Ripon & Leeds, The Hatfield Estate, Lady Elizabeth Hastings Charity Estate The Ledston Estate AR Briggs & Co. Ltd Symphony Group Ltd			
Mr George Hall, Scholes Community Forum 00020		There is inconsistency in the proportion of affordable housing under H5 (up to 40%) when cross referenced with the threshold and zoned requirements set out in the draft SPD. To satisfy soundness tests in PPS12 (para 4.25, vi and vii) consistency and coherence must prevail. This should be addressed prior to the submission stage.		
OTHER COMMENTS				
Mr Roger Davis 04754		Object – affordable housing should be made available to local people as a first priority	Leeds City Council are introducing a 'local homes for local people' policy whereby 25% of all council homes would be set aside for those with a local connection.	No change.

Ms Amanda Jackson, University of Leeds 05676		House prices have increased in last 5-10 years, impacting on the private rented sector rental rates. Affordability affects many communities and requires a city wide approach. University accommodation should be exempt from affordable housing contributions. University accommodation reduces pressure in communities with high levels of students and is in itself affordable housing	Purpose built student accommodation is currently exempt from affordable housing provisions.	The Core Strategy & SPD will further clarify what type of developments are expected to contribute towards affordable housing.
Mrs Sue Ansbro, White Young Green Planning 00420	Leeds Trinity University College	It should be confirmed within the policy that student accommodation, which responds to specialist need in the housing market should not be subject to the requirement to deliver affordable housing. This is not clear in the current drafting.		
Dr Rachel Unsworth, University of Leeds 00846		Wherever possible, affordable housing should be delivered with use of construction trainees who may be considered as occupiers of small units on some sites once they have contributed to the construction.	Paragraph 5.2.5 of the CS acknowledges that 'housing cannot be viewed separately from the necessary infrastructure requirements for mixed and sustainable communities...it is important that the planning of projects includes an assessment of links with jobs...'. Leeds City Council will encourage such schemes.	No change.
Mr Matthew Jones, Drivers Jonas 05558	Horsforth Riverside LLP	Accept that arrangements such as S106 agreements must be agreed to ensure affordability is embodied for future people in housing need.	S106 legal agreements are the standard way of ensuring affordable requirements are controlled.	
Mr David Colley, Bury & Walker Solicitors 02527	Leeds Residential Property Forum	Affordable housing places huge burden on developers which has to be passed on. Impacts on specialist accommodation providers such as students, young professionals. Also impacts on private rented sector, in particular very little purpose built private housing to rent, which is bad at time when the Council recognises this is needed for homeless, vulnerable and low earners. Private rented sector is also important for those on average wages, shut out of owner occupation. Special treatment should be allowed for specialist accommodation and the private rented sector, particularly where such housing will be let to those who would otherwise be looking for accommodation in the social or intermediate sector.	The Private Rented Sector is not by definition affordable housing – see definitions in PPS3. There is still a need for a variety of tenures to enable people to have access to a variety of housing products (different 'rungs' on the 'housing ladder') and providers of specialist accommodation including private rented housing should not be exempt from the policy.	
Mr Leon Armstrong, Mosaic Town Planning	Miller Homes	Bramhope has similar issues of affordability to traditional rural locations – affluent commuters has lead to house price inflation. Also, restrictive planning	Low cost market housing is not by definition affordable housing – see definitions in PPS3. There is still a need for a variety of tenures to	The EVA is being updated and will be

005672		policies – unbalanced housing market at expense of cohesive and inclusive community. PAS sites - initial phase of dev could be to provide affordable or low cost market housing. RSS requires managed growth in the north of the City Region (policy LCR1) and a greater emphasis on delivering affordable housing. The geographic aspect to affordable and low cost market housing should be recognised in the CS. Para 5.3.44 is complacent in referring to a 'good stock of low cost market housing in many areas without exploring how to increase supply in areas such as Bramhope.	enable people to have access to a variety of housing products (different 'rungs' on the 'housing ladder'). The revised/updated EVA tests the viability of different affordable housing targets across a range of market areas. Affordable housing policy will have regard to the EVA evidence base.	published prior to revisions to the CS. Policy H5 will be revised as necessary.
Mr Mark Johnson, Dacre Son & Hartley 00480	Taylor Wimpey	Land at Churchfields Boston Spa should be released for development – it can provide much needed market housing as well as affordable housing benefits	An appeal into a planning application has been heard and the Inspector's decision is awaited.	No change.
Mr Peter Beaumont, Keyland Developments Ltd 02064	AVL Investors Forum	Clarification is needed on affordable housing percentages linked to deliverability in the Aire Valley across the LDF period	The Core Strategy will set out a range of targets applicable under different scenarios with the evidence to support this, but the detail will be set out in a Supplementary Planning Document (SPD) as this can then be responsive to up to date evidence on housing markets, need for affordable housing and the viability of delivering the targets.	Revise policy H5 wording. The SHMA and EVA are being updated and will be published prior to revisions to the CS.
9th December Planning Aid, Leeds City College - Travel and Tourism Students		More affordable places should be built. A lot of flats are empty in Leeds - these flats are expensive and the average person can not afford them.		
7 th December: Planning Aid - Disability and Access Groups		Holbeck Urban Village – luxury flats not for local people – no affordable housing. More affordable housing needed. A proportion should be affordable and designed to look the same as the open market units.	As above, and Current policy is that the affordable units should be of the same design as the market housing, and this will be future policy.	No change.
9th December Planning Aid, Leeds City College - IT Practitioner Students		Affordable housing should be built within developments so that there are mixed communities.	This is national policy (PPS3)	

<p>26th November Tenants Federation</p> <p>Group 1</p>		<p>Make sure Tenants Federation are consulted on SPD. The group support affordable housing generally.</p> <p>How will the housing remain affordable?</p> <p>Some concerns that integrated affordable housing can reduce the value of surrounding properties.</p>	<p>The Tenants Federation will be consulted on any revisions to the SPD.</p> <p>Section 106 Agreements ensure that the dwellings remain affordable into the future</p> <p>There is no evidence to support this. Affordable units are of the same specification and design as market houses, so tenure of them is not visually apparent.</p>	
<p>4th November Crossgates Shopping Centre</p>		<p>Council housing should remain council in perpetuity – need to safe guard from right to buy. Many issues with sale to ALMO – is very arms length.</p>	<p>The Core Strategy policy is about provision of affordable housing through planning applications for private market housing.</p>	
<p>14th December 2009: Apna Day centre women's session</p>		<p>Asian community want to buy houses in same areas but difficult with house prices being high in general. All areas where people live suffer from this problem. General support for more affordable housing. One lady has a son who is unable to move at the moment because it is too expensive in Harehills.</p>		
<p>23rd November White Rose Shopping Centre</p>		<p>Private sector rented accommodation doesn't work because the landlords have no social conscience and are just trying to make a profit</p>	<p>The Private Rented Sector is not by definition affordable housing. The Council does have a Private Rented Sector Strategy and Action Plan, and landlord accreditation scheme, which aims to tackle these issues.</p>	

CORE STRATEGY PREFERRED APPROACH APPENDIX 4

LCC RESPONSES TO REPRESENTATIONS ON POLICY H6 LOCATION OF SPECIALIST HOUSING

Representor (include agent)	Those Repre- sented	Representor Comment	LCC Initial Response	Action
Student Housing				
Headingley Network 3046		Purpose built student accommodation should be dispersed. This shares out the advantages and disadvantages of large numbers of young people amongst other areas of the City.	Leeds City Council will gather further evidence to enable full consideration of all issues before rewriting policy H6. The evidence base will include information from the universities, HMO licensing authorities and others, as well as the Strategic Housing Market Assessment (SHMA) update 2010. Students not living in halls of residence form part of the overall demand for housing, as captured by the RSS figure. The RSS does not provide a separate institutional forecast for students. Therefore student accommodation will continue to count towards meeting the overall RSS housing requirement. Whilst there has been a high level of growth in student numbers over the past few years, there are no plans for major growth at Leeds Met or the University of Leeds. Coupled alongside cuts to educational funding, it is expected that the student population will remain steady over the coming years. LCC will work with the Universities to	Policy H6 to be rewritten to separate out the different forms of specialist housing and applicable policies. The Allocations DPD will identify development opportunities that exist for specialist forms of housing development, or areas where there is potential to
Ash Road Resident's Association (4698)				
14 th Dec 2009 Planning Aid – BME groups				
Far Headingley Village Society (35)		Welcome the plan to provide housing mix targets for local neighbourhoods in Inner North West Leeds		
Leeds HMO Lobby (26)		Agree broadly with paragraphs 5.3.45-5.3.48 & Policy H6 (and in particular, the reference in the Summary document to 'student accommodation') Policy SC6 confirms that this refers to student housing. Agree with the need to maintain "the balance and health of communities."		

Weetwood Residents Association (2655)		Suggest rewrite para 5.3.45: Specialist forms of accommodation such as student accommodation should be controlled & distributed around the city to avoid excessive concentrations. There has been an increase in the private rented sector, but more so in inner NW due to growth in students. This has been claimed to bring benefits, but local problems; pressure on the housing stock, reducing stock for families, visual and residential amenity issues, eg. poor external maintenance (by landlords or tenants) so the appearance of a whole street or area becomes degraded; late night street noise and disturbance; change in range of amenities eg. shops, schools, has changed in response to demographic change. Population is out of balance. Need Area of Housing Mix (UDP Policy H15) Purpose built developments - begun to shift the concentration away from Headingley but may displace problems.	ensure that student accommodation is being met. In addition, new legislation in 2010 on HMOs and a change in the Use Classes Order to make HMOs a distinct use class from residential dwellings needs to be reviewed. (NB. This cannot be applied retrospectively to existing HMOs, but will only apply to new ones. The changed legislation is on HMOs, not specifically student houses). The current CS policy refers to distributing specialist forms of accommodation around Leeds to reflect the location of needs and local characteristics. The policy was not intended to mean total dispersal. It would replace UDP policy H15 and H15A. It is recognised that a balance needs to be achieved as total dispersal would be contradictory to the aims of sustainable development in terms of transport etc. Specialist housing is to be located having regards to both the needs of those who will occupy it, and the needs of the local community.	restrict/ control development. The policy will have regard to up to date evidence. SPDs will be produced where further expansion of the CS policy is required.
Little Woodhouse Community Association (3054)		Purpose built student accommodation – ‘ghettoism’, encourages ASB among students. Dispersal good, but conflicts with transport accessibility and students wish to be with their peers. Overall increase in student numbers in Little Woodhouse - few student houses empty. Too highly priced to attract owner occupiers, so bought by larger student landlords who bring them up to a reasonable standard for letting, contrary to what CS states. Agree planning permission should be needed for change to shared houses, but too late for our area. Purpose built developments - not a complete solution to student housing problems. Saturation point reached - possible future decrease in numbers. Need to ensure mix of housing with affordable housing a high priority. Should be policies for the development of large empty buildings & former HMOs. The needs of individual areas must be considered and cannot be adequately served by an overall strategy.	SPDs can only be prepared where there is a need to expand on/provide more detail to the CS policy, for e.g. it may be that an SPD on HMOs rather than specifically on student housing in NW Leeds will be an appropriate response to the change in legislation – this will be determined once the evidence and legislation have been fully reviewed.	
Ms Garance Rawinsky (14)		Too late - Burley Triangle students flats have already tipped the balance of Little Woodhouse. Overrun by HMO'S. One school surviving, will never be attractive to families.		

Dacre Son & Hartley (480)	Taylor Wimpey Mrs BE Henderson, Mr DA Longbottom, Mrs OM Midgley Redrow Plc Persimmon Homes Taylor Wimpey/PersimmonExcel	Acknowledgment of the rise in student numbers is welcomed. It should be noted that para 5.2.29 refers to 60000 students whereas para 5.3.45 refers to 40000. Student numbers have gone beyond 80000 and while purpose built accommodation has been provided in certain areas this has not kept pace with the increase in overall numbers. The Universities and Council need to take stock, forecast and plan for future increases given recent increases are above and beyond the housing requirements of the RSS. These numbers will need to be added to the housing requirements		
Inner NW Area Committee Planning Sub Group (5696)		Plan led approach needs to be taken to purpose built student accommodation. The each case on its merits approach has led to many developments in close proximity - problems for residents. The population within Hyde Park & Woodhouse is out of balance. Policy should try to maintain balance. A strong evidence base and supporting DPD are required to reinforce this policy. Without this - ineffective and upholding appeals will be difficult, needs of individual areas must be considered and cannot be adequately served by an overall strategy for the city. Para 5.3.50 - agree with proposal to prepare supplementary guidance		
Stanks and Swarcliffe Residents Association (5052)		The new super college for 10,000 students is still to be built with five satellite colleges. Land is at a premium for this. Why is it not moving forward to create employment and training as part of a growing city vision with housing that meets the need of the city and it's families? The ALMO's have a lot to answer for here as regard to their vision.		
17.11.09 Merrion Centre		Burley Road / Kirkstall Road now student area - no longer just Headingley		
19 th December Planning Aid – Leeds Youth Council		Need to avoid excessive grouping of students, but they should be concentrated in certain areas as it is hard to balance the needs of students with those of residents. Students have different needs and lifestyles.		

Ms A O'Brien (5639)		If people decide to live near one of our two longstanding universities they must expect to find a high population of students in the vicinity. This contrasts with Leeds Trinity which is expanding far beyond its original scope so more sympathy with Horsforth residents.		
Ms Clare Marlow (3074)		Support H6 and Para 5.3.50 as anything that helps to take the pressure off LS6 is welcomed. Should be a cap on multi-letting in LS6 with immediate effect and a ban on family houses that are turned into bed-sits/ tiny flats. The visual appearance of conservation areas is paramount. Such properties and gardens aren't properly looked after, bins left out, too many cars. Most of the landlords don't care or don't have time to look after their properties properly. This ban would probably have to be tackled at Government level.		
NHPNA (3134)		Support encouragement of purpose-built accommodation in appropriate places. P 5.3.50 proposal for mixed-housing targets is welcomed and the suggestion that tight planning regulations for HMOs might be enforced is hopeful. However, ensuring that Headingley is developed to become an Area of Mixed Housing should be made explicit. The current situation where great swathes of the neighbourhood are given over to HMOs creating grotty student dives is appalling! Permanent residents demand that the Council put in place a policy that will bring back a balanced and ethnically diverse community, where young and old, professional and working class people can live together and student numbers are savagely reduced.		

University of Leeds (846)	<ul style="list-style-type: none"> •The rise of the Private Rented Sector is not solely linked with expansion of the student market - essential to the supply of affordable housing for many. •University numbers have stabilised. No major growth. •Decline in the number of families within Headingley can be equally attributed to changed requirements. Back to back & terraces with no gardens not desirable for families. However, need for primary school places in the area may be evidence of retention of students following their graduation. •Accreditation by LCC and Unipol - standards are greatly improved and better than the Private Rented Sector elsewhere. •The Noise Abatement Society reports – no difference between student & non student areas. •Car parking has increased due to increased car ownership and pressures caused by commuters. The University's travel surveys consistently show a decline in car use by students. In 2008 only 20% of students had a car in Leeds and of these only 5% used their car regularly. <p>It is unclear what types of, & how, specialist housing will be controlled. Existing control - Area of Housing Mix. Support this policy. Do not intend to develop any new residential sites within this area. Controls to HMO's and the PRS can only be achieved through national change in policy eg to Use Class Order. Would not support the introduction of HMO or student number quotas - this would reduce choice & drive up rental prices. Students prefer to live close to Uni. Support controls on location & amenity provisions made by purpose built student providers. Eg Burley Road - resulted in an unplanned student village, detrimental impact on community. Unlikely to be fully dispersal. Huge increase in purpose built blocks & opportunity for many students to live in City Centre apartments aimed at the general market.</p>		
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Bury & Walker Solicitors (2527)	Leeds Residential Property Forum	<p>More purpose built accommodation is inappropriate. Non-1st years prefer to live in shared houses in the community (part of life skills and education experience). Remote student blocks encourage more car usage and transport problems. HMOs make a valuable contribution to meeting some housing needs. Dispute growth in numbers over the Plan period. Student housing policies have always been dictated by pressure groups and the Council has failed to regard the interests of the wider community, including students and other residents of HMOs. Planning dept. needs much more liaison and inter-departmental working, e.g. with Housing, Environmental Health and licensing and accreditation schemes, to determine the true evidence base. The mandatory HMO licensing scheme has revealed no significant problems. Noise & disturbance insignificant compared with ASB in other areas. No evidence that HMOs offer the worst living conditions. Overcrowding is normally controlled by licensing in larger houses. Garden management & refuse disposal has been addressed. Dispute that if students were to move out then families would move in. Main property types - old, no gardens, difficult to heat, lack parking. Just part of demographic change. Policy fails to recognise valuable source of accommodation for young professionals - no longer just a student enclave. Regional centre needs rented properties close to the city centre. H6 point one is wrong - can forbid development in certain areas, but cannot force development to take place elsewhere. Affluent suburbs aren't balanced communities, so why should student areas be different.</p>		
Barton Wilmore (57)	Park Lane properties	<p>Student Housing fails to link to a suitable evidence base. Para 5.3.45 and 46 offer a simplistic view. Policy H6 should be positively worded to encourage new student housing on appropriate sites, including in inner NW Leeds to give students an alternative to traditional forms of housing. The link between purpose built student housing and the release of traditional housing from the student letting market should be recognised.</p>		

White Young Green Planning (420)	Leeds Trinity University College	Provision of student accommodation on a campus such a LTUC should be recognised & encouraged – sustainable, will reduce pressure on housing within existing community areas and, thus, the problems associated with visual and residential amenity within.	Purpose built on campus student accommodation should be encouraged.	Amend text to support on site campus developments
Saved Policy H15				
Leeds HMO Lobby (26)		The Lobby disagrees that in fact “Planning [is] managing these issues by using powers at its disposal.” At paragraph 1.6 & throughout, reference is made to ‘Saved UDP Policies’. Appendix 3 is a Schedule of Saved Policies which includes Policy H15. This was adopted in the Revised UDP in 2006, precisely in order to address the problems summarised in paragraph 5.3.45. It seeks to discourage further student housing at the expense (and to the detriment) of family occupation. Policy H15 should be cross-referenced and retained (or a new, improved version) with specific reference that an SPD will be prepared for Inner NW Leeds if the UC Order is amended.	Para 1.6 of the CS is intended to refer to a list of UDP policies saved until the CS is in place. It is intended that policies H15 and H15A will be replaced by policy H6, and should it be necessary, any SPDs will be prepared to further expand on the higher level policy at a later date.	Amend para 1.6 of the CS to make clear reference to saved policies and the intentions of the council to them. SPDs will be produced where further expansion of the CS policy is required
Ash Rd Resi Assoc 4698		UDP policy H15 (Area of housing Mix) should be carried forward. Suggest LCC impact assess the possible age related implications of omitting UDP policy H15	Once the CS policy is established/adopted, any appropriate SPD can be pursued. Consideration will need to be given to the effectiveness of previous policy H15 and H15A, an up to date evidence base and recent changes in legislation to HMOs.	
Mr Chris Webb 3099		UDP Policy H15 should be retained and/or retained in interim before DPD/SPD is produced - not as strong as it should be but is better than no restraint at all. Need restraint on loss of family homes		
Weetwood Residents Assoc 2655				
Little Woodhouse Comm Assoc 3054				
Woodbine Terr Resi Assoc 5688				
Inner NW Area Committee Planning Sub Group 5696				
Headingley Network 3046				

<p>Mr Cockerham 5637 Mrs Colley 5641 Mr Davidson 2560 Mr Joad 5647 Mrs Kirk 5650 Head Dev Trust 5652 Mr Webb 3099 Becketts Park Resi Ass 5656 S. Head Comm Ass 3369 (35)</p>				
<p>2nd Nov 2009 –Civic Hall</p>				
<p>Houses in Multiple Occupation</p>				
<p>Leeds HMO Lobby (26)</p>		<p>Agree with the account of HMOs in general, but not that “the HMO sector has been contracting” (5.3.47); numbers around Headingley have increased hugely & they outnumber all other forms of tenure – this should be recognised. Paragraph 3.2 notes “the high proportion of young people, reflecting the city’s role as a major provider for Higher and Further Education” - but not the fact that they are concentrated in Inner NW Leeds; the benefits are noted in 5.2.29, but not the costs. Agree that the population is out of balance and action is needed to ensure a sustainable community” (5.3.45). Agrees with the proposal in paragraph 5.3.50 to prepare supplementary planning advice for inner NW Leeds, to establish housing mix targets for local neighbourhoods.</p>	<p>As above, and planning applications will have to have regard to the changes in HMO legislation.</p>	<p>As above and the CS text will be expanded to reflect more accurately the evidence surrounding HMOs</p>
<p>Inner NW Area Committee Planning Sub Group (5696)</p>		<p>As above, and many of the problems experienced in Headingley with HMOs are experienced with purpose built blocks, and a large amount of family homes have been acquired by landlords for those that want to be close to friends without being in expensive blocks.</p>		
<p>Ash Road Resident’s Association (4698)</p>		<p>5.3.50 local restraint on HMOs is essential as it is key to the survival of Headingley as a viable community that there is a demographic balance. Arguments that restricting HMOs risks creating a non student ghetto miss the point entirely as the need is to have representation of all groups of people and forms of housing tenure.</p>		

Woodbine Terr Residents Assoc (5688)		Support control of further HMO development in Headingley for students in order to prevent additional distortion of social mix & community life.		
University of Leeds (846)		<p>•Whilst there are issues associated with concentrations of HMO's, they are an essential component to the housing market and should be recognised as being key to the provision of affordable accommodation for many people. House prices continue to rise despite the downward economy and continue to be out of the reach of many people, in particular, single person households.</p> <p>•Overcrowding is not commonplace in most HMO's. Since the introduction of HMO licensing, many landlords have downsized to accommodate fewer people per household. Through licensing, basic amenities such as sound proofing and fire precautions can be enforced by local authorities.</p> <p>It may be a feature of the next era of housing development that HMO's for younger and older people become a commoner requirement and that they will be especially designed rather than, as hitherto, being conversions of existing properties.</p>	The private rented sector, which includes HMOs is recognised as an important sector or 'rung' on the overall housing ladder. The CS recognises the importance of HMOs in accommodating households.	
Weetwood Residents Association (2655)		Rewrite the definition of House in Multiple Occupation (HMO) according to the accepted legal definition. HMOs expanded during the last two decades in specific areas in response to demand from student and young professional groups for shorter-term accommodation. Both traditional and newer HMOs frequently offer poor conditions, internally and externally: overcrowding, provision of basic amenities limited, noise, lack of fire precautions, inadequate parking, poor management of gardens and refuse disposal. Dense clusters in particular streets or areas cause particular problems. In a controlled environment, HMOs make a valuable contribution to meeting some housing needs.	The definition of HMO will be aligned with the new legislation 2010.	As above and HMOs will be clearly defined
Liberal Democrat Otley & Yeadon Cllrs (4817)	From mtg 01/12/09	Scope to identify a tolerance/threshold re HMO's/students on a street (some streets only have 1 house left). Scope to convert HMO's back to a single unit or larger flats to keep families in the city.	LCC will gather further evidence to enable full consideration of all issues before rewriting policy H6.	The policy will have regard to up to date evidence. SPDs will be

Mr Staniforth (2612)		Delivery of strategy depends on political and managerial commitment. Headingley and Hyde Park have suffered in this respect... no control over HMOs ...and a surplus of small dwellings.		produced where further expansion of the CS policy is required.
Housing for Elderly People				
Headingley Network 3046		Need more sheltered and affordable housing. Elderly peoples housing should be near local centres.	Policy H6 provides for this.	Policy H6 to be rewritten to separate out the different forms of specialist housing & applicable policies. The policy will have regard to up to date evidence. SPDs will be produced where further expansion of the CS policy is required.
Weetwood Residence Assoc 2655		Agree with criteria for sheltered housing schemes		
7 th Dec 2009: Planning Aid - Leeds Soc for Deaf & Blind		The word 'should' be located within easy walking distance of local centres ought to be replaced by 'must' because if the schemes are not built in such locations the residents will be isolated and cut off.	Will review evidence	
Ash Rd Residents Assoc 4698		Sheltered housing needs to be in a safe environment with good accessibility, close to existing community and family. If housing is not near family support this leads to more reliance on outside help – should have 'pods' for support carers etc		
7 th December Planning Aid – Disability and access groups				
Barwick in Elmet & Scholes Parish Council (3046)		Support is given to Policy H6 for the location of Specialist Housing ie. sheltered accommodation is supported (0.6 hectares adjacent to an existing facility is available for this purpose in Scholes)	Specific sites will be dealt with through the Allocations DPD.	No further action until Allocations DPD
Leeds Primary Care Trust (2504, 3003)		The focus on elderly people seems to be the provision of sheltered housing. A fitter older population may prefer the option of facilitating downsizing as an alternative or life-time homes. Need to consider increased provision of healthcare for increased population.	Lifetime Homes are included within the Code for Sustainable Homes and referred to on page 39 of the CS in a footnote. It is accepted that clearer reference to Lifetime Homes and encouraging independent living should be made within the section on elderly housing.	CS to include clearer reference to Lifetime Homes.
4 th December Planning Aid – Voluntary Action Leeds		Lifetime Homes standard should be included in policy not just a footnote - homes need to allow for adaptations for elderly. Concerns about the inability of the council to regulate	The Strategic Housing Market Assessment Update 2010 and other sources of evidence will be used to inform appropriate policies on housing mix (including the need	

26 th November 2009: Leeds Tenants Federation		the number of 'adapted homes' in the city. Whilst the number of adapted homes in the city is unknown it is believed that more are needed. Need policy to encourage this. These dwellings should be effectively integrated within other dwelling types.	for more 1 bedroom or 2 bedroom units).	
7 th Dec 2009 : Planning Aid – Disability and access groups		No mention of lifetime homes. SC9 p.41 – lifetime homes should be planned for now. SPD in London on this. Policy should be defined and embedded in the document.		
4 th Dec 2009: Planning Aid – Voluntary action group		2 or more bedrooms ideal for the elderly, so that they can have relatives to stay over. Lifetime Homes should be mentioned.		
Carter Jonas (5681)	AR Briggs & Co. Symphony Gp Ltd Lady Elizabeth Hastings Charity Estate Diocese of Ripon & Leeds Ledston Estate Hatfield Estate	Policy H6 sets out criteria for the provision of specialist housing for the elderly. The policy criteria in relation to easy walking distance to town and local centres is equally applicable to all housing developments. No clear reference to Lifetime Homes.	Accessibility is one factor considered in determining applications for housing developments, but it is a key criterion in determining the location of elderly housing schemes. See comments above re Lifetime Homes	
3 rd Nov Members Briefing Cllrs Fox, Anderson Parker.		Although new bungalows are not an efficient use of land, they would free up existing family housing currently in occupation by elderly people.	The Strategic Housing Market Assessment Update 2010 and other sources of evidence will be used to inform appropriate policies on housing (including the need for bungalows for the elderly).	Revised policy H6 will have regard to up to date evidence
14 th December 2009 – Planning Aid: BME Groups (ladies)		Need more sheltered accommodation which is suitable for Asian residents (Cultural needs - food, wardens who speak language, but mixed not solely Asian). Need to be located in areas where people already live and within easy distance of temple / mosque.	Planning policy cannot discriminate or promote different occupiers of sheltered accommodation. Inclusion of all, and encouragement of independent living are fully supported.	Amend policy and/or text to refer to independent living
15 th December – Planning Aid: BME Groups (men)		Elderly need more home help to allow them to stay in own homes for longer. Need more sheltered housing & nursing homes particularly for Asian elders.		

7 th Dec 2009 : Planning Aid – Disability and access groups		H6 should incorporate wording/definition of disabled and put in glossary – the term should be defined in a more inclusive approach – not disabled, but those affected by ill health, injury or disability.	Amend text	Amend text and clarify definition of disabled
Policy H6: General comments				
Mosaic Town Planning (5672)	Miller Homes	Provision should be made for specialist accommodation to be provided in conjunction with market and affordable housing, particularly in Bramhope. PAS, to provide more sustainable and inclusive communities.	Developers are free to provide specialist accommodation in conjunction with other housing. All development sites, not just PAS should provide for sustainable and inclusive communities.	No change to policy
Leeds Civic Trust (62)		Question the practicality of distribution but generally agree for other classes	LCC will gather further evidence to enable full consideration of all issues before rewriting policy H6. The evidence base will include information from the universities, HMO licensing authorities and others, as well as the Strategic Housing Market Assessment (SHMA) update 2010.	Policy H6 to be rewritten to separate out the different forms of specialist housing & applicable policies. The policy will have regard to up to date evidence. SPDs will be produced where further expansion of the CS policy is required.
Turley Associates (1743)	Barratt Strategic	Policy H6 fails the 'effective' test of soundness as it fails to demonstrate or identify mechanisms by which the specialist forms of accommodation will be distributed around Leeds.		
Scholes Community Forum (20)		Subject to detailed comments in regard to the housing strategy/evidence and caveat that 89% of development takes place on “allocated sites” the forum supports the principles and objectives contained within Policy H6.		
7 th December Planning Aid - Leeds Society for Deaf & Blind		Distributing specialist housing around the district in reflection of local need strongly supported. Need associated facilities. What will the council do to prevent other developments at the most accessible sites, identified in the allocations document?		

CORE STRATEGY PREFERRED APPROACH APPENDIX 5
LCC RESPONSES TO REPRESENTATIONS ON THE LEEDS ECONOMY

Responses to questions which do not include further comments.

Question	Agree	Disagree
Q13. Do you agree with the proposals to enhance the economic role of the City Centre?	38	5
Q14. Do you with the proposed location of employment land, including offices?	22	2
Q15. Do you agree with the approach to help grow and diversify the rural economy?	42	1

Additional comments

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
General comments & EC1 – Economic Development Priorities				
White Young Green	Leeds Bradford Airport	Policy EC1 contains little evidence of detailed analysis of drivers of the Leeds Economy e.g. cross references to evidence base economic papers, the RES or Leeds Agenda for Improved Economic Performance. Section should emphasise more the importance of developing a modern transport system and state that LCC will invest and work with partners and stakeholders to seek improvements to rail, road and airport infrastructure.	The RES and Leeds Agenda for Improved Economic Performance have influenced the preferred approach document. Cross references would help to make these linkages more explicit. There is an overlap between this section and the Well Connected City policies. Clearly, a modern transport system is vital to growing the Leeds economy in a sustainable manner.	Review evidence base and identify necessary cross references.
Bradford MDC		More clarity required on: <ul style="list-style-type: none"> Role and function of settlements close to Bradford How infrastructure associated with the level of economic growth is to be planned for and delivered Evidence base needs to be made available and open to scrutiny. 	Further work on the role and function of settlements in the district will be undertaken as part of the Housing Growth Options Study, which will form part of the evidence base. The Infrastructure Delivery Plan will identify the infrastructure requirement resulting from the level of development proposed in the plan. Further clarification on economic development demand and supply issues will be provided as part of the update of the Employment Land Review. This will include a	Reconsider after reviewing result of evidence base updates.

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
			review of the need for employment land and premises over the plan period and assessment of existing employment sites in terms of suitability, availability and viability. This will be published well before the submission draft of the Core Strategy.	
Government Office Y&H	44618	Policy EC1 does not need to be presented as policy.	The contents of EC1 could form part of a redrafted spatial vision <u>or</u> be retained in its current form replacing UDP strategic aims SA4 and in part SA5, SA6 & SA9 and strategic principles SP6 and in part SP7 & SP8.	Review
White Young Green	Rockspring Hanover Property Unit Trust	EC1 – should support the development of existing employment sites and the provision of a range of employment sites across the district.	The first bullet point of EC1 does this to some extent but the wording suggested would be too general and not provide any further locational guidance to be applied to the identification of sites.	None
GVA Grimley	City East Limited - Rushbond Group	EC1 – Support objective 1. Important to allocate a range of sites in different locations catering for differing industries and employment needs. e.g. for start-up businesses through to SMEs.	The section would benefit by making reference to the requirements of small and medium sized business and for this to be one or the criteria to be used to identify suitable sites.	Revise policy or supporting text
ID Planning	The Castle Family Trust	EC1 – General support for the approach.	Support noted.	
ID Planning	Barwick Developments Ltd; Persimmon Homes (West Yorkshire) Ltd; Edmund Thornhill; Great North Developments Ltd; Bracken Developments Ltd; Robert Ogden Partnership Ltd; Ringways Motor Group; Persimmon Homes and Taylor Wimpey	EC1 – Support broad objectives but further objectives should be included. First objectives should be to use current allocations within the UDP in accordance with RSS Policy E3. Should recognise circumstances where greenfield development close to the motorway network will be required for industrial/distribution development. Cannot rely solely on prioritising PDL in urban areas.	Current allocations will need to be reconsidered against criteria set in PPS4 but it is expected that in the main existing employment sites will be considered suitable and retained. Out-of-centre office sites will be subject to the sequential test of PPS4 except where they already benefit from an extant planning permission as the CS Preferred Approach document makes clear (EC4). The second bullet under Policy EC1 refers to prioritising brownfield land but is not intended to mean that <u>only</u> brownfield land can be developed. It is merely an important consideration in the identification of employment land. Taking this approach is consistent with Policy EC2.1(d) of PPS4 but it would perhaps be clearer if this statement was clarified in the supporting text.	Revise supporting text.

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
White Young Green	Goodman International	<p>Lack of synergy between 'Leeds: the Agenda for Improved Economic Performance' and the Core Strategy. The former recognises that one of the most significant areas of new investment and employment opportunity is in the Aire Valley.</p> <p>EC1 – Policy should recognise the potential that continued development, and redevelopment of, existing employment sites has to offer e.g. Leeds Valley Park. Such sites represent important employers for a wide range of people.</p>	<p>The importance of employment opportunities in the Aire Valley are made clear under Policy EC5 and elsewhere in the Core Strategy.</p> <p>Policy EC4 acknowledges that existing planning permissions such as Leeds Valley Park can provide new office floorspace.</p>	None
Scott Wilson	PPL c/o Revera	<p>EC1 – Support general principles, particularly bullets 2,3,4 & 5. Considered that Parlington Estate could accommodate a major cultural, leisure, heritage and tourism facility and/or renewable energy opportunities which would contribute to the economic priorities for Leeds and deliver a facility of regional and national significance.</p> <p>Concern over promoting the city centre as a location for leisure development as it cannot provide for all types of leisure proposals. Wording of bullet 4 should be amended to also include “whilst recognising that not all leisure development can be provided appropriately within the city centre alone.</p>	<p>Promoting the city centre as a strategic location for leisure development is entirely consistent with national and regional planning policies. However, this does not mean that all leisure development will take place there and there is a role for smaller centres and for out-of-centre locations for development that cannot fit easily into existing centres. This could be explained in the supporting text but the suggested wording is not precise enough to be included in the policy wording. There also are other issues to consider including compatibility within Green Belt policies.</p>	Revise supporting text.
Natural England		<p>Welcome the economic development priorities to prioritise the use of brownfield land, to promote the low carbon economy and to support local decentralised energy solutions.</p>	<p>Comes of support welcomed.</p>	None
Metro		<p>Para 5.3.53 – Not clear how the infrastructure will be identified or what the process will be to update evolving infrastructure requirements.</p> <p>EC1 – Supports in principle the approach to focus growth on brownfield land which has good access to public transport. Greater clarity needed to establish what is meant by good access. If the required public transport interventions make the site unattractive to the market, these requirements should not be diluted to</p>	<p>The Infrastructure Delivery Plan will help to identify specific transport infrastructure requirements.</p> <p>Public transport accessibility standards are set out in RSS and Policy T2 of the CS Preferred Approach. The plan needs to have a degree of flexibility and conflicts between public transport requirements and viability may need to be considered on their merits.</p>	Reconsider with updated evidence

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
		meet market demands.		
Inner NW Area Committee Planning Sub Group		EC1 – Bullet 5 welcomed and would expect policy to acknowledge role of walking and cycling in delivering access to jobs.	Support noted. Walking and cycling accessibility is implicit in Policy T2 and is encouraged in other planning documents, for example it is a key priority in the emerging West Leeds Gateway SPD.	None
Nathanial Lichfield & Partners	Steven Parker and Family	EC1 does not acknowledge that Greenfield land will need to be brought forward for employment purposes.	The second bullet under Policy EC1 refers to prioritising brownfield land but is not intended to mean that only brownfield land can be developed. It is merely an important consideration in the identification of employment land. Taking this approach is consistent with Policy EC2.1(d) of PPS4 but it would perhaps be clearer if this statement was clarified in the supporting text.	Revise supporting text
Natural England		Welcome preference for utilising previously developed land and sites in high frequency public transport corridors. However, brownfield sites can harbour biodiversity resources so sites should be investigated prior to allocation.	These issues are addressed in detail under Policies B1-B5 and there would be little benefit to repeating them in this section.	None
EC2: Economic role of the city centre				
English Heritage		Endorse view the environmental quality is vital to the economic success of the city centre but enhancement needs to encompass the quality of buildings as well as streetscapes and open spaces.	Accept the point being made but the issue is not unique to the city centre and is picked up elsewhere under Policy SC8.	None
Government Office for Y&H		The Core Strategy should justify the city centre boundary and provide a policy hook to a possible AAP or masterplans. Should spell out that public transport links need to be improved between the city centre and the City Region. A delivery plan is required including what infrastructure is required and who is going to fund and provide it.	City centre policy issues are currently divided between a number of sections of the plan. Agree that the Core Strategy needs to be clear on the broad extent of the city centre boundary i.e. whether it should grow and if it should where that growth should be focused. The decision will need to take into account the Urban Eco Settlement proposal and evidence emerging from the City, Town and Local Centres Study and the updated Employment Land Review on the need for additional floorspace for town centre uses (retail, office, leisure development). The Infrastructure Delivery Plan will help to identify specific strategic public transport requirements resulting from proposed city centre development.	Review extent of City Centre boundary

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
GVA Grimley	City East Limited - Rushbond	CS should recognise need to focus some economic development within town centres including employment, retail, leisure, tourism, culture, health and sport.	Agree that town centres have a role to play and this role is recognised under Policy SC3.	None
Savills	MEPC	Welcome overall content which affirms the primacy of the city centre.	Comments of Support welcomed.	None.
Leeds Civic Trust		Some of the bullet points in Policy EC2 are too specific.	General content of EC2 considered appropriate and it is important that it sets out clear and specific priorities. It may need updating and clarifying where appropriate in the light of updates to the evidence base.	Review policy
Turley Associates	Warmfield Group	The evidence base is not clear in respect of the existing, committed and extant office permissions and their locations. Important to understanding the numerical analysis present in the CS including how the requirement has been derived and the basis for targets for the city centre, town centres and out of centre locations.	The Employment Land Review is to be brought up to date with an April 2010 base date. This will include evidence on the need for and supply of employment land, including existing planning permissions. Targets may be revised to take account of the updated evidence base.	Update ELR and consider implications for targets.
CB Richard Ellis	Learmonth Property Investment	Support improving public transport links to the airport and facilitating its planned expansion is key to the growth of the economy and the vitality of Leeds and the City Region.	Comments of Support welcomed	None
Leeds Chamber of Commerce		Need to address number of critical aspects listed under EC2 e.g. City Park and green space, the Arena and flood alleviation whilst maintaining benefit of river frontages.	These issues will be addressed through detailed master planning work and as part of the determination of planning applications but the comment raises a wider issue about how city centre issues which cross cut a number themes are addressed. The profile of the city centre in the document could be raised through a re-ordering of the document so that there is, for example, a specific city centre section	Review structure of draft Publication document
Carter Jonas	The Diocese of Ripon & Leeds; The Hatfield Estate; Lady Elizabeth Hastings Charity Estate; The Ledston Estate; AR	Support approach that makes the city centre the main location for larger scale retail, office and leisure development. Not clear how the city centre park will sit within the broader Green Infrastructure framework	Support noted. Green Infrastructure matters are discussed under Policy G2.	None

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
	Briggs & Co. Ltd; Symphony Group Ltd.			
GMI Property Company		New homes, jobs and leisure opportunities are needed to support the wider prosperity of the district. Important that a suitable range and choice of quality homes are available to those working in the city centre.	The Core Strategy provides for an increase in jobs and leisure opportunities over the plan period. Housing issues are addressed separately under the Housing Challenge sub-theme.	None
Drivers Jonas	McAleer & Rushe	Clarity required on status of New Lane site. It is located in a prime location to the south of the city centre close to the railway station and motorway network. Object to exclusion of education facilities from the city centre section (SC3) Highlight potential for city centre to become a destination of company HQs. Highlights linkages between site and south of the city and ability to break down barriers.	The supporting text (para 5.3.55) identifies the broad potential of sites south of the river in the city centre. Detailed work on the status of individual sites will be undertaken as part of the Site Allocations DPD. The city centre is identified as a strategic location for office development, which would include company HQs but there would be no basis for reserving land specifically for this purpose.	For Site Allocations DPD to address
North Yorkshire CC		Welcome proposals to support the role of Leeds city centre as an economic driver for the wider region.	Support noted.	None
Turley Associates	Barrett Strategic	Support the general thrust to maintain the economic importance of the city as the economic driver of the region.	Support noted.	None
Scott Wilson	PPL c/o Revera	Concern over promotion of city centre for leisure development. Should be qualified and recognised that not all economic activity can take place in the city centre.	Promoting the city centre as a strategic location for leisure development is entirely consistent with national and regional planning policies. However, this does not mean that all leisure development will take place there and there is a clear role for smaller centres and for out-of-centre locations for development that cannot fit easily into existing centres. Policies in the Sustainable Communities section address this in detail.	None
CB Richard Ellis	Hammerson Plc	Support. Eastgate and Harewood Quarter will provide a leading role in delivering primary objective of EC2.	Comments of Support welcomed	
Natural England		Support provision of new park in city centre.	Comments of support welcomed.	

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
Metro		Consistent with broad objectives and priorities for transport in the LCR Transport Strategy. Reference could be made to the development of rapid transit to boost capacity and improve connectivity. Development in Rim area will require improvements in interchange facilities for buses.	NGT scheme could be referred to as an example of public transport investment linking the city centre and other parts of the city.	Revise supporting text
University of Leeds		Welcome the new park. Likely that there will not be a need for as much additional retail space as is currently in the pipeline. Monitoring of retail trends and churn should inform the way forward on additional or replacement retail facilities. Extra cultural and leisure institutions and activities should be encouraged. City markets should be protected and encouraged.	Support for park noted. The Council are embarking on the preparation of a City Centre, Town and Local Centres Study which will identify the need for additional retail floorspace in the city over the plan period. This will include advice on how to support the independent retail and market sectors. This will inform the direction of the Core Strategy and the approach taken to retail development in the city centre.	Complete Retail & Town Centres Study and consider implications.
Location of employment land and offices – General				
Liberal Democrat Otley & Yeadon Councillors		Include reference to local centres of employment.	Analysis of existing patterns of employment could form of the update to the ELR. Data is available at the middle super output area (neighbourhood) level for employment floorspace in the B classes. The CS could cross reference this work which may also influence the criteria for the location of new employment land.	Update ELR and consider implications
Government Office for Y&H		Policy should be expanded to give more direction on where employment sites will be located. Locationally specific elements of EC4 & EC5 would be clearer if they were incorporated into EC2 & EC3. Stronger policy hooks needed to the Aire Valley AAP , the Allocations DPD and masterplans.	Agree that policies need to be more locationally specific. The update of the Leeds Employment Land Review will assist this process. Do not consider that EC2 and EC4 should be merged. EC2 deals with economic development issues in the city centre in their wider sense where as EC4 deals with office development across the city. Similarly EC3 & EC5 cover different but overlapping issues and should be retained as separate policies. EC3 sets the overall requirement for all employment land/floorspace at the district level where as EC5 details the strategy for identifying the land to meet the industrial & storage/distribution requirement. A number of references are made to the Site Allocations DPD and Area Action Plans. These will need to be brought up to date where necessary e.g. reference to the South Bank Planning Statement under	Update ELR and revise policy

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
			Policy EC2.	
DHA Planning	Munroe K Ltd	Fails to recognise contribution made by existing employment sites and the need to protect, retain and enhance these e.g. White Rose Office Park. Maximum use should be made of existing sustainable sites additional to the promote of town centres to provide a good range and variety of office accommodation.	The suitability of sites to accommodate new employment development will be a matter for the Site Allocations DPD taking into account national, regional and Core Strategy policies. The focus of the Site Allocations DPD will be to identify sites to accommodate new employment development to meet identified need assisted by the findings of the Employment Land Review.	For Site Allocations DPD.
ID Planning	Robert Ogden Partnership	Map Book – Welcome that PAS sites are retained on the Proposals Map. The Tingley site should be allocated for mixed use housing and employment development.	This will be a matter for the Site Allocations DPD taking into account the overall employment land requirement and specific locational priorities identified in the Core Strategy and national and regional planning policies.	For Site Allocations DPD.
Nathaniel Lichfield & Partners	Steven Parker and Family	Land at York Road/Sandbeck Lane, Wetherby has the potential to accommodate some of the future employment requirements of Wetherby. RSS identifies Wetherby as a Principal Town and therefore it should be the main focus for employment. EC1 does not acknowledge that Greenfield land will need to be brought forward for employment purposes.	Accept that the Employment Land Review update will need to consider in more detail the specific employment requirements of Wetherby given that it is identified as a Principal Town in the RSS. However, the suitability of sites to accommodate new employment development will be a matter for the Site Allocations DPD taking into account national, regional and Core Strategy policies. Policy EC1 should be more explicit in identifying current and as yet undeveloped employment allocations as having potential to contribute to the employment land/floorspace requirements over the plan period. Many of these allocations are greenfield.	For Site Allocations DPD. Revise EC1 wording.
Carter Jonas	The Diocese of Ripon & Leeds; The Hatfield Estate; Lady Elizabeth Hastings Charity Estate; The Ledston Estate; AR Briggs & Co. Ltd; Symphony Group Ltd	Important that the Council identifies sufficient land to meets its economic growth ambitions and that these are in the right locations. Tendency for repetition in some policies (e.g. location and scale of office development: SC3, SC5 and EC1-EC4).	Agree - the employment land requirement is to be reassessed taking into account the most recent employment forecast available from the Regional Econometric Model provided by Yorkshire Forward. The wording of the mentioned policies will be reviewed and any unnecessary repetition removed but the intention was that issues relating to office development which cut across the sustainable communities and economy themes were adequately covered.	Part of ELR update. Review policies SC3, SC5 & EC1-EC4

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
White Young Green	Rockspring Hanover Property Unit Trust	No recognition of the Thorp Arch Estate - should be recognised via Map 3 "Key Economic Development Opportunities".	The suitability of sites to accommodate new employment development will be a matter for the Site Allocations DPD taking into account national, regional and Core Strategy policies. There is a need to define more clearly what a 'Key Economic Development Opportunity represents for the publication document or whether the concept should be retained.	Update ELR and consider implications.
Policy EC3: Provision of employment land and premises				
Yorkshire Forward		The Leeds City Region Development Programme identifies a shortage of R&D incubator units. May be a need to make a specific reference in EC3 & EC5. Would be beneficial to find a means of reflecting in the job forecast the changed position of the national and regional economy since the ELR and RSS. Job growth forecasts should be based on the most recent version of the Regional Econometric Model.	Agree that a reference to the specific need for R&D incubator units would be appropriate. The employment land requirement is to be reassessed taking into account the most recent employment forecast available from the Regional Econometric Model provided by Yorkshire Forward.	Revise policy and update ELR and consider implications.
Scholes Community Forum		Concern over concentration of office development in the city centre. Brownfield site in rural areas should be considered for office and R&D facilities but not other use classes. Disturbed that R&D is grouped with industry and storage/distribution.	There is a role for small-scale brownfield development in rural areas as acknowledged by Policy EC7 and PPS4 but large scale development of offices should be directed towards locations with good accessibility particularly the city centre and other town centres. R&D facilities are grouped with industry and storage/distribution because they have the similar locational requirements according to national and regional planning policies. Office development is considered differently due to the 'town centres first' locational approach of PPS4.	None.
Helen Longfield		Does not agree with extensive out of centre office development which means future policy will have limited impact to the detriment of neighbouring districts and the city centre. RSS policy to encourage development in the Leeds-Bradford corridor is not borne out in policies.	The plan does not identify the need for further extensive out-of-centre office development but has to acknowledge the reality that a number of large sites are partially developed and/or benefit from extant planning permissions and these will inevitably take up some of the identified demand for office floorspace. The Leeds-Bradford corridor is identified as a regeneration priority area under Policy SC1.	None.

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
ID Planning; Turley Associates	The Castle Family Trust; Barwick Developments; Persimmon Homes (West Yorkshire); Edmund Thornhill; Great North Developments; Bracken Developments; Robert Ogden Partnership; Ringways Motor Group; Persimmon Homes and Taylor Wimpey Swayfields (Skelton) Limited; The Warmfield Group; Barratt Strategic	<p>EC3 - The use of employment figures from the ELR rather than the RSS is inappropriate and therefore unsound.</p> <p>Table E1 – Only 65% of job provision suggested by RSS is being planned for. ELR is out of date and precedes the RSS which states that the evidence base should be revisited once the econometric model has been updated. Use Scenario B of the model rather than Scenario C used by RSS. Methodology applied is unduly constrained by past performance.</p> <p>Provision of land for industrial and distribution is only 14% of that forecast in the RSS. Job creation potential of distribution is under-estimated which hampers the ability of the strategy to deliver enough land to accommodate future growth.</p> <p>Net effect is to significantly under provide land for job growth.</p> <p>375ha allowance for employment land is inadequate. The 2006 ELR is not an appropriate basis for assessing future employment land requirements as it is aging and focused on past take up rates. The RSS land requirement allowing for flexibility would amount to 585ha.</p> <p>Reliance on past trends is not an appropriate method for assessing the role of the Regional Capital and ignores the transformational agenda set by RSS.</p> <p>Not appropriate to release land in a piecemeal manner and this removes certainty from the market and does not address the need for a Green Belt review.</p> <p>Concerned about the lack of up to date delivery assessment with respect to consideration of whether there is a five year supply of market ready sites.</p>	<p>The employment land requirement is to be reassessed taking into account the most recent employment forecast available from the Regional Econometric Model provided by Yorkshire Forward.</p> <p>It is not appropriate to rely on the RSS employment figures alone, however. These are based on pre-recession forecasts and are unrealistic in terms of future economic growth (from a 2006 base date). Policies E1 and E3 of the RSS allows for the use of more detailed sub-regional or local forecasts or more up-to-date information in addition to Table 11.1 and 11.2. Yorkshire Forward have acknowledged that there is a need to update the forecast in their representation to the Core Strategy consultation.</p> <p>Disagree that only 14% of the land requirement derived from RSS is being catered for. This confuses the net and gross land requirement.</p> <p>However, do agree the plan does need to provide a flexible supply of land for economic development given the requirements of new national guidance set out in PPS4. This may mean there is a need to allocate more than the 375 hectares identified in the Preferred Approach document but this will depend on the detailed results of the ELR update.</p> <p>The ELR update will also provide an assessment of the suitability, availability and viability of existing sites in the employment land supply (including allocations and windfall sites).</p>	Update ELR and consider implications.

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
Scott Wilson	PPL c/o Revera	<p>EC3 – Amend 2nd bullet to acknowledge that sites will be brownfield and greenfield.</p> <p>Table 3 – Claimed oversupply of land in the east/north east of the district should not prevent suitable site along in M1 corridor in the east from coming forward. The suitability of a site for employment should be determined through Site Allocations DPD not the ELR which will become out of date.</p> <p>M1 corridor would be a suitable location for distribution and logistics businesses e.g. land to the north of J47 of the M1 and to the west of the existing employment land south of the junction.</p>	<p>Policy EC1 should be more explicit in identifying current and as yet undeveloped employment allocations as having potential to contribute to the employment land/floorspace requirements over the plan period. Many of these allocations are greenfield. Beyond this it is not necessary to refer to the status of sites under this policy.</p> <p>Policy EC3 - An assessment of the suitability of sites against a broad set of physical, sustainability and policy criteria will be published as part of the updated ELR but the respondent is correct in asserting that this is ultimately a matter for the Site Allocations DPD. Agree that the M1 corridor is generally a suitable location for distribution uses subject to other planning considerations. This is an important locational factor identified in under EC5.</p>	Reword Policy EC1, update ELR and consider implications.
White Young Green	Rockspring Hanover Property Unit Trust	EC3 – Should be redrafted to incorporate the long term protection and growth of existing employment parks.	Protection of existing employment areas is addressed under Policy EC6. Potential for growth of existing areas will need to be considered in terms of the need for employment land and the suitability of various options.	None
NHS Leeds		EC3 – Should be strengthened to specify factors to determine the suitability of employment sites such as potential for noise and air pollution affecting nearby residents.	These are important amenity considerations which need to be taken into account as part of the identification and allocation of employment land but they are too specific to be written in Policy EC3 which is of a more strategic nature..	Consider issue through ELR assessments
Policy EC4: Location of office development				
Scholes Community Forum		Conflict between EC4 bullet 3 & 4 and paras 5.3.83 & 5.3.87. Need for more clarity and evidence as basis for decisions.	Disagree that there is a conflict between these statements. Making the centres of towns and villages serving a rural catchment the first choice location for office development in rural areas is a sustainable approach to the location of office development consistent with national and regional policy. Policy EC7 allows some flexibility with regard to small-scale development.	None
Barwick in Elmet & Scholes Parish Council		General support for economic policies but reservations with regard to bullet 4 of EC4 and para 5.3.83.		

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
GVA Grimley	City East Limited (Rushbond Group)	Office policies should not be over prescriptive so as to prohibit significant office development in regeneration areas where market forces, site availability and demand allow for investment.	Disagree that policies are over prescriptive. The approach is consistent with the town centres first approach set out in PPS4. The final bullet point allows more flexibility within regeneration areas for small and medium scale development.	None
BNP Paribas	Telereal Trillium	Support locational preference for new office uses. Large scale out-of-centre office uses should be allowed to develop for other uses. Policy EC6 should allow out-of-centre office to be redeveloped for other use where more centrally located sites are available.	Applications for the redevelopment of existing employment sites would need to be considered against the criteria set out under EC6.	None
Drivers Jonas	Barwood Developments & Caleast Holdings	EC4 – Clarification needed on the approach to ancillary offices as it is sometimes required to support larger industrial/warehousing. Policy requires some flexibility in relation to smaller ancillary office development.	The supporting text to EC4 could explain that ancillary office development is acceptable in accordance with PPS4 policy.	Revise supporting text
Savills	MEPC	As a highly sustainable location, Wellington Place's allocation in the current UDP should be carried over to any site allocations document.	Agree that Wellington Place is a sustainable location in the city centre and office development is appropriate and consistent with national and regional policy. The allocation of land is a matter for the Site Allocations DPD.	For Site Allocations DPD.
Leeds Chamber of Commerce		A presumption against office proposals in edge or out of centre locations may inhibit opportunity for employment growth in locations which are accessible to main transport corridors and near to residential areas.	There is a preference for sites and premises for offices within existing centres but this does not amount to a presumption against development on the edge or out of centres if the criteria set out in PPS4 and Policy EC4 can be satisfied.	None
Barton Willmore	Templegate Developments Ltd	Further clarification needed in respect to office development.	Further clarification on supply issues will be provided as part of the update of the Employment Land Review. This will include an assessment of existing employment sites in terms of suitability, availability and viability. This will be published well before the submission draft of the Core Strategy.	Update ELR and consider implications.
Drivers Jonas	McAleer and Rushe Group	EC4 – Request clarification on bullet point 2 as unclear whether it refers to edge city centre locations within or outside the present boundary. Certain edge of centre locations may be appropriate for larger scale offices supported by small scale retail or residential uses.	All sites within the existing (or amended) city centre boundary are classified as in-centre. Sites outside but within 300m walking distance of that boundary are classified as edge-of-centre according to the PPS4 definition as well as sites within 500m of the train station. Edge of centre sites will need to be considered on their	None

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
			own merits as part of the Site Allocation DPD but first preference will be to identify sites within the city centre for large scale development.	
Scott Wilson	PPL c/o Revera	EC4 – Should have an additional bullet that allows for small scale office use through the conversion of rural buildings as this would encourage sustainable living and working patterns.	This issue is broadly covered by the last bullet of Policy EC7 and PPS4.	None
CB Richard Ellis	Marshalls plc	ELR does not include specific site assessments therefore difficult to assess whether evidence base is sound. Request Council to confirm that Lingwell Gate Lane site has been discounted from the employment land supply. Site has been marketed with no reasonable offers. Support de-allocation from employment to housing with local retail.	Further clarification on supply issues will be provided as part of the update of the Employment Land Review. This will include an assessment of existing employment sites in terms of suitability, availability and viability. This will be published before the submission draft of the Core Strategy. An assessment of the Ligwell Gate site will be included but it will be a matter for the Site Allocation DPD to determine the appropriate end use.	Update ELR / Site Allocations DPD
White Young Green	Rockspring Hanover Property Unit Trust	EC4 – Policy excludes the ability to enable small and medium scale office development on existing major employment sites outside regeneration areas. Such development should be allowed in specific circumstances – within curtilage, where sustainable transport can be delivered, where B1 offices can help existing employment provision, office element less than 20% of employment floorspace.	The policy as drafted is consistent with new national policy set out in PPS4. The need for new floorspace for office development will be reviewed as part of the ELR update but it is expected that this will show there is little need for further out of centre development.	Update ELR and consider implications.
Highways Agency		Table 2 – Not appropriate to assume B1 development under 1,500 sq m have ‘no significant travel impact’ as they may have a significant cumulative impact on the local transport network. Statement should be removed.	The table was included in the document to give a brief indication as to why the threshold was chosen. The thresholds are to be reviewed in the light of updated national policy in PPS4 and the forthcoming update of the Leeds Employment Land Review. Accept that several smaller development can have a significant cumulative impact and therefore the wording needs to be reconsidered.	Update ELR and consider implications. Revise wording.
Metro		EC4 – Support the sequential approach to office locations with focus being on the city centre and main centres.	Comments of support welcomed	None
University of Leeds		Agree with no further out of town office parks.	Comments of support welcomed.	None

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
EC5: Location of research & development, industrial and distribution/warehousing development				
Leeds Cycling Action Group		Should not be encouraging airport related development.	This reference needs to be clarified. It is not the intention of the policy to encourage out of centre office development at this location. The Key Economic Development Opportunity status reflects the planning approval for airport growth and thus potential for the increase in the number of jobs at the location.	Revise wording
Government Office for Y&H		EC5 (B) – concern that ‘non-operational’ airport related development might lead to pressure for office parks near the airport. Should not be a key economic development opportunity on Map 3 without a rider.		
ID Planning	The Castle Family Trust; Barwick Developments; Persimmon Homes (West Yorkshire); Edmund Thornhill; Great North Developments; Bracken Developments; Robert Ogden Partnership; Ringways Motor Group; Persimmon Homes and Taylor Wimpey	Table E3 – Not based on a credible evidence base as lacks clarity as to how the sub-division has been calculated. EC5 – Welcome except for overall requirement figure of 375ha.	Agree that more clarity is required. The apportionment of the overall land requirement to sub-areas and explanation of the methodology will be reviewed and published as part of the update to the ELR.	Update ELR and consider implications.
Mosaic Town Planning	Miller Homes	Support for allocation of employment land around the airport and to meeting localised employment needs through smaller scale developments.	Comments of support welcomed	None
British Waterways		EC5 – supportive of a flexible approach to allocating and safeguarding employment land within the Aire Valley. Concerned if a restriction on change of use of low grade employment uses close to waterways prevented the appropriate redevelopment of vacant and underused land along the network contrary to PPS3.	The Aire Valley AAP will address such conflicts in a detailed and integrated manner in order to promote a wider mix of development in the area. However, it is important that the undoubted locational benefits of the Aire Valley for industrial and storage/distribution uses are secured by reserving a minimum amount of land for such uses.	None

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
Lister Haigh	D Parker & Sons	The identified Wetherby site could help provide the requirement for 185 hectares of local employment opportunities.	The merits of individual sites will be considered as part of the preparation of the Site Allocations DPD.	For Site Allocations DPD
CB Richard Ellis	Learmonth Property Investment Company Ltd	EC5 – Need greater clarity on the types of use that would be defined as ‘airport related’. The availability of existing space within the LBA Industrial Estate should meet that need. The existing allocation should be retained and considered for other airport related development such as hotel and leisure proposals and parking.	Agree that greater clarity is required. EC5 refers specifically to industrial and distribution uses so the intention of the policy as written was meant to refer to airport related development in these specific sectors. The reallocation of land for other airport related uses would be a matter for the Site Allocations DPD and would need to be consistent with national, regional and local policy approaches and based on a clearly identified need.	Clarify through revision to supporting text. Any reallocation of land would be done through the Site Allocations DPD.
Highways Agency		Para 5.3.76 re accessibility of the Aire Valley requires qualification. Need conditions relating to trip generation thresholds. EC5 – Statement encourage B8 development on sites close to motorways need qualification. Only acceptable if appropriate mitigation measures are in place.	These are general statements explaining why the Aire Valley is an appropriate location for these uses. The Aire Valley AAP will take an integrated approach to ensure that new development does not result in an unacceptable impact on the highway network.	None
EC6: Existing employment sites and premises				
White Young Green	Harrow Estates; Yoo Invest	EC6 – In order to limit the loss of existing employment site there needs to be a positive approach to recognising that in order to deliver the required housing land supply there will be a need to develop some of these sites	EC6 acknowledges this but recognises that there may also be a need to protect strategic and local employment sites in certain cases to ensure there is balanced and sustainable growth. Calculations on the employment land requirement will continue to make allowance for some loss of existing employment sites. EC6 as drafted will need to be reconsidered in relation to the new approach to economic development uses set out in PPS4 but also the needs to take into account the importance of providing some local employment opportunities in the ‘B class’ sectors.	Review in terms of PPS4 compliance.
Yorkshire Water Services		EC6 – Supports policy. Yorkshire Water’s Investment Plan is based on existing allocations and committed sites of employment land is reallocated for housing there may not be sufficient water/sewerage capacity to support new development. Additional text regarding infrastructure should be added to part B.	Comments of support welcomed.	None.

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
BNP Paribas	Telereal Trillium	Policy EC6 should allow out-of-centre offices to be redeveloped for other uses where more centrally located sites are available.	EC6 will allow for decisions to be taken on their individual merits in accordance to the criteria set out in the policy.	No change
ID Planning	The Castle Family Trust	EC6 – Broadly support but clarification required as to whether it applies to buildings/land last in employment use.	The policy is intended to apply to buildings/land last in employment use. Given there may be uncertainty this needs to be clarified in the supporting text.	Revise supporting text.
Drivers Jonas	McAleer and Rushe Group	EC6 – Object. It is appropriate for some single use allocations to be brought forward for a mix of uses comprising mainly offices but supported by small scale retail and residential uses in interests of design and viability.	Core Strategy policies would allow mixed development of offices and residential to be brought forward subject to the sequential test outlined in PPS4. Any retail development would also need to be considered in terms of PPS4 and much would depend on the scale proposed in relation to the overall development.	None
Indigo	National Grid Property Holdings Ltd	EC6(B) – There will be instances where employment sites cannot be retained or brought back into use for reasons such as changing market circumstances / viability. Has the potential to sterilise sustainable brownfield sites.	Accept that this could be the case. EC6 as drafted will need to be reconsidered in relation to the new approach to economic development uses set out in PPS4 but also the need to take into account the importance of providing some local employment opportunities in the 'B class' sectors.	Review in terms of PPS4 compliance.
CB Richard Ellis	Learmonth Property Investment Company Ltd	EC6 – Imprecise and overly restrictive. A more selective approach needed to ensure non-strategic employment sites are not unduly restricted from diversifying.		
CB Richard Ellis	Marshalls plc	EC6 – Approach is wholly inflexible. Criterion should be included which considers the changing needs of business and the financial viability of the site.		
White Young Green	Rockspring Hanover Property Unit Trust	EC6 – Needs to be a positive approach to recognised that delivering 75% PDL target will require existing employment sites.	There is a potential conflict between the housing target of 75% and EC6 (b) which seeks to prevent loss of existing employment sites in certain circumstances. Hitting the 75% targets will require a certain level of windfall development. Needs to be resolved through comparison of SHLAA and ELR results. The compliance of the approach with PPS4 is also an issue.	Review against evidence base
Highways Agency		EC6 – accessibility should be included in the criteria.	Accessibility of new development will be considered as a matter of course against national, regional and local policies. It does not need to be added an additional criterion under this policy.	None.

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
EC7: The rural economy				
East Keswick Parish Council		In relation to bullet point encouraging retention and enhancement of existing visitor attractions and provision of facilities suggest Crabtree Lane car park could be improved at cost of £4-5000.	This is too detailed an issue to be considered in the Core Strategy but the policy approach of EC7 would support such improvements in principle.	None
Harewood House Trust		Scant reference to important heritage assets within the district such as Harewood House. Essential for document to give explicit support to future development and enhancement of places of historical and cultural significance.	Reference to heritage assets would be relevant to include as these are an important aspect of the rural economy.	Revise supporting text.
Government Office for Y&H		EC7 does not add significantly to guidance in PPS7 and a separate policy is probably not needed. Para 5.3.87 refers to Map 3 but this does not provide sufficient locational detail for a key diagram.	EC7 needs to be reviewed in terms of the updated guidance set out in PPS4 (EC6 & EC7). It would benefit the policy to be more spatially specific. Updates to the evidence base in terms of the ELR, City Centre, Town and Local Centre study and the Housing Growth Options Study will help to inform an updated approach which is more spatially specific.	Review against PPS4.
Steve Harris		Retention of local shops, services and visitor attractions also important to inner city suburbs such as Burley & Kirkstall.	Agree but these issues are considered in more detail in the sustainable communities section. Policy EC7 is designed to specifically address rural economic development issues.	None
British Waterways		EC7 – waterway assets are fixed so policies should acknowledge that it is not always possible to find suitable sites adjacent to the waterways for some waterway-dependent uses in or around existing settlements e.g. visitor attractions, marinas, boatyards etc. More flexible approach would be consistent with PPS7 and the Good Practice Guide.	These issues are very specific and the policy approach should allow decisions to be taken on their merits. If a proposal happens to be water-related the approach to concentrating development within around existing settlements and town and village centres may be less relevant.	None

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
Carter Jonas	The Diocese of Ripon & Leeds;The Hatfield Estate Lady Elizabeth Hastings Charity Estate; The Ledston Estate; AR Briggs & Co. Ltd; Symphony Group Ltd	EC7 does not provide a reasonable policy basis for ensuring a vibrant and diverse rural economy e.g. by failing to make reference to the role of agriculture and the “real” rural economy. Little to support the enhancement of farming activity and diversification.	EC7 needs to be reviewed in terms of the updated guidance set out in PPS4 (EC6 & EC7). Accept that the policy should make reference to the importance of the agricultural economy.	Review against PPS4.
Savilles	Harewood Estate	EC7 should recognise that the continued vitality of smaller settlements is important. Meeting economic, housing and other needs is vital to enable them to thrive. Final criterion should define that small scale development may include housing or other uses to meet local needs. Conversion of building should continue to be permitted outside of such locations. Certain parts of rural Leeds where there are clusters of economic activity should be identified as self contained priority areas for rural employment.	This needs to be considered in relation to the overall spatial vision informed by evidence base work, particularly the Settlement Study and the ELR. Housing is not an economic development which falls under the definition set out in PPS4	Update evidence base and consider implications.
Lister Haigh	D Parker & Sons	The Wetherby site could help provide the requirement for 185 hectares of local employment opportunities	The merits of individual sites will be considered as part of the preparation of the Site Allocations DPD.	For Site Allocations DPD.

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
Scott Wilson	PPL c/o Revera	<p>EC7 does not provide the necessary support to sustain, grow and diversify the rural economy in places that fall outside the identified Smaller Settlements or village boundaries.</p> <p>Suggest flowing amendments:</p> <p>Bullet 1: Delete reference to <u>major</u> settlements and <u>town centres</u> and retain remainder.</p> <p>Bullet 5: Add provision of <u>new</u> facilities.</p> <p>Bullet 6: Change smaller <u>settlements and villages</u> to say <u>rural areas</u></p> <p>New bullet: Supporting the development of large scale leisure and tourism proposals that would bring significant environmental, economic and social benefits to the district and wider region.</p>	<p>Bullet 1: Disagree, the major settlements and their town centres have an important role to play in serving their surrounding rural communities. The role should be recognised, protected and supported in the interests of promoting sustainable patterns of development. This is consistent with RSS policy. The suggested change would dilute the approach</p> <p>Bullet 5: the suggested change is appropriate</p> <p>Bullet 6: The suggested change could conflict with Green Belt objectives and is not supported.</p> <p>New bullet: This statement is too open ended and would potentially be inconsistent with the PPS4 centres first approach and /or Green Belt objectives. There may be example of leisure development over the plan period which are not appropriate for a town centres and these should be considered on their merits against national, regional and other local policies.</p>	Revise policies where appropriate.
Scott Wilson	Jonathon Hague	Support policy. Important to the smaller settlements that are to accommodate future housing growth as the retention and enhancement of supportive services are essential in the creation of sustainable communities.	Comments of support welcomed.	None



Report of the Director of City Development

Development Plan Panel

Date: 22nd June 2010

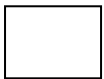
Subject: Leeds LDF Natural Resources and Waste DPD: Analysis of Consultation Responses

Agenda Item:

Originator: Helen Miller
Tel: 247 8132

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 11 May, members received a report concerning the Leeds LDF Natural Resources and Waste Development Plan Document Policy Position Report, setting out an initial report of consultation and a headline summary of the comments received.
2. The purpose of this report is to provide further detailed consideration of the comments received and an indication of the Council response.

1.0 Purpose of this report

- 1.1 At Development Plan Panel on 11 May, members received a report concerning the Leeds LDF Natural Resources and Waste Development Plan Document Policy Position Report, setting out an initial report of consultation and a headline summary of the comments received. The purpose of this report, is to provide further detailed consideration of the comments received and the proposed Council response. This also gives an indication of further work that is needed on the Document and some of the issues that need to be addressed.

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 decisions and where appropriate, site specific allocations. The Natural Resources and Waste Development Plan Document (NR&W DPD) is one of these documents. It is intended to provide a basis for planning decisions regarding six key natural resource themes: land use, waste, minerals, water, air quality and renewable energy. It intends to ensure, as much as possible, that our natural resources are used in a responsible way.
- 2.2 Following consideration of the 'Policy Position Report' by Development Plan Panel on 13th October 2009, a period of informal public consultation was undertaken across the District from 18th January to 1st March 2010. 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. 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 purpose of the NR&W DPD is to set out where land is needed to help society manage natural resources like minerals, energy, water and waste over the next 15 years and help us to use our scarce resources in a more efficient way.

Specific representations and Leeds City Council responses

- 3.2 Land Use (Contaminated Land, Tree- Planting and Canal and Rail Freight)
Policies include the safeguarding of existing rail sidings and canal wharves in order to protect our ability to transport materials by canal and rail. There are also policies to encourage the remediation of contaminated land and urban tree planting.
The policy which proposes to safeguard existing rail sidings and canal wharves has received tremendous support, such that it has been featured on television (Look North) and has been the subject of a number of articles in the Evening Post and in the national 'Planning' journal. Leeds has been held up as an example of good practice in enabling a modal shift from road freight to canal and rail freight. Other Local Authorities are being encouraged to follow our lead. Network Rail have supported the policy in principle but objected to the safeguarding of two identified rail sidings due to the fact they are not big enough for freight purposes. They have suggested alternative sidings instead and would also like the DPD to encourage the provision of an intermodal terminal somewhere along the Holbeck to Stourton line.

A number of barge operators have stated that they are keen to pursue opportunities for water based freight to and from Leeds and have suggested further sites for wharves that they would like the Council to safeguard. Officers are assessing these proposals. However the safeguarding of wharves is an area of potential conflict with housing proposals, as canal-side housing is also seen as attractive. It is important for us to support the uses which are most appropriate to rail and canal and to the wider benefit of Leeds. In this respect, the ability for industry to be able to bring materials in and out by canal and rail has enormous benefits in reducing HGVs, congestion and pollution and helps to support a secure employment base for the City. It has also become apparent that there are wider interests in freight beyond the mineral and aggregates elements relevant to this DPD and therefore it might be appropriate for this DPD to look at use of freight for all materials and goods, not just those associated with the minerals and waste industry.

A lot of support for urban tree-planting was received, for example from the Civic Trust, Natural England and Friends of the Earth.

3.3 Minerals

Policies aim to ensure that we have a sufficient supply of minerals to meet demand. This is done by safeguarding existing sites and allocating new sites and/ or extensions to existing sites. We have called these Mineral Safeguarding Areas (MSAs).

A number of responses, including from Government Office for Yorkshire and the Humber (GOYH) and the Coal Authority have objected to our interpretation of Minerals Planning Guidance. The Guidance states that Mineral Safeguarding Areas should be used to identify where resources exist so that we can ensure that they are not unnecessarily sterilised by development. This does not mean that applications for extraction in an MSA will be viewed favourably. The Coal Authority points out that the failure to include an MSA for coal is contrary to Minerals Planning Guidance. In order for the DPD to be found sound at Examination in Public it is necessary to carry out further research, agree our definition of MSAs and provide maps showing the locations of MSAs. This will need to include MSAs for coal and fireclay, building stone and sand and gravel.

A number of respondents have commented that there is a need for sub-regional apportionment, particularly for sand and gravel extraction.

Additionally, a number of respondents have objected to the Policy Position which gives a presumption in favour of restoration of quarries to alternative uses from landfill and the lack of any further provision for landfill. Leeds has resisted identifying more landfill sites but to support this position it will be necessary to clearly demonstrate that no further landfill provision is necessary, or make provision if this cannot be shown.

Of those who responded to the minerals question, the majority are in support of the protection of existing minerals sites in continued mineral use and for the safeguarding of existing concrete and asphalt plants.

3.4 Energy

Policies aim to encourage the use of renewable energy and to provide criteria for assessing suitable locations for wind energy development. A table is included which shows how the Regional Spatial Strategy target for grid-connected renewable energy generation could be achieved from different types of renewable energy (and thus help to meet the Government's national target for renewables. There is an

overwhelming majority in support of encouraging renewable energy. There are limited responses to the wind energy policy but of those that did respond, the majority are in support. Concerns were raised about the effectiveness of wind energy. A number of respondents would like us to state more specifically which areas of the District are suitable for wind energy development. This reflects comments that were also made on the Core Strategy Preferred Approach consultation. In response to these comments it would clearly be helpful to identify Areas of Search for large scale wind energy development. Additionally, the Council needs to be proactive about renewable energy in order to achieve respectable production levels.

3.5 Water

The DPD contains a suite of policies designed to help manage flood risk from both river flooding and surface water flooding. There are also policies to encourage water efficiency and minimise water consumption. There is a lot of support for our approach to managing flood risk. However, a number of respondents have asked for greater emphasis on reducing water consumption and improving water quality.

3.6 Air Quality

Policies aim to require all developments to incorporate measures for improving air quality where appropriate and to consider the potential for the introduction of Low Emission Zones and Low Emission Strategies. There was a lot of support for Low Emission Strategies, however the identification of Low Emission Zones met with mixed reactions with some people in support, others opposed and some wanting to know more specifically whereabouts the zones would be located before they would support or object to them.

Officers in the Environmental Studies Team in the Transport Planning Section are currently looking at Low Emission Zones and there will need to be a lot of further consultation on this issue if it continues to emerge as a direction of benefit.

3.7 Waste

Policies set out our approach for providing sufficient land to enable us to manage all the different types of waste over the plan period. This is done by safeguarding many existing waste management sites where appropriate, allocating four new strategic waste sites and identifying industrial estates as preferred locations which have the potential to provide more waste facilities within them. There are no new landfill sites allocated because it is thought that there are already sufficient approved landfill sites to meet the need for the plan period. However there are a number of respondents, including GOYH, who object to the lack of any further provision for landfill. There are no new allocations proposed for hazardous waste. However there is a known shortage of sites in the Leeds City Region for disposing of hazardous waste.

In January earlier this year officers met with the Planning Inspectorate for a review of our approach towards the production of the Natural Resources and Waste DPD. The Inspector recommended that the Council should, as far as possible, attempt to quantify our existing waste capacity and ensure that we demonstrate an ability to provide for the forecasted waste until 2026, including each different waste stream. Further work on refining our current management capacity is underway and officers have met with adjoining authorities to attempt to gather information on waste movements across boundaries.

4.0 Next Steps

- 4.1 Changes in national policy, advice from the Planning Inspectorate and representation responses, have made it clear that further work is necessary.
- 4.2 Discussions have taken place with Network Rail and adjoining Local Authorities and further discussions are planned with British Waterways and the Environment Agency. Evidence needs to be analysed from the Coal Authority and British Geological Survey regarding the extent of mineral deposits. There is more work to do on the waste data to ascertain whether the provision of sites across the District is sufficient. The renewable energy section would benefit from a more proactive stance to ensure that we can help meet the Government's target for renewable energy generation. It would be helpful to identify Areas of Search for wind energy development and to give criteria for other kinds of renewables.

5.0 Implications for Council policy and governance

- 5.1 None, other than to reiterate that the Natural Resources and Waste Development Plan Document must be in general conformity with National Planning Policy and the emerging Core Strategy.

6.0 Legal and resource implications

- 6.1 Following the detailed consideration of all comments received and in line with recommendations from the Planning Inspectorate, it is necessary to undertake further technical work and research, to underpin particular policies. 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.

7.0 Conclusions

- 7.1 This report has provided further analysis of the comments received in respect of the Natural Resources and Waste Development Plan Document Policy Position Report. In response to comments received the schedule attached as Appendix 1 details the changes and next steps in preparing the draft Publication document for Panel consideration in due course.

8.0 Recommendation

- 8.1 Development Plan Panel is recommended to:
- i) Note and comment on the contents of the report and the course of further action (as detailed in the Appendices) in preparing a draft Publication Natural Resources and Waste Development Plan Document.

APPENDIX

LCC RESPONSES TO REPRESENTATIONS ON THE NATURAL RESOURCES AND WASTE DPD POLICY POSITION REPORT

Appendix 1 – Responses on the Land Use/ Freight theme

Appendix 2 – Responses on the Minerals theme

Appendix 3 – Responses on the Water Resources theme

Appendix 4 – Responses on the Air Quality theme

Appendix 5 – Responses on the Renewable Energy theme

Appendix 6 – Responses on the Waste theme.

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LAND USE AND FREIGHT COMMENTS					
Ref	Name of respondee	Organisation	Comments	Response	Action
4	Dr. Roger Lorenz	N/A	<ul style="list-style-type: none"> Supports safeguarding wharfs. Providing a direct handling and freight route with the Humber ports. 	Support welcomed.	
5	Mike Latham	Bayford Oil	<ul style="list-style-type: none"> For information we successfully use barges to import product into our storage terminal here in Leeds. Each barge carries the equivalent of 18 articulated lorry loads and we average 2 barges per week, which equates to 1,872 lorry journeys from Leeds to Immingham and back. We couldn't operate without barges and would advocate other businesses to look at the advantages of waterborne transport. 	This is important evidence that helps to justify the need for the Proposed Policy.	Add info. to evidence base.
6	Mike Harrison	RMS Europe Ltd	<ul style="list-style-type: none"> Welcome any positive action to move cargo by water further inland 	Support welcomed.	
7	Roger Clay	Avon Navigation Trust	<ul style="list-style-type: none"> Fully support the proposal of Leeds City Council to retain wharfage and to zone waterside land for industrial use. 	Support welcomed.	
8	Dave Prior	N/A	<ul style="list-style-type: none"> Support any action taken by Leeds council to prevent any further destruction of our needed canal wharves. 	Support welcomed.	
9	A E Jones	Member of the Commercial Boat Operators Association	<ul style="list-style-type: none"> It is highly commendable that Leeds is actively protecting water born freight potential by safeguarding wharves. The piecemeal property and retail development of former commercial waterside sites effectively inhibits any future revival of waterway transport with its long-term environmental, economic, and social benefits. It is much to Leeds' credit that their planning policy considers future benefits as outweighing short-term gains. 	Support welcomed.	
10	Geoff Wheat	Humber Barges Association	<ul style="list-style-type: none"> As an operator of freight barges on the Aire & Calder Navigation, I must stress the importance of identifying and reserving for future use those wharves where freight can be handled, or could be at some later stage. One might laugh at the concept of a passenger railway without any stations, or of a motorway without exits, but this situation is approaching on our freight waterways. It is becoming more and more difficult to attract freight as there are often no 	Support welcomed.	

			<p>convenient wharves for the transshipment of the cargo. As freight rates are always tight, and even more so in this recession, any suggestion of moving further up or downstream may lead to the extra road haulages involved to kill dead a project.</p> <ul style="list-style-type: none"> I would suggest that the whole of the water's edge in Leeds be reviewed to ascertain that no disused wharves are left unrecorded, and to make the highest priority that of checking that no industrial use could be better placed alongside that wharf. Whilst waterside housing might be more saleable than that away from the rivers and canals, it surely makes no sense to turn away potential freight because it "has nowhere to stop". 	<p>Agree, given the overwhelming support for the Policy and the evidence that has come to light that there is demand for more wharfage in Leeds.</p>	<p>Review water side to double check if there are any further suitable wharf sites that need safeguarding.</p>
11	Tim Lowry	N/A	<ul style="list-style-type: none"> With reference to your Leeds consultation I strongly believe that rail lines and wharves must be conserved for the good of the environment. It is important to get lorries off the roads and use environmentally friendly water and rail. This is Government policy and is referred to as MODAL SHIFT. 	<p>Support welcomed.</p>	
12	Barbara Panvel	N/A	<ul style="list-style-type: none"> I'm writing to agree with the proposal 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. I hope that Leeds will take a lead in this and, in so doing, encourage others to follow suit, reducing emissions, road congestion and fuel use. 	<p>Support welcomed.</p>	
13	John Branford	Branford Barge Owners	<ul style="list-style-type: none"> Branford Barges would like to take this opportunity to write to Leeds City Council and express their view on Wharves in the Leeds area. Branford Barge Owners family date back carrying cargo over 200 years and have carried freight into Leeds city centre previously in the past. Branford Barge Owners are carrying cargo right now for Lafarge Aggregates and are currently in their fourth year of a Freight facilities grant, moving cargo from the River Trent near Newark to Whitwood Euro port in the Wakefield district, up to 250 thousand tonnes per annum are moved by water. Therefore the environmental impact is self evident; 	<p>Support welcomed.</p>	

			<ul style="list-style-type: none"> • Wharfs must be safeguarded on canal sides for water freight to take place. We are all aware that roads and motorways are getting more congested; water freight is a viable alternative. • Canals cannot operate without wharves commercially. We feel wharfs in the Leeds area are crucial to safeguard water freight movement. 		
14	Jonathon Branford	Branford Barge Owners	<ul style="list-style-type: none"> • I work for my family business as a captain on a 500 tonne barge, I hope to make this a life long career, I am currently 28 years old and have been working for the business since I was 16. In the past I have brought cargo into Leeds using the Goodman Street Wharf. I hope in the future to be able to use Wharves again commercially in the Leeds area. It is essential that Wharves are safeguarded to be used for commercial use. 	Support welcomed. Important for LCC to be aware that there is demand to use the canal for freight.	Add info. to evidence base.
15	Alison Branford	Branford Barge Owners	<ul style="list-style-type: none"> • I write this e-mail to show my support for the safeguarding of wharves in the Leeds area. I currently work as a primary school teacher in the North Yorkshire area. However I was born into a family of Barge Owners. My father and brother both currently work on the rivers and inland waterways within the Yorkshire and Lincolnshire area. • It would be a great shame if the canals are only been used by pleasure craft and the opportunity for commercial use is lost. Safeguarding of wharves does have sound economic as well as environmental benefits for the long term. Leeds needs to be a forward thinking city planning for the future. 	Support welcomed.	
16	Peter Hugman	BargeConsult	<ul style="list-style-type: none"> • Current proposals indicate the upsurge in the interest in using the Aire & Calder for transporting freight to and from Leeds. The decision to protect the wharves/areas indicated is a huge step forward to ensuring that this can go ahead. In the 2009 Site Selection Study Update for Waste Solution Programme dated 2009, the possibility of accessing the identified sites at Skelton Grange and Knostrop (sites 18,19 + 21) by barge is excluded as a possibility. I believe that this is due to the short distance used for access to a wharf at only 250m (page 57). Current work I am carrying out would indicate that this should be at least 100m and would significantly improve the scoring of these sites especially with an improved Skelton Grange Bridge. 	Support welcomed.	

			<ul style="list-style-type: none"> • My business has been involved in Inland Waterways transport in the Yorkshire area for nearly 30 years and recently we have spent a significant amount of effort identifying wharves that are still useable for commercial purposes. • Most commercial wharves are well over 100m long and I would suggest that the economic area associated with a wharf is at least 1000m rather than the 250m identified by your consultants. • I am currently involved with two projects to restart flows into the Stourton area of Leeds. One, the subject of a recent successful trial is, I believe, at the point of significant investment with the second not far behind. • I and my clients are fully behind your plan to 'protect' the wharves specified and would hope that other planning departments will take note of this action and follow your lead. • The loss of the last remaining canal side wharves in the Leeds area would affect the modal choice for transport over a long period. A wharf can unfortunately be sold for development fairly easily, but building a wharf from scratch is a very costly and time consuming process (starting at £3m). 	Important for LCC to be aware that there is demand to use the canal for freight.	Add info. to evidence base.
17	Graham Whorton	Birmingham Canal Navigations Society	<ul style="list-style-type: none"> • I am writing in support of the initiative to safeguard the railway sidings and canal side wharves in Leeds as written into the Leeds Natural Resources and Waste Local Development Framework proposals. Aggregates, waste and other bulk cargoes are well suited to be carried by water and I hope that Leeds will see the benefit from the use of 700 tonne barges on the Aire & Calder Navigation to cut down on road haulage, reduce carbon emissions and traffic congestion and will follow London's success in re-opening safeguarded wharves. 	Support welcomed.	

18	Peter Morris	Centro	<ul style="list-style-type: none"> • I am writing in support of the need for retention of wharfage and any associated rail sidings on the Aire and Calder Navigation. Use of water and rail for freight has important long term implications for the 'green' agenda, as well as immediate benefits for those living along any trunk routes that would suffer avoidable, additional heavy lorry mileages were the ability to use water for bulk loads to be lost. • I hope Leeds will be able to follow the successful example of London in re-opening previously safeguarded wharves - the 'halo' effect of this for both the Olympics and the City of London is plain for all the world to see. 	Support welcomed.	
19	Edward G Hunt	N/A	<ul style="list-style-type: none"> • It is far better to carry 700 tons of aggregates or waste by barge on the Aire & Calder Navigation than in 35 trucks. Too many wharves all over the country have have been lost due to the greed of developers. • As a member of the Inland Waterways Association I am a supporter of transport on Inland Waterways. 	Support welcomed.	
20	A E Waddington	Ernest V Waddington Ltd	<ul style="list-style-type: none"> • We are writing to say we agree with the safeguarding of railway sidings and wharves for the transportation of minerals and/or waste. Without wharves the navigation is a route to nowhere. Like a motorway with no exits. 	Support welcomed.	
21	C B Holmes	Thursday's Child at Stoke Golding	<ul style="list-style-type: none"> • Write in support of the Commercial Boat Operators Association, being in favour of canal and river wharves not to be used for building. <p>The wharves in Leeds on the Aire & Calder Navigation are a part of our nations heritage. They were built for the purpose of loading and off-loading goods and can still be used today and in the future if no other development takes place. The wharves need to be protected from development and wherever possible, following the example of London, used for transporting materials.</p>	Support welcomed.	

22	Ian Smith	English Heritage Y&H	<ul style="list-style-type: none"> We broadly support the Vision for this particular DPD especially the fourth bullet-point relating to a high level of environmental protection.. It is not clear why this particular set of UDP Saved Policies have been selected whilst others, which seem to be of equal relevance to the consideration of the issues within this DPD, have been excluded. 	Support welcomed. LCC intends to review all the UDP Saved policies and the relevant ones will be incorporated into this DPD.	Review Saved UDP policies and incorporate relevant ones into the DPD.
23	Eric J Ruff	N/A	<ul style="list-style-type: none"> Although I clearly do not live in Leeds I, along with my wife, visited Leeds last May. In fact we visited twice. The first time we arrived by canal but due to our schedule were not able to stay long. We were impressed by the canal and its potential as a tourist attraction. As we liked what we saw we decided to visit Leeds after our boat trip and so spent a couple of days sightseeing in your lovely city. We liked it very much and would encourage others to visit Leeds. <p>I certainly support the retention of wharves as areas for handling cargo carried by water. It's really quite obvious, or should be obvious, to all that water transportation is cheaper and more efficient, as well as being 'greener', than road transportation. I foresee a move towards increased water transportation for bulk items in the not-too-distant future and to safeguard that I firmly believe that wharves should be protected. Once the land is used for housing, high-rise flats, shops, etc. it will be very difficult to convert it back into wharves.</p>	Support welcomed.	
25	Richard Kendall	Hull & Humber Chamber of Commerce, Industry & Shipping	<ul style="list-style-type: none"> In response to the consultation on the above document, we would like to express our support for safeguarding wharves and railway sidings which could be used for the transportation of minerals and waste materials. Companies in our area may be interested in using these facilities more in the future, so we feel it is important that they are protected for these uses. 	Support welcomed. Important to note that other companies in the area may be interested in using the Canal.	Consider surveying other companies to ascertain likelihood of use of the Canal by them.
27	David Lowe	The Airedale Barge Co Ltd	<ul style="list-style-type: none"> I am writing to strongly support the proposals to safeguard various wharves and waterside land in Leeds for the purpose of encouraging movement of waste and aggregates (and other freight) by water. <p>There is no point in trying to adopt the Government's objective of getting freight off road and on to water (and rail)</p>	Support welcomed.	

			<p>if there are no wharves or sidings to handle the traffic</p> <p>It is gratifying that Leeds City Council is 'leading the way' (outside of London) in this respect and hopefully others will follow.</p>		
30	John Dodwell	Commercial Boat Operators Association	<ul style="list-style-type: none"> • This document is in response to the above consultation. It is submitted by the Commercial Boat Operators Association (CBOA) which is the trade association representing firms which carry cargo and provide engineering services on Britain's inland waterways. We have 100 members, including associates. • 2. Our answer to the consultation question no 4 "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?" is Yes. • 3. Our answer to the consultation question no 16 "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?" is Yes as the location of two of them would facilitate the use of water freight. • 4. In answer to the consultation question no 17 "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?", we reply Yes as to Cross Green and express no view about the other four. However, we are puzzled that the whole of the Cross Green Industrial Park has not been included. We recognise that part of the Park is not used for waste/mineral activities but this situation may change. • 5. We observe that only two wharves have been listed and suggest that others be added. • 6. We think it is very important to look at the ownership and 	<p>Support welcomed.</p> <p>It is not the intention to import waste from other authorities.</p> <p>It is important to make provision for other industrial uses besides minerals and waste and therefore we have not identified the whole of the Cross Green Industrial area for waste.</p> <p>Agree.</p> <p>An important role of the</p>	<p>Identify other appropriate wharf sites and safeguard accordingly.</p>

			<p>wharves and potential wharves for safeguarding. The experience of the Mayor of London, Transport for London, the London Development Agency and the Port of London Authority (the navigation authority) with their 50 safeguarded Thameside wharves is that land ownership is crucial to the success of wharf safeguarding and their use as wharves. Such use has been frustrated by property companies wishing to build homes or offices there and denying the use of the wharves to potential wharf users. In two such cases, this impasse has eventually been resolved by threatening to use compulsory purchase powers; as a result, the property companies have sold the land at wharf prices, not housing values. We note that about 50% of all the aggregates used in construction in London arrive in London by water freight.</p> <ul style="list-style-type: none"> • 7. We are therefore pleased to see the wharf at Old Mill Lane, Hunslet on the list. This is owned by British Waterways (albeit that part is leased out at present). They can be presumed (or pressure can be put on them) to be supportive of wharf uses. • 8. However, the Stourton wharf on the list is owned by a property company and we understand that their long term wishes for the site relate to housing. Although they have granted a short term lease to the present occupier, proper investment in wharves needs longer length security of tenure. • 9. If for this reason only, we recommend that the British Waterways owned land in Skelton Grange Road be added to the list. Although works would need to be carried out to the land to make it a usable wharf, the fact that it is owned by British Waterways means there is a greater likelihood of it being used for water freight. The wharf area could have good road access to Pontefract Road. In any event, the wharf's status needs clarifying as it is already designated as a wharf. • 10. Other parts of the document show the location of asphalt/concrete plants, including five in Cross Green where there is also a large metal recycling plant (EMR) and a 	<p>planning system is to protect land in the public interest. We would therefore encourage owners of the safeguarded wharf sites to work with us in protecting sites for this purpose. CPO powers are available to use for this purpose but we would wish to come to an agreement on this issue rather than have to use CPO.</p> <p>British Waterways have confirmed their support for canal freight.</p> <p>There has been no objection to the proposed safeguarding of the Stourton Wharf from the land owner. The area is not suitable for housing development as it is largely industrial.</p> <p>Agree this wharf should be safeguarded.</p> <p>Agree this wharf should be safeguarded.</p>	<p>Safeguard wharf.</p>
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			<p>timber shredding plant. This area is very close to the Navigation where there is what is known as the Total Oil wharf. This is just opposite the Knostrop Lock and mooring bollards and lighting can be seen – see attached photo. Although the wharf by itself has no immediate hinterland, we consider that is a very good case for examining the use of this wharf in conjunction with the Cross Green users – for both incoming and outgoing goods. We are aware of the dismantled railway that runs between Cross Green and the Navigation; we consider this can be dealt with by building a tunnel through the embankment or by cutting a path in the embankment and building a footbridge over the gap.</p> <ul style="list-style-type: none"> • 11. We therefore recommend that the Total Oil wharf be considered for inclusion on the list. • 12. We are surprised to see the Hanson Cross Green asphalt plant site (document reference no 22) among those not to be safeguarded. We also note that the aggregate recycling site in Bridgewater road, Cross Green (document reference no 186) being excluded. Both of these are close to the Total Oil wharf. We recommend that these suggestions of exclusion be reviewed. • 13. When Skelton Grange Power Station was in use, it received coal by water with the unloading equipment straddling the River itself from the barges in the Navigation. The wharf is still there. In view of the proposals in Map E that the Power Station site be a strategic waste site, we recommend that Skelton Grange Wharf on the Aire and Calder Navigation be added to the list. Whilst we can see that original waste would largely arrive by road from various parts of the city, there will be scope to take recyclates (e.g. scrap metal, glass etc) away by barge. We already know of waterside firms elsewhere in Yorkshire wishing to receive Leeds' domestic residual waste and shredded timber/wood pellets by barge. • 14. In view of their proximity to the Navigation, we support the proposals that the Stocks and Bison sites in Stourton be 	<p>Agree this wharf should be safeguarded.</p> <p>Agree that we should review the potential for safeguarding this wharf. The site is a housing allocation in the UDP. At that time it was expected that the industrial nature of the area would change with the decline of the traditional industries, however this has not happened and the area remains heavily industrial. Housing may no longer be the most appropriate allocation for this site.</p> <p>Agree.</p> <p>Support welcomed.</p>	<p>Safeguard wharf.</p> <p>Safeguard wharf.</p> <p>Review UDP housing allocation. Potentially safeguard wharf.</p> <p>Add Skelton Grange Wharf to the list of protected wharves.</p>
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			<p>earmarked for waste and aggregate recycling.</p> <ul style="list-style-type: none"> • 15. It is sometimes said that wharves have no place in city centres. This is thought to be based on the concept that there is no point in bringing goods by barge into city centres if the goods are then transferred to lorries for distribution out of the city centre. Whilst this is true for e.g. containers, in the context of aggregates and waste the statement completely overlooks the fact that aggregates are needed in city centres for construction whilst waste originates within towns and cities and the question is how to get it out. • 16. We are aware that waterside housing has its attractions – although we understand that in the Stourton wharf case, some £200m of public money would have to be spent in clearing up contamination. Homes. We observe that housing does not need to be by the waterside – wharves do; and that wharves do not need de-contamination to anything like the same extent. • 17. We also point out that a freight waterway without wharves is like a motorway without exits – not much use! • 18. We also point out that the whole Plan complies with the following planning policy guidelines <ul style="list-style-type: none"> a. PPG 13 Planning Policy Guideline 13 – Transport – states that “Land use planning has a key role in delivering the Government’s integrated transport policy” b. PPG 13 also said that local authorities should identify and, where appropriate, protect wharves for freight use, including the re-opening of disused wharves. c. This was supported by PPG 11/PPS11 – regional planning; PPG 12 – development plans; PPG 10 – planning and waste management. d. More specifically, the following paragraphs apply <ul style="list-style-type: none"> i. PPG13 (Transport) para 45, requiring local authorities to 	<p>Comments noted.</p> <p>Comments noted.</p> <p>Support welcomed, acknowledgment of compliance with national policy.</p>	
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			<p>protect wharves etc from detrimental development. Annex B para 10 refers to local authorities aiming to promote the role of wharves.</p> <p>ii. PPG 11 (Regional Planning) para 6.3 refers to Regional Transport Strategies providing a strategic steer on the role and future development of inland waterways consistent with national policy. Annex B Para 25 refers to involving freight operators and others and says that in doing so the local authority should look at the siting of links to inland waterways and “it should help to promote the carriage of freight by rail and water”.</p> <p>iii. PPG 10 (Planning and Waste Management) paragraph A10 refers to waste transfer sites being sited so their output can be transferred to water to go to final disposal. Paragraph A 14 reminds local authorities that there may be significant environmental and economic advantages when water transport can be used instead of road vehicles. Paragraph A 51 refers to numerous factors which can influence the location of new waste facilities, such as the availability of water transport.</p> <p>iv. PPG 12 (Development Plans) para 5.16 requires development plans to include proposals for the development of ports and harbours. DfT guidance on Local Transport Plans lists one of the criteria as being “evidence that opportunities for the greater use of water freight are being taken into account in land use planning decisions”. Table 27 on sustainable distribution gives some minimum requirements, such as “evidence that the strategic role for freight distribution for growth in the local economy has been assessed”; “evidence that opportunities for the greater use of water freight are being taken into account in land use planning decisions”.</p> <p>v. PPG 4 (Industrial, Commercial Development and Small Firms), paras 10, 11 and 12 clearly encourages the allocation of waterside sites to those businesses which can benefit from access to the water – retail is given as an example which does not benefit from waterside access.</p>	<p>We have not specifically sought to transfer waste by water however this is an important point and merits further examination.</p> <p>Support welcomed.</p> <p>Advice noted.</p>	<p>Identify if there is potential for water based movement of waste to and from waste transfer sites.</p>
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			<p>vi.PPG 3 (Housing) para 42 refers to the release of waterside industrial sites for housing inhibiting the use of water freight.</p> <p>vii. PPG 24 (Planning and Noise) refers to the need to ensure that wharves are protected against noise sensitive developments being too close to a working wharf.</p> <p>e. Underlying these policies is the concept that wharves should be protected from unsuitable development – whether on the site or too close near by – and that opportunities for expansion should be encouraged.</p>	Advice noted.	
31	Scott Wilson (agents)	Nick Hollands, Veolia Environmental Services Ltd	<ul style="list-style-type: none"> • Preferred Policy Position - Land 1: Reducing Landtake (Page 9) In general, the preferred policy position is supported. However (as alluded to elsewhere in this part of the plan) it is considered that the use of previously developed land should be prioritised for all waste development, not just for 'co-located' and 'compatible' waste activities, as seems to be the inference in the preferred policy position statement. • Preferred Policy Position - Land 2: Contaminated Land (Page 10) It is considered that the preferred policy position, which is to support the redevelopment of sites only where there is 'proven' contamination, does not reflect the general discussion in the supporting paragraphs - which is to encourage development on all previously developed/ brownfield land (only some of which may have 'proven' contamination). The Council should therefore amend the policy to provide more broad support for development on brownfield land where there may be the potential for contamination or a history of potentially contaminating uses. Also, the need for 'financial assessment' and 'planning obligations' should arguably not be stated within the policy since these may not be required in every case. • Preferred Policy Position - Land 3: Urban Tree Planting (Page 10) 	<p>The intention of the policy is to prioritise remediation of contaminated land over other planning obligations.</p> <p>Respondent has misunderstood the intention of the Policy, this is because the Policy is not very clear.</p>	<p>Policy needs to be clarified.</p> <p>Policy needs to be clarified.</p>

			<p>In general, the preferred policy position is supported. However, where it states: “and a provision for all planning applications to resist healthy tree/vegetation loss”, it should be recognised that in some cases it may not be possible to avoid the loss of some trees/ vegetation and in such cases suitable compensatory measures may be sought.</p> <ul style="list-style-type: none"> Preferred Policy Position - Land 4: NRWDPD Transport Modes (Page 11) Whilst the intention behind the preferred policy position is understood, it should be recognised that, just because a site can be accessed by means other than road (e.g. via rail sidings and wharves), it does not necessarily mean that the site is suitable for waste development. It is questionable therefore whether the policy should state that the Council will provide ‘support in principle’ for development on such sites. The policy should instead recognise the importance of seeking sustainable transport opportunities and where a site is both suitable for waste management uses and potentially capable of being served by alternative transport modes that the council will seek to encourage this wherever practical and viable and ensure that potential future linkages are safeguarded. 	<p>Point noted.</p> <p>LCC is considering widening out the freight safeguarding from just waste and minerals freight to all freight. This would then include those wharves that have potential for bringing steel in and out.</p>	<p>Consider respondent’s suggestion. Consider if unavoidable tree loss should require a replacement of two trees for every one.</p> <p>Extend safeguarding of waste and minerals canal and rail freight sites to all canal and rail freight sites.</p>
34	Peter H Boyce	Commercial Boat Operators Association	<ul style="list-style-type: none"> As an operator of commercial cargo boats on the inland waterways, I find it imperative that no further wharfage is lost to redevelopment. Finding that suitable sites for loading cargo have been lost is frustrating and hinders our business. We operate on green principles, and seek to reduce the carbon footprint of our transport by the use of the inland waterways. This use will grow in the future as more cargoes are moved to water transport. The River Aire to Leeds is a major player in the low carbon transport system, and is an asset for the future. It requires its wharves to be secured as traffic increases. Therefore I ask you to retain the precious wharfage assets along the waterways in Leeds, and reject planning applications which will change their use as wharves. 	Support welcomed.	

36	Dr Kevin Grady	Leeds Civic Trust	<ul style="list-style-type: none"> The LCT will support all these objectives but they should be more specific and challenging, making real commitments to change. (Land 3) The LCT has campaigned for additional tree planting throughout the city and the better maintenance/replacement of existing trees – it thus supports this policy. However, there are conflicts with other policies eg the A65 Quality Bus Initiative and NGT could lead to the loss of many trees. The policy should be extended to require the replacement of existing trees by new specimens (and not by small trees!) on a two for one basis as a minimum. (Land 4) The LCT supports the policy to move waste and minerals to water/rail transport with the consequent need to preserve appropriate wharves/sidings. This could impact on existing consents in Hunslet where a wharf has permission for residential development which, while in itself is of high quality, would sterilise an existing minerals wharf. It appears as if this site and others in the area are not safeguarded. Should there be a review of consents given the change in the market and the Eco-Settlement plans for the Lower Aire Valley? 	<p>Support welcomed. The consultation process has brought to light a number of wharves that we were previously unaware of that can also be safeguarded.</p> <p>Agree. NGT is involving some tree losses which are being replaced on a two for one basis.</p> <p>The wharf in question was not proposed to be safeguarded because it is allocated for housing in the Leeds UDP. However this consultation has brought forward very strong support and encouragement for protecting wharves, including from the tenants of the site in question. It would seem appropriate therefore to review the housing allocation to ascertain if it is still the most appropriate use or if it should in fact be safeguarded.</p>	<p>Safeguard additional wharves.</p> <p>Consider including a two for one replacement tree policy.</p> <p>Review UDP housing allocation. Potentially safeguard wharf.</p>
39	Alan Jones	N/A	<ul style="list-style-type: none"> I have been alarmed and frustrated in recent years by the closing of potentially useful wharves alongside our navigable waterways to enable them to be developed for residential or non-navigation purposes. I understand that there is a similar proposal for wharves in Leeds and I object to it. Navigations to Leeds are perfectly viable and modern and it would be environmentally quite wrong to lose their potential for waterborn commerce. 	<p>Support for safeguarding canal wharves welcomed. This DPD does not propose to close any wharves but instead seeks to protect them. There is however , a proposal in the Aire Valley Area Action Plan for housing on a wharf site.</p>	<p>Refer objection to the Aire Valley Area Action Plan Team.</p>
41	James A Walker	N/A	<ul style="list-style-type: none"> I am writing in support of your proposal to safeguard canal/river wharves for future use. <p>It is very much to the credit of Leeds City Council that such a proposal has been made. I have no doubt that many local</p>	<p>Support welcomed.</p>	

			<p>authorities will eventually be highly criticized for failing to anticipate the future need of safe and efficient bulk transport especially to city centres.</p> <p>The use of wharf land for building is short sighted and fails to take any account of the environmental benefits of water transport. As the demands for greenhouse gases reduction become more acute so will the needs grow to make good use of all energy efficient methods of manufacturing and transport.</p> <p>The benefits of water transport, where up to 700 tons of cargo can be delivered to or from city centres are immeasurable. Businesses using bulk materials should be actively encouraged to occupy sites adjacent to canals or rivers and to maximise their use of waterway transport.</p>	Agree with comments.	
42	D G Cox	ASD Metal Services	<p>Strong support for the safeguarding of railway sidings and canal wharves. Want to transport steel profiles and sections by water. Have trialled transporting steel by water from their existing site at Stourton Point and it was extremely successful. Found that one barge replaced the need for 24 articulated heavy goods vehicles. They currently transport 60,000 tonnes of steel per year on Leeds roads which could all go on the water. Their barge has a low emission engine. Also want to transport 'used' wood material for recycling on the canal out to the Humber Ports rather than sending to landfill as currently happens. Cannot do any of this without investing and a serious disincentive to investing is the proposal for the wharf for housing in the Aire Valley Area Action Plan.</p>	<p>Support welcomed. Comments on Aire Valley Area Action Plan noted.</p> <p>It is important for LCC to know that there is this demand for using the wharves. Important to know how much traffic can potentially be diverted from roads to the canal.</p>	<p>Objection to the Aire Valley Area Action Plan to be referred to the Aire Valley Area Action Plan Team. Need to ensure consistency between Aire Valley AAP and Natural Resources and Waste DPD.</p> <p>Add info. to evidence base</p>
43	Michael A Constable	N/A	<ul style="list-style-type: none"> I understand that the consultation period for this proposal is about to come to an end. As a frequent visitor to Leeds, previously for business purposes, but now for family reasons, I must say that I whole heartedly support the idea of not only preserving the few remaining Wharves on the River, but making active use of them. I am able to remember the old Leeds Wharves with the Co-Op coal fleet much in evidence, and then more recently the fuel barges lying below the Lock by what is now the Royal Armouries. Unfortunately though on my recent visits I did not see any commercial traffic on the Navigation at all and felt that it was 	Support welcomed.	

			<p>a great pity. Given the horrific road congestion which our bus encountered the last time we visited there is a clear need for trying to relieve the roads by reintroducing both rail and water trade to the City and this proposal is a step in the correct direction. I can only hope that it is followed up with even more sensible proposals to seek out other bulk cargoes which could travel from the Ports to the City as well as the removal of waste and the bringing in of aggregate.</p> <p>Large river navigations like this can play a major role in the commercial success of a City and I hope Leeds City Council will grasp this opportunity now, before it is too late. Whilst housing developments alongside water may bring in short term revenue, they also bring with them serious problems in terms of traffic congestion and also have deleterious effects on the drainage, which can lead to flooding and infrastructure failure. Without suitable wharves to operate to and from, the Navigation will die as there is not enough pleasure boat traffic to justify its existence as much more than a drain.</p>	LCC is considering widening out the freight safeguarding from just waste and minerals freight to all freight.	Extend safeguarding of waste and minerals canal and rail freight sites to all canal and rail freight sites.
44	Gerald J F Heward	Wood Hall & Heward Limited	<ul style="list-style-type: none"> 1. This document is in response to the above consultation. It is submitted by Wood, Hall & Heward Ltd, a London based canal workboat and barge operating company. Although London based our barges work all over the UK and we currently have 3 tugs and 5 barges working on the Leeds & Liverpool Canal. A major barrier we encounter to the greater use of our inland waterways is lack of access to the canal and suitable loading and unloading facilities. Against this background we made the following responses to the consultation. 2. Our response to the consultation question No. 4 "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?" is Yes. 3. Our response to the consultation question No. 16 "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?" is Yes as the location of two of them 	<p>Support welcomed.</p> <p>Important for LCC to be aware that there is demand to use the canal for freight.</p> <p>Support welcomed.</p> <p>Support welcomed.</p>	Add info. to evidence base.

			<p>would facilitate the use of water freight.</p> <ul style="list-style-type: none"> • 4. Our response to the consultation question No. 17 “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?” is Yes to Cross Green. • 5. We are pleased to see the wharf at Old Mill Lane, Hunslet on the list. This is owned by British Waterways and a working wharf here would support BWs efforts to increase freight transport on BWs canals. • 6. We would suggest that the British Waterways owned land in Skelton Grange Road should be added to the list. Although work would need to be carried out to make it a usable wharf, the fact that it is owned by British Waterways means there is a greater likelihood of it being used for water freight. The wharf area could have good road access to Pontefract Road. • 7. Other parts of the document show the location of asphalt/concrete plants, including five in Cross Green where there is also a large metal recycling plant (EMR) and a timber shredding plant. This area is very close to the Navigation where there is the Total Oil wharf. Although the wharf by itself has no immediate hinterland, we consider there is a very good case for examining the use of this wharf in conjunction with the Cross Green users – for both incoming and outgoing goods. • 8. We would therefore suggest that the Total Oil wharf be considered for inclusion on the list. • 9. We are disappointed to see the Hanson Cross Green asphalt plant site (document reference no 22) among those not to be safeguarded. We also note that the aggregate recycling site in Bridgewater road, Cross Green (document reference no 186) being excluded. Both of these are close to the Total Oil wharf. We suggest that these exclusions be reviewed. 	<p>Support welcomed.</p> <p>Support welcomed.</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree that we should review the potential for safeguarding this wharf. The site is a housing allocation in the UDP. At that time it was expected that the industrial nature of the area would change with the decline of the traditional</p>	<p>Safeguard wharf.</p> <p>Safeguard wharf.</p> <p>Safeguard wharf.</p> <p>Review UDP housing allocation. Potentially safeguard wharf.</p>
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		<ul style="list-style-type: none"> • 10. When Skelton Grange Power Station was in use coal was delivered by water and the wharf is still in existence. In view of the proposals in Map E that the Power Station site be a strategic waste site, we suggest that Skelton Grange Wharf on the Aire and Calder Navigation be added to the list. Whilst we can see that original waste would largely arrive by road from various parts of the city, there will be scope to take recyclates (e.g. scrap metal, glass etc) away by barge. • 11. In view of their proximity to the Navigation, we support the proposals that the Stocks and Bison sites in Stourton be earmarked for waste and aggregate recycling. • 12. We are concerned that many towns and cities have lost access to the canal through residential and office development. If we are to reduce the ever increasing demand for more road transport we must ensure access to water and rail transport in order to exploit those transport options. • 13. We also observe that the whole Plan complies with the following planning policy guidelines <ul style="list-style-type: none"> a. PPG 13 Planning Policy Guideline 13 – Transport – states that “Land use planning has a key role in delivering the Government’s integrated transport policy” b. PPG 13 also said that local authorities should identify and, where appropriate, protect wharves for freight use, including the re-opening of disused wharves. c. This was supported by PPG 11/PPS11 – regional planning; PPG 12 – development plans; PPG 10 – planning and waste management. d. More specifically, the following paragraphs apply <ul style="list-style-type: none"> i. PPG13 (Transport) para 45, requiring local authorities to protect wharves etc from detrimental development. Annex B para 10 refers to local authorities aiming to promote the role of wharves. ii. PPG 11 (Regional Planning) para 6.3 refers to 	<p>industries, however this has not happened and the area remains heavily industrial. Housing may no longer be the most appropriate allocation for this site.</p> <p>Agree</p> <p>Support welcomed.</p> <p>Advice noted.</p>	<p>Safeguard wharf.</p>
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			<p>Regional Transport Strategies providing a strategic steer on the role and future development of inland waterways consistent with national policy. Annex B Para 25 refers to involving freight operators and others and says that in doing so the local authority should look at the siting of links to inland waterways and “it should help to promote the carriage of freight by rail and water”.</p>		
			<p>iii. PPG 10 (Planning and Waste Management) paragraph A10 refers to waste transfer sites being sited so their output can be transferred to water to go to final disposal. Paragraph A 14 reminds local authorities that there may be significant environmental and economic advantages when water transport can be used instead of road vehicles. Paragraph A 51 refers to numerous factors which can influence the location of new waste facilities, such as the availability of water transport.</p>	Advice noted.	
			<p>iv. PPG 12 (Development Plans) para 5.16 requires development plans to include proposals for the development of ports and harbours. DfT guidance on Local Transport Plans lists one of the criteria as being “evidence that opportunities for the greater use of water freight are being taken into account in land use planning decisions”. Table 27 on sustainable distribution gives some minimum requirements, such as “evidence that the strategic role for freight distribution for growth in the local economy has been assessed”; “evidence that opportunities for the greater use of water freight are being taken into account in land use planning decisions”.</p>		
			<p>v. PPG 4 (Industrial, Commercial Development and Small Firms), paras 10, 11 and 12 clearly encourages the allocation of waterside sites to those businesses which can benefit from access to the water – retail is given as an example which does not benefit from waterside access.</p>	Advice noted.	

			<ul style="list-style-type: none"> vi. PPG 3 (Housing) para 42 refers to the release of waterside industrial sites for housing inhibiting the use of water freight. vii. PPG 24 (Planning and Noise) refers to the need to ensure that wharves are protected against noise sensitive developments being too close to a working wharf. <ul style="list-style-type: none"> e. Underlying these policies is the concept that wharves should be protected from unsuitable development – whether on the site or too close nearby – and that opportunities for expansion should be encouraged. 		
45	Rachel Wigginton	GOYH	<ul style="list-style-type: none"> • The policies in this section need to be more specific. They are written as objectives rather than spatial policies. Otherwise you need to consider whether they are necessary. • Saved policies N31 and N52 should be replaced in this DPD if they are still appropriate. 	The policies in this section refer to a large number of sites which are shown in the mapbook, they are too numerous to mention individually. Agree.	Incorporate relevant Saved UDP policies.
46	Angela Flowers	North Yorkshire County Council	<ul style="list-style-type: none"> • It is felt that whilst Land 2: Contaminated Land refers to economic impact arising from land restoration it could also note environmental impacts which are also a key consideration. 	Comments noted.	
47	A A Phillips	N/A	<ul style="list-style-type: none"> • I understand that there is a proposal to safeguard river and canal wharves in Leeds for use in connection with transportation of goods by barge. I wholeheartedly support this intention. There is an urgent need to move as much cargo as possible around this country by water transport, which can be more economical and certainly is more environmentally friendly. The sight of commercial vessels loading, unloading and travelling is also an attraction in its own right. I encourage you to adopt this proposal. • I write from Birmingham, where lack of a viable commercial water transport system is a major factor in the demise of industry in the Midlands. 	Support welcomed. Support for the approach in Leeds is welcomed.	
	Martyn Coy	British Waterways	<ul style="list-style-type: none"> • As the authority responsible for the operation and maintenance of the Aire & Calder Navigation and Leeds & 		

			<p>Liverpool Canal;</p> <ul style="list-style-type: none"> • In the light of British Waterways' statutory duties as a navigation authority and its statutory duties under the British Waterways Act 1995 to protect and safeguard the heritage, natural environment and landscape character of waterways and to encourage public access to and recreation use of the navigable waterways; • As a statutory consultee for planning applications within 150 metres of our waterways; • In the light of British Waterways' track record in regeneration delivery and the Government requirement for British Waterways to promote and secure the waterways as a catalyst for urban regeneration; • In the context of the DETR publication "Waterways for Tomorrow" (June 2000), in which the Government clearly states its commitment to increasing the economic and social benefits offered by the waterways. Apart from their traditional role as a system that supported waterborne freight and passenger transport, waterways serve a variety of functions including acting as an agent of or catalyst for regeneration in urban and rural areas; water management resource (water supply, transfer, and drainage); tourism, cultural, sport, leisure, educational and recreation resource; as well as heritage, landscape, open space and ecological resource. The government makes reference to increasing the benefits offered by the waterways by supporting the development of the inland waterways through the planning system. • Policy Land 4: NRWDPD Transport Modes Policy T4 of the Yorkshire and Humber Regional Spatial Strategy (RSS) calls for plans and strategies 'to identify and protect appropriate facilities for the loading and unloading of water-borne freight, having regard to issues such as landside transport links and potential conflicts of use and disturbance'. However, whilst proposed Policy Land 4 aims to safeguard 	Comments noted.	
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			<p>wharves, 'where possible', it relates to their use for natural resource and waste activities only. Such a narrow focus would reduce the opportunity for other forms of waterborne freight transportation on the waterway; and that is other forms of waterborne freight that might readily fit with wider aims of waterside regeneration as set out in the emerging Aire Valley Leeds Area Action Plan. In this regard, the policy should address waterborne freight in general of which minerals and waste is only one element. Indeed, the two sites that are identified on the Policy Position Map are currently general employment sites, with one handling construction steel as opposed to raw minerals.</p>	<p>Agree that the Policy should support water-borne freight in general. LCC intends to extend the policy to cover other types of water freight and not just waste and minerals.</p>	<p>Extend safeguarding of waste and minerals canal and rail freight sites to all canal and rail freight sites</p>
54	Mike Brown	N/A	<ul style="list-style-type: none"> It has surprised me over the years about how little the powers that be in Leeds know about the fantastic canal infrastructure at their disposal and how absurd it is that it is totally unused at a time when the traffic congestion in and around Leeds is getting worse every day. <p>I think it is worth pointing out that the stretch of the Aire and Calder Navigation between Knostrop Flood Lock and Knostrop Lock known as the Knostrop Cut was developed in 1959 with purpose built warehousing and barge handling facilities and has been criminally under used since the late 1960's.</p> <p>It was built and designed for larger barges and the location of this area of the canal is perfect with the network of newly built roads surrounding the canal to almost develop a canal zone, this concept is very successful in European cities such as Brussels. Knostrop depot is still intact, it perhaps needs a little investment, but the wharf is still there with good storage and covered areas, overhead covered unloading facilities and located in a safe area where it would not effect other users such as cyclists and walkers etc. Leeds would be capable of handling 600 tonne barges, with direct access for export via the port of Goole or onwards to any of the Humber ports, also direct links via the Aire and Calder Navigation to other towns and cities in Yorkshire or even to Nottingham via the River Trent.</p> <p>Just off the centre of Brussels lies a very similar canal to the</p>	<p>Agree</p> <p>Agree</p> <p>Important evidence for this DPD.</p>	<p>Safeguard wharf.</p> <p>Add info. to evidence base.</p>

			<p>Aire and Calder Navigation, it is a little bit larger and can accommodate larger barges, but a special zone for the canal has been successfully developed with modern handling facilities and various bulk cargoes such as aggregates, waste, oil and petrol products slip in and out of the city unnoticed as they could and have done easily in Leeds too; but yet carrying up to 30-40 lorry loads which if people were made aware, would be very attractive proposition!</p> <p>The section of the Aire and Calder Navigation below Knostrop Lock and beyond Skelton Grange Power Station Bridge is another prime area to further develop barge handling facilities the access to the motorways is even better here, ADS Metals had a successful trial delivery of 2000 tonnes of steel in 2008, if they could be supported on their site which is again canalside, they would be encouraged to invest in a barge served terminal in and out of Leeds.</p> <p>It seems to be a bit of a myth that any barge traffic has been moving on the Aire and Calder Navigation to read recent articles, particularly the one in the evening post last week, it gives totally the wrong impression of canal and never mentions that Leeds did receive serious tonnages until eight years ago . Then three and half thousand tonnes of sand per week was delivered by barge to a wharf off Goodman Street operated by Lafarge Aggregates , before the wharf was moved to Whitwood near Castleford , when two thirds of the sand had to be lorried back to Leeds because it was destined for Bison's in Hunslet ! If operators such as the main dry cargo carrier John Branford had been consulted and guys like myself, John Dodwell , David Lowe, extra lorry miles could have been avoided and new canal work created. The canal was modernised in the late sixties for another fuel based contract to deliver oil products from Salt End Hull to Leeds for Esso, this was discharged near to Clarence Dock by six purpose built 500 barges, it just appears that all the work has been done in the past to upgrade Leeds into a well served canal port , only to let all the work be undone .</p> <p>Goodman Street area below Knostrop Lock had huge oil</p>	<p>Important for LCC to be aware that there is demand to use the canal for freight.</p>	<p>Add info. to evidence base.</p>
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			<p>storage facilities and until 1987 JH Whitaker tanker barges brought over 100000 tonnes per annum of oil products into this corner of Leeds, once again un-noticed.</p> <p>Currently oil products are carried to Fleet storage at Lemonroyd near Woodlesford and aggregates to Whitwood, but LeedS should be the jewel in the crown and an ideal canal served model for the whole of the UK.</p> <p>In my opinion and as do consider myself an expert of the Aire and Calder Navigation, Leeds City Council needs to wake up and not only safeguard the wharves, but also look to overhaul the whole of the Knostrop-Hunslet area and develop an inland port where not hundreds, not thousands, but millions of tonnes could be carried in and out of the city by 600 tonne barges and if the canal was developed to its maximum length and depth, 700 tonne barges could navigate from the Humber ports of Hull and Immingham direct into the heart of Leeds and Yorkshire!</p>	<p>Evidence of demand and need for Policy.</p> <p>Comments noted.</p>	<p>Add info. to evidence base.</p> <p>Review potential for an inland port.</p>
55	Colin Holm	Natural England	<ul style="list-style-type: none"> Natural England welcomes Preferred Policy Position – Land 1: Reducing Land take. We agree that the policy will help reduce land take and as a consequence we consider that it will reduce potential negative effects on biodiversity and landscapes. Furthermore, the reference to criteria aimed at preventing adverse environmental and social impacts is important. However, the policy should make clear what these criteria are. We would advise that such criteria should include the avoidance or satisfactory mitigation of impacts on landscape, biodiversity, access and impacts on air, soil and water. Natural England agrees with Preferred Policy Position - Land 3: Urban Tree Planting. We would, however, point to the possibility that some sites that may be earmarked for tree planting may already be significant resources for biodiversity. For instance, alongside some transport corridors there may be significant grassland habitats (such as calcareous grassland in the east of Leeds). Tree planting would diminish such habitats, so we would recommend checking with the local environmental records centre (in Leeds' case, West Yorkshire Ecology) whether any species 	<p>Support welcomed. Agree with comments.</p> <p>Agree. Where tree planting is carried out as part of a development LCC would expect an ecological assessment to have been submitted as part of any application.</p>	<p>Add criteria to Policy.</p> <p>Amend policy to say that tree planting will be encouraged/carried out except where it would have an adverse impact on existing important habitats and species.</p>

			<p>or habitats have been recorded at sites, and making an assessment of the suitability of the land prior to tree planting (e.g. by utilising ecological expertise from within the Council).</p> <ul style="list-style-type: none"> Natural England would be happy to advise further on ways in which this can be achieved. Tree planting should also be consistent with the landscape character of the area. We would advise that an important part of the evidence base for the Local Development Framework as a whole is an up to date landscape character assessment. To ensure that planning applications play their role in increasing tree cover in appropriate places we would advise that supporting text is added to this policy to ensure that ecological and landscape constraints to this policy are adhered to. This will include that appropriate evaluation of site biodiversity and consideration of landscape character is included with proposals. Natural England welcomes 'Preferred Policy Position - Land 4: NRWDPD Transport Modes' which allows for non motorised transport modes to support the development types covered by this DPD. 	<p>As part of the Leeds UDP a comprehensive landscape assessment was completed. Since then the landscape remains largely the same, consequently it is unlikely a comprehensive review is needed. There may be scope, however, subject to resources, to target selected areas for review where or if key changes are apparent.</p>	<p>Review within the context of the preparation of the Core Strategy publication draft.</p>
53	Ian Moore	Inland Waterways Association	<ul style="list-style-type: none"> Re Natural Resources and Waste Development Plan Document Please find attached the Leeds Natural Resources and Waste DPD response form. I am writing on behalf of the West Riding Branch of the Inland Waterways Association in support of the Preferred Policy Position – Land 4: NRWDPD Transport Modes, safeguarding canal wharves. The Inland Waterways Association has over 17,000 members and campaigns for the conservation, use, maintenance, restoration and sensitive development of Britain's canals and river navigations. This includes encouraging water freight. In addition to the 2 wharves identified on Maps B2, we also support safeguarding the other waterside minerals and waste management sites listed in the document, as shown on Maps E and F, as these could also provides scope for future wharfage. 	<p>Support welcomed.</p>	

			<ul style="list-style-type: none"> Also we would like to see the inclusion of the former Hunslet "Total" wharf at Knowsthorpe (close to Knostrop Flood Lock) on land adjacent to Cross Green Industrial Estate, as this would provide wharfage on the north bank of the river which could serve businesses on the industrial estate. Further to the above British Waterways also own land at Stourton off Skelton Grange Road, which was intended for development as a wharf but has not yet been developed. And for this reason and as it is already owned by BW, we would like to see this safeguarded as well. 	Agree	Safeguard Wharf.
58	Mary Keynes	Impact Residents Network	<ul style="list-style-type: none"> We agree with the vision subject to the reservations and suggestions set out below. Please note especially our response to question 2. Development of "previously developed land" designated as "brownfield" should be subject to consultation with residents, as many of our existing green spaces are in fact designated as brownfield although they have been green space within the living memory of most people in the area. Thus newbuild targets set by central government may conflict with the protection of existing green spaces in inner areas such as ours, which should surely be given higher protection to preserve their rarity. This could result in loss of amenity in deprived areas. We strongly support planting trees in the city centre to fill the gaps in its green infrastructure, and we suggest that the emphasis should be on the use of native species and on trees able to resist and adapt to the stresses of climate change. 	<p>The development plan does not designate 'brownfield' sites. All proposed housing and employment allocations, whether on brownfield or greenfield sites will be subject to statutory public consultation. Green spaces which are designated as such in the Leeds UDP will continue to be protected as Saved Policies. In due course, the emerging Leeds LDF will replace these saved policies with a similar protection policy based on evidence gathered during the council's PPG17 study. The Council has carried out a PPG17 audit and this evidence will be used to update the green space planning policies so that any new important greenspaces can also be given protection.</p> <p>Support welcomed.</p>	<p>Include in the text a reference to the need for varieties that are better suited to climate change.</p>

59	Ed Carlisle	Together for Peace	<ul style="list-style-type: none"> • Could we have a special focus on community orchards, ie fruit trees? Get local people involved (even just a few) to plant them etc – and there'll be something nice for the community to enjoy together in a few years time 	Acknowledge importance of community orchards.	Review suggested policy to see if there is any scope for giving encouragement to community orchards.
61	Stuart Beardwell	Leeds Friends of the Earth	<ul style="list-style-type: none"> • 2. Efficient use of previously developed land should allow for redevelopment options of green space and food growing land, and not necessarily just be buildings. Bringing brownfield/contaminated land into reuse should be encouraged, and 'efficient' use should not just look at economic efficiency but also the environmental and social aspects of redevelopment. • 3. This could be strengthened - when development takes place, it shouldn't just resist healthy tree and vegetation loss but actively increase it, not just 'wherever possible' - this should be a requirement. Having a target for increasing the number of fruit and nut trees within the city should also be included in the policy, to allow for increased food availability and community food growing spaces (eg. community orchards). • 4. This should be strengthened to include them being safeguarded for future public transport improvements, as well as mineral/waste transportation. Public transport should be considered as part of the NRWDPD as it fits in with issues or air quality, land use, energy. 	<p>UDP policies require green space provision as part of developments and these policies will be updated and integrated into the Core Strategy and Site Allocations DPD. The PPG17 audit has examined allotment provision and where there are shortages we will need to develop relevant policies to address this.</p> <p>Given the support for the tree planting policy LCC will be looking at how it can be strengthened and improved.</p> <p>Public transport is dealt with in the Core Strategy as it is a strategic issue for Leeds.</p>	<p>Review suggested policy to see if there is any scope for giving encouragement to community orchards and fruit/ nut trees.</p> <p>Cross refer to Core Strategy.</p>
62	Sharon Cox	MDS Transmodal Ltd	<ul style="list-style-type: none"> • MDS Transmodal is a specialist freight transport consultancy that has been involved in various studies over many years concerning the potential for increasing the contribution of inland waterways to the carriage of freight in the UK. Amongst other things, I was co-author of the DfT guidance report "Planning for Freight on Inland Waterways" in which we highlighted the best practice of safeguarding wharves. • In general it is very welcome to see that the planners have put forward suggestions for safeguarding wharves, complying with overarching planning policy guidelines, and I 	Support welcomed.	Add to evidence base.

			<p>fully support that push in development planning because it is essential to safeguard wharves in order to realise the freight potential of the waterways. It is also essential to reserve waterside land.</p> <ul style="list-style-type: none"> • I agree with the two wharves that have been proposed for safeguarding. • I agree with the areas of waterside land to be reserved. The unused wharf owned by British Waterways should remain as a wharf and be included within the plan. 	<p>Support welcomed.</p> <p>Support welcomed. Agree</p>	<p>Safeguard wharf.</p>
65	Mr. Zulfiqar Ali	Environment Agency Y&H	<ul style="list-style-type: none"> • We suggest the following wording be incorporated within your Land Development section to the effect that: <ul style="list-style-type: none"> i) The Environment Agency will object to any proposed landfill site in groundwater Source Protection Zone 1. (ii) For all other proposed landfill site locations, a risk assessment must be conducted based on the nature and quantity of the wastes and the natural setting and properties of the location. (iii) Where this risk assessment demonstrates that active long-term site management is essential to prevent long-term groundwater pollution, the Environment Agency will object to sites: <ul style="list-style-type: none"> • below the water table in any strata where the groundwater provides an important contribution to river flow or other sensitive surface waters; • on or in a Major/Principal Aquifer; • within Source Protection Zones 2 or 3. <p>The area of principal aquifer and most of the source protection zones within the Leeds Metropolitan District Council area is the Magnesian Limestone which is found to the east of the city.</p>	<p>It would be helpful to meet with the Environment Agency to discuss these comments further.</p>	<p>Meet with EA.</p> <p>Add info. to evidence base.</p>
67	Mike Willison	Leeds Local Access Forum	<ul style="list-style-type: none"> • Policy Land 4 - In relation to wharves, every opportunity, where possible should be taken to provide walkways and cycleways. 	<p>Agree in general however where there is a working wharf, it is likely that access for walking and cycling may be restricted due to safety reasons.</p>	<p>Explain in the text.</p>

70	Mr A.Rivero	Network Rail (Property)	<ul style="list-style-type: none"> Although it is logical to suggest existing freight sidings and canal wharves should be safeguarded for possible transfer of material by rail or canal, not all existing facilities are in appropriate locations both in terms of the modern railway network or neighbourhood uses. Many of the remaining yards were designed for service by the horse and cart and do not sit comfortably with either the strategic road network or adjoining developments. In addition they are not all of a size capable of taking the modern type of rail vehicle. As an example, Whitehall Yard (in your document as Holbeck sidings, no.19) – this should be re-named for clarity to the name it is known by in the railway industry (Whitehall Yard) – is very restricted in size (length of siding) and also because of its position it is very difficult to access by rail, given the heavy flow of passenger traffic emanating from Leeds station. Its value as a freight site is therefore very low. <p>In terms of overall freight provision for the city further work has to be carried out in providing a suitable location which is not fettered by exiting capacity and timetabling issues but also is well related to the strategic road network. The potential for freight use at Neville Hill east sidings and Hunslet Riverside is important in this context.</p> <p>You should also be aware that the current UDP identifies Marsh Lane (18) as an important gateway development site, which is supported by NR, and as the yard is again hampered by capacity and size we do not consider it appropriate to safeguard the freight designation.</p> <p>The other two sites identified (Pontefract Road and the Tarmac sidings at Hunslet Riverside) are on long leases for the duration of the DPD and are of an appropriate size and location - therefore we have no objection to their designation.</p> <p>As such we object to policy Land 4 and in particular the designation of the sidings at Marsh Lane and Whitehall yard (Holbeck) for safeguarding.</p>	<p>Leeds has met with Network Rail to discuss in detail the suitability of rail sidings in the Leeds District for freight purposes.</p> <p>Comments noted. LCC acknowledges the need to review the use of the proposed sidings for freight. However we are aware of other sidings that may have more potential and work is on-going to review whether or not these need to be safeguarded.</p> <p>LCC acknowledges that there may be further potential for freight use at Neville Hill. This needs to be reviewed in the light of the need for the facility and its proximity to existing housing.</p> <p>As above.</p> <p>Support welcomed.</p> <p>Objection noted.</p>	<p>Work on-going.</p> <p>Rail sidings to be reviewed. Likely to be changes to the safeguarded sites list.</p> <p>Work on-going.</p> <p>Consider removal of site from safeguarded site list.</p> <p>Consider removal of these two sidings from safeguarded site list.</p>
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			<ul style="list-style-type: none"> • A suggested amended wording of the policy could be: “.....safeguards existing rail sidings and wharves where possible (taking into account location, size and capacity constraints of the rail network in particular) and supports new non-road infrastructure facilities.....” • Deletion of maps 18 & 19 from mapbook B2. At this stage pending a review of the Neville Hill area (it may be required for a new locomotive depot) and Hunslet Riverside we do not consider it appropriate at this time to suggest any further site for safeguarding under this policy. See Word Doc response for details. 	<p>Suggested wording is helpful.</p> <p>Work on-going to identify alternative rail sidings and to provide support for an inter-modal facility somewhere along the Hunslet to Stourton line.</p>	<p>Review and consider inserting suggested wording.</p> <p>Work on-going to identify alternative rail sidings and to provide support for an inter-modal facility somewhere along the Hunslet to Stourton line.</p>
71	David Berry	The Coal Authority	<p>Although mining legacy problems and issues occur as a result of mineral workings, it is important that new development delivered through the Local Development Framework recognises these and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.</p> <p>As the Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of the Coal Authority may be required.</p> <ul style="list-style-type: none"> • The comments which the Coal Authority would like to make in relation to mining legacy issues are: • Representation No.2 Preferred Policy Position – Land 2: Contaminated Land Test of Soundness Justified Effective Consistency With National Policy x <p>Comment –</p>	<p>Comments noted.</p>	

			<p>The proposed policy approach towards the redevelopment and remediation of contaminated land is welcomed. Given the legacy of coal mining within the Leeds area, and for the reasons outlined above, the Coal Authority considers that this approach could be widened to incorporate the opportunity to assess and address any coal mining-related land instability or other public safety issues as part of the development process.</p> <ul style="list-style-type: none"> The inclusion of additional text/criteria on land instability within the proposed policy approach would ensure consistency with the requirements of PPG14. <p>Reason – To ensure that this important locally distinctive issue is properly addressed through the DPD in line with the requirements of PPG14.</p>		
75	Nicola Bell of Scott Wilson (agent)	PPL Revera	<ul style="list-style-type: none"> Preferred Policy Position – Land 3: Urban Tree Planting is supported in principle. However, encouragement for tree planting should not be restricted to urban areas as the title of the policy position suggests. It is suggested that the word ‘urban’ is removed from Preferred Policy Position – Land 3 to avoid any misinterpretation. 	<p>Woodland planting is encouraged in the Core Strategy and it sets a target.</p> <p>The purpose of this policy is to address the specific need for <u>urban</u> tree planting with particular regard to urban cooling.</p>	Cross refer to Core Strategy.
78	Jon Dodwell	Commercial Boat Operators Association	<ul style="list-style-type: none"> Q4: Yes. Suggest more wharves be added to the list. Suggests looking at land ownership in connection with wharves to prepare for/preempt problems like those in London 	Agree, this consultation has brought forward more wharves that may be suitable for safeguarding.	Safeguard additional wharves, consult with landowners.
79	Mr GA Whiteley		<ul style="list-style-type: none"> wants to see land and wharves on the Aire and Calder Navigation reserved for waterborne cargo. 	Support welcomed.	
80	Dan Walker, David L Walker Ltd.(agent)	David Atkinson, Lafarge Aggregates Ltd	<ul style="list-style-type: none"> PPPL1: it is suggested that this could be expanded to include secondary processes such as ready mixed concrete manufacture, this has the added benefit of contributing to PPPL4, which is a satisfactory policy position. 	Agree, policy does in fact include secondary processes as well but only with regard to brownfield land.	
83	Matthew Fowler		supports wharf safeguarding. Q2-4: Yes	Support welcomed.	

86	Lionel Sykes		<ul style="list-style-type: none"> • Q2: We need to develop and reuse all brown/grey land and leave all the green belt untouched apart from the additional trees and I mean the correct ones. • Q4: Leeds has a very poor transit (bus) system for a major city. The buses may be new but they are very rare to keep to a time table, unfortunately the driver are not helpful, when you do come across a polite driver it is so noticeable. We should of had an underground installed in the early 70s, (if Newcastle could do it, I am sure Leeds could, but I guess the city fathers of that era were not only deaf but blind too. If you have an efficient bus/tram/rail system you would take 65% of private cars off the roads in the inner city, until then we can dream. 	<p>This is a Core Strategy issue.</p> <p>Leeds is promoting a New Generation Transport System to replace the supertram proposal.</p>	
94	Mrs Ann Slater		<ul style="list-style-type: none"> • Only existing - no new building of wharves to handle waste. 	New wharves are not proposed, only existing.	
97	Trevor Maggs		<ul style="list-style-type: none"> • Supports Safeguarding Wharves 	Support welcomed.	

Minerals					
Ref	Respondee	Organisation	Comments	LCC Initial Response and links	Action
001	Martin Clayton:Geo Plan Ltd	Marshalls Natural Stone	<p>Market forces will determine how long Howley Park Quarry will remain in operation for.</p> <p>Safeguarding is to protect viable mineral resources for future generations, not just for the duration of a development plan document. The justification for not safeguarding potential crushed rock resources is therefore flawed.</p> <p>Safeguard potential resources between the existing Howley Park quarry and the M62 against inappropriate development that might otherwise sterilise them.</p>	<p>The DPD will continue to safeguard the quarry until the brick clay has either run out or is no longer needed. This is because it is better to use the existing quarries to meet need rather than to open new ones.</p> <p>Agree need to consider.</p>	<p>None</p> <p>Consider if this area should be a Mineral Safeguarding Area (MSA).</p>
022	Ian Smith	English Heritage	<p>Midgley Farm, Otley – There is a Grade II Listed Building immediately to the south of this area – proposals need to accord with national policy.</p> <p>Sand and gravel resources in north Leeds area are located in attractive landscape areas and within the area are some important historic assets therefore support the identification and production of the Wharfe Valley.</p> <p>We broadly support the approach set out for the protection of potential sources of building and roofing stone which reflects the advice in Annex3 of MPS1.</p> <p>Need to safeguard quarries which are currently being worked (and their possible extensions) and former quarries which have the potential to be reopened to supply material for the repair and restoration of historic</p>	<p>Midgley Farm is a long-standing allocation in the UDP, any planning application will be assessed against stringent environmental criteria.</p> <p>Support welcomed.</p> <p>Support welcomed.</p> <p>Agree important quarries for this purpose should be</p>	<p>DPD to include environmental criteria to reflect the requirements of the current UDP Saved Policies.</p> <p>Liaise with EH and</p>

			<p>structures and buildings within the area. (MPS1 Annex 3 para 3.3)</p> <p>English Heritage and LGYH have commenced work on a project which will identify important historic quarries within the region.</p> <p>Policy Position Statement should make reference to other important sources identified as part of the emerging Regional Strategic Stone Study.</p>	safeguarded.	LGYH once the findings of the study are available, to see if any further safeguarding needed and incorporate relevant data for Leeds into the DPD.
028	David Brewer	Director General of the confederation of UK Coal Producers (CoalPro)	<p>Paragraphs 3.18 and 3.19 and Preferred Policy Position 5 are incorrect and do not accord with national policy guidance as set out in MPS1 and MPG3.</p> <p>The statement in the first sentence of 3.18 is incomplete and one can only conclude that this is deliberately the case to the point of being disingenuous. The presumption against opencast coal mining can be set aside if the proposal is environmentally acceptable or can be made so by the use of planning conditions or obligations. There is therefore a clear onus on the MPA to work with the applicant to determine what reasonable planning conditions or obligations can be used to make the proposal environmentally acceptable if it is adjudged not to be so initially.</p> <p>Furthermore, if (and only if) the proposal is not, or cannot be made, environmentally acceptable, then community benefits should be taken into account. These principles apply even in the Green Belt or other sensitive areas provided the proposal meets the highest environmental standards. The statement in the first sentence of para 3.18 should therefore be amended to reflect the above.</p> <p>para 3.18. It is simply not the case that the further exploitation of fossil fuels is counter to the main principles. Whilst ever UK coal demand exceeds indigenous supply, which is likely to be the case for years to come, then production of coal in the UK, including from within Leeds, is not simply a relatively low carbon option, but <u>THE</u> lowest carbon option of the available alternatives. The only alternatives is imports with the consequent carbon emissions associated with transport. Using imports</p>	<p>Agree</p> <p>Comments noted.</p>	<p>Review our approach to MSAs and include MSA for coal.</p> <p>Suggest a carefully re-worded statement – eg the shallow coalfield</p>

		<p>as opposed to indigenous sources is contrary to MPS1 and is simply the antithesis of sustainability.</p> <p>The statement in the third sentence of para 3.18 that coal cannot be ruled out in the immediate future as an energy source is a massive and crude understatement of the situation. At present coal provides about a third of the country's electricity and at times in winter, this proportion increases to half, not least in this present cold winter. Without coal, the entire electricity generating and supply system would completely break down with all the consequences that that entails. Whilst coal burn will gradually reduce over the next few years it will remain an essential component of the UK's electricity generating system, not least to provide essential back up for intermittent and unreliable renewable sources, for many years to come and probably permanently. The sentence needs completely rewriting to reflect the situation as it stands and not pure fantasy.</p> <p>Para 3.19 is simply unacceptable and is directly contrary to minerals planning guidance. There remain significant resources of shallow coal in Leeds and extraction opportunities other than at development sites remain. Such opportunities are, or can be made, fully compliant with MPS1 and MPG3. The shallow coalfield is not fragmented and it is wrong to state that it is untenable for the Council to identify MSAs for coal. This is contrary to guidance in MPS1 which <u>requires</u> MPAs to identify MSAs. Greater Manchester has been able to identify such areas and there is no reason whatsoever why Leeds should not also be able to comply with national guidance.</p> <p>The MPAs need not, and should not exclude the built up area. Indeed, the statement in para 3.19 that coal might be extracted prior to development applies equally to redevelopment within built up areas and there are many such examples nationally. Indeed, how can such opportunities be assured if the MSAs do not extend to cover such areas? The paragraph should be completely rewritten to reflect guidance in MPS1 and MPAs should be established for coal. As a consequence, the Preferred Policy Position should be completely rewritten. The extraction of coal should be catered for and the principles set out in MPG3, as described above, should be applied. MSAs should be identified for coal, as required by MPS1, and including</p>	<p>LCC accepts that our approach to MSAs need to be reviewed and that we need to identify an MSA for shallow coal.</p>	<p>itself is not fragmented but the opportunities for extraction are limited within built up areas and outside those areas other constraints apply.</p> <p>Review our approach to MSAs and include MSA for coal.</p> <p>Review our approach to MSAs and include MSA for shallow coal. Appropriate mapping to show the extent of the MSA to be provided.</p>
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			<p>the built up area and all Green Belt land. A map of the MSAs for coal should be drawn up.</p> <p>Para 3.20 should refer to the potential for producing fireclay in conjunction with coal. Fireclay is a nationally important resource for high quality buff-coloured bricks and is in short supply. It can, generally, only be produced economically in conjunction with surface-mined coal. Reference should be made to this in Preferred Policy Position 6.</p> <p>Para 3.26 and the Preferred Policy Position should make it clear backfilling with overburden arising from the mineral extraction process itself is favoured. It is necessary to distinguish this from backfilling with landfill waste.</p>	<p>Agree</p> <p>Backfill does normally mean overburden.</p>	<p>Include reference to fireclay.</p> <p>Clarify in the text that the backfill should be with overburden rather than landfill waste.</p>
032	Ben Ayres	Hanson UK	<p>Safeguard existing mineral-related sites:</p> <p><u>Asphalt Plant at Hunslet (Off Bridgewater Road) & Possible Aggregates & Asphalt & Concrete Railhead Complex (DPD document ref No 22).</u></p> <p>Object to the existing site not being safeguarded. Plans to expand current business at the site or alternative - Neville Hill. Plans in preparation with landlord (DB Schenker)</p> <p>In order to safeguard its asphalt facility and maintain continuity of supply to its customers will either develop the existing site into a rail head facility incorporating an Asphalt plant, aggregates handling facility and concrete manufacturing plant or to relocate to provide this development at an alternative site.</p> <p><u>Provision should therefore be made in the Natural Resources and Waste DPD -Policy Position Report for possible expansion at Hunslet or relocation of the facility to Neville Hill.</u></p>	<p>This site is a housing allocation in the UDP. However, as yet it has not come forward. LCC needs to consider if the housing allocation is still appropriate in this industrial area. There is a need to protect and enhance Leeds' role as a regional employment centre and this site is more suited to meeting employment needs than it is for meeting housing demand. There are other areas of the City which are more suitable for housing.</p>	<p>Either safeguard the existing asphalt plant off Bridgewater Road (site ref. 22) or try to find an alternative site that can also be accessed via rail.</p>

			<p><u>Concrete Plant at Cross Green Way, Cross green industrial Estate (DPD document ref No 27).</u> We support this proposal.</p> <p><u>Concrete Plant at Knowsthorpe Road ,Cross green industrial Estate (DPD document ref No 31).</u> We support this proposal.</p> <p><u>Mineral reserves should be safeguarded Brickworks at Swillington (DPD document ref No 4).</u> We support this proposal.</p>	<p>Given the desire of the existing occupant to expand operations in the Leeds area and the importance of the nature of their business to the asphalt and concreting industries and also the fact that the facility can be serviced by rail rather than road, it is recommended that Leeds safeguards site ref. 22 and replaces the UDP housing allocation with an employment allocation.</p> <p>Supports welcomed.</p>	
	Hanson UK continued	<p><u>Brickworks at Howley Park Quarry & Brickworks (DPD document ref No 5).</u> We support this proposal.</p> <p><u>Sand & gravel allocation at Midgley Farm, Nr Oltey (DPD document ref No 39).</u> We support this proposal.</p> <p><u>Sustainable Mineral Site Management .</u> <u>An Example of a successful partnership developed between the Developer, the planning authority and the local community:</u> Otley (Bridge End) Quarry restoration scheme and ongoing partnership with the Oltey Wetland Nature reserve trust.</p>	<p>Support welcomed.</p> <p>Support welcomed.</p> <p>Support welcomed.</p>	<p>Proceed with safeguarding of existing site.</p> <p>Proceed with allocation.</p> <p>Suggest could use this example in the DPD with photos to illustrate.</p>	

			<p><u>Industrial estates that have been identified as appropriate for waste and mineral uses</u></p> <p>Provision needs to be made available for B2 uses such as the manufacture of concrete in North Leeds (i.e. in Bramhope, Otley, Yeadon, Guisley). Hanson has an ongoing need for a replacement concrete plant site (1 acre plot-B2 use) for its Otley Concrete Plant (now closed) in the North Leeds Area.</p> <p>LCC would not extend existing planning permission at Otley – no other suitable alternative industrial sites in Otley or surroundings. Hanson sought permission to secure a possible site at Blackhill Quarry at Bramhope (DPD document ref No 1) which was refused by Leeds CC.</p> <p>Relocating the concrete production into the quarry area would reduce the visual impact of the Plant. Allocation of land for B2 uses required in North Leeds unless planning policy changes to allow the use of existing quarry sites for such processes – seek to promote use of land within Blackhill quarry as a location for a concrete plant.</p> <p>Alternatively consider increasing existing industrial areas like Milners Road, Guisley, or for example bring forward new industrial land in the Otley area as part of or prior to any long term relief road proposal at Otley.</p>	<p>The industrial nature of a concrete batching operation means that it can be difficult to find suitable locations for it. For this reason it is preferable to support existing operations where they are running without objection, rather than allocating new sites.</p> <p>The Otley site is in the Green Belt and the Blackhill Quarry site is not an appropriate location as the stone there is not suitable for concrete and therefore it would have to be brought in.</p>	
036	Dr Kevin Grady	Leeds Civic Trust	<p>(Mineral 9a/b) while the aspiration for more sensitive after use of mineral sites is welcomed, there can be positive benefits from accommodating the landfill which will remain an element in the overall waste management strategy. Limited landfill can provide funding for the enhancement of sites which would otherwise develop in an inappropriate way and or lead to safety concerns from unauthorised use. Supports longer term restoration periods.</p>	<p>Comments noted.</p>	
037	Les Morris	National Grid	<p>Draws attention to the presence of overhead cables and gas pipelines</p>	<p>Comments noted.</p>	

			within specific sites and the need to consult with them prior to determination of any planning applications.		
038	Malcolm Ratcliffe	Mineral Products Association	<p>In <u>paragraphs 3.1 and 3.9</u> the text refers to '<i>regional targets for aggregates...production</i>'. Nowhere in MPS1 or in the RSS is the term used of mineral production.</p> <p>The sub regional apportionment (which is not a target production level or a maximum production ceiling) is expressed as a total tonnage over the indicative period. This can be averaged out by dividing by the numbers of years in the period and such a yearly figure will be used to calculate the landbank.</p> <p>Amend text to reflect this and suggest the phrase could be substituted by reference to 'sub regional apportionment'.</p> <p><u>Paragraph 3.3</u> refers to 'excessive importation' of aggregates. We are not sure what you mean by this. The West Yorkshire sub region has probably always been a net importer of aggregates and there is nothing unusual about large urban areas being so. Imports might only be described as excessive if the mpas were not observing their responsibilities to provide for local aggregates production.</p> <p><u>Paragraphs 3.6, 3.7 and 3.10</u> and the ensuing <u>Preferred Policy Positions 1 and 2</u> on mineral safeguarding Areas and Sites are entirely inadequate. The BGS report '<i>A Guide to Mineral Safeguarding in England</i>' published in 2007 seeks to provide advice which facilitates the implementation of national policy set out in MPS1 paragraphs 10 and 13.</p> <p>The text appears to misunderstand the application of the BGS recommendations about mineral safeguarding and confuses mineral resources with reserves. In this respect we would direct you to the IMM Reporting Code which defines the differences between mineral resources and reserves.</p> <p>The text indicates that safeguarding is only intended for permitted</p>	<p>Acknowledged</p> <p>Agree that it would be useful to have a sub-regional apportionment.</p> <p>Agree need to be clear about mineral movements.</p> <p>Agree need to re-assess our approach to MSAs and have clear definitions of what we mean by an MSA and a resource and a reserve. It would be helpful to set these out in the DPD.</p> <p>Agree this needs explaining more clearly. Intention is to</p>	<p>Re-work reasoned justification to use accepted terminology.</p> <p>Leeds intends to establish an on-going dialogue with other Authorities in the LCR to work towards establishing sub-regional apportionments.</p> <p>Mineral movements to be clearly set out in a background Minerals evidence report.</p> <p>Provide definitions in DPD.</p>

			<p>reserves ('existing mineral sites') which is contrary to the intention of the BGS guidance to safeguard all mineral resources of economic importance.</p> <p>An area like Leeds with constrained sand and gravel resources will need to include identification within landscape designations and urban areas. Other minerals may need a modified approach in view of the extent of the resource but the Council should include all minerals that are of economic importance. This should include sandstone and limestone resources. The Council should carry out a consultation exercise with the industry to refine the areas of mineral deposits that need to be safeguarded, not for the plan period but for the longer term. It would then be open for the Mapbook sites to be included within that Safeguarding Area as identified sites of proven mineral reserves and provision for mineral related activities.</p> <p><u>Paragraph 3.9</u> indicates the current uncertainty over the sub regional apportionment which is under review. The correct approach will be to proceed with the LDF on the basis of the current sub regional apportionment set out in Table 10.1 of the RSS until such time as this is changed. It would be good practice in our view, for the Council to make contingency plans for a higher apportionment should this become a reality.</p> <p>Disappointed the Council is not willing to address the severe shortfall in sand and gravel provision. The results of the 2008 AM survey (set out in the 2009 RAWP report) indicates that at the end of 2008 there was a one year landbank for sand and gravel in West Yorkshire and only one operating pit, in Leeds, which has limited remaining reserves. Whilst the Council has identified one site for future sand and gravel production in Leeds this will, according to the UDP Review 2006 para 5.5.41, add 1.6 mt to the landbank, or 4.7 years (1.6/0.34mt). We understand that the timeframe for the DPD is for 15 years, in which case there is a substantial shortfall in identified provision, which the DPD appears not to address.</p> <p>MPS1 paragraph 15 advises that local authorities should, "<i>identify sites, preferred areas and/or areas of search, having taken account of environmental considerations, to provide greater certainty of where</i></p>	<p>safeguard existing sites and also to draw up MSAs.</p> <p>Agree but clarify with GOYH what plan period we are planning for.</p> <p>This is a regional issue and needs a consensus at regional level.</p> <p>Leeds has identified two sites for sand and gravel not one.</p> <p>Agree</p>	<p>Review our approach to MSAs and consult with minerals industry.</p> <p>Consult GOYH whether need to plan until 2026 or beyond.</p> <p>Seek consensus on sub-regional apportionment for sand and gravel.</p> <p>Identify specific sites, preferred areas and areas of search as</p>
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		<p><i>future sustainable mineral working will take place;</i>” This is backed up by guidance in the MPS1 Practice Guide which further advises of the importance of identifying Specific Sites or Preferred Areas. Areas of Search are to be reserved for circumstances “<i>where knowledge of mineral resources may be less certain...</i>” (para 41), which is not the case in Leeds where the sand and gravel resources are well known. Paragraph 42 is particularly relevant. This says, “<i>It is not generally appropriate to identify only areas of search in a LDD because these provide less certainty of where development might take place. MPAs that choose this approach must fully justify it in their LDDs. In most cases sufficient specific sites and/or preferred areas should be identified, so that on adoption of a LDD, there is adequate provision to cover the LDD, if sufficient acceptable sites are known at that stage.</i>”</p> <p>Urge the Council to carry out call for sites to meet the expected shortfall in sand and gravel provision, and not to rely on Areas of Search or criteria based policies, which do not accord with national policy and best practice guidance.</p> <p>We find the <u>Preferred Policy Position – Minerals 7</u> confusing in that although recycling is mentioned in the tile, it does not feature in the text box. This should be remedied.</p> <p>Once potential for recycling has been exhausted for residual C&D waste and other inert wastes, there remains a need for landfill which can be accommodated in mineral excavations. Urge Council to recognise this in order to reduce the distance travelled by waste residues to final disposal and to improve quarry restoration. However, we also support the broad objective of encouraging biodiversity.</p> <p>Accordingly, we also support <u>Preferred Policy Position – Waste 4: Providing Self Sufficiency for C&DE Waste</u> as far as it goes, but would observe that self sufficiency involves providing for the disposal to landfill of residues after recycling. In view of our comments on the continued need to landfill inert waste residues, we cannot support the Council’s <u>Preferred Policy Position – Waste 11: Landfill Disposal</u> which advocates a presumption against new landfill provision within the LCC</p>	<p>A call for sites is not necessary as LCC already knows where the sand and gravel is.</p> <p>Agree.</p> <p>Leeds has sufficient holes in the ground to meet need during the plan period and well beyond.</p> <p>Leeds has sufficient holes in the ground to meet need during the plan period and well beyond.</p>	<p>necessary to meet the apportionment once it has been agreed.</p> <p>Add ‘minerals recycling’ to the policy.</p> <p>Provide evidence of landfill capacity in the background evidence report.</p> <p>Provide evidence of landfill capacity in the background evidence report</p>
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			area.		
044	Gerald J F Heward	Wood Hall and Heward Ltd	<p>Supports safeguarding of wharves.</p> <p>“ We are pleased to see the wharf at Old Mill Lane, Hunslet on the list. This is owned by British Waterways and a working wharf here would support BWs efforts to increase freight transport on BWs canals.</p> <p>Add BW owned land at Skelton Grange Road should be added to the list. The wharf area could have good road access to Pontefract Road.</p> <p>Include Total Oil wharf on the list – can be used in conjunction with the Cross Green users for both incoming and outgoing goods.</p> <p>Reinstate Hanson Cross Green asphalt plant site (document reference no 22) and Bridgewater road, Cross Green (document reference no 186) on the list.</p> <p>Add Skelton Grange Wharf to list in view of the proposals in Map E that the Power Station site be a strategic waste site. Whilst we can see that original waste would largely arrive by road from various parts of the city, there will be scope to take recyclates (e.g. scrap metal, glass etc) away by barge. In view of their proximity to the Navigation, we support the proposals that the Stocks and Bison sites in Stourton be earmarked for waste and aggregate recycling.</p>	Comments as above for response to Hansons.	Add possible wharves to list of safeguarded sites.
045	Rachel Wiggington	GOYH	<p>PPM1 The Inspector’s comments on MSAs and proposed extraction areas are supported. Separate policies are needed for extraction areas.</p> <p>PPPM3 The Wharfe Valley should be considered as a potential MSA to be shown on the Proposals Map. You will also need to be able to justify a policy that appears to presume against further extraction.</p>	Leeds intends to re-assess it’s approach to MSAs. New MSAs will be re-drawn in line with MPS1. There is a wide variety of interpretation of what is an MSA and	Review our approach to MSAs and consult with minerals industry and GOYH.

			<p>PPPM4 Show workable resources as MSAs on the Proposals Map and the expansion sites as proposed extraction areas.</p> <p>Para. 3.18-19 We note that there is a presumption against opencast coal mining in MPG3 but this does not preclude indicating safeguarding areas. The policy should reflect guidance in MPS1 and MPG3, including in relation to the Green Belt and is only needed if it adds to national guidance.</p> <p>MPG3 para. 37 lists criteria and refers to broad areas of search or indication of the shallow coalfield/constraints or a combination of these. The policy should also refer to other energy minerals, including coal methane.</p> <p>PPPM9a There is still a need to address landfill of residual waste, since there will still remain a (reduced) requirement this. There will be some need for landfill capacity which might be accommodated in minerals sites.</p> <p>Para. 3.30 All the saved minerals policies should be replaced in this DPD, if they are still appropriate, or otherwise deleted.</p>	<p>Leeds intends to set out its definition of what this means.</p> <p>Leeds has no data on coal methane.</p> <p>Leeds has sufficient landfill capacity to meet the need for this and other wastes during the plan period.</p> <p>Agree.</p>	<p>None.</p> <p>Review Saved UDP Policies, integrate into DPD where appropriate.</p>
046	Angela Flowers	North Yorkshire County Council	<p>PPM2 – safeguarding at 2 specific sites is a limited approach to safeguarding of aggregate resources within Leeds. The BGS report: A Guide to Mineral Safeguarding in England (BGS 2007) - mineral safeguarding areas are areas of known minerals resources that are of sufficient economic or conservation value to warrant protection for generations to come.</p> <p>In response to para 3.8 industry reps consider Wharfe valley to contain a large and good quality sand and gravel resource. Wharfe Valley is unviable for new quarry development due to landscape/envirom designations and strong local opposition (BGS report West Yorkshire sand and gravel resources: Investigating the potential for an increased sub-regional apportionment (2009).</p>	<p>Clarify our approach to safeguarding existing sites and providing MSAs along with clear definitions.</p> <p>Agree need to weigh landscape quality and public views with need for sand and gravel. For a large population the Wharfe Valley is the closest thing people</p>	<p>Review MSAs and re-consult with minerals industry and GOYH.</p>

			<p>Set out a more comprehensive approach to the safeguarding of aggregate resources to prevent further sterilisation of good quality resources does not occur and to ensure their long term availability. This could be in the form of more widely defined safeguarding areas, based on resource considerations rather than existing production units.</p> <p>Potential for alternative approach to apportionment still exists. A review of the approach is a requirement of current RSS policy. Whilst limited, there may be some potential for increase of sand and gravel apportionment for West Yorkshire.</p> <p>Currently sand and gravel supplied to the Leeds-Bradford area is transported over long distances. The sustainability of such an approach is questionable in terms of transportation impacts.</p> <p>Landbanks of aggregate in North Yorkshire have been declining in recent years (sand and gravel in particular) and growing pressures and constraints on production from within North Yorkshire may have an impact on the longer term ability of North Yorkshire to continue to supply the West Yorkshire area.</p> <p>Council should set out a more positive policy approach to both the safeguarding and the provision of future supply of sand and gravel in particular. Without this a more sustainable approach to sand and gravel supply within the Region is unlikely to be delivered.</p>	<p>have to a quality landscape. Leeds is able to meet some of the need for sand and gravel but cannot meet all of it.</p> <p>Agree.</p> <p>Leeds is able to meet some of the need for sand and gravel but cannot meet all of it.</p>	Review MSAs.
048	Heaton Planning	D Green, UK Coal Ltd	National Policy does not restrict development within GB, important landscapes, areas of nature conservation, biodiversity or on agricultural land so neither should NRWDPD. Minerals can only be worked where they are found. It is down to the individual operations to be able to provide adequate mitigation measures and sensitive working practices to allow such developments to proceed with minimal effect.	Mineral extraction must be balanced alongside other planning factors which lead to quality of life for a large urban population.	

			<p>Need to demonstrate why tools such as landscape character cannot be used.</p> <p>Para 1.10, page 3, sets out the expanded Vision for the DPD – we would recommend the inclusion of safeguarding and avoidance of sterilisation of natural resources (as recommended within para 13 of MPS1) within this section and this should be re-enforced within the Key Objectives of the NRWDPD.</p> <p>Preferred Policy Position – Land 3: Urban Tree Planting. This position is appropriate and is supported.</p> <p>Safeguarding Approach Preferred Policy Position – Minerals 1: Safeguarded Mineral Sites. This is NOT the correct approach to be taking in safeguarding the Authority’s mineral resource. See Planning and Minerals Practice Guide, Nov 2006, Para 32 and Regional Spatial Strategy (RSS): the Yorkshire and Humber Plan, Policy ENV4: Minerals.</p> <p>Minerals resources should be protected from sterilisation irrespective of the size of the resource.</p> <p>Acknowledge resource of coal is small but still important to protect in long term. There is no presumption that resources safeguarded through MSAs or MCAs will actually be worked for minerals</p> <p>Recommend that mineral safeguarded areas should be expanded to cover the whole of the authority’s mineral resource. See Nottinghamshire County Council policies which provide a clear steer on constraints.</p> <p>Restoration Preferred Policy Position – Mineral 9a and Mineral 9b The Preferred Approaches for restoration seem appropriate; we would state that the restoration of some sites can benefit from the landfilling of waste.</p>	<p>A Landscape Character Assessment was carried out and used to define SLAs in the UDP. Same study supports the DPD.</p> <p>Agree.</p> <p>Support welcomed.</p> <p>Leeds intends to review it’s approach and new MSAs will be re-drawn and we will then re-consult with the minerals industry and other key stakeholders.</p> <p>Support welcomed.</p>	<p>Include safeguarding and avoidance of sterilisation of natural resources in the Vision and in the Key Objectives.</p> <p>Review and re-consult on MSAs.</p> <p>Review Saved UDP</p>
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			<p>Para 3.30 states the following Saved Policies are relevant, it is not clear whether these are proposed to be retained for the NRWDPD: N45, N46, N46A, N46B, N48B, EM9, GM4</p> <p>Concern regarding the resistance of extraction within Special Landscape Protection Areas, the retention of Policy EM9 and over the approach being taken for Mineral Safeguarding Areas.</p> <p><u>COAL AND ENERGY</u></p> <p>Preferred Policy Position – Minerals 5: Coal Need to be explicit that there is only a presumption against coal extraction if it does not meet the <u>tests</u> as set out in MPG3, para 8. All development needs to ensure environmental impacts are acceptable and if not that other factors may override such unacceptable impacts. See decision by the Secretary of State for a UK Coal application at Huntington Lane, Telford for the extraction of coal by surface mine methods. The SoS decision and Inspector's report reiterate the tests within MPG3.</p> <p>There is not clear evidence how the future extraction of indigenous coal resources is counter to the NRWDPD's main principles. The NRWDPD should have clear regard to the aims of the Government's White Paper on Energy: Meeting the Energy Challenge, May 2007. This document analyses the long-term energy challenge the UK faces.</p> <p>Refer to The UK Government published 'The Energy Challenge: Energy Review Report' (Cm 6887) in July 2006. UK will become importers of oil and gas therefore need to secure reliable energy supplies to prevent risk to the nation's energy security. Need to make best use of existing reserves including coal. Decline in coal production can be reversed if surface mine output is maintained at recent levels balanced against environmental impacts and community needs.</p> <p>Within the Leeds Authority area there are identifiable coal reserves that, despite the assertion of the NRWDPD that they are 'very</p>	<p>Agree.</p> <p>Mineral extraction must be balanced alongside other planning factors which lead to quality of life for a large urban population.</p> <p>Agree</p> <p>Leeds will define an</p>	<p>policies, integrate into DPD where appropriate.</p> <p>Review our approach to MSAs.</p> <p>Revise Policy Position wording in the Publication draft document.</p>
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			<p>fragmented', are capable of being mined by surface working methods and these should be safeguarded. More sustainable to use own reserves rather than importing. The national planning guidance provided within MPG3 is outdated; there is a clear shift in the Government's position on supporting the extraction of indigenous coal.</p> <p>Para 6.1 There are no clear mechanisms in place for ensuring delivery of renewable and low-carbon energy generation in the NRWDP over the plan period therefore it must be accepted that there will continue to be a reliance on energy supplied by fossil fuel power stations. In turn the NRWDPD should be more positive in securing an indigenous supply of coal.</p>	<p>MSA for coal but this will not mean that extraction will be supported.</p> <p>The LDF is required to demonstrate how we intend to encourage greater provision of renewable energy, this obligation does not exist for coal.</p>	<p>Define an appropriate MSA for coal.</p>
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055	Colin Holme	Natural England	<p>Natural England welcomes 'Preferred Policy Position – Minerals Safeguarding Areas – Building Stone' and its emphasis on protecting resources for local minerals extraction. Utilising local stone can facilitate design consistent with landscape character. However, future development of minerals extraction should only be undertaken where environmental constraints can satisfactorily be resolved. Effects on landscape character, biodiversity, access and the sustainable use of soils will all need to be considered.</p> <p>Natural England would make the following comments in relation to the sites considered in the minerals safeguarding policies:</p> <ul style="list-style-type: none"> - Any operations developed at Minerals Safeguarding Area 37 should ensure that appropriate measures are taken to safeguard the interest of the nearby UK Biodiversity Action Plan deciduous woodland, viewpoints from the Leeds Country Way and the nearby Eccup Reservoir SSSI; - Any operations developed at Minerals Safeguarding Area 35 should ensure that appropriate measures are taken to safeguard the interest of the nearby Micklethorn Ings SSSI. - Any operations developed at Minerals Safeguarding Area 40 should ensure that appropriate measures are taken to safeguard the interest of the nearby UK Biodiversity Action Plan deciduous woodland. <p>Natural England agree with 'Preferred Policy Position 9a: Restoration of Minerals Sites'. We would like to see linkages made to the achievement of Biodiversity Action Plan objectives and the enhancement of ecological networks, particularly within the region's Biodiversity Opportunity Areas (see: http://www.yhbf.org/articledetail.aspx?page=AC83E0DC-F9A8-4918-9AD9-FB62C4D8596C&article=1BF625A1-A1FF-4649-B1E5-CB758CA5469D). We would be happy to work with Leeds when proposals for restoration are developed. Further support for this policy could be achieved through, for example, a minerals SPD or detail in the supporting text to the policy.</p> <p>Natural England welcome 'Preferred Policy Position – Minerals 9B: Restored Site Management', which allows for longer periods of aftercare to accommodate restoration for nature conservation.</p>	<p>Support welcomed.</p> <p>Points noted on individual sites. Any impacts on SSSIs will be considered if and when applications come forward.</p> <p>Agree</p> <p>Offer welcomed.</p>	<p>Reinforce links with achievement of Biodiversity Action Plan objectives.</p>
056	Sam Thistlethwaite	Banks Developments	<p>Preferred Policy Position – Minerals 5: Coal</p> <p>Paragraphs 3.18 and 3.19 and Preferred Policy Position 5 do not accord with national policy guidance as set out in Mineral Planning Statement 1 and Mineral Planning Guidance 3.</p>		

			<p>opportunities be assured if the MSAs do not extend to cover such areas? The paragraph should be completely rewritten to reflect guidance in MPS1 and MPAs should be established for coal.</p> <p>As a consequence, the Preferred Policy Position should be completely rewritten. The extraction of coal should be catered for and the principles set out in MPG3, as described above, should be applied. MSAs should be identified for coal, as required by MPS1, and including the built up area and all Green Belt land. A map of the MSAs for coal should be drawn up.</p> <p>Preferred Policy Position – Minerals 6: Brick Clay</p> <p>Para 3.20 should refer to the potential for producing fireclay in conjunction with coal. Fireclay is a nationally important resource. It can, generally, only be produced economically in conjunction with surface-mined coal. Reference should be made to this in Preferred Policy Position 6.</p>	Agree	Include reference to fireclay in the draft Publication document.
058	Mary Keynes	Impact Residents Network	Supports protection of mineral resources through safeguarding areas and alternative uses for restoration.	Support welcomed.	
061	Stuart Beardwell	Leeds Friends of the Earth	<ul style="list-style-type: none"> • 5) Agree with protecting mineral resources but also depends on the site and appropriateness of retaining for future use. This approach doesn't take into account the need to reduce demand and exploitation of natural resources and minerals and look to reusing and recycling materials. • 7) If we are effectively moving waste up the waste hierarchy, there should be less demand for landfill area and therefore alternative uses for exhausted quarries will need to be sought. 	<p>Support welcomed.</p> <p>Support welcomed.</p>	
063	Matt Naylor	Yorkshire Water	<p>Mineral Safeguarded Areas</p> <p>Yorkshire Water has apparatus crossing three sites identified as safeguarded sites and owns land within a fourth.</p> <p>LPA Ref: L010 YW Ref: LD0007</p>	Site specific comments noted and will be taken into account when or if a planning application is received.	

			<p>Site Address: Howley Park Quarry, Morley A trunk water main is recorded to cross the site. YW has reached an agreement with the quarry operator with respect to this pipe.</p> <p>LPA Ref: L012 YW Ref: LD0008 Site Address: Britannia Quarry, Morley There is a 525mm surface water sewer crossing the site. This sewer will require the necessary protection from future quarrying activity.</p> <p>LPA Ref: L005 YW Ref: LD0013 Site Address: Moor Top Quarry, Guiseley The safeguarded mineral site includes an area of essential operational land under the ownership of Yorkshire Water. This land will probably be required in our next capital investment plan (2010-2015) for a new service reservoir to ensure security of the public water supply network across Leeds. Therefore the land will be unsuitable for quarrying.</p> <p>LPA Ref: L012A YW Ref: LD0017 Site Address: Britannia Quarry Extension, Morley There is a 525mm surface water sewer crossing the site. This sewer will require the necessary protection from future quarrying activity.</p>		
065	Mr. Zulfiqar Ali	Environment Agency Y&H	<ul style="list-style-type: none"> Minerals 7: Minerals Recycling and Reuse sites <p>We support the provision of minerals recycling sites as being key in reducing the amount of Construction, Demolition and Excavation waste which is currently landfilled.</p>	Support welcomed.	
068	Mike Willison	Leeds Local Access Forum	<ul style="list-style-type: none"> Supports protection of mineral resources Supports safeguarding existing mineral sites. 	Supports welcomed.	

			<ul style="list-style-type: none"> • Supports finding alternative uses for quarries. Any development of safeguarded areas or extensions of safeguarded sites should seek, where appropriate, to maintain and enhance the public right of way network. • Opportunities should be sought on restoration to enhance the rights of way network by adding new paths and the retention of any diverted paths. The LLAF supports the examples cited in the Policy. 	Consider opportunities for requiring this when incorporating the Saved UDP policies.	Review Saved Policy and incorporate policy wording into the DPD as appropriate.
71	David Berry	The Coal Authority	<ul style="list-style-type: none"> • Representation No.1 Preferred Policy Position – Minerals 5: Coal Test of Soundness Justified Effective Consistency With National Policy. Objection – The Coal Authority welcomes the recognition within paragraph 3.18 that fossil fuels including coal cannot be excluded as an important energy source in the future. <p>The Coal Authority objects to preferred policy position which does not identify Minerals Safeguarding Areas (MSAs) for coal.</p> <p>Whilst most respondents to the earlier consultation did not wish to see any encouragement for further coal mining the definition of MSAs does not indicate a presumption that the resources contained within them will be worked (MPS1, para. 13). This is reiterated by the BGS 'Guide to Mineral Safeguarding in England' It is unreasonable for the Council to attach any weight to this argument as part of the justification for its proposed approach.</p> <p>Furthermore, the Surface Coal Resource Plan, which the Coal Authority provided to Leeds City Council in December 2009, shows the surface coal resource area to be a coherent feature present across much of the southern part of the Council's administrative area. It does not therefore represent a fragmented resource which would be untenable to safeguard, as suggested in</p>	Comments noted.	Review our approach to MSAs and map MSA for coal then consult with mineral operators.

			<p>paragraph 3.19 of the consultation document.</p> <p>Whilst the proposal to assess any future planning applications for coal extraction on their merit is welcomed, the Coal Authority is of the opinion that the Council's overall proposed approach to coal is not based on a robust or credible evidence base and does not take full account of the need for, or purpose of, MSAs.</p> <p>The BGS Guide states that MSAs do not preclude other forms of development but ensures that mineral resources are adequately and effectively considered in land-use planning decisions.</p> <p>The Coal Authority's Surface Coal Resource Plan has been developed in conjunction with British Geological Survey and surface mining operators specifically for use within the planning process. It represents the best available geological and minerals resource information for the area, as required by paragraph 32 of the MPS1 Practice Guide, and therefore demonstrates the existence of proven and economically viable coal resources for planning purposes. When combined with the evidence outlined above, which demonstrates that there will be a continued demand for coal over the DPD period, the Coal Authority is of the opinion that there is a clear justification for safeguarding coal through the definition of an MSA covering the surface coal resource area. This should be supported by the inclusion of appropriate policy criteria to avoid the unnecessary sterilisation of resources within the MSA, which should include encouraging the prior extraction of coal, where practicable, if it is necessary for non-minerals development to take place within the MSA. The example policy set out on page 10 of the BGS Safeguarding Guide may be helpful for this purpose.</p> <p>This approach will ensure that the presence of surface coal resources is a material consideration of planning applications for non-minerals development within the MSA. It would not indicate any presumption that the areas within the MSA would be</p>	<p>Comments noted.</p>	<p>Review our approach to MSAs and map MSA for coal then consult with mineral operators</p>
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			<p>appropriate for coal extraction, or that other forms of development would automatically be precluded within the MSA.</p> <p>As outlined above, the Coal Authority would welcome the inclusion of an appropriate policy setting out the criteria against which any application for coal extraction could be assessed. However, whilst this should be included within the DPD, it should not be viewed as a replacement for the definition of an MSA for coal as this is necessary in order to ensure consistency with the guidance in MPS1.</p> <p>Reason – To ensure the DPD is consistent with the guidance in MPS1 (Planning & Minerals).</p>		
075	Nicola Bell of Scott Wilson (agent)	PPL Revera	<ul style="list-style-type: none"> Support the need to protect mineral resource and the need to find alternative uses for restored quarries. Support is given to safeguarding existing mineral, sand and gravel and building stone sites as set out in Preferred Policy Positions 1, 2 and 4. Object to safeguarding mineral –related sites in general industrial areas. <p>Whilst it is acknowledged that it would be difficult to identify mineral safeguarding areas for coal, it is reinforced that the Leeds district has significant resources of un-worked coal and its exploitation should not be prevented simply because it is not identified spatially.</p> <p>The wording of Preferred Policy Position – Minerals 5: Coal is supported, as it allows for planning applications for coal mining to be judged on their individual merit.</p>	<p>Supports welcomed.</p> <p>It is necessary to safeguard to ensure that the need for such activities can be met.</p> <p>Comments noted.</p>	<p>Review our approach to an MSA for coal and re-consult with relevant stakeholders.</p>
076	Jon Crossley	Micklefield PC	<ul style="list-style-type: none"> Supports protection of mineral resources Supports safeguarding existing mineral sites. Supports finding alternative uses for quarries. The eastern red line boundary of the protected mineral (limestone) extraction site at Bragdale is rather inopportune. It rigidly following a 50m separation from the nearby watercourse, the red line intrudes into Weet Wood and thereby intrudes into the Special 	<p>Supports welcomed.</p> <p>An MSA does not mean that consent will be granted for extraction. Boundaries for MSA</p>	<p>Clarify whether this an allocated site or an MSA. If it is an</p>

			Landscape Area. It is surely in everybody's interest (not least the smoothest possible adoption of this LDF) for the red line to be revised to skirt the edge of the woodland. Why raise the potential for formal objection to either tree loss (if the area is quarried) or harm to the SLA, for no good reason? Please revise the red line to exclude Weet Wood from the proposed protected site for mineral extraction.	should follow the line of the resource. Boundaries for an allocated site should exclude Weet Wood.	allocated site then the boundary should exclude Weet Wood.
080	Dan Walker, David L Walker Ltd.(agent)	David Atkinson, Lafarge Aggregates Ltd	<ul style="list-style-type: none"> • Supports protection of mineral resources • Supports safeguarding existing mineral sites. • Only supports finding alternative uses for quarries where necessary or appropriate, however it should be recognised that restoration of sites can be enhanced by the importation of materials. Safeguarded areas need to be shown on proposals map. <ul style="list-style-type: none"> • PPM2 need more detailed contributions on landbank/provisions to allow for considered opinion. • PPM5-9b: further detailing and definitions needed. 	Supports welcomed. Leeds is struggling to fill all its landfill sites and therefore needs to encourage alternative uses. Agree to review MSAs and map as appropriate. Need consensus on sub-regional apportionment. Agree	Provide further landfill data in background evidence report. Review MSAs. LCC working on this with adjoining MPAs.
086	Lionel Sykes		<ul style="list-style-type: none"> • Q5: we need to protect our mineral resources, but if they are required for use, what is the answer? • Q6: The question can only be answered by LCC Planning Department. • Q7: Once a quarry has had all it's minerals extracted, it is only suitable for landfill. 	DPD proposes the answer and seeks comments from public. There are numerous examples of other after-use.	None.
088	Mike Harty	Biffa Waste Services Ltd	<ul style="list-style-type: none"> • Supports protection of mineral resources • Supports safeguarding existing mineral sites. • Do not support finding alternative uses for quarries as PPM9a states there is still need for landfill sites. 	Support welcomed. Leeds is struggling to fill all its landfill sites and therefore needs to encourage alternative uses.	None. Provide further landfill data in background evidence report.

091	FM Lister (Trustees)	Henry Hudson (deceased) estate	<ul style="list-style-type: none"> Not all mineral resources need safeguarding, and need to be assessed on individual merits. Safeguarding sites in general industrial areas should not preclude other uses. Should not preclude use as land fill as part of restoration, but not be preferred option 	<p>Mineral resources do need to be safeguarded to protect them from future sterilisation. Land for waste must be specifically safeguarded to ensure we have enough sites to enable us to manage our waste. Leeds is struggling to fill all its landfill sites and therefore needs to encourage alternative uses.</p>	<p>Further work needed to demonstrate that industrial estates have capacity for waste uses.</p> <p>Provide further land fill data in background evidence report.</p>
094	Mrs Ann Slater		<ul style="list-style-type: none"> Supports protection of mineral resources Supports safeguarding existing mineral sites. Do not support finding alternative uses for quarries as they can be used for non-recyclable waste. Then landscape when full. 	<p>Support welcomed.</p> <p>Leeds is having difficulty finding enough waste to fill up land fill sites.</p>	<p>Provide further landfill data in background evidence report.</p>
096	Nicholas Beale	Tarmac Ltd	<ul style="list-style-type: none"> Site specific support, however notes UDP policy for housing allocation may constrain the operation of the main mineral processing site in Cross Green 	<p>Agree. Important to protect industrial employment base within Leeds.</p>	<p>Consider re-allocation of UDP housing site for employment purposes through the LDF process.</p>
099	Mr Philip Hutchins	Woodkirk Stone Sales Limited	<ul style="list-style-type: none"> Supports protection of mineral resources Supports safeguarding existing mineral sites Alternative uses depends on what type of quarry though. Different uses for different types. 	<p>Supports welcomed.</p> <p>Comments noted.</p>	<p>Review Policy Position Minerals 9 to reflect what might be appropriate for different types of quarry.</p>

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WATER QUALITY

Ref	Name of respondee	Organisation	Comments	LCC Initial Response	Action
026	Andy Parnham	LCC Councillor (Farnley Ward)	Question 8 - Agree with grey water recycling.	Support welcomed	None
031	Scott Wilson (agents)	Nick Hollands, Veolia Environmental Services Ltd	<p>Preferred Policy Position - Water 1: Functional Flood Plan (Page 21) Support for Policy Position.</p> <p>Preferred Policy Position - Water 2: Development in Flood Risk Areas (Page 22) Support for Policy Position. Need to clarify whether this relates to all developments or all developments within flood risk areas (since the policy refers to development in flood risk areas).</p> <p>Preferred Policy Positions - Water 3, Water 4, Water 6 These preferred policy positions are supported.</p> <p>Preferred Policy Position - Water 7: Protection of Water Quality (Page 26) Support in general. However, Veolia would wish to understand the proposed 'defined zones' where more stringent criteria are to be applied before making further comment.</p>	<p>Support welcomed</p> <p>Clarify wording relates to development in flood risk areas</p> <p>Support welcomed</p> <p>Comments noted</p>	<p>Policy to be made more explicit</p> <p>Policy to be made more explicit</p>
036	Dr Kevin Grady	Leeds Civic Trust	<p>(Water 6) Two of the four suggestions included in this policy relate to the reduction of outflows – more emphasis should be placed on reducing consumption including the installation of water-saving devices within all buildings. There is also the issue of leaking pipes which are still a concern on a regular basis – are these counted in Leeds' higher per capita consumption?</p> <p>(Water 5) We feel that in order to complement the Flood Alleviation Scheme, policies to require the use of SUDS techniques should be strengthened – the policy should be extended to changes of use and conversions, with the adoption of policies to prevent paving over of gardens. It is acknowledged that this may need to be tied to national regulations but LCC should seek to introduce local directions in sensitive areas.</p>	<p>Covered in more detail in Sustainable Construction SPD</p> <p>The policy seeks to apply SUDS to change of use and conversions where possible – it will be necessary for applicants to demonstrate cases where</p>	<p>More information on the water hierarchy</p> <p>None</p>

				it is not possible. The policy requiring development not to increase surface water run off will also be applicable to policies for building hardstandings with impermeable surfaces, as these are no longer permitted development	
045	Rachel Wigginton	GOYH	<p>PPP Water policies. You need to consider whether these add to PPS25 and are thus necessary.</p> <p>Para. 4.27: All the saved water resource policies should be replaced in this DPD, if they are still appropriate or otherwise deleted.</p>	<p>Policies deal with the specific circumstances in Leeds</p> <p>Agree</p>	Further work required to assess the UDP Saved Policies
046	Angela Flowers	North Yorkshire County Council	<p>Flood Risk - The policy position with regard to flood risk reflects PPS25. It is suggested that water compatible development such as marinas, docks and wharves can be incompatible with the objectives of the Water Framework Directive. Development in areas of flood risk may have regard to Surface Water Management Plans, which are likely to be prepared by relevant authorities when the Flood & Water Management Bill 2009 is enacted as well as wider climate change adaptations discussed in the Yorkshire & Humber Climate Change Adaptation Study (2009) which contains a specific section for Leeds City Council.</p> <p>Water quality - Policy position reflects protection of sensitive water bodies, however objectives of the Water Framework Directive mean <u>all</u> water bodies should seek to attain good status and plans should not result in deterioration.</p>	<p>Comments noted</p> <p>Further work to identify and address potential conflicts</p>	<p>Check Policy against the Yorkshire & Humber Climate Change Adaptation Study (2009)</p> <p>Research on water quality and evaluation to determine if there is a further policy needed</p>
053	Martyn Coy	British Waterways	<p>Paragraph 4.25 – Water Quality</p> <p>British Waterway’s welcomes that the DPD acknowledges the need to protect water quality of sensitive water bodies. We note reference to the Leeds & Liverpool canal.</p>	Support welcomed	None

055	Colin Holm	Natural England	<p>Natural England supports 'Preferred Policy Position – Water 6: Water Efficiency'. Support but would prefer to see a minimum standard for water efficiency stated within the policy, such as certain point score / consumption category aligned with the Code for Sustainable Homes (see: http://www.planningportal.gov.uk/uploads/code_for_sust_homes.pdf).</p> <p>Support 'Preferred Policy position – Water 7: Protection of Water Quality'.</p>	<p>Agree, Core Strategy includes policy for new buildings to meet the Code for Sustainable Homes which includes water efficiency. Sustainable construction SPD also contains policies</p> <p>Support welcomed</p>	<p>Improve links between LDF documents</p>
058	Mary Keynes	Impact Residents Network	<p>Domestic water saving devices such as double flush toilets should be affordable and available to households; domestic water metering should be available on a voluntary basis with a pay structure that rewards economical users.</p> <p>Measures to reduce flood risk should be strictly adhered to and regularly monitored and enforced. This is essential in view of recent flooding which has occurred as a result of climate change.</p>	<p>Core Strategy includes policy for new buildings to meet the Code for Sustainable Homes which includes water efficiency. Sustainable construction SPD also contains policies</p> <p>Covered in proposed water policies</p>	<p>None</p>
061	Stuart Beardwell	Leeds Friends of the Earth	<p>8) Green roofs, more green space within developments (ie. less concreted/tarmaced areas).</p> <p>9) These approaches do not go far enough in addressing land use issues in the upper Aire Valley, the Flood Alleviation Scheme should be seen as a long-term process of engagement with the stakeholders of the catchment area, not a one off concrete-pouring exercise. Infrastructure alone will not solve the flooding problem.</p>	<p>Green roofs are being pursued in the Core Strategy</p> <p>The Environment Agency's Catchment Flood Management Plan is the correct vehicle for addressing this. Land use issues upstream of the Leeds District cannot be addressed in our LDF.</p>	<p>None</p> <p>None</p>
065	Mr. Zulfiqar Ali	Environment Agency Y&H	<p>Water Resources - Water Resources section has focused on flood risk and managing flooding but very little reference to other aspects of water resources. Water resources covers all sources of water that are potentially useful to humans. This includes agriculture, household, recreation and environmental activities.</p> <p>Need to deal with water availability and its link with water dependent industry within Leeds. Water availability from both surface water and groundwater sources must be considered when looking at any new water dependent</p>	<p>Agree</p> <p>Agree but within the powers of the LDF planning and development</p>	<p>Be explicit over what Leeds can and cannot control relating to the water cycle</p>

development as part of the preliminary viability study. This information is particularly important given the commitment to renewable sources of energy which is referred to later on in the Natural Resources and Waste Development Plan Document (NRWDPD). It is important to note that, at least three of these renewable source methods are water dependent and therefore an assessment of water availability status throughout Leeds is critical if they are to be successful.

Providing there is no pollution, we will encourage the augmentation of groundwater resources through techniques such as SUDS and artificial recharge, particularly where resources are scarce, or where such activities would reduce the flood risk from development.

Agree that 'water is not a scarce resource in the Leeds area' however the NRWDPD aims to ensure efficient use of natural resources.

Water Efficiency - The Plan recognises that overall water consumption in Leeds is 36% higher than national average. However, it is not clear whether these figures are based on full potable water use for the Leeds area or just on household consumption these figures need to be substantiated. We would also like to see a commitment made towards reducing water consumption across Leeds to fall in line with or below national average.

The systems to improve overall water efficiency in new developments are all based around grey and waste water. The use of water efficient fixtures and fittings such as low-flush toilets and sensor taps is not covered.

Water Quality - Water 7: Protection of Water Quality
Need to define the criteria for defining water sensitive waterbodies.

control system.

Whilst the use of SuDS (particularly percolation methods) can help to recharge groundwater - as well as mitigating flood risk, sites that have a history of contamination would not be suitable for these methods, due to the risk of transferring these contaminants to the groundwater.
Agree

Core Strategy includes a policy for new buildings to meet the Code for Sustainable Homes which includes water efficiency. Sustainable construction SPD also contains relevant guidance.

Define criteria.

Add sentence to text to clarify that whilst water is not scarce in Leeds we would still want to ensure it is used efficiently.

Improve links with Core Strategy.

			<p>WFD relates to all water bodies not just sensitive water bodies. A further aim is to comply with water related standards and objectives for environmentally protected areas established under EU legislation which may require meeting more stringent standards in some areas.</p> <p>Prefer to see greater emphasis on new developments not to cause deterioration and the continued protection of water quality for all surface and groundwater's.</p> <p>Flood Risk - We support the policies suggested for dealing with flood risk. We very much welcome the policies dealing with surface water run-off.</p> <p>Policy Position Appendix - Figure 1 Please note that this has now been updated by your Land Drainage Department and therefore should be updated accordingly.</p> <p>We suggest that para 4.2 be amended to show flood zone 3 divided into 3ai and 3aii to be in line with the Strategic Flood Risk Assessment. This would then clearly indicate 4 flood zones but with 3a divided.</p> <p>Para 4.8 expand last sentence to say that if there are known flooding issues an FRA may even be asked for in flood zone 1 (such as where surface water flooding is an issue).</p> <p>Contaminated Land Support and offer to help develop policy further with regard to impact on water quality. Where water resources are particularly sensitive we expect the planning authority to apply conditions that will ensure that water quality is protected and improved.</p>	<p>Consider if need further policy for environmentally protected areas.</p> <p>Should be addressed by National Policy, not just a Leeds issue.</p> <p>Support welcomed</p> <p>Agree</p> <p>Agree</p> <p>Agree – add sentence.</p> <p>Support and offer welcomed.</p>	<p>Update Appendix Figure 1</p> <p>Amend para 4.2 to include sub-delineation into zones 3ai and 3aii.</p> <p>Add sentence.</p> <p>Meet with EA to explore Policy development.</p>
075	Nicola Bell of Scott Wilson (agent)	PPL Revera	<p>Support for all the water resources policies.</p> <p>The Cock Beck also presents an opportunity to assist with flood alleviation schemes in the east of Leeds to reduce the risk of flooding downstream. The areas adjacent to the Cock Beck could be de-silted to restore lakes within the estate which would be wet at all times but have the potential to store substantial amounts of additional water in peak flow events to alleviate flood risk.</p>	<p>Support welcomed.</p> <p>Land drainage team consulted and welcome suggestion.</p>	<p>Add to Water 5 Surface Water Run Off, 'wherever appropriate, developers will be encouraged to create additional water storage opportunities in order to mitigate downstream flooding'.</p>
080	Dan Walker, David L	David Atkinson, Lafarge	<p>Q9: Disagree with policy, the careful design of schemes can be used to mitigate the efforts of flood risk and enhance flood attenuation benefits.</p>	<p>A clear policy is needed to ensure that this happens</p>	<p>None</p>

	Walker Ltd.(agent)	Aggregates Ltd		and so that developers know early on what is expected of them.	
082	David Blackburn	LCC Councillor (Farnley Ward)	Question 8 - Agree with grey water recycling. Need to make sure that planners take this into account in planning application.	Support welcomed	None
085	Ann Blackburn	LCC Councillor (Farnley Ward)	Question 8 - Agree with grey water recycling. Need to make sure that planners take this into account in planning application.	Support welcomed	None
086	Lionel Sykes		<p>Q8: flooding in Leeds is caused by neglect and very poor upkeep of drainage system, as blocked drains lead to flooding. Yorkshire Water could help by repairing leaks once notified in days instead of months.</p> <p>Q9: There should be no development where there is the slightest chance of flooding or flood risk.</p>	<p>LCC Flood Risk Section has advised that actions are in place to address this issue. However, even if the infrastructure is in perfect working order it will not be able to cope during extreme rainfall events.</p> <p>This would mean abandoning parts of our City Centre and out-lying settlements on the River Wharfe – which is not desirable and not government policy.</p>	None
091	FM Lister (Trustees)	Henry Hudson (deceased) estate	<p>Q8: Support for measures to reduce demand for treated water.</p> <p>Q9: Areas on published maps are wildly inaccurate. Need further investigation.</p>	Support welcomed. SFRA is approved by the EA as accurate.	None

AIR QUALITY COMMENTS					
Ref	Name of respondee	Organisation	Comments	LCC Initial Response	Action
31	Scott Wilson (agents)	Nick Hollands, Veolia Environmental Services Ltd	<ul style="list-style-type: none"> Paragraph 5.2 - Air Quality Management (Page 27) In the last sentence, where it states “a majority of respondents thought there should be a presumption against developments which may impact upon air quality”, it should be recognised that this doesn’t quantify whether those impacts are significant or not, and whether the impacts can be reduced through appropriate mitigation. Preferred Policy Position - Air 1: Air Quality Management of Developments (Page 28) Whilst it is considered appropriate for certain developments to consider, through appropriate risk assessments (which may include health impact assessments), the potential effect of the proposed development on local air quality, it is considered that any potential effects (after mitigation) should be considered in the context of whether they prevent/interfere with the implementation of measures set out within Leeds’ Air Quality Action Plan. Preferred Policy Position - Air 2: Low Emissions Zone(s) (Page 28) Veolia would wish to understand where the proposed ‘Low Emissions Zones’ are to be located before making further comment. 	<p>Comment noted, text referred to relates to issues and options results.</p> <p>Air Quality Action Plan is not designed for this purpose nor is it a planning tool, therefore PPP Air 1 is a necessary planning policy.</p> <p>Point Noted. More definition of the types of areas/sensitive receptors that will be covered by this policy.</p>	<p>None</p> <p>None</p> <p>LEZ feasibility work is on-going by the LCC Environmental Studies Team within the Transport Planning section.</p>
36	Dr Kevin Grady	Leeds Civic Trust	<ul style="list-style-type: none"> (Air 2) Objects to LEZs More appropriate measures which would address other issues as well as emissions would be limits on workplace parking, limit on expansion of the airport and introduction of electric/hybrid public transport (road and rail). 	<p>Objection Noted</p> <p>Included within Low Emission Strategies in supporting text</p>	<p>LEZ feasibility work is on-going by the LCC Environmental Studies section.</p>

55	Colin Holm	Natural England	<ul style="list-style-type: none"> We welcome 'Preferred Policy Position – Air 1: Air quality management of Developments' and would advise that requiring low emission strategies for developments that may generate significant traffic pollution offers a viable means of addressing some of the air quality impacts of developments. Further information on low emission strategies is available from http://www.lowemissionstrategies.org/ 	Support Welcomed	Check weblink.
58	Mary Keynes	Impact Residents Network	<ul style="list-style-type: none"> We agree with Air Quality policies, and also that air quality should be monitored in older parts of the city which are subject to heavy traffic. Planners should be able to require measures to improve air quality in older districts such as ours. Moreover, we are very concerned that reported plan to build an incinerator in LS09 could endanger our air quality, as has been reported from other incinerator sites which have shown a damaging environmental impact on a large zone around the incinerator. We recommend strongly that we and other adjacent communities should be included in consultations on this plan to build an incinerator in one of the most densely populated areas in Europe. We strongly support this, and suggest that selection of these Low Emission Zones should be related to the monitoring of air quality as proposed in the previous two questions. 	<p>There is a continual air quality audit process across the whole District. Potential impacts on air quality are assessed within the Sustainability Appraisal objectives. Evidence demonstrates the area is able to accommodate waste technologies. No evidence to suggest incinerators endanger air quality due to highly stringent regulations.</p> <p>Support welcomed and comments noted.</p>	Further work to produce principles of LEZs is required and to decide whether they will be taken forward.
	Stuart Beardwell	Leeds Friends of the Earth	<ul style="list-style-type: none"> 10 Further consultation needs to be done to determine where LEZs would be. Equal access to good quality air needs to be ensured. 11 This will be a good idea as long as steps are put in place to make Low Carbon transport more affordable and the infrastructure in place to support new technologies i.e. electric car charging points. 	<p>If we do define them, a thorough consultation will be undertaken.</p> <p>This will be looked at as part of the low emissions strategies.</p>	Further work to produce principles of LEZs is required and to decide whether they will be taken forward.

65	Mr. Zulfiqar Ali	Environment Agency Y&H	<ul style="list-style-type: none"> Air 1: Air Quality Management of Developments We support the policy but would add the specific advice below with particular reference to new waste development. <p>Some waste management facilities have the potential to effect air quality. Any waste management facility would be subject to a permit under the environmental permitting regulations. The objective of the permit is to prevent harm to the environment or human health. For incinerators emission limits are set to comply with those in the WID which are based on World Health Organisation Standards. A permit would not be issued in a particular location if air quality standards would be breached as a result of the installation.</p> <p>There may be a cumulative effect on air quality if several facilities are sited in close proximity and this must be taken in to account as early as possible. As such this should be referred to in the DPD.</p> <p>Odour is mentioned in the policy and this is a key issue for us. We would advise separating odour from air emissions as an impact, experience tells us that odour is the most common cause of complaint and has to date been more of a problem with technologies designed to handle large quantities of mixed biodegradable waste.</p>	<p>Support welcomed.</p> <p>Comments will be incorporated within the DPD.</p> <p>Agree this is necessary.</p> <p>Agree this distinction is worth reflecting</p>	<p>Incorporate into text.</p> <p>Will be completed through the SA and reflected in the final submitted policy</p> <p>To reflect distinction and include wording on odour.</p>
80	Dan Walker, David L Walker Ltd.(agent)	David Atkinson, Lafarge Aggregates Ltd	<ul style="list-style-type: none"> Q10 No, comments: sufficient legal action exists outside the Planning Regime to address air quality matters. There is a danger of duplication of regulatory functions 	<p>Aware, but for the purposes of the LDF it is appropriate to consider the air quality impacts on development decisions.</p>	<p>None.</p>

88	Mike Harty	Biffa Waste Services Ltd	<ul style="list-style-type: none"> • Objects to planners requiring measures to improve air quality and objects to LEZs. 	Objections noted.	None
91	FM Lister (Trustees)	Henry Hudson (deceased) estate	<ul style="list-style-type: none"> • Q10: No: Do not agree that all development should include aspects to <u>improve</u> air quality. But when the development involves the likely degradation of air quality the proposal should certainly contain measures to <u>safeguard</u> air quality. • Q11: No. Do not favour the creation of LEZs at this time. 	<p>The policy seeks to incorporate measures commensurate to the scale of the development.</p> <p>Objection Noted.</p>	None
93	Mr Kenna		<ul style="list-style-type: none"> • Q11: with regards to lowering emissions there are already many industrial units in east Leeds area. Transporting waste to this location from across Leeds will only add further to this. Plus extra emissions from incinerator 	<p>The DPD strategy seeks to locate facilities in a way that minimises transportation impact. The new Energy from Waste facility is not likely to lead to an overall increase in emissions. This is assessed as part of the sustainability appraisal.</p>	None

ENERGY COMMENTS					
Ref	Name of respondee	Organisation	Comments	LCC Response	Action
3	Susane Farrar	N/A	The Council could save energy by turning off unessential street lighting and turning off the Christmas lights earlier each night.	Comments noted.	None.
22	Ian Smith	English Heritage Y&H	<ul style="list-style-type: none"> Reservations about the principle of including the amount of energy likely to be generated from Energy from Waste plants within the figures for renewable energy generation. The desire to increase the amount of energy which comes from renewable technologies could result in a greater amount of waste simply being burnt rather than being recycled. Concern about the scale of some structures associated with Energy from Waste plants. The Policy should expect any scheme and its location to be appropriate in terms of accessibility, sustainability issues, environmental considerations etc Support Policy Energy 2 for assessing the appropriateness of wind energy developments. This reflects the advice in national policy guidance regarding the protection of nationally-designated environmental assets. Support Policy Energy 3 for assessing the appropriateness of micro-generation developments as it includes regard to the impact upon conservation of the built environment. 	<p>Policy Waste 1 supports the waste hierarchy and therefore encourages waste to be recycled and reduced in the first instance. However, there will always be residual and other waste that requires treatment and can contribute to renewable energy targets. Normal development control principles regarding scale, design and siting will apply.</p> <p>Support welcomed.</p> <p>Support welcomed.</p>	Explain in the text that normal DC principles apply.
26	Andy Parnham	LCC Councillor (Farnley Ward)	<ul style="list-style-type: none"> Energy Policy 4 - Energy from Waste Do NOT agree with incineration. Do agree with wind energy, solar power, water power. (Para. 6.23) 	<p>The DPD does not advocate a particular technology.</p> <p>Support welcomed.</p>	Re-iterate in the text that the DPD does not advocate a particular technology.
31	Scott Wilson (agents)	Nick Hollands, Veolia Environmental Services Ltd	<ul style="list-style-type: none"> Para 1.14, Page 4 In Diagram 1 - Key Objectives for the NRWDPD, under 'waste', the fourth point should be amended to read "recover products and energy from waste". 	Agree	Amend DPD to reflect suggested wording.

		<ul style="list-style-type: none"> • Support Policy Energy 1 • ENERGY FROM WASTE Paragraph 6.23 (Page 35) The statement “EfW facilities use municipal household waste to generate power” is incorrect, since EfW facilities can also accept other wastes (such as commercial and industrial wastes) and are not limited to household waste. The statement should therefore be amended to reflect this. • Policy- Energy 4: Energy from Waste (Page 36) Clarify that support is for energy from residual waste. • Reword bullet 1 “the proposals are supported by a study of the opportunities and potential for energy production and useage and as a minimum has an identified outlet for any electricity produced”. • Reword bullet 2 “...would not cause significant environmental effects that cannot be satisfactorily mitigated”. • Bullet 3. What is meant by “a study of alternative options”? - is this referring to a study of alternative options for treating the waste or a study of alternative sites or both? This needs clarification. Also, it is not clear why a specific assessment of financial viability would be necessary in the context of determining a planning application? • Policy Energy 4 also needs criteria: <ul style="list-style-type: none"> i. to take account of cumulative impacts of waste development in a particular area; ii to expect sufficient transport infrastructure to support the sustainable movement of waste. iii to give priority to the re-use of previously developed sites • Paragraph 6.24 - Combined Heat and Power and Preferred Policy Position - Energy 5: Heat and Power Recovery (Page 36) The linkage if any between Energy Policy 4 and Energy Policy 5 needs to be clarified. Where the document states (referring to CHP) “it is an established technology and can be implemented to support a district heating network”, as highlighted above, it should be recognised that this is subject to overcoming practicality/ viability hurdles. Accordingly, 	<p>Support welcomed.</p> <p>Agree.</p> <p>Support welcomed.</p> <p>Agree</p> <p>Agree</p> <p>Agree this is not clear.</p> <p>Cumulative impact is being assessed through the Sustainability Appraisal. Agree need to explore potential for a criteria based policy on this.</p> <p>Agree need to improve links between Energy 4 and 5 but do not wish for policy to be too restrictive. We have used the words</p>	<p>Amend text accordingly.</p> <p>Amend text accordingly.</p> <p>Amend text accordingly</p> <p>More work needed on this.</p> <p>Explore potential for a criteria based policy on this.</p> <p>Further work needed on Energy 4 and 5.</p>
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			<p>the policy should be amended to say “Seeks to encourage the application of CHP to current and future development throughout the District where practical and viable”.</p> <ul style="list-style-type: none"> Paragraph 6.25 - Heat Distribution Networks (Page 36) The text needs to recognise that the delivery of heat distribution networks is dependent on close co-operation of a range of key stakeholders and end users frequently over a long period of time. 	<p>‘where appropriate’ which means the same as ‘where practical and viable’. Not necessary to change this.</p> <p>This is acknowledged in the section on ‘Working in Partnership’.</p>	<p>None.</p> <p>Include reference to heat distribution networks in the Working in Partnership section.</p>
33	Matthew Trigg	RWE npower	<ul style="list-style-type: none"> RWE npower’s view is that Policy Energy 4 should accord with this criteria based approach set out in paragraph 21 of PPS10 which seeks to assess: <ul style="list-style-type: none"> the conformity of waste development proposals with guidance in PPS10, environmental and physical constraints, and cumulative impacts of waste development in a particular area; the suitability of transport infrastructure to support the sustainable movement of waste. <p>In addition, the policy should also reflect guidance in PPS10 which states that priority should be given to the re-use of previously developed sites for waste related uses.</p> RWE npower supports the selection of its Skelton Grange Power Station site as a proposed strategic waste site, particularly as an EfW facility. 	<p>A criteria policy may be helpful but is only necessary if it adds something further to PPS10. Need to consider if there is anything specific to Leeds that we need to include.</p> <p>Support welcomed.</p>	<p>Consider producing a criteria policy for energy from waste but only if it adds something further to PPS10 and the waste policies and in the light of the Saved UDP policies.</p>
35	Mr Robert Sladdin	University of Leeds	<ul style="list-style-type: none"> In the Introduction paragraph 1.1 add ‘Identify opportunities for reducing energy usage’ as it is at least an equal priority to renewable energy. Develop infrastructure to support electric vehicles. 	<p>Energy efficiency is dealt with in the Core Strategy.</p> <p>Potentially include a criteria policy to support infrastructure for evs.</p>	<p>Improve links between documents to cross refer to Core Strategy. Consider criteria policy.</p>

36	Dr Kevin Grady	Leeds Civic Trust	<ul style="list-style-type: none"> • (Energy 1) Improving the energy efficiency of the existing stock of housing is a national issue which needs to be addressed by central government. • (Energy 3/5/6) an assessment of the potential for heat pumps, thermal mass heat storage should be a requirement for all developments. LCC could be an exemplar through its school development programme and the Arena 	<p>Energy efficiency is dealt with in the Core Strategy.</p> <p>Heat pumps are not always viable for every development. Need to allow developer to choose the most appropriate technology.</p>	<p>Improve links between documents to cross refer to Core Strategy</p>
45	Rachel Wigginton	GOYH	<ul style="list-style-type: none"> • Policies need to add to national and regional guidance and to core strategy policies i.e. be locally specific, otherwise they are not necessary. • Para 6.7 and PPP – Energy 1 If this is to be a strategic policy in the Core Strategy, there is no need to repeat it here. It is also necessary to address the more demanding policies that will be required in the proposed urban eco-settlement in the Aire Valley, in accordance with the PPS1 Eco Town supplement. Reference should be made to these policies in other documents if they are not in this DPD. • Saved Policy N54 should be replaced in this DPD. 	<p>Point noted.</p> <p>Agree this policy may not be necessary if the links are improved to the Core Strategy.</p> <p>N54 is replaced in the Core Strategy, however more detailed policies for each different type of RE need to be developed in this DPD.</p>	<p>Improve links between documents to cross refer to Core Strategy</p> <p>More detailed policies for each different type of RE need to be developed in this DPD.</p>
46	Angela Flowers	North Yorkshire County Council	<ul style="list-style-type: none"> • With regard to energy efficiency, this could be applied to the whole life cycle of development and zero carbon standards are likely to be applied to buildings other than homes beyond 2016 (i.e. 2019). • The Council may wish to refer to the document 'Permitted development rights for small scale renewable and low carbon energy technologies, and electric vehicle charging infrastructure', a CLG consultation which closed on 9th February 2010 which, like the policy position has regard to cumulative impacts, it also includes other impacts such as vibration arising from wind energy. 	<p>Energy efficiency is dealt with in the Core Strategy.</p> <p>Agree, this sounds useful.</p>	<p>Improve links between documents to cross refer to Core Strategy.</p> <p>Take account of the CLG consultation in further work.</p>

48	Heaton planning (agent)	D Green, UK Coal Ltd	<ul style="list-style-type: none"> • COAL AND ENERGY Cross reference with Minerals There is only a presumption against surface coal mining if it does not meet the tests as set out in MPG3, para 8. • The NRWDPD should have clear regard to the aims of the Government's White Paper on Energy: Meeting the Energy Challenge, May 2007. In particular paragraph 4.25, page 111, recognises that coal-fired generation makes an important contribution to the UK's energy security and the flexibility of the UK energy system, while acknowledging that in order to have a long term future its environmental impact must be managed effectively. • Paragraph 4.27, page 112, acknowledges that the UK's coal resources have the potential not only to help to meet our national demand for coal and to reduce our dependence on imported primary fuels, but also to contribute to the economic vitality and skills base of the regions where they are found. Page 124, says there is a value in maintaining access to economically recoverable reserves of coal.' • The UK Government published 'The Energy Challenge: Energy Review Report' (Cm 6887) in July 2006. is concerned about energy security and loss of the indigenous coal production. (Para 4.23) Leeds' coal resources should be safeguarded to help the UK enhance energy security and to offer a more sustainable solution than imports from distant countries 	<p>See minerals section for further details. Have agreed to define an MSA for surface coal.</p> <p>This section is specifically about renewable energy in line with the Government's target to increase renewable energy production in the UK.</p> <p>There is a specific requirement in the PPS1 Supplement, for LDFs to demonstrate how they will encourage renewable energy. The same requirement doesn't exist for coal.</p> <p>Leeds will produce an MSA for surface coal in order to protect the resource.</p>	<p>Clarify in the text that the purpose of this section is specifically with regard to promoting Renewable Energy.</p> <p>Produce MSA for surface coal (See Minerals table).</p>
49	Barton Willmore (agent)	John Wignall, Towngate Estates Ltd	<ul style="list-style-type: none"> • PPP2: clarification of "areas of ecological importance" requested. • PPP5: In support of concept. 	<p>Clarify that this is referring to national and local designations. Support welcomed.</p>	<p>Amend policy accordingly.</p>
51	John Pilgrim	Yorkshire Forward	<ul style="list-style-type: none"> • Supports CHP in Leeds where economically viable • Support wind energy but suggest more positive phrasing of the policy position. Suggesting "promote and encourage, rather than restrict " wind energy whilst taking into account any impacts, visual and otherwise. 	<p>Support welcomed.</p> <p>Comment noted. Will consider suggestion as part of re-drafting.</p>	<p>Consider suggestion and redraft accordingly in the Publication draft.</p>

52	Nicole Harrison, Arup.	Aire Valley Environmental	<p>AVE support EFW particularly with relation to identified outlet for energy, co-location and energy efficient synergies</p> <p>Supports CHP</p> <p>Supports principles of Heat Distribution Infrastructure but concerns about over prescriptive terms and possibility they may become a barrier</p>	<p>Support welcomed.</p> <p>Support welcomed. Further work is to be carried out on this Policy.</p>	Further work is to be carried out on this Policy.
53	Martyn Coy	British Waterways	<ul style="list-style-type: none"> Paragraph 6.8 – Renewable Energy Generation Inland waterways provide opportunities for renewable energy generation, for example through small-scale hydropower and wind turbines. BW is exploring opportunities for hydropower devices on its network. In addition, BW has developed a method for using temperature differentials in water to offer cooling to waterside buildings. 	Agree more work needed on hydro-power.	Meet with BW to discuss further.
55	Colin Holm	Natural England	<ul style="list-style-type: none"> Policy Energy 1: should set out targets for energy efficiency within new developments.at least consistent with Buildings Regulations targets and for non-domestic developments. Policy Energy 2: should add criteria: <ul style="list-style-type: none"> -the areas of ecological impacts’ should include impacts on statutory and non-statutory sites for nature conservation (such as Local Nature Reserves and local wildlife sites), UK Biodiversity Action Plan species and habitats, the presence of protected species, and areas of deep peat; -impacts on recreation and access; and -impacts on the historic environment and cultural heritage More detail can be found at http://www.naturalengland.org.uk/Images/NEBPU1805Annex2_tcm6-15152.pdf. Policy should make clear that wind energy developments are not confined to wind turbines alone, but may also include additional associated infrastructure such as roads and grid connections.: Policy Energy 3: should consider the impact of micro generation on biodiversity with the need for ecological surveys decided on a case by case basis. There can be conflicts such as turbine interference with a bat roost, or micro hydro development affecting the habitat of water voles or otters. 	<p>Energy efficiency is dealt with in the Core Strategy.</p> <p>Agree</p> <p>Point noted regarding grid connections. Transport infrastructure is already included in the Policy.</p> <p>Agree</p>	<p>Improve links between documents to cross refer to Core Strategy.</p> <p>Amend Policy as suggested.</p> <p>Add ecology bulletpoint.</p>

58	Mary Keynes	Impact Residents Network	<ul style="list-style-type: none"> We agree that provision of most of these sources of renewable energy should be encouraged. We strongly support an increase in the development of wind energy, and suggest that there should be serious investigations of ways of reducing the impact of wind farms on highway safety, aeronautical radar and transmission masts reception, whether by technological developments or by better management. 	Support welcomed but we do not agree that wind turbines affect highway safety.	
59	Ed Carlisle	Together for Peace	<ul style="list-style-type: none"> Policy Energy 2: LCC should look at incentives for people to install wind turbines. Particularly considering neighbourhood primary schools, or faith buildings carry emotional weight for people <p>Policy Energy 3: LCC should look at incentives for people to install micro generation in neighbourhoods and homes,–</p> <ul style="list-style-type: none"> Exemplary eco schemes should be promoted such as anaerobic digestors to turn waste into methane?. Partnership with communities is needed (via local coops or CICs etc?) so that Leeds provides start up funding and communities supply the management 	<p>Support welcomed.</p> <p>Make cross references in the text to incentives.</p> <p>Agree, DPD promotes the waste hierarchy whilst remaining technology neutral.</p> <p>Agree. There is a section on this in the DPD already.</p>	<p>Amend text accordingly.</p> <p>Expand the Working in Partnership section.</p>
61	Stuart Beardwell	Leeds Friends of the Earth	<ul style="list-style-type: none"> Omissions that need addressing: <ol style="list-style-type: none"> 1) provision of information for reducing energy consumption 2) the need for better design i.e. passive solar gain. 3) the need for speading the cost of capital investment and reducing pay-back time. This could be achieved by local schemes where capital costs are paid back through fuel bills and are linked to the property so people can afford to invest in properties even if they may need to move at a later date. Policy needs to provide greater encouragement to wind turbine developments so that proposals like the one at Hook Moor can be approved subject to the satisfaction of the MoD. 	<p>Energy efficiency is dealt with in the Core Strategy.</p> <p>Not possible for the planning system to facilitate this.</p> <p>Point noted. Will consider the suggestion as part of the re-draft.</p>	<p>Improve links between documents to cross refer to Core Strategy.</p> <p>Consider the suggestion as part of the re-draft of policy.</p>
63	Matt Naylor	Yorkshire Water	<ul style="list-style-type: none"> Supports wind energy policy Supports EFW especially with regards to co-location and identified outlet for energy 	Support welcomed.	
65	Mr. Zulfiqar Ali	Environment Agency Y&H	<ul style="list-style-type: none"> Energy 3: Micro-generation Development We would suggest as a 6th Bullet point the highlighting that protection and enhancement of Biodiversity should be added in. 	Agree.	Add bulletpoint.

			<ul style="list-style-type: none"> • Energy 4: Energy from Waste Waste used for Energy from Waste (EFW) should be residual waste and therefore unsuitable for other uses which are higher up the waste hierarchy (reuse, recycling and composting). Without adequate materials recycling and sorting facilities it is not possible to be confident that this would be the case especially for commercial industrial waste where there is less information about its composition. Plans for energy from waste should be accompanied by improved segregation and sorting commercial industrial waste. Cross reference with waste • Energy 5 and 6 We very much support the aspiration to use Combined Heat and Power for district heating networks. • Microgeneration We strongly encourage ground source heat pump (GSHP) systems to be operated sustainably. In most cases this means there should be a balance between demand across a year for schemes using heating and cooling. This will avoid unacceptable heating or cooling of the ground and groundwater. 	<p>Policy Waste 1 supports the waste hierarchy and therefore encourages waste to be recycled and reduced in the first instance. However, there will always be residual and other waste that requires treatment and can contribute to renewable energy targets.</p> <p>Support welcomed.</p> <p>Beyond remit of the Planning System.</p>	
75	Nicola Bell of Scott Wilson (agent)	PPL Revera	<ul style="list-style-type: none"> • Policy 2 Wind Energy: lacks the necessary detail to give wind farm developers and landholders the advice/guidance and assurity needed to encourage developments to come forward. • New policy suggested at the beginning of the Energy section:: 'When determining renewable energy related planning applications Leeds City Council will; <ul style="list-style-type: none"> • look favourably on proposals for renewable energy; • not require applicants to demonstrate the overall need for renewable energy to be sited in a particular location; and • ensure any local approach to protecting landscape and townscape is consistent with PPS22 and does not preclude the supply of any type of renewable energy other than in the most exceptional circumstances.' • Para 6.11 - Of the minimum target of 75MW of renewable energy generated in the Leeds District by 2021, 40MW is the estimated 	<p>Wind energy 2 needs to be read in conjunction with the Wind Speed Map which does give an indication of the most viable areas. It may be possible to identify Areas of Search for wind and we will look at this.</p> <p>This is a repetition of national policy. Leeds will be carrying out further work on this section.</p>	Consider identifying Areas of Search for wind energy.

			<p>contribution from wind power. The RSS target is a minimum target, and subject to further review will be revised upwards if it is met. Meeting the target should not prejudice further renewable energy proposals as and when they come forward.</p> <ul style="list-style-type: none"> • Figure 9 shows wind speed measured in metres per second at 45 m above ground level. As typical wind turbine height is more than 90m Figure 9 is not reflective of the height where wind speed becomes an important factor. Also, PPS22 states that local planning authorities should not make assumptions about the technical and commercial feasibility of renewable energy projects. The following wording should be added to Para 6.14: 'Figure 9 provides a generalised indication of Leeds' wind resource by providing estimated mean wind speed data for Leeds District in metres per second and measured 45 metres above ground level. This suggests that wind energy development would be viable in the Leeds district. It is acknowledged that wind speeds may be greater than that shown in Figure 9, above 45 metres. • Given the nature of wind farms (which require significant spacing between the turbines and sensitive receptors), it is unlikely that they can be accommodated, to any great scale within the urban areas, and thus there needs to be an acknowledgement that for Leeds to deliver the renewable energy through wind power to the level indicated, some will almost certainly need to be located within the green belt. Parlington is promoted as a suitable area for wind turbines. <p>Page 6 of PPS22 advises that climate change issues and the need to generate energy from renewable sources could be considered to outweigh any harm to the green belt, and any other harm. It is therefore suggested that the following wording (which reflects the message relayed in paragraph 13 of PPS22) should be inserted into the NRWDPD after para 6.15</p> <p>'PPS22 does not set out a sequential approach to site selection for renewable energy proposals in terms of land use and designations. It is acknowledged that because of the nature of the Leeds District and some renewable energy schemes (particularly wind farms) proposals may come forward in the green belt that have elements that will comprise inappropriate development, which may impact on the openness of the green belt. Careful consideration will therefore need to be given to the visual impact of projects, and developers will need to demonstrate very special circumstances that clearly outweigh any harm by reason of</p>	<p>Need sound planning reasons for rejecting any planning application.</p> <p>Figure 9 is based on the Government's modeling and is the only evidence base available to us on wind speeds. It is clear that it is indicative and that further testing would need to be done to confirm precisely what the actual wind speeds are.</p> <p>PPS22 states that wind turbines are inappropriate development in the GB unless demonstrate very special circumstances. Leeds will consider identifying Areas of Search for wind energy which will indicate which areas are most suitable.</p> <p>Leeds does not consider the suggested wording to be necessary. However, we recognize that it would be helpful to identify Areas of Search for wind energy.</p>	<p>Clarify in the text that the target is a minimum.</p> <p>Identify Areas of Search for wind energy.</p>
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			<p>inappropriateness and any other harm if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.’</p> <p>Draft PPS15 places a greater emphasis on the distinction between direct effects on a cultural heritage asset and effects on its setting. It also gives recognition that a need for a development may play a crucial role in determining whether adverse effects may be acceptable when it comes to settings of cultural heritage assets (e.g. listed buildings, scheduled monuments, conservation areas and archaeological remains). This is an important issue for wind turbines specifically but also wording should reflect the fact that addressing climate change is one of the factors highlighted in the context of need within the draft PPS15. We therefore propose the following:</p> <ul style="list-style-type: none"> • ‘when assessing proposals for wind turbines which may have an adverse effect on cultural assets, Leeds City Council will have regard to PPS15, specifically that such schemes are highlighted in the context of need and that this will be weighed accordingly in the determination of planning applications.’ <p>It is noted that earlier consultation identified that ‘most people thought that the NRWDPD should provide both criteria-based and specific spatial guidance’ (para 6.9). PPS22 advocates that policies should be based on criteria rather than specific spatial guidance and such criteria should be worded positively rather than a series of negative constraints towards renewable energy developments. Also, wording needs to be inserted to reflect the approach taken in PPS7 which deals with landscape designations and indicates that there should be sufficient protection under criteria-based policies (for example based on landscape character assessment) to avoid the need for rigid local designations that may unduly restrict acceptable sustainable development and important economic activity in rural areas. Wind farms in particular should not be precluded on account of their proximity to spatially biased local designations such as ‘Special Landscape Areas’.</p> <ul style="list-style-type: none"> • The opening sentence to Policy Energy 2 should be amended as follows: ‘Wind energy developments will be viewed positively with a presumption in favour of development and will be judged on whether its energy contribution and other benefits can be shown to outweigh any 	<p>This is national policy and it is not necessary to repeat it.</p> <p>The PPS1 Supplement on climate change updates PPS22 with regard to this issue. Leeds intends to identify Areas of Search for wind energy.</p> <p>No need to repeat national policy.</p>	
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			<p>significant impacts on:...</p> <ul style="list-style-type: none"> For micro-generation that is "Permitted Development" (e.g. solar panels, individual wind turbines) it will be very difficult to record the provision they make accurately and thus demonstrate their tangible contribution to the 75MW of installed grid connected renewable energy target for Leeds. This needs to be made clear in the supporting text. The second part of Policy Energy 3 is negatively worded. The following positive wording is suggested: 'The Council will encourage proposals for micro-generation technologies and they will be judged on whether its energy contribution and other benefits can be shown to outweigh any impact on...' The Parlington estate is promoted as having the potential to deliver an energy from waste scheme. Anaerobic digestion could be delivered to process waste generated, in part, from surrounding communities and the estate, to reduce travel between source and process. It has good road connections. 	<p>Disagree that there is any need to make reference to this. We will not expect permitted developments to contribute towards the target.</p> <p>This is Green Belt and Special Landscape Area and therefore not an appropriate location for an Energy from Waste plant.</p>	<p>Consider using suggested wording.</p>
82	David Blackburn	LCC Councillor (Farnley Ward)	<ul style="list-style-type: none"> Energy Policy 4 - Energy from Waste (Question 12) - Do NOT agree with incineration. Do agree with wind energy, solar power water power. (Para. 6.23) 	<p>DPD is technology neutral and does not specify the technology that will be used for the energy from waste.</p>	<p>The Waste Management Section of LCC is carrying out further public consultation on the Residual Waste Treatment facility.</p>
85	Ann Blackburn	LCC Councillor (Farnley Ward)	<ul style="list-style-type: none"> Energy Policy 4 - Energy from Waste (Question 12) - Do NOT agree with incineration. Do agree with wind energy, solar power water power. (Para. 6.23) 	<p>DPD is technology neutral and does not specify the technology that will be used for the energy from waste.</p>	<p>The Waste Management Section of LCC is carrying out further public consultation on Residual Waste</p>

					Treatment.
86	Lionel Sykes		Objects to wind power. Any person on LCC who is pushing for wind power must be in the pocket of the company who install them.	This is insulting towards Council officers who work very hard in the public interest.	
87	Alan Broadbent		Supports EFW as a policy to prevent future landfill	Support welcomed.	
88	Mike Harty	Biffa Waste Services Ltd	<ul style="list-style-type: none"> • Support policies on renewable and wind energy. • Biomass as energy source should not be discounted. • EFW can also generate power from commercial/industrial waste. • PPPE4: no requirement that developers consider alternative sites. • Planning authorities should not consider financial viability of projects. 	<p>Support welcomed. We recognize the DPD needs to say more about biomass.</p> <p>Agree no need to consider alternatives. Financial viability is relevant because there may well be a number of obligations and mitigations which developers need to meet.</p>	Delete bulletpoint. Need further explanation of this point.
91	FM Lister (Trustees)	Henry Hudson (deceased) estate	Support for all six sources of renewable energy, but careful consideration of aspects should be undertaken before decision. Prefer use of wind energy. Potential issues of lesser relevance.	Support welcomed and comments noted.	None.
99	Mr Philip Hutchins	Woodkirk Stone Sales Limited	Wind energy should be amongst several options for renewables and not a 'special case'	Agree.	Provide more guidance on other forms of renewables.
100 /101	K. L & G Townend	Save Our Home and Environment	Objects to Policy 4 and the location of any proposed incinerator. Feels that the area has enough industrial /waste facilities already and it is unfair/unjust to overload one area.	The site selection study for waste management sites looked at locations all over the District and Cross Green was found to be the most appropriate location.	None

WASTE COMMENTS

Ref	Name of respondee	Organisation	Comments	LCC Initial Response	Action
022	Ian Smith	English Heritage Y&H	<p>Support the intention to have a strategy which actively encourages waste minimisation. The LDF should reduce the amount of this type of waste being created by including policies (within either the Core Strategy or other DPDs) which seek to encourage the reuse of existing buildings. Only where the reuse of an existing building could be shown to be impracticable or a less sustainable solution, should demolition of the building be permitted. The explanatory text to this Policy should set out how the plan, as a whole, will seek to reduce the amount of this type of waste being generated.</p> <p>Concerns about the process to identify the Residual Waste Treatment facility on Map E. Whilst the Council have made a report about the choice of sites publicly-available, this was not subject to a formal consultation process - nor have the range of possible sites been tested through an SEA/Sustainability Appraisal.</p> <p>Consulting on only four sites, all of which lie within one particular sector of the city gives consultees limited choice. Wider consultation on sites ranging across the whole city would have been appropriate to such an proposal.</p> <p>Concerned how the potential waste treatment sites were assessed as part of Stage 3. There is nothing within the Report which sets out the assumptions used regarding the scale of buildings which might be built as part of the development of these sites. In the absence of such assumptions, it is difficult to adequately assess the likely impact which such a facility might have upon the surrounding area. A typical EFW plant of 40 to 60 metres in height, with an 80 metre stack, could have a significant impact on environmental assets a considerable distance from the site of the plant.</p> <p>Disagree with the assessment of the impact which the top four sites in Table 4.2 might have upon the City's historic environment. All four sites could, potentially, have an adverse effect upon the character and setting of a number of historic assets in their vicinity. Given the lack of assumptions regarding the scale of development likely on each site, it is difficult to ascertain why a particular score has been attributed to each of</p>	<p>Most demolition is permitted development (unless it is a Listed Building or in a Conservation Area). The CS requires BREEAM and Code for Sustainable Homes standards to be met, which indirectly encourages the reuse of buildings.</p> <p>This consultation is an opportunity to comment on the Site Selection process. SA/SEA considerations were used to short list the sites during the study. The final selected sites will be subjected to a further formal SEA/SA process. It would have been pointless to consult on sites that have no chance of going ahead.</p> <p>The potential impacts referred to were all taken into account during the site short-listing process and weighed against other planning issues. The assessment concluded that the Aire Valley is the most suitable location because it is predominantly industrial.</p> <p>Detailed proposals for sites will need to consider the</p>	None

			<p>these sites. All four of these sites should have scored 2 (and possibly 1) and certainly not 3. Depending upon the scale of the development, an EFW plant on any of these sites could impact upon the setting and views out of the Grade II Registered Historic Park and Garden at Temple Newsam (the principal building of which is the Grade I Listed Temple Newsam House). The northern edge of the Knostrop Site lies less than 400 metres from the boundary of this registered landscape. The group of Grade II Listed Buildings at Thwaites Mill lie only 60 metres from the southern edge of the western part of the Knostrop Site and only 400 metres from the Power Station Site. There is no indication whether, if permission is granted on one of the sites, this would preclude development of the other three. No indication is given regarding what types of Strategic Waste treatment might be appropriate on each.</p>	<p>impact on heritage through an EIA and provide appropriate landscape mitigation.</p> <p>The Site Selection process did not assume any one particular technology. The DPD is technology neutral.</p>	
026 Page 274	Andy Parnham	LCC Councillor (Farnley Ward)	<p>Waste Policies 3 & 4 - Providing Self Sufficiency for C&DE Waste and Waste Policy 9 -Waste Uses Within Existing Industrial Areas</p> <p>(Question 16) - Of the 5 sites proposed under Para. 7.81, 7.42 and 7.47 (Policy Position), object to the sites on Ashfield Industrial Estate and Far Royds 'F' being extended (Ashfield Ind. Est. is at the back of Cobden Primary). Object to the extension of sites No. 140 Ashfield Way (McHugh Plant) or Site No. 145 Ashfield Way (Mone Bros) 'C2'.</p> <p>Waste Policy 7 - Safeguarded Existing Waste Management Sites Para. 7.64 – Object to extension of Site No. 140 Ashfield Way (McHuch Plant) and Site No. 145 Ashfield Way (Mone Bros).</p> <p>Object to Site No. 194 Upper Wortley Road (Matthews) 'D' Site. It is an eyesore and near a residential area and access would cause highways issues.</p>	<p>These sites are proposed for retention as important existing sites, some have potential for intensification and extension but would only be allowed if environmental circumstances allow.</p> <p>This is an existing site which it is NOT proposed to safeguard.</p>	None
030	John Dodwell	Commercial Boat Operators Association	<p>In view of the fact that Skelton Power Station site be a strategic waste site, we recommend that Skelton Grange Wharf on the Aire and Calder Navigation be added to the safeguarding list as there will be scope to take recyclates (e.g. scrap metal, glass etc) away by barge.</p>	<p>Comments noted</p>	<p>Review the potential for safeguarding of this wharf.</p>

031	Scott Wilson (agents)	Nick Hollands, Veolia Environmental Services Ltd	<p>Para 1.9 & 1.10, Page 3 - In general, the vision of the DPD is supported.</p> <p>Paragraph 7.10 - Meeting the Future Waste Management Needs for Leeds (Page 41). Paragraph 7.10 is supported, however a new sentence should be added at the end along the following lines: “However as the quantities of waste arisings are substantially greater than for municipal waste streams the additional capacity required will also be far greater if landfill diversion and sustainable waste management practices for such waste streams are also to be secured”.</p> <p>Preferred Policy Position - Waste 1: Self-Sufficiency for Future Waste Management in Leeds (Page 42) is supported.</p> <p>Preferred Policy Position - Waste 2: Providing Self-Sufficiency for MSW (Page 47), together with the supporting text at paragraph 7.32 is supported, particularly with regard to the policy for residual waste treatment. Of the four sites highlighted on Map E, the site of the Former Wholesale Market in Cross Green is considered to be particularly suitable for the development of a large scale, strategic residual waste treatment facility.</p> <p>Preferred Policy Position - Waste 3: Achieving Self Sufficiency for C&I Waste (Page 49) is supported.</p> <p>Preferred Policy Position - Waste 8: Strategic Sites for Waste Treatment (Page 56) is generally supported. However, the need for proposals to “demonstrate how they meet the criteria in Annex E of PPS 10” is queried, since Annex E of PPS 10 refers to ‘Locational Criteria’ which should be taken into account by Waste Planning Authorities when assessing the suitability of areas/sites for waste management. Presuming that the Council has applied this approach when determining which sites are to be identified on Map E, there should be no need for this assessment to be duplicated by the developer at the application stage. Perhaps what the Council means to pick up on is the ‘advice on likely impacts and the particular issues that arise with specific types and scale of waste management facilities’, which is given in the accompanying practice guide - and it is this that should be referred to instead.</p> <p>Para 1.14, Page 4 In Diagram 1 - Key Objectives for the NRWDPD, under ‘waste’, it is considered that the fourth point should be amended to read “recover products and energy from waste”. The document goes on to talk about</p>	<p>Support welcomed.</p> <p>Noted, we are aware of this. Sentence not necessary as it states the obvious.</p> <p>Support welcomed</p> <p>Support welcomed</p> <p>Support welcomed</p> <p>Agree.</p> <p>Agree</p>	<p>None</p> <p>Amend policy to incorporated suggested wording.</p> <p>Amend policy to incorporated</p>
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			support for energy from waste (particularly in sections 6 and 7), however this is not reflected anywhere in the objectives.		suggested wording.
33	Matthew Trigg	RWE npower	RWE npower supports the selection of its Skelton Grange Power Station site as a proposed strategic waste site, particularly as an EfW facility. The policy should recognise that the site is also appropriate for other employment related uses. Planning permission has already been given for significant employment related development and there are no infrastructure constraints.	Support welcomed	Agree to allocate sites and retain allocation until no longer required for waste.
036	Dr Kevin Grady	Leeds Civic Trust	<p>As C&DE waste is such a large proportion of that generated in the district, greater emphasis should be given to minimising its production – this will also address other issues such as the energy embedded in present buildings. There should be a policy to encourage reuse/remodelling of buildings rather than their demolition and replacement. Full consideration should be given of the lifetime cost of the new building as against the old, including the construction/ demolition impact in the calculations.</p> <p>Having all four options for strategic waste sites in the Lower Aire Valley means that there is an on-going commitment to carrying waste across the city to this location for processing. Question whether there should be other locations around the city for more local treatment.</p> <p>Does not identify any locations for waste sites in North and West Leeds. Additional, appropriate locations should be sought in this area.</p>	<p>Most demolition is permitted development. The CS require BREEAM and Code for Sustainable Homes standards to be met, which indirectly encourages the reuse of buildings.</p> <p>Safeguarded sites are located throughout the city. Areas of search on existing industrial sites have also been identified for this purpose. Comment noted</p>	Work on-going to accurately record and review existing waste sites.
037	Les Morris	National Grid	<p>The consultation document identifies the following potential minerals and waste sites which are crossed by National Grid's high voltage overhead electricity transmission lines:</p> <p>§ Site 08: Extraction site § Site 35: Mineral Safeguarding site § Site 65: General Waste site § Site 103: General Waste site § Site 171: Existing Landfill site</p> <p>National Grid does not object to the proposals outlined, however the following points should be taken into consideration.</p>	Points noted	None

			National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential operators of the sites should be aware that it is National Grid policy to seek to retain our existing overhead lines in-situ because of the strategic nature of our national network. Developers and planning authorities need to consider the location and nature of existing electricity transmission equipment when planning a development.		
038	Malcolm Ratcliff	Minerals Products Association	Supports Preferred Policy Position – Waste 4: Providing Self Sufficiency for C&DE Waste, however, self-sufficiency also involves providing for the disposal to landfill of residues after recycling. Council’s Preferred Policy Position – Waste 11: Landfill Disposal Object to the presumption against new landfill provision within the LCC area.	There is adequate approved landfill capacity for the plan period.	None
40	Kevin Parr (Enzygo) (Agent)	Mr Rod Mordey, Rockspring Hanover Property Unit Trust	We wish to put forward two sites within Thorp Park Trading Estate owned by our client, for inclusion in the Natural Resources and Waste Development Plan Document as part of the Leeds Local Development Framework: - Land know as “Westminster Yard” , centred at NGR SE 444 462 (444410, 446235), is located to the west of Thorp Park Trading Estate. The proposed site covers an area of 5.8 hectares and lies immediately to the north of Avenue B of the Estate. - Land located immediately to the south of Westminster Yard , centred at NGR SE 445 460 (444600, 446100). The proposed site covers an area of 8.8 hectares and is bounded by Avenue B to the north, Street 3 to the east, Avenue D to the south and Street 1 to the west.	Comments noted	Further work to be carried out to assess the site’s suitability.
45	Rachel Wigginton	GOYH	Para 7.8 A zero waste vision is not realistic. PPS10 sees disposal as the last option, but one which must be adequately catered for and refers to a need to plan for the disposal of the residues from treated wastes. Para 16 of the PPS requires LDFs to ensure there are sufficient opportunities for the provision of waste management facilities in appropriate locations including for waste disposal. Para 7.12 The document does not demonstrate that cross-boundary waste management options have been sufficiently considered. It is possible that sharing facilities could be the best option in parts of the District, including in relation to strategic waste facilities. Para 7.19 Relevant saved policies should be replaced in this DPD. Para 7.20 Reference is made to The Site Selection Study 2007 and Update	Zero waste is a worthy aspiration of the Council’s Integrated Waste Strategy, which we are required to acknowledge. The emphasis within the guidance is on self-sufficiency but there is strategic provision for treating CDE and CI wastes. There is no RSS guidance on this issue. Agree	None None Review UDP Saved Policies and incorporate into this

			<p>Addendum 2009 in relation to the selection of potential waste management facilities. Such an assessment and rejection of alternatives should be part of this DPD. The authority will need to justify at examination that the proposed sites are the best alternatives with supporting evidence that has been consulted on. All sites that have been considered should also have been subject to SA.</p> <p>Para 7.28 See comments under para 7.8. The DPD should still plan for the disposal of the reduced residues to landfill. A policy is still needed for residual landfill from all waste streams.</p> <p>Para 7.71 See comments under para 7.20. It is understood that other sites have been assessed and rejected, but this needs to be more upfront in the LDF with adequate justification of why these sites have been chosen and others rejected. The authority will need to be able to show that shared facilities with adjoining authorities have been adequately considered in this assessment.</p> <p>The Aire Valley is a preferred location for an urban eco-settlement in the Leeds City Region. This presents both challenges and opportunities for these potential waste management sites in the Aire Valley. PPS1 Eco-town supplement refers in paragraph ET19 to eco-towns planning for sustainable waste and resources, covering both domestic and non-domestic waste. This would set higher targets for dealing with waste and consider the use of locally generated waste as a fuel source for combined heat and power generation. The proposed facility needs to be fully embedded within the emerging eco-settlement proposals and explain the linkages to the Aire Valley AAP and masterplan.</p> <p>PPP – Waste 11 Object. See comments under para 7.8. PPS10 sees disposal as the last option, but one which must be adequately catered. In this context we do not consider that a presumption against landfill is acceptable.</p>	<p>SA/SEA considerations were used to short list the sites during the study. Advice from PINS, is that it is not necessary to SA the long list of sites (>1000 sites), only those that are going forward within the DPD.</p> <p>There is adequate approved landfill capacity for the plan period.</p> <p>There are commercial facilities dealing with cross boundary waste.</p> <p>Comments Noted</p> <p>The DPD is locally specific, Leeds has more than sufficient landfill capacity for the plan period.</p>	<p>DPD where appropriate.</p> <p>Work is on-going to progress the Urban Eco-Settlement by the City Council.</p>
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046	Angela Flowers	North Yorkshire County Council	<p>Preferred Policy Position - Waste 1: self-sufficiency for Future Waste management in Leeds - Paragraph 7.15 of the policy position document recognises the regional role of Leeds and the potential role of facilities within Leeds to serve a wider catchment beyond the City boundary. Whilst this recognition is welcomed, it does not appear to be fully reflected in the policy. This indicates that Leeds will work with sub-regional partners to achieve a net balance of waste management facilities across West Yorkshire.</p> <p>The approach should recognise the role that facilities within Leeds could play in serving needs arising within the wider Leeds City Region, including those parts of the LCR within North Yorkshire.</p> <p>The policy position document does not appear to address any potential requirements for the management of low level radioactive waste arising from non-nuclear industry. It is likely that some such wastes arise within Leeds and consideration should be given as to how they are to be managed. Such an approach would be in accordance with the Planning Inspectorate document: Examining the Soundness of Minerals and Waste Policies in Core Strategies (PINS 2009).</p>	<p>The NRWDPD does actually say this.</p> <p>We acknowledge this point, in Leeds this is mainly hospital waste.</p>	<p>None</p> <p>Formulate approach and draft text.</p>
049	Barton Willmore (agent)	John Wignall, Towngate Estates Ltd	<p>Objects to wording in paragraph 1.10 - amend to a more "deliverable" aim.</p> <p>P7.65-7.73: supports approach. P7.78: support need for flexibility.</p> <p>PPP10: fourth bullet point needs amending to reflect the table on P61.</p>	<p>LCC intends to aim high in achieving quality of life for people.</p> <p>Support welcomed.</p> <p>All saved policies will be reviewed .</p>	<p>None</p> <p>Review Saved policies and incorporate where appropriate.</p>
050	Sophie Taylor (Agent)	Britannia Refined Metals Limited (BRM)	<p>Object to the proposed 'safeguarding' designation (C1) site reference no. 93. Site should be removed from the NRWDPD.</p> <p>Site Closure - The site was previously used by BRM for the collection and recycling of lead acid batteries. The factory closed in 2002 and has since been cleared and secured. The adjoining land to the west of the BRM site was used for associated car parking for the BRM site and is also now vacant. The site was actively marketed by Knight Frank as an existing industrial use, but there was no successful interest. Given the site has been cleared and there has been no market interest in the site, there is no need to safeguard the site for such a use.</p> <p>The BRM site had operated as a lead refinery for approximately 40 years. The site was used for taking material feedstock such as scrap lead, lead-by-products and scrap batteries, which were smelted and refined to produce lead ingots and recycled polypropylene. A Phase II Site</p>	<p>Site to be safeguarded for waste uses as it has not been demonstrated to the Council that the site is not needed for waste.</p>	<p>Work is on-going to ascertain overall land take for future waste needs.</p>

Investigations report revealed considerable levels of contamination of soils by lead (and other metallic contaminants associated with lead). Although minor, there is also evidence of impact from lead and antimony in water samples. The costs of remediation could be in excess of £2,000,000. BRM is committed to ensuring the site's successful remediation and does not feel that this could be guaranteed by a waste management operation.

The site identified on Plan 93 does not fully fall within the ownership of BRM. The western section falls within a separate ownership. Issues of landownership are likely to be a constraint in bringing the site forward as one and this would prevent the site's delivery as a waste management facility.

The site is adjacent to a recently developed residential estate, which was granted planning permission in 2005. The residential development is part of a wider mixed use proposal for site allocated as E4.40, and demonstrates that there is already a move away from heavy industry to residentially led mixed use development around the BRM site. A waste management facility would not site easily next to these other uses, and could hinder further development and industry in the vicinity.

Waste management facilities, should in accordance with UDP Policy WM1 demonstrate that the need of the facility outweighs the harm that might result and is consistent with the principles of sustainable development. The use of the BRM site for a waste facility would cause great harm on nearby residents and given the number of other more suitable sites available (identified on Map C1), there does not appear to be a case that the need would outweigh the harm in this instance.

BRM's Development Intentions - BRM commenced pre-application discussions with the Leeds Planning Authority in June 2009 regarding the residential redevelopment of the site. Detailed discussions have taken place regarding the principle of the site's development and much work has been undertaken to demonstrate its sustainability. This work is ongoing and is likely to culminate in an application for planning permission within the next six months. Given the stage of the pre-application discussions and pending planning application, it is very unlikely that a waste management facility will be deliverable at this site and a planning permission could be in place before the final NRWDPD is in place.

The site is surrounded by Green Belt to the north, east and south east. The eastern section of the site identified on Plan 93, within the ownership of BRM falls within Green Belt. It is considered that such a use (waste management) would not be an appropriate development in the Green Belt and would conflict with policies contained within PPG2 Greenbelts and UDP Policy N33. Given the number of other sites identified as

Leeds has not made any commitment to residential development on the employment site.

			'safeguarded' it does not appear that there is a shortage to justify that 'special circumstances' exist.		
052	Nicole Harrison (Arup – Agent)	Aire Valley Environmental- AVE	<ul style="list-style-type: none"> • Supports self-sufficient future waste management • Supports self-sufficiency for MSW • Supports achieving self-sufficiency from C & I waste Policy 6 sewage sludge mention of Knostrop to explore synergies of co-processing msw and C&I and water treatments. Implementation will help achieve these aims	Support Welcome	None
053	Martyn Coy	British Waterways	Policy Waste 7 - Support the safeguarding of dredging sites at Thwaite Mill (LDF doc. Ref 167) and Woodlesford (LDF doc. Ref 172).	Support Welcome	None
Page 281	Colin Holm	Natural England	Preferred Policy Position – Waste 1: Self sufficiency for Future Waste Management in Leeds' Given that a number of the potential urban sites are on previously developed land, which can form an important habitat for a range of species (and may support the UK BAP habitat 'open mosaic habitats on previously developed land') appropriate ecological surveys, as well as assessment of impacts on townscape character and on public rights of way, should be required.	Support Welcome	None
	Mary Keynes	Impact Residents Network	Object to incineration of waste for the following reasons; expense, dangerous emissions; demand of large incinerators for a steady supply of waste will discourage waste prevention and recycling.	DPD is technology neutral.	The City Council via the Waste Management Service, is continuing to liaise with a wide range of stakeholders (including local residents) as part of the residual waste project.
059	Ed Carlisle	Together for Peace	Not convinced about waste incinerators. Suspect using unused quarries for landfill is maybe the lesser of two. Commission a major piece of public art made out of waste similar to the WEEE Man at the Eden Project in Cornwall – www. weeman.org Council waste sites need to include for more waste refuse. Supportive of gradually decreasing bin pick ups. In the long term giving whole streets communal bins might enable people in neighbourhoods to hold one another to account around waste reduction and act more cooperatively.	DPD is technology neutral. Comments noted	The City Council via the Waste Management Service, is continuing to liaise with a wide range of stakeholders (including local residents) as part of the residual waste project.

063	Matt Naylor	Yorkshire Water	<p>YW supports the overall approach to planning for new waste management facilities and the aim to identify strategic sites, in particular identifying sites where co-location is appropriate.</p> <p>Yorkshire Water supports the inclusion of Strategic Sites 2 and 3 as potentially suitable waste management sites. Areas of land within Knostrop Waste Water Treatment Works will be available and suitable for development as waste management facilities, particularly given the benefits of co-locating waste uses (see above) and preferred policy Waste 6.</p> <p>The boundary on the Knostrop site (Site 3) needs a slight amendment to fully represent the area of land available for a strategic waste use. This has been attached as a separate document.</p>	<p>Support welcomed.</p> <p>Support welcomed.</p> <p>LCC understands that this comment is made in error.</p>	<p>Review boundaries.</p>
065	Mr. Zulfiqar Ali	Environment Agency Y&H	<p>Support the vision and objectives of the document and welcome the close tie in with tackling climate change.</p> <p>Waste 1: Self sufficiency for future waste management in Leeds Add a commitment to work with neighbouring authorities on specific waste streams in order to achieve the highest levels of resource recovery for the region. Also need to include reference to the benefits of sharing information and experience of new waste technology.</p> <p>Waste 2: Providing self sufficiency for MSW The chosen solution must extract the most value from waste and should be flexible enough to accommodate advances in technology and changes in waste composition.</p> <p>Waste 3: Achieving self sufficiency for C & I waste There should be a presumption that any increased capacity for Commercial Industrial waste will drive the management of that waste up the hierarchy.</p> <p>Waste 4: Providing self sufficiency for C&DE waste Support. More provision is required to prevent valuable materials being landfilled. In order to increase recycling and reduce fly tipping there should also be some offsite provision suitable for small builders.</p> <p>It should also be a priority to reduce and reuse construction waste on site through the use of sustainable construction methods and site waste management plans.</p> <p>Incorporate a policy which promotes sustainable construction and building design which encourages and facilitates waste segregation. The need for</p>	<p>Support welcomed.</p> <p>There are commercial facilities dealing with cross boundary waste. Leeds has made a commitment to working with neighbouring authorities (see Waste 1).</p> <p>DPD is technology neutral.</p> <p>There is an inevitability about this in any event.</p> <p>Agree</p> <p>Covered in Core Strategy and Sustainable Construction SPD</p>	<p>Work on-going.</p> <p>The City Council's Waste Management Section are considering a scheme for small quantities of waste for small builders.</p> <p>Improve links between documents.</p>

			<p>Site Waste Management Plans could also be included within the policy.</p> <p>Agricultural Waste - Some types of agricultural waste are being dealt with on farms, and that there is increasing interest in anaerobic digestion and composting for dealing with slurries and vegetable waste. Some more enterprising farmers are looking at the possibility of bringing in wastes from the food processing industry to make the investment in new treatment technology more cost effective. Criteria based policies which recognise the impacts of these types of technologies could be useful.</p> <p>Other types of agricultural waste such as packaging, scrap metal and construction waste are more likely to be dealt with off farm as commercial industrial waste.</p> <p>Waste 5: Hazardous Waste Agree that hazardous waste capacity should be maintained and that special provision may need to be made for the remediation of contaminated sites so that they can be brought back in to use.</p> <p>Waste 7: Safeguarded Existing Waste Management Sites No objection to the safe guarding of waste management sites unless there is a proven environmental reason which cannot be mitigated through other means.</p> <p>Waste 8: Strategic Sites for Waste Treatment The suitability of the four strategic sites is dependant to a large extent on the chosen technology, and its environmental impacts. It has not been made clear whether there are circumstances where all four sites would be developed. For some technologies the cumulative effect of emissions and also cooling water availability may be a limiting factor and this should be explored as early as possible.</p> <p>It is important for Leeds to take responsibility for its own waste but applications should also be considered in a regional context.</p> <p>PPS10 Support - An emerging issue over the past 12 months has been the disposal or further treatment of the outputs from Mechanical Biological Treatment and Autoclave type facility commonly referred to as compost like output or in some cases refuse derived fuel. These outputs remain waste and as such require waste permits for their onward treatment or disposal. They cannot be spread to land without authorisation or burned for energy</p>	<p>Noted but taking urban waste into the green belt is not consistent with sustainability principles.</p> <p>Noted</p> <p>Comment welcomed. There is a regional and sub-regional shortage of hazardous waste capacity.</p> <p>All sites have been assessed for their environmental impact and only safeguarded where there is no conflict.</p> <p>Disagree. All four strategic sites are potentially suitable for any technology. Cumulative effects will be assessed in the SA.</p> <p>Agree.</p>	<p>Work on-going to establish accurate data.</p>
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			<p>except in a Waste Incineration Directive (WID) compliant incinerator. Productive outlets for these residual wastes need to be planned for alongside the proposals for initial treatment.</p> <p>Waste 9: Waste Uses within Existing Industrial Areas A well run waste facility is suitable for most industrial areas. Existing buildings can be used, however, where potentially odorous wastes are being handled there may then be problems with the effective employment of modern negative pressure odour control technologies.</p> <p>Waste 11: Landfill Disposal Agree that landfill is a last resort and any requirement for further capacity should be assessed on this basis.</p>	<p>Noted. The DPD is providing a range of sites for waste and is technology neutral.</p> <p>Support welcomed. Potential for odour problems will be assessed as part of any relevant planning applications.</p> <p>Support welcomed.</p>	
072	Nicholas Howarth	Howarth Timber	Knostrop Sewage Works should become the location for new waste treatment facility as it is more remote from both residential areas and heavily occupied commercial sites.	Support welcomed.	
074	Diane Gill	Save Our Homes	Object to Wholesale Market site as location for incinerator.	DPD is technology neutral.	The City Council via the Waste Management Service, is continuing to liaise with a wide range of stakeholders (including local residents) as part of the residual waste project.

075	Nicola Bell of Scott Wilson (agent)	PPL Revera	<p>The spatial principles outlined in Preferred Policy Position – Waste 1: Self sufficiency for Future Waste Management in Leeds and Waste 2: Providing Self Sufficiency for MSW to enable Leeds to meet its own waste management needs are supported.</p> <p>The 'Future MSW Capacity Requirement at 2026' table (pg 46) identifies a need for green waste composting facilities to deal with an additional 64,000 tonnes per annum, a new processing facility for organic waste streams of Municipal Solid Waste (MSW) to treat 45, 000 tonnes per annum through a Anaerobic Digestion or In-Vessel Composting facility. There is also an identified need for new facilities to deal with Commercial and Industrial Waste and Construction, Demolition and Excavation Waste. Whilst it is acknowledged that large strategic sites (such as those identified on Maps E and F) are required to enable Leeds City Council to plan effectively, this should not prevent localised waste facilities coming forward that could appropriately serve immediate communities and reduce travel between source and process. Parlington Estate is promoted as having the potential to accommodate such facilities given its location adjacent to the J47 of the M1.</p> <p>Preferred Policy Position – Waste 10: Future Waste Use Proposals - Support.</p> <p>Support the retention of UDP saved policy WM7 which supports composting and recognises that there may be circumstances where this activity may take place in Green Belt. It is suggested that the Parlington estate could provide centralised waste to energy facilities for the nearby settlements of Garforth, Barwick-in-Elmet and Aberford, to assist with creating self-sufficiency of their localised waste stream, as part of wider renewable energy proposals.</p>	<p>Support welcomed.</p> <p>The strategy is to provide waste facilities in accordance with PPS10. ie. on industrial land which is appropriate for such uses.</p> <p>Green waste composting needs to be assessed on a specific basis depending on the type and scale of the process.</p> <p>Support welcomed.</p> <p>It is intended to review Saved Policies and where appropriate incorporate these into the DPD.</p>	<p>Review policy position to provide locational criteria.</p> <p>Review and incorporate appropriate saved policies into DPD.</p>
080	Dan Walker, David L Walker Ltd.(agent)	David Atkinson, Lafarge Aggregates Ltd	<p>Objects to the principle of safeguarding existing sites and the strategic waste sites as all potential sites should be considered on an individual basis and specific planning merits. Section 7 needs further consideration in regards to recovery aspects of inert waste.</p>	<p>This is contrary to the Development Plan led planning system set up by Government.</p>	<p>None.</p>

081	Lisa Morris		Does not think the incinerator should be built next to residential housing like the Wholesale Market Site. Supports approach to safeguarding existing sites and the strategic waste sites.	Objection noted. Support welcomed.	
082	David Blackburn	LCC Councillor (Farnley Ward)	<p>Waste Policies 3 & 4 - Providing Self Sufficiency for C&DE Waste and Waste Policy 9 -Waste Uses Within Existing Industrial Areas</p> <p>(Question 16) - Of the 5 sites proposed under Para. 7.81, 7.42 and 7.47(Policy Position) object to extension of Ashfield Industrial Estate and Far Royds 'F' Sites (Ashfield Ind. Est. is at the back of Cobden Primary).</p> <p>Object to extension of Site No. 140 Ashfield Way (McHugh Plant) or Site No. 145 Ashfield Way (Mone Bros) 'C2'.</p> <p>Waste Policy 7 - Safeguarded Existing Waste Management Sites</p> <p>Para. 7.64 – Object to extension of Site No. 140 Ashfield Way (McHuch Plant) and Site No. 145 Ashfield Way (Mone Bros).</p> <p>Object to use of Site No. 194 Upper Wortley Road (Matthews) 'D' Site as it is an eyesore and near a residential area and entry would cause a traffic problem.</p>	<p>Objections noted.</p> <p>These sites are proposed for retention as important existing sites, some have potential for intensification and extension but would only be allowed if environmental circumstances allow.</p> <p>This is an existing site which it is NOT proposed to safeguard.</p>	Work is on-going to accurately assess whether we are meeting our waste requirements.
084	Gavin Fernley	Blackshaw Holdings	The owners object to safeguarding Carr Croft MRF Site 58 due to its town centre location. It is not an appropriate use at this location and its present operation is proving difficult. Suggests safeguarding St Bernard's Mill (ref 141) as has recent planning permission for a MRF.	<p>Site to be safeguarded for waste uses as it has not been demonstrated to the Council that the site is not <u>needed</u> for waste.</p> <p>St. Bernard's Mill is already safeguarded for aggregate recycling purposes.</p>	Further work will be carried out to assess the potential for the alternative site put forward. If it is acceptable as an alternative MRF site then there will be a need to find an alternative aggregate recycling site as the suggested alternative is currently used for this purpose.

085	Ann Blackburn	LCC Councillor (Farnley Ward)	<p>Waste Policies 3 & 4 - Providing Self Sufficiency for C&DE Waste and Waste Policy 9 -Waste Uses Within Existing Industrial Areas</p> <p>(Question 16) - Of the 5 site proposed under Para. 7.81, 7.42 and 7.47(Policy Position) Object to extension of Ashfield Industrial Estate and Far Royds 'F' Sites (Ashfield Ind. Est. is at the back of Cobden Primary).</p> <p>Object to extension of Site No. 140 Ashfield Way (McHugh Plant) or Site No. 145 Ashfield Way (Mone Bros) 'C2'.</p> <p>Waste Policy 7 - Safeguarded Existing Waste Management Sites</p> <p>Para. 7.64 – Object to extension of Site No. 140 Ashfield Way (McHuch Plant) and Site No. 145 Ashfield Way (Mone Bros).</p> <p>Object to use of Site No. 194 Upper Wortley Road (Matthews) 'D' Site as it is an eyesore and near a residential area and entry would cause a traffic problem.</p>	<p>Objections noted.</p> <p>These sites are proposed for retention as important existing sites, some have potential for intensification and extension but would only be allowed if environmental circumstances allow.</p> <p>This is an existing site which it is NOT proposed to safeguard. Category D sites are NOT safeguarded.</p>	Work is on-going to accurately assess whether we are meeting our waste requirements.
086	Lionel Sykes		<p>Keep waste sites away from any water treatment plants.</p> <p>I do not agree with your selection for strategic sites. Sites should be near 'A' roads/motorways to keep costs down.</p> <p>Do not support discouraging landfill, as long as it is carried out correctly, efficiently and economically</p>	<p>Noted</p> <p>Agree to point regarding good access links.</p> <p>Leeds has sufficient landfill sites to meet the need for the plan period and therefore there is no need to allocate new sites.</p>	None, all 4 proposed strategic sites have good access to the motorway network.
087	Alan Broadbent		<p>Supports approach to safeguarding existing sites and the strategic waste sites.</p> <p>Need to move away from land fill sites as quickly as possible by improving recycling centres. Leeds is not organised to do this</p>	Support welcomed.	None.
088	Mike Harty	Biffa Waste Services Ltd	<p>Supports approach to safeguarding existing sites and the strategic waste sites.</p> <p>AD is the preferred choice.</p>	Support welcomed. DPD is technology neutral.	None.
091	FM Lister (Trustees)	Henry Hudson (deceased) estate	<p>Supports approach to safeguarding existing sites and the strategic waste sites.</p> <p>Considers that landfill still required. Early site identification will be better policy</p>	Support welcomed. <p>Leeds has sufficient landfill sites to meet the need for the plan period</p>	None.

092	Mrs Kenna		Not all the strategic sites should be in LS9, questions spatial vision	The general location has been found to be the most suitable location in the District for strategic sites as it is an industrial area with good road connections.	The City Council via the Waste Management Service, is continuing to liaise with a wide range of stakeholders (including local residents) as part of the residual waste project.
093	Mr Kenna		<p>Suggests a site in NW Leeds as a strategic site or join with Bradford area</p> <p>Suggests moving strategic sites further out of an already over-extended Leeds area. Go NW.</p> <p>Suggests industrial estates for waste in Pudsey, Guiseley or even out towards Wetherby.</p> <p>Supports filling in sites away from densely populated areas as these will not be potentially as harmful to quality of life of local people.</p>	<p>The general location has been found to be the most suitable location in the District for strategic sites as it is an industrial area with good road connections.</p> <p>DPD provides a range of sites across the District, including industrial estates.</p>	The City Council via the Waste Management Service, is continuing to liaise with a wide range of stakeholders (including local residents) as part of the residual waste project.
094	Mrs Ann Slater		Supports safeguarding waste sites in industrial areas away from residential. Does not support strategic waste sites as they are too close to homes. Only supports landfill when a proven need is established.	Comments noted.	None.
95	Mr R D Taylor		<p>Protests to increased recycling separation at home (due to space and smell).</p> <p>Objects to incineration (due to proximity)</p>	Increased recycling is necessary in order to reduce the amount of waste. This DPD is technology neutral.	The City Council via the Waste Management Service, is continuing to liaise with a wide range of stakeholders (including local residents) as part of the residual waste project.
100	Mr K L Townend	Saves Our Homes and The Environment	Asks why all sites are near them. Already much noise/pollution from existing infrastructure and industrial.	The general location has been found to be the most suitable location in the District for strategic sites as it is an industrial area with good road connections.	The City Council via the Waste Management Service, is continuing to liaise with a wide range of stakeholders (including local residents) as part of

					the residual waste project.
101	Mrs G Townend	Saves Our Homes and The Environment	Asks why all sites are near them. Already much noise/pollution from existing infrastructure and industrial.	The general location has been found to be the most suitable location in the District for strategic sites as it is an industrial area with good road connections.	The City Council via the Waste Management Service, is continuing to liaise with a wide range of stakeholders (including local residents) as part of the residual waste project.

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