



DEVELOPMENT PLAN PANEL

Meeting to be held in Civic Hall, Leeds, LS1 1UR on
Monday, 2nd July, 2012
at 1.30 pm

MEMBERSHIP

Councillors

M Coulson
P Gruen
R Harington
J Lewis
K Mitchell
N Taggart (Chair)
N Walshaw

C Campbell

B Anderson
C Fox

T Leadley

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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 Head of Governance Services 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> <p>No exempt items or information have been identified on this agenda.</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> <p>To receive any apologies for absence.</p>	
6			<p>MINUTES - 6TH JUNE 2012</p> <p>To approve as a correct record the minutes of the Development Plan Panel meeting held on 6th June 2012.</p>	1 - 2
7	All Wards;		<p>LEEDS SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (DPD) SITE ASSESSMENTS</p> <p>To receive and consider a report from the Director of City Development presenting proposed site assessment details attached to this report.</p>	3 - 28
8	All Wards;		<p>LDF CORE STRATEGY - PUBLICATION DRAFT, ANALYSIS OF CONSULTATION RESPONSES: H5 AFFORDABLE HOUSING</p> <p>To receive and consider a report from the Director of City Development presenting a review of consultation responses in relation to affordable housing.</p>	29 - 50

Item No	Ward	Item Not Open		Page No
9	All Wards;		<p>LDF CORE STRATEGY - PUBLICATION DRAFT, ANALYSIS OF CONSULTATION RESPONSES: POLICY H6 - HOUSES IN MULTIPLE OCCUPATION (HMOS), STUDENT ACCOMMODATION AND FLAT CONVERSIONS</p> <p>To receive and consider a report from the Director of City Development presenting a review of consultation responses in relation to Policy H6 - Houses in Multiple Occupation (HMOs), Student Accommodation and Flat Conversions.</p>	51 - 64
10	All Wards;		<p>LDF CORE STRATEGY - PUBLICATION DRAFT, ANALYSIS OF CONSULTATION RESPONSES: POLICY SP4 - REGENERATION PRIORITY AREA AND POLICY SP5 - AIRE VALLEY LEEDS URBAN ECO SETTLEMENT</p> <p>To receive and consider a report from the Director of City Development presenting a review of consultation responses in relation to Policy SP4 (regeneration priority areas) and Policy SP5 (the Aire Valley Leeds Urban Eco Settlement).</p>	65 - 90
11	All Wards;		<p>LDF CORE STRATEGY - PUBLICATION DRAFT, ANALYSIS OF CONSULTATION RESPONSES: POLICY SP11 'TRANSPORT INFRASTRUCTURE AND INVESTMENT PRIORITIES', POLICY T1 'TRANSPORT MANAGEMENT' AND POLICY T2 'ACCESSIBILITY REQUIREMENTS FOR NEW DEVELOPMENTS'</p> <p>To receive and consider a report from the Director of City Development presenting a review of consultation responses in relation to SP11 'Transport Infrastructure and Investment Priorities', T1 'Transport Management' and T2 'Accessibility Requirements for New Developments'.</p>	91 - 114
12			<p>DATE AND TIME OF NEXT MEETING</p> <p>Tuesday, 7th August 2012 at 1.30pm.</p>	

Agenda Item 6

Development Plan Panel

Wednesday, 6th June, 2012

PRESENT: Councillor N Walshaw in the Chair

Councillors B Anderson, M Coulson, C Fox,
and T Leadley

1 Election of Chair

In the absence of Councillor N Taggart, Councillor N Walshaw was elected to chair the meeting.

2 Chair's Opening Remarks

The Chair welcomed all in attendance to the June meeting of Development Plan Panel.

3 Declaration of interests

There were no declaration of interests made at the meeting.

4 Apologies for Absence

Apologies for absence were received on behalf of Councillor P Gruen, Councillor K Mitchell and N Taggart.

5 Minutes - 3rd April 2012

RESOLVED -That the minutes of the meeting held on 3rd April 2012 be approved as a correct record.

6 LDF Core Strategy - Publication Draft, Initial Report of Consultation

The Director of City Development submitted a report on the latest developments in relation to public consultation on the LDF Core Strategy.

Appended to the report was a copy of a document entitled 'Core Strategy Publication draft consultation, list of meetings attended' for the information/comment of the meeting.

The Chair welcomed the following officers to present the report and to respond to Members' questions and comments:-

- David Feeney, Head of Forward Planning and Implementation, City Development
- Steve Speak, Deputy Chief Planning Officer, City Development
- Lyla Peter, Data Team, Forward Planning and Implementation, City Development

Detailed discussion ensued on the contents of the report and appendices.

In summary, the key areas of discussion were:-

Draft minutes to be approved at the meeting
to be held on Monday, 2nd July, 2012

- the need to acknowledge that the Gypsies and Travellers issue was an important issue and that a positive outcome was required in this area
(The Deputy Chief Planning Officer responded and confirmed that this issue would be addressed)
- clarification of the wording within the National Planning Policy Framework General Policy and the need to remove the words 'without delay' in relation to approving planning applications that accord with the policies in this plan
(The Deputy Planning Officer responded that the wording was taken from a model policy issued by the Planning Inspectorate but that in the light of Members' comments further consideration would be given to the policy wording)
- clarification if there was any further guidance available in relation to environmental conditions attached to the General Policy
(The Head of Forward Planning and Implementation responded and informed the meeting that no further guidance was available at present)
- the need for Panel Members to be supplied with a copy of the detailed representations received to date on the LDF Core Strategy
(The Head of Forward Planning and Implementation agreed to deposit a copy of the document in each of the group offices for Members' guidance and reference)
- clarification of the breakdown of the 353 representations received and the percentage of responses received from the general public
- the concerns expressed that the LDF process requires that the consultation was aimed at the soundness of the plan as opposed to focusing on the specific detail of the policy which would have been difficult for the public to understand and may account for the limited scale of public response
- the need for any further consultation periods to be kept at a minimum to avoid any further potential problems developing
- clarification of the latest developments around windfall

RESOLVED-

- a) That the contents of the report and appendices be noted.
- b) That this Panel notes that further work was needed to analyse responses which would be presented to subsequent meetings over the summer period.

7 Date and time of next meeting

Monday 2nd July 2012 at 1.30pm in the Civic Hall, Leeds.

(The meeting concluded at 2.45pm)

Report of Director of City Development

Report to Development Plan Panel

Date: 2nd July 2012

Subject: Leeds Site Allocations Development Plan Document (DPD) Site assessments

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

Summary of main issues

1. A report on the scope of the Site Allocations DPD was brought to Development Plan Panel on 6th March 2012, and agreed at Executive Board on 16th May 2012. Leeds Site Allocations DPD will cover specific topic areas of: Retail, Housing, Employment and Greenspace (PPG17). Consistent with the overall scale of growth and strategy approach, a selective Green Belt review will be necessary to meet housing and employment requirements identified in the Core Strategy as appropriate.
2. The importance of local community and local ward member input in the consultation process has been emphasised.
3. The Council has received many expressions of interest from communities wishing to prepare their own neighbourhood plan. Council officers propose to share our methodology to site assessment with interested communities. This should ensure a consistent approach to assessing sites, and transparency of information.

Recommendation

4. Development Plan Panel are requested to note the proposed site assessment details attached to this report at appendices 1-3, and be aware that this information may be made available to communities undertaking preparation of Neighbourhood Plans, to enable a clear, transparent process and a consistent approach to site assessment.

1 Purpose of this report

- 1.1 The purpose of this report is to make members aware of the proposed site assessment details attached to this report, and be aware that this information may be made available to communities undertaking preparation of Neighbourhood Plans, to enable a clear, transparent process and a consistent approach to site assessment, should they wish to use the same or a similar approach.

2 Background information

- 2.1 On 16th May 2012, Executive Board approved the scope of Leeds Site Allocations DPD, which will cover specific topic areas of: Retail, Housing, Employment and Greenspace (PPG17) and incorporate a selective Green Belt review.

3 Main issues

- 3.1 The process and stages of preparation of the DPD will involve a continual process of engagement with the public including local communities, developers, parish councils and local ward members. In particular, where communities are preparing neighbourhood plans, it makes sense to share our approach with them because emerging ideas from neighbourhood plans should help inform the Site Allocations DPD and using a consistent approach to assessing sites should help communities and ensure transparency in work being undertaken.

4. Corporate Considerations

4.1 Consultation and Engagement

The Site Allocations DPD will form part of the statutory development plan process/the Local Development Framework and will be subject to public consultation throughout the various stages of production prior to adoption in accordance with statutory planning requirements. Similarly, neighbourhood plans, once adopted, will form part of the statutory development plan. Sharing of information in assessing sites will therefore be mutually beneficial.

5. Equality and Diversity / Cohesion and Integration

- 5.1 Any proposals within the Site Allocations DPD will be subject to a screening exercise to establish the need for an Equalities Impact Assessment.

6. Council policies and City Priorities

- 6.1 Policies and proposals/site specific allocations within the Site Allocations DPD will need to reflect the City priorities identified in the Vision for Leeds and the Local Development Framework, in particular the delivery of the Core Strategy long term spatial vision, objectives and policies.

7. Resources and value for money

- 7.1 Sharing of the site assessment approach with communities producing neighbourhood plans represents value for money in that it could reduce time and resources spent developing alternative assessments.

8. Legal Implications, Access to Information and Call In

- 8.1 The Site Allocations DPD will follow the statutory development plan process (Local Development Framework).

9. Risk Management

- 9.1 Transparency and sharing of our assessment approach will aid consistency in producing plans by different communities elsewhere. Sharing of information in assessing sites will therefore be mutually beneficial.

10. Recommendations

- 10.1 Development Plan Panel are requested to note the proposed site assessment details attached to this report, and be aware that this information may be made available to communities undertaking preparation of Neighbourhood Plans, to enable a clear, transparent process and a consistent approach to site assessment.

11. Background documents

- 11.1 Executive Board Report 16th May 2012
- 11.2 Appendix 1: Site Proforma
- 11.3 Appendix 2: Green Belt Review Assessment Methodology
- 11.4 Appendix 3: Sustainability appraisal framework

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Site Ref: 17 22

Site Name

Planning History

Site Ref: 10000000

Site Name

Site Characteristics

Please highlight an option for each of the following characteristics

Topography		
Flat	Sloping	Undulating
Natural Landscape		
Significant Tree Cover	Limited Tree Cover	No Tree Cover
Boundaries		
Existing well defined	Partially well defined	Poorly defined
Does the site have a road frontage?		
Yes	No	

Distance to Rail Station (metres):		Distance to bus stop (metres)	
Nearest Railway Station		Bus Stop ID	
SFRA Flood Zone:	0.00	Within Retail Buffer Zone:	0.00
EA Flood Zone:	0.00	Agricultural Land Class:	1.00
HSE Haz:	0.00	Strategic Employment Buffer:	0.00
HSE Gas Pipeline		Conservation Areas	0.00
Ancient Monument:	0.00	Listed Buildings:	0.00
Public Rights of Way:	0.00		

Comments and Conclusions

UDP Designation

Greenbelt (%):		Urban Green Corridor (%):	0.00
Protected Area of Search N34:	0.00	Rural Land:	0.00
City Centre PSQ	0.00	Town Centre:	0.00
Special Landscape Area:	0.00	Allotments (N1A):	0.00
Proposed Greenspace (N5):	0.00	Protected Playing Pitch (N6):	0.00
Nature Conservation Area:	0.00	Other?:	

Natural Resources and waste DPD

SiteNRW:	0.00
SiteNRW_100:	0.00

Green Belt

1. Check the unrestricted sprawl of large built up areas			
Would development of this site lead to/constitute ribbon development	Yes	No	
Would development result in an isolated development site not connected to existing boundaries	Yes	No	
Is the site well connected to the built up area (Does it have 2 or more boundaries with existing built area)	Yes	No	
Would development of the site effectively 'round off' the settlement?	Yes	No	Partial
Do natural features and infrastructure provide a good existing barrier between the existing urban area and undeveloped land – which if breached may set a precedent for sprawl?	Yes	No	
Overall Conclusion – Development of the site would Result in			
High potential of unrestricted sprawl		Low potential to lead to unrestricted sprawl	

2. Prevent neighbouring towns from merging			
Would development of the site lead to physical connection of 2 or more settlements?	Yes	No	
Do natural features and infrastructure provide a good existing barrier/boundary to the site that would ensure that development was contained?	Yes	No	
Overall Conclusion – Development of the site would Result in			
Coalescence/merging of settlements	No merging of settlements	No merging of settlements but	
		There is no defensible boundary	Would significantly reduce the green belt gap between settlements

3. Assist in safeguarding the countryside from encroachment			
Is there a strong defensible boundary (infrastructure) between the existing urban area and the site?	Yes	No	
Does the site provide access to the countryside?	Yes	No	
Does the site include national or local nature conservation designated areas (SSSIs etc)	Yes	No	
Does the site include areas of woodlands, trees, hedgerows that are or protected, or significant unprotected tree/hedge cover?	Yes	No	
Does the site include any grade 1 agricultural land?	Yes	No	
Does the site contain buildings?	Yes	No	
If yes, are these in agricultural use?	Yes	No	
Overall Conclusion			
The site performs an important role in safeguarding the countryside from encroachment		The site does not perform an important role in safeguarding the countryside from encroachment	

4. Preserve the setting and special character of historic towns			
Is the site adjacent to a conservation area, listed building or other historical feature?	Yes	No	
If yes, could development preserve this character?	Yes	No	
Overall Conclusion – Development of the site would			
Have no effect on the setting and special character of historic features	Have an effect on the setting and special character of historic features, which could be mitigated against through appropriate detailed design		Have a significant effect on the setting and special character of historic features

Site Ref: 2740

Site Name

Overall Conclusion from Assessment against all 4 purposes of green belt and essential character openness and permanence

Gypsy Traveller Site Assessment

Could site be effectively managed	Yes	No	Maybe
	(Text)		
Would gypsies and travellers live on the site?	Yes	No	Maybe
	(Text)		
Proximity to housed gypsies and travellers	Yes	No	
	(Text)		
Experience of previous encampments	Yes	No	Unknown
	(Text)		

Proposed Uses

Proposed Use	
Residential	Mixed use - Please state:
Employment (B2&B8)	
Retail/office (B1 & A use classes)	Other – Please State:

Summary of Infrastructure and other planning requirements

Site Ref: []

Site Name

Summaries (please provide detail in relevant section)
Highways
Public Transport
Affordable Housing
Greenspace
Biodiversity
Education
Health
Retail/Other Town Centres
Utilities (Drainage/Water/Electricity)
Built heritage
Other

Site Availability

Site Ref:

Site Name

Availability of site		
Known landowner	Yes(give details)	No
Willing landowner	Yes	No

Site Boundary

Does the boundary of the site need to be redrawn?: Yes / No

Would the redrawing of the site change conclusions/assumptions that would effect final assessments and conclusions?: Yes / No / Partial (if yes or partial a second assessment based on the new boundary needs to be undertaken)

Surrounding sites impact

Is the development of this site contingent on the development of surrounding land/sites?		
Yes	No	Partial
In what way is it contingent? (Circle all that apply)		
Road access	Enables shared delivery of infrastructure	
Enables joining up of site to settlement	Other (comments)	

Conclusion of Assessment

Site Ref: 07/01/001

Site Name

Decision		
Site Accepted		Site rejected
Specify Use (select as appropriate)		
Residential		Employment
Retail/Office		Mixed Use (Specify mix)
Reason and summary		
Is the site likely to affect other sites? (If Yes give details)		
If residential, Site Capacity?		
If residential use, Phase of delivery? (circle)		
Short (1-5 years)	Medium (5-10 years)	Long (10+ years)

Assessment Details

Planning Officer Initials

Site assessment completed (date):

Database input completed (date)

Appendix 2 Green Belt Review Methodology

Once the general extent of a Green Belt has been approved, boundaries should only be altered in exceptional circumstances. It is therefore necessary to assess which land within the Green Belt can make a significant contribution to meeting long term development land supply needs which would be least damaging to the purposes and integrity of the overall Green Belt in the Leeds district.

When assessing a site that is only partially in the Green Belt, only assess the part that is Green Belt.

GB purposes, criteria for assessing sites:

National Planning Policy Framework (NPPF) para 79 states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are their openness and permanence. Para 80, sets out the 5 purposes of Green Belt:

Purpose	Criteria and definitions	Assessment
1. Check the unrestricted sprawl of large built up areas	<p>This is not the same as urban development per se. It is a judgement as to whether a development would result in inefficient use of land considering the following criteria:</p> <ul style="list-style-type: none"> i. Would development of the site lead to/ constitute ribbon development YES/NO ii. Would development result in an isolated development site not connected to existing boundaries YES/NO iii. Is the site well connected to the built up area? – Does it have 2 or more boundaries with the existing built up area? YES/NO iv. Would development of the site effectively 'round off' the settlement pattern YES/NO/PARTIAL v. Do natural features and infrastructure (major road, river etc) provide a good existing barrier between the existing urban area and undeveloped land, which if breached may set a precedent for unrestricted sprawl? YES/NO 	<ul style="list-style-type: none"> i. If response yes, high potential for unrestricted sprawl ii. If response yes, result would be isolated development, high potential for urban sprawl iii. If a site is well connected ie has several boundaries with the adjacent urban area, lower potential for urban sprawl. If only one boundary with existing urban area, development would 'jut out' or not be as well related and has more potential to result in urban sprawl. iv. If response yes, development would 'round off', low potential for unrestricted sprawl v. if yes, higher potential for urban sprawl. <p>Overall conclusion: Development of the site would result in:</p> <p>High potential to lead to unrestricted sprawl OR</p> <p>Low potential to lead to unrestricted sprawl (Delete response which does not apply)</p>
2. Prevent neighbouring towns from merging	<p>It is impossible to define a minimum distance that there should be between settlements.* (see bottom of 3rd column). The important consideration is whether development would appear to result in the merger of built up areas. Topography and features such as rivers and major roads can act as barriers preventing merging. The assessment therefore looks at:</p> <ul style="list-style-type: none"> i. Do natural features and infrastructure provide a good physical barrier or 	<ul style="list-style-type: none"> i. If yes, a good physical boundary is more likely to perform a role in preventing neighbouring towns from merging. ii. If development would lead to the merging/physical connection of settlements the site would not prevent towns from merging. <p>Overall conclusion: Development of the site would lead</p>

	<p>boundary to the site that would ensure that development was contained? YES/NO</p> <p>ii. Would development of the site lead to physical connection of 2 or more settlements? YES/NO</p>	<p>to coalescence/merging of settlements OR</p> <p>Development of the site would not result in the merging of settlements OR</p> <p>Development of the site would not result in actual merging of settlements but does not:</p> <p>i) make good use of any physical barriers/there is no defensible boundary and/or</p> <p>ii) development of the site would significantly reduce the Green Belt gap between settlements. (see * 2nd column, explanation)</p> <p>(Delete response which does not apply)</p>
<p>3. Assist in safeguarding the countryside from encroachment</p>	<p>This is an assessment as to the extent to which the Green Belt constitutes 'open countryside' from assessing countryside characteristics. If the site has any such characteristics it can be said to assist in safeguarding the countryside from encroachment. The characteristics are:</p> <p>i. Is there a strong, defensible boundary between the existing urban area and the site – wall, river, main road etc (as opposed to garden boundaries) YES/NO</p> <p>ii. Does the site provide access to the countryside – footpaths, bridleways across the land, or is it a designated park/greenspace? YES/NO</p> <p>iii. Does the site include national or local nature conservation designated areas (SSSIs etc) YES/NO</p> <p>iv. Does the site include areas of woodland, trees or hedgerows that are protected (protected ancient woodland) or significant unprotected tree/hedge cover. YES/NO</p> <p>v. Does the site include any grade 1 (high quality) agricultural land? YES/NO</p> <p>vi. Does the site contain buildings? YES/NO If yes, are these in agricultural use? YES/NO</p>	<p>i. If response yes, there is an existing defensible boundary between the existing settlement/urban area and the site, the site will perform a role in safeguarding the countryside from encroachment</p> <p>ii. If yes, the site performs a role in providing access to the countryside for the urban population, the site will perform a role in safeguarding the countryside from encroachment.</p> <p>iii. If yes, the site performs a role in safeguarding the countryside from encroachment.</p> <p>iv. If yes, the site performs a role in safeguarding the countryside from encroachment.</p> <p>v. If yes, the site performs a role in safeguarding the countryside from encroachment.</p> <p>vi. If the site contains buildings that are not in agricultural use, development (on that part of the site) would be classed as brownfield rather than Greenfield development, so the site would not perform a role in safeguarding the countryside from encroachment.</p> <p>Overall conclusion: The site performs an important role in safeguarding the countryside from encroachment OR</p>

		<p>The site does not perform an important role in safeguarding the countryside from encroachment</p> <p>(Delete response which does not apply)</p>
<p>4. Preserve the setting and special character of historic towns</p>	<p>Most towns have a historic core, so this assessment focuses on whether a site is adjacent to a conservation area, listed building, historic park or garden or other features of historic significance.</p> <p>Where a site is adjacent* to such a feature, development may still be able to preserve the setting and special character if done sensitively through appropriate design. This is a matter of judgement at initial site selection stage.</p> <p>* adjacent is either abutting the current boundary or only separated by a road that isn't included in the boundary.</p> <p>For the assessment:</p> <p>i. Is the site adjacent a conservation area, listed building or other historical features? YES/NO</p> <p>ii. If 'yes' could development preserve this character? YES/NO/PERHAPS</p>	<p>Overall conclusion:</p> <p>Development of the site would have no effect on the setting and special character of historic features OR</p> <p>Development of the site would have an effect on the setting and special character of historic features, which could be mitigated against through appropriate detailed design OR</p> <p>Development of the site would have a significant effect on the setting and special character of historic features</p> <p>(Delete response which does not apply)</p>
<p>5. Assist in urban regeneration, by encouraging the recycling of derelict and other urban land</p>	<p>Not to be included within GB assessment because the Core Strategy policies encourage regeneration within the urban area</p>	<p>N/A</p>
		<p>NB. The conclusion under each purpose is an overall assessment from the conclusions from all the criteria in that category/Green Belt purpose.</p>
<p>OVERALL CONCLUSION FROM ASSESSMENT AGAINST ALL 4 PURPOSES OF GREEN BELT AND ESSENTIAL CHARACTERISTICS OF OPENNESS AND PERMANENCE:</p>		

We have not applied a scoring or weighting system as a site may have only one applicable criteria as opposed to many, but this one factor may be so significant as to mean that overall, the effect on Green Belt purposes is still very significant – for example the site may be isolated and so not satisfy the purpose of preventing urban sprawl, but satisfy all other Green Belt purposes, but this alone may be considered to have a more significant effect on the purposes of Green Belt than for example a site which it is considered would round off a settlement but has various 'countryside characteristics' which means that the site performs a role in safeguarding the countryside from encroachment. The end comments box is for the overall conclusion from looking at all the purposes to be outlined. We may have to assess this further once site visits have taken place to establish sites which have a significant effect on the purposes of Green Belt and those that do not, but this is an iterative process and will be determined once more site visits have been undertaken.

LP/15/5/12

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Appendix 3

The Sustainability Appraisal Framework

The City Council has developed an SA Framework which can be used as the basis for the appraisal of all Local Development Documents produced under the Leeds Local Development Framework. The preparation of the framework was completed in 2007 and has been used for the Core Strategy and other local development documents. The framework provides a total of 22 objectives. As part of the preparation of the Scoping Report for the Site Allocations DPD, the decision making criteria has been reviewed and revised for their relevance and application to the purpose and scope of the Site Allocations DPD.

The proposed SA framework for the Site Allocations DPD is set out below.

SUSTAINABILITY APPRAISAL FRAMEWORK

SA OBJECTIVES	DECISION MAKING CRITERIA	INDICATORS
ECONOMIC OBJECTIVES		
1. Maintain or improve good quality employment opportunities and reduce the disparities in the Leeds' labour market.	<ul style="list-style-type: none"> a. Will it maintain or improve current employment rates in Leeds? b. Will it support employment opportunities for people who live in or close to the area? c. Will it support equal employment opportunities? d. Will it reduce the disparities in employment rates between deprived and affluent parts of Leeds? e. Will it help to reduce the high rates of unemployment among black and ethnic minority groups? 	<ul style="list-style-type: none"> 1. % of people who are in work 2. Total employment 3. Unemployment rates (%) 4. Worklessness rates (those claiming job seeker's allowance, income support, incapacity benefit) 5. Average gross weekly earnings for residents (£) 6. % of SOAs in the 20% most deprived nationally in the IMD employment domain 7. Difference in employment rates between the highest and lowest SOAs 8. Unemployment rates among BME groups (%) 9. Amount of land developed for employment by type 10. Amount of completed office development and % developed in town centres
2. Maintain or improve the conditions which have enabled business success, economic growth and investment.	<ul style="list-style-type: none"> a. Will it support existing businesses? b. Will it encourage investment? c. Will it improve productivity and competitiveness? d. Will it encourage rural diversification? 	<ul style="list-style-type: none"> 1. Gross Value Added (GVA) per capita 2. No. of VAT registered businesses 3. Amount of completed retail and leisure development 4. Employment land supply (ha)
SOCIAL OBJECTIVES		
3. Increase participation in education and life-long learning and reduce the disparity in participation and qualifications achieved across Leeds.	<ul style="list-style-type: none"> a. Will it provide accessible training and learning opportunities for adults and young people? b. Will it increase participation in education and qualifications in disadvantaged communities? c. Will it increase participation in education and qualifications among BME groups? 	<ul style="list-style-type: none"> 1. % of economically active adults with at least level 2 and level 3 qualifications 2. Educational qualifications: students achieving 5 or more GCSEs at grades A*-C 3. Educational qualifications of those aged 16-49 by ethnicity 4. % of SOAs in the 20% most deprived nationally in the IMD Education, skills and training deprivation domain

SA OBJECTIVES	DECISION MAKING CRITERIA	INDICATORS
4. Improve conditions and services that engender good health and reduce disparities in health across Leeds	a. Will it promote healthy life-styles, and help prevent ill-health? b. Will it improve access to high quality, health facilities? c. Will it address health inequalities across Leeds?	1. Life expectancy 2. Mortality rates from coronary heart disease and cancer 3. % of people of working age population with limiting long-term illness 4. % of people whose health was not good 5. Estimate of obesity % 6. No of people on incapacity benefits and severe disability allowance 7. % of SOAs in the 20% most deprived nationally in the IMD Health deprivation & disability domain
5. Reduce overall rates of crime, and reduce the disparities in crime rates across Leeds.	a. Will it help address the causes of crime? b. Will it help to reduce disparities in crime rates across Leeds?	1. Crime survey trends in burglary and vehicle related thefts 2. Recorded crime (violent crime, robbery, domestic burglary, vehicle crime, criminal damage) 3. Fear of crime in residents surveys 4. % of SOAs in the 20% most deprived nationally in the IMD crime domain
6. Maintain and improve culture, leisure and recreational activities that are available to all	a. Will it increase provision of culture, leisure and recreational (CLR) activities/venues? b. Will it increase non-car based CLR activities? c. Will it increase participation in CLR activities by (i) local people and (ii) tourists? d. Will it preserve, promote and enhance local culture and heritage?	1. Visitor statistics from major attractions 2. % participation in sport and physical activity
7. Improve the overall quality of housing and reduce the disparity in housing markets across Leeds	a. Will it make housing available to people in need (taking into account requirements of location, size, type and affordability)? b. Will it reduce (the risk of) low housing demand in	1. Housing completions (annual number) 2. Average house price 3. House price/earnings ratio 4. Annual completions of affordable housing

SA OBJECTIVES	DECISION MAKING CRITERIA	INDICATORS
	<p>some parts of the city, and reduce the number of empty properties?</p> <p>c. Will it help improve the quality of the housing stock and reduce the number of unfit homes?</p> <p>d. Will it improve energy efficiency in housing to reduce fuel-poverty and ill-health?</p>	<p>5. % of dwellings by tenure (owner-occupied, private rented and social rented)</p> <p>6. % of total dwellings that are vacant</p> <p>7. % of LA and RSL dwellings that are difficult to let</p> <p>8. % of LA, RSL and owner-occupied dwellings that are low demand</p> <p>9. % of total dwelling stock that is unfit</p> <p>10. % of LA dwellings that fall below the 'Decent Homes Standard'</p> <p>11. % of Fuel poor households</p> <p>12. Average energy efficiency rating of homes</p>
8. Increase social inclusion and active community participation	<p><i>Social inclusion</i></p> <p>a. Will it help to reduce poverty?</p> <p>b. Will it provide more services and facilities that are appropriate to the needs of ethnic minorities, older people, young people and disabled people?</p> <p><i>Community participation</i></p> <p>c. Will it give the community opportunities to participate in or towards making decisions?</p> <p>d. Will local community organisations be supported to identify and address their own priorities?</p> <p>e. Does it enable less-well resourced groups to take part?</p> <p>f. Does it take steps to involve not yet reach groups?</p>	<p><i>Social inclusion</i></p> <p>1. % of SOAs in the 20% most deprived nationally in the IMD Income deprivation domain</p> <p>2. % of SOAs in the 20% most deprived nationally in the IMD Income deprivation affecting children index</p> <p>3. % of SOAs in the 20% most deprived nationally in the IMD Income deprivation affecting older people index</p> <p>4. Educational qualifications of African Caribbean, Pakistani and Bangladeshi pupils: students achieving 5 or more GCSEs at grades A*-C compared to Leeds average</p> <p>5. Unemployment rates among BME groups (%)</p> <p><i>Community participation</i></p> <p>6. Civic participation - % who participated in civic affairs in the last 12 months</p> <p>7. Turnout in local elections (%)</p>
9. Increase community cohesion	<p>a. Will it build better relationships across diverse communities and interests?</p> <p>b. Will it increase people's feelings of belonging?</p> <p>c. Will it encourage communities to value diversity?</p> <p>d. Could it create or increase tensions and conflict locally or with other communities?</p>	<p><i>Indicators to be included from Community Cohesion Action Plan when finalised</i></p>
ENVIRONMENTAL OBJECTIVES		

SA OBJECTIVES	DECISION MAKING CRITERIA	INDICATORS
10. Increase the quantity, quality and accessibility of greenspace	a. Will it increase the quantity of publicly accessible greenspace? b. Will it address deficiencies of greenspace in areas that are under-provided? c. Will it improve the quality and management of greenspace across Leeds?	1. Quantity of greenspace 2. Quantity of greenspace per 1,000 population 3. % of eligible greenspace managed to green flag award standard 4. Accessibility of greenspace to residential areas
11. Minimise the pressure on greenfield land by efficient land use patterns that make good use of derelict and previously used sites & promote balanced development	a. Does it make efficient use of land by promoting development on previously used land, re-use of buildings and higher densities? b. Will it promote the development of communities with accessible services, employment, shops and leisure facilities?	1. % of land developed for employment which is on previously developed land 2. % of new homes on previously developed land 3. % of new dwellings completed at less than 30 dwellings per hectare
12. Maintain and enhance, restore or add to biodiversity or geological conservation interests	a. Will it protect and enhance existing habitats, especially priority habitats identified in the UK and the Leeds Biodiversity Action Plan? b. Will it protect and enhance protected and important species? (Important species are those identified in the UK and the Leeds BAP.) c. Will it protect and enhance existing designated nature conservation sites? d. Will it provide for appropriate long term management of habitats? e. Will it make use of opportunities to create and enhance habitats as part of development proposals? f. Will it protect / mitigate ecological interests on previously-developed sites? g. Will it protect sites of geological interest?	1. Change in priority habitats by type 2. Areas designated for their intrinsic environmental value inc. sites of international, national, sub-regional or local significance (SSSIs, SEGIs, LNRs, LNAs) 3. Status/condition of SSSIs (favourable or recovering) (%)
13. Reduce greenhouse gas emissions and thereby help to tackle climate change	Will it reduce greenhouse gas emissions from: a. Transport	1. Estimated CO ₂ emissions (Total) 2. Estimated CO ₂ emissions (Industry/Commercial) 3. Estimated CO ₂ emissions (Domestic) 4. Estimated CO ₂ emissions (Road Transport)
14. Improve Leeds' ability to manage extreme	<i>Flood Risk including likely effects of climate change</i>	1. No. of properties located within flood risk zones

SA OBJECTIVES	DECISION MAKING CRITERIA	INDICATORS
weather conditions including flood risk and climate change	a. Will it prevent inappropriate development on flood plains and prepare for the likelihood of increased flooding in future?	2. Number of incidences of internal property flooding per annum 3. No. of planning permissions granted contrary to the advice of the Environment Agency on flood defence grounds
15. Provide a transport network which maximises access, whilst minimising detrimental impacts	a. Will it reduce the need to travel by increasing access to key services and facilities by means other than the car? b. Will it ease congestion on the road network? c. Will it provide/improve/promote information about alternatives to car-based transport? d. Will it reduce the number of journeys by personal motor transport? e. Will it make the transport/environment attractive to non-car users? f. Will it encourage freight transfer from road to rail and water? g. Will it reduce the causes of transport-related accidents?	1. AM peak period mode split to central Leeds 2. Change in area wide road traffic 3. Change in peak period traffic flows to central Leeds. 4. Ease of pedestrian access to jobs, services, leisure etc (pedestrian counts) 5. Peak period rail patronage 6. Annualised index of cycling trips 7. Distance of public transport stops/station to residential areas (desire lines distances between public transport facilities and residential areas) 8. Total killed/seriously injured (KSI) casualties 9. Child KSI casualties
16. Increase the proportion of local needs that are met locally	a. Will it support the use of more local suppliers for agriculture, manufacture, construction, retailing and other services? b. Will it ensure that essential services (e.g. employment, health services and shops) and resources to serve communities are within reasonable non-car based travelling distance? c. Will it provide appropriate housing for local needs? d. Will it support the vibrancy of city, town and village centres? e. Will it help facilitate improved ICT services and resources in disadvantaged communities?	1. % of new residential development within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and a major health centre 2. % of new residential development within 800m (10 minutes walk) of: a GP premises, primary school, supermarket or convenience store, post office 3. Number of vacant units and % of vacant floorspace in town centres 4. Amount and % of completed retail, office and leisure development respectively in town centres

SA OBJECTIVES	DECISION MAKING CRITERIA	INDICATORS
17. Reduce the growth in waste generated and landfilled.	a. Will it help to provide or safeguard facilities for recycling, recovering and processing waste?	1. Total household waste (kg per person) 2. Household waste recycled (%) 3. Amount of municipal waste arising, & managed by type, & the % each management
18. Reduce pollution levels	a. Will it promote the clean-up of contaminated land? b. Will it reduce air, water, land, noise and light pollution? c. Will it reduce the risk of pollution incidents and environmental accidents?	1. Total area of contaminated land 2. No. of days when air pollution is moderate or high 3. Number of Air Quality Management Areas and areas of concern / no. of dwellings affected 4. Annual road traffic emissions of NOx across principal road network 5. Water quality – length of rivers in good or fair chemical and biological quality 6. Satisfaction with cleanliness of streets
19. Maintain and enhance landscape quality	a. Will it maintain and enhance areas of high landscape value? b. Will it protect and enhance individual features such as hedgerows, dry stone walls, ponds and trees? c. Will it increase the quality and quantity of woodland features in appropriate locations and using native species? d. Will it protect and enhance the landscape quality of the City's rivers and other waterways? e. Will it take account of the geomorphology of the land?	1. Amount of development taking place in areas of high landscape value 2. Area of woodland coverage
20. Maintain and enhance the quality and distinctiveness of the built environment	a. Will it ensure new development is appropriate to its setting and support local distinctiveness?	1. Consistency of development with Leeds City Council design guidance
21. Preserve and enhance the historic environment	a. Will it protect and enhance sites, features and areas of historical, archaeological and cultural value in urban and rural areas? b. Will it protect and enhance listed buildings, conservation areas and other designated historic features and their settings?	1. No. of listed building of each grade, conservation areas, scheduled ancient monuments and historic parks and gardens 2. No. & % of listed buildings at risk 3. No. of listed buildings demolished 4. No. & % of conservation areas with appraisals

SA OBJECTIVES	DECISION MAKING CRITERIA	INDICATORS
		5. Areas of known significant archaeological interest of national, regional or local interest
22. Make efficient use of energy and natural resources and promote sustainable design.	<ul style="list-style-type: none"> a. Will it increase energy and water efficiency in all sectors? b. Will it increase energy from renewable sources? c. Will it promote the energy, water and resource efficiency of buildings? d. Will it minimise the loss of high quality agricultural land and soils? e. Will it affect land designated for minerals use? 	<ul style="list-style-type: none"> 1. Domestic water consumption (litres/day/household) 2. Use of SUDS and interceptor measures 3. Renewable energy capacity installed by type 4. Agricultural land classification

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Report author: Nasreen Yunis

Report of the Director of City Development

Report to: Development Plan Panel

Date: 2nd July 2012

Subject: LDF Core Strategy – Publication Draft, Analysis of Consultation Responses: H5 Affordable Housing

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

Summary of main issues

1. The Core Strategy Publication Draft was subject to 6 weeks public consultation during February – April 2012. Section 3 of this report summarises the issues raised and the Table in Appendix 1 suggests how the City Council should respond. Appendix 2 illustrates how the text of the Core Strategy would need to be altered.
2. Of the wide range of issues raised, none are considered to warrant any major changes to the Core Strategy and only a few minor changes. The analysis and suggested changes are set out in Appendices 1 and 2.

Recommendations

Development Plan Panel is requested to:

- i). Endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval.

1.0 Purpose of this Report

- 1.1 Within the context of the Core Strategy Initial Report of Consultation (6th June), the purpose of this report is to review consultation responses in relation to affordable housing. Appendix 1 attached, summarises the representations, key issues raised, the City Council's view and proposed action.

2.0 Background Information

- 2.1 Following Consideration by the Development Plan Panel and Executive Board, a 6 week period of public consultation has been undertaken, commencing on 28th February to 12th April 2012. Consistent with the LDF regulations, this is a targeted stage of consultation, with emphasis upon requesting responses in relation to the "soundness" of the plan. Within this context, the consultation material comprised of a range of documents, which were subsequently made available on line or as paper copies, including:

- Core Strategy Publication Draft (Main Document)
- Sustainability Appraisal (& Non Technical Summary)
- Habitats Regulations Assessment Screening
- Equality Impact Assessment Screening
- Draft Infrastructure Delivery Plan
- Draft Core Strategy Monitoring Framework
- Health Topic Paper
- Report of Consultation on Preferred Approach (October – December 2009)

Links were also incorporated to the consultation web pages to the evidence based material, which has been prepared to help inform the emerging document (including the Employment Land Review, Leeds City Centre, Town and Local Centres Study, Housing Growth in Leeds, Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment and the Leeds open space, sport and recreation assessment.

3.0 Main Issues

- 3.1 A summary of the main issues which have been raised is provided below.

1. Evidence base.

- Concerns raised that the policy is unsound in relation to having no justified evidence base to support the upper 50% limit for affordable housing.
- Concern raised that the Policy is unsound as it does not assess the cumulative impact of affordable housing in conjunction with other policy requirements.

2. Targets.

- Targets of 5-50% are inappropriate for affordable housing as some sites will not be able to support any affordable housing, and the 50% target for is too high.

3. Thresholds.
 - Some concern that the threshold of 10-15 units for affordable housing provides no certainty
 - Concern that the policy is unsound and threshold should be lower.
4. Supplementary Planning Document (SPD)
 - Concern that the Core Strategy should set out affordable housing policy in full, that it is unacceptable for the SPD to set thresholds, targets, and mix.
 - Concern that the SPD should not set the affordable housing requirement on a regular basis, is unsound, adds delivery burden and is contrary to the National Planning Policy Framework.
5. Combine the Community Infrastructure Levy (CIL) and affordable housing policy.
 - Suggestion that the policy requirement for affordable housing be linked into a combined CIL and Affordable Housing policy.
6. Positive Planning for affordable housing.
 - The policy should inform of a need to plan positively in a manner that addresses the needs to deliver more affordable housing across the district using as many traditional and innovative ways as possible.

The vast majority of comments made by most respondents relate to the areas above. Concerns have also been raised as listed below by a smaller number of respondents.

7. Specialist housing
 - That elderly accommodation should be given a similar status as affordable housing and student housing developments exempted from affordable provision.
8. Tenures/ affordable rent.
 - Fails to adequately address affordable rent (submarket rent) category.
 - Terminology in relation to quartile and decile earnings is inappropriate.
9. Recycling properties/brownfield/self build
 - Use of empty brownfield sites, empty shops in conservation areas for affordable housing.
 - Include alternative methods of provision through encouraging similarly subsidised mutual self build schemes.
10. Reliance on private tenures
 - Objection that private tenures should not support the provision of social housing, and that the private rented sector is having to provide for the less well off in society.
11. Off site provision/ provision tied to the permission on alternative sites.
 - Policy is unsound as no provision has been made for off site or for contributions to be made in certain cases.
 - Provision tied to the permission, be provided on alternative sites where the need is greater.

12.Support

- Supportive of the provision of affordable housing in order to create a balanced community and suitable housing for all types of housing need.
- The policy provides an appropriate policy hook as the core strategy seeks to meet all housing needs and demands.
- Support for SPD and approach.

4.0 Corporate Considerations

As noted above, the Core Strategy, forms part of the Local Development Framework and once adopted will form part of the Development Plan for Leeds.

4.1 Consultation and Engagement

- 4.1.1 As outlined in this report, the Core Strategy Publication draft has been subject to a further 6 week period of consultation. This has been undertaken in accordance with the LDF Regulations and the City Council's adopted Statement of Community Involvement (SCI).

4.2 Equality and Diversity / Cohesion and Integration

- 4.2.1 An Equality Impact Assessment Screening was undertaken on the Core Strategy Publication draft, prior to consultation (see Core Strategy Executive Board Report, 10th February 2012). This concluded that equality, diversity, cohesion and integration issues had been embedded as part of the plan's preparation. For information and comment, the Screening assessment has also been made available as part of the supporting material for the Publication draft consultation. Within this overall context, it will be necessary to continue to have regard to equality and diversity issues, as part of the ongoing process of preparing the Core Strategy, including considering representations and next steps.

4.3 Council Policies and City Priorities

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

4.4 Resources and value for money

- 4.4.1 The DPD is being prepared within the context of the LDF Regulations, statutory requirements and within existing resources.

4.5 Legal Implications, Access to Information and Call In

- 4.5.1 The DPD is being prepared within the context of the LDF Regulations and statutory requirements. The DPD is a Budgetary and Policy Framework document and as such this report is exempt from call-in by Scrutiny.

4.6 Risk Management

- 4.6.1 The Core Strategy is being prepared within the context of the LDF Regulations and the need to reflect national planning guidance. The preparation of the plan within the context of ongoing national reform to the planning system and in responding to local issues and priorities, is a challenging process. Consequently, at the appropriate time advice is sought from a number of sources, including legal advice and advice from the Planning Advisory Service and the Planning Inspectorate, as a basis to help manage risk and to keep the process moving forward.

5. Conclusions

- 5.1 This report provides an overview of the issues raised about policy H5. It is not considered that any of the issues raised are compelling enough to justify any major changes to the Core Strategy. Two of the issues generate minor wording changes and all of the others warrant no further changes.

6. Recommendations

- 6.1 Development Plan Panel is requested to:

i). Endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval.

7. Background documents¹

- 7.1 A substantial number of documents are available representing various stages in preparation of the DPD and the background evidence base and Equalities Impact Assessment Screening. These are all available on the City Council's web site (LDF Core Strategy Pages) web pages or by contacting David Feeney on 247 4539.

¹ The background documents listed in this section are available for inspection on request for a period of four years following the date of the relevant meeting. Accordingly this list does not include documents containing exempt or confidential information, or any published works. Requests to inspect any background documents should be submitted to the report author.

Appendix 1:

Core Strategy Publication Draft - Analysis of Consultation Responses

Policy H5 Affordable Housing

Representor (include agent)	Representor Comment	LCC Initial Response	Action
Policy H5 Affordable Housing			
Evidence base			
0480 Taylor Wimpey (via Dacre Son & Hartley) 0480 Barrats Leeds (via Dacre Son & Hartley) 0480 Warner (via Dacre Son & Hartley) 0480 Kebbell (via Dacre Son & Hartley) 0480 Barrett York (via Dacre Son & Hartley) 0480 Keyland (via Dacre Son & Hartley) 0480 Miller (via Dacre Son & Hartley) 0480 Redrow (via Dacre Son & Hartley) 0480 Chatford (via Dacre Son & Hartley) 0480 Mirfield (via Dacre Son & Hartley) 5671 Great North Developments Ltd (via ID Planning) 5671 Consortium of Housebuilders Ltd (via ID Planning) 5671 Housebuilders Consortium 5671 Barratt David Wilson (via ID Planning) Homes 5671 Robert Ogden Partnerships Ltd (via ID Planning) 5671 ELE Northern Quarant Consortium (via ID Planning) 5671 Edmund Thornhill,	Policy is unsound in relation to having no justified evidence base to support the upper 50% limit for the Affordable Housing target range. Its introduction and subsequent amendment via an SPD would be ineffective.	The evidence is derived from the Economic Viability Assessment (EVA) 2010. The EVA outlines that targets of 50% should be achievable in certain areas in certain market conditions. The SHMA (2011) provides further evidence on the need for affordable housing.	No change.

<p>Thornhill Estates (via ID Planning) 5671 Worthlea Estates Estates (via ID Planning) 5671 Edmund Thornhill, Thornhill Estates 5671 Redrows Homes (Yorkshire) Ltd (via ID Planning) 1186 T G M F Emsley (via ID Planning) 5895 Barratt David Wilson Homes Yorkshire Homes</p>			
<p>0092 Home Builders Federation</p>	<p>The policy is unsound it introduces a very broad range of affordable housing targets, the Council has not assessed what impact these ranges might have on viability of developments in particular the specific housing market areas of the district and in combination with other policies specified in the CS such as 20% increase in Part L of the Building Regulations, which is contrary to the NPPF (para 174 &177 requiring that costs of any local requirements be added and assessed at the plan making stage to ensure that these are viable and will not impede delivery). The Council is relying on site-based viability assessments in order to avoid the need to properly assess the cumulative impact of its plan policies on development. Object to site by site basis viability assessment. If there is doubt regarding targets then a lower target should be set. The economic viability assessment 2010 states that certain areas cannot support any AH, plans need to be deliverable.</p>	<p>An EVA was carried out in 2010. Some account was taken of the financial effect of existing policies including affordable housing.</p> <p>A CIL economic viability study (Oct 2012) will further take into account policies and assess the cumulative impact of Core Strategy policies and NPPF policy changes which have come into effect since the drafting of these policies. The CIL economic viability study will provide an even more up to date picture, using the existing suite of policies including sustainable construction.</p>	<p>No change</p>

0057 Ashdale Land & Property Company Ltd (via Barton Willmore Planning Partnership Northern) 0057 Hallam Land Management Ltd (via Barton Willmore Planning Partnership Northern) 0057 Templegate Developments (via Barton Willmore Planning Partnership Northern)	Targets of 5- 50% are inappropriate, as some sites will not be able to support any AH provision at all. Para 182 of the NPPF requires that plans should be justified, based on proportionate evidence. The SHMA does not include reference to a 50% target.	The evidence base for the policy is the EVA (2010), the SHMA (2011) there is also evidence that schemes have been negotiated at the 5% level. The current interim affordable housing target has reduced the affordable housing requirement in certain areas (city centre and inner areas) from 15% to 5% to assist viability.	No change
5672 MFS Land Ltd	5-50% targets too high, as overdependence on brownfield sites. The Economic Viability Assessment (2010) found that in the city centre, inner and outer area where most brownfield sites will be achieved there is an over dependence on brownfield sites.	As above. Sites are identified in the SHLAA, to demonstrate sufficient housing to meet the needs of the city.	No change
2663 Spawforths 2663 Miller Strategic Land (via Spawforths)	Agree that updates are undertaken through AMR's. Also support the element of the policy regarding viability appraisals and viability led planning applications. A robust housing needs and market assessment should inform of the need for AH through to sub areas.	Noted. Updates of benchmark figures are carried out on an annual basis and updates of need periodically.	No change
Targets			
0057 Ashdale Land & Property Company Ltd (via Barton Willmore Planning Partnership Northern) 0057 Hallam Land Management Ltd (via Barton Willmore Planning Partnership Northern) 0057 Templegate Developments (via Barton Willmore Planning Partnership Northern)	On unviable sites, affordable housing should be considered on a site by site basis on the basis of economic viability risks to delivery, finance available, need to provide economic returns to willing landowners and developers and an up to date SHMA.	Applicants may choose to submit individual viability appraisals to verify that the affordable housing target cannot be met and provision be reduced accordingly.	No change
0092 Home Builders Federation	The policy introduces a very broad range of affordable housing targets, the Council has not assessed what impact these ranges might have on viability of developments in particular the specific housing market areas of the district and in combination with other policies specified in the CS such as	An economic viability assessment has been carried by DTZ. This demonstrates that 50% can be achieved. Some account has been	No change

	20% increase in Part L of the Building Regulations, which is contrary to the NPPF (para 174 & 177 requiring that costs of any local requirements be added and assessed at the plan making stage to ensure that these are viable and will not impede delivery). The Council is relying on site-based viability assessments in order to avoid the need to properly assess the cumulative impact of its plan policies on development. Object to site by site basis viability assessment. If there is doubt regarding targets then a lower target should be set. The economic viability assessment 2010 states that certain areas cannot support any AH, plans need to be deliverable.	taking of existing policies to include affordable housing. A CIL economic viability study (Oct 2012) will further assesses the cumulative impact using the existing suite of core strategy policies including sustainable construction.	
0106 Aberford Parish Council	5-50% would like to see a more detailed explanation for this, specifically whether this range of target relates to site location, site size or other criteria. Otherwise this target seems meaningless.	The evidence is derived from the Economic Viability Assessment (EVA) 2010. The EVA outlines that targets of 50% should be achievable in certain areas in certain market conditions. The Core Strategy is for a long time period but the detail will be set out in SPD as this can be responsive to up to date evidence. Until such time the current thresholds will apply as set out in the interim affordable housing policy. By doing this, a flexible approach to delivery will be achieved.	No change
0420 Caddick Developments (via White Young Green Planning)	Recent evidence base for AH has demonstrated percentages below the range defined in this policy. The CS does not provide a clear policy context through an evidence base for affordable housing targets up to 50%.		
2663 Spawforths 2663 Miller Strategic Land (via Spawforths)	5-50% target should set actual figure, contrary to NPPF. A robust housing needs and market assessment should inform the need for AH, which should reflect the local housing market sub areas.		
5867C/o Hileys Solicitors (via LDP Planning)	Welcome wording of policy as allows viability assessments to be undertaken at application stage as deviations in what individual sites can accommodate. 50% is higher than now and supposedly justified by DTZ report. Undue burden should not be placed on developers to prove unviable. Table 7.3 of DTZ report can be as a standard in SPD, along with a viability assessment if not consider 50% unsound.		
Thresholds			
0466 Savills	The threshold of 10-15 provides no certainty for developers as to whether a small site will need to comply or not, not what criteria are to be used in assessing which threshold is to apply.	The Core Strategy is for a long time period but the detail will be set out in SPD as this can be responsive to up to date evidence.	No change
2956 Cllr Thomas Leadley	10-15 threshold does not do as much as it could to maximise AH and is unsound.	A threshold below 10 was considered too low by the EVA (2010)	
4825 Morley Town Council	Policy is unsound as sets thresholds below which no AH liability. Rates should be maximised by raising a cash levy against all dwellings even 1. Accumulation of levy to small settlements may be the only way that smaller settlements get		

	AH, to match with CIL.		
SPD			
0092 Home Builders Federation	SPD should not set out requirements for AH on a regular basis, this is unsound, adds delivery burden and is contrary to the NPPF.	The Core Strategy will set out the overall policy and scale of requirement which has been subject to viability testing. But the detail will be set out in a SPD, as this can be responsive to up to date evidence on housing markets, need for AH and the viability of delivering the targets. By doing this a flexible approach to delivery will be achieved. Until an SPD is approved the current interim affordable housing policy will remain in use. The interim affordable housing policy has been welcomed by the housing industry and reflects a flexible approach in responding to changing economic conditions.	No change
2663 Spawforths 2663 Miller Strategic Land (via Spawforths)	Targets should not be delegated to the SPD as is contrary to NPPF.		
5034 Evans Homes No2 Ltd	Due to devolvement to the SPD, thresholds and targets remain far reaching in range with little indication as to the likely requirements, and is difficult to interpret without further guidance. Delays in the SPD would mean no local guidance and provision to be determined through the planning application process. A CS policy which provides clear guidance, informed by an economic viability, to include an exceptions test relating to viability and feasibility on site.		
5121 Directions Planning	Unacceptable that the SPD set thresholds, targets, and mix, this should be set through the Core strategy. NPPF changes the role of SPD and this should be reviewed in light of NPPF. The policy should be reviewed in light of the NPPF.		
5671 Consortium of Housebuilders Ltd (via ID Planning) 5671 Housebuilders Consortium 5671 Barratt David Wilson (via ID Planning)Homes 5671 Robert Ogden Partnerships Ltd (via ID Planning) 5671 ELE Northern Quarant Consortium (via ID Planning) 5671 Edmund Thornhill, Thornhill Estates (via ID Planning) 5671 Worthlea Estates (via ID Planning) 5671 Edmund Thornhill, Thornhill Estates 5671 Redrows Homes	The Council seeks to alter on a regular basis the requirement via an AH SPD. Para 153 of the NPPF informs SPD should not be used to add further burden to delivery and written in its current form the policy adds unnecessary burden.		

(Yorkshire) ltd (via ID Planning) 1186 T G M F Emsley (via ID Planning)			
5681 Meadowside Holdings LTD 5681 The Diocese of Ripon and Leeds 5681 Lady Elizabeth Hastings Estate Charity 5681 AR Briggs and Co 5681 The Bramham Park Estate	Flexibility is required over the Core Strategy period as the policy recognises needs and market conditions may vary over time. Detailed matters be deferred to a SPD which may be reviewed on an annual basis.	Support	No change
0057 Ashdale Land & Property Company Ltd (via Barton Willmore Planning Partnership Northern) 0057 Hallam Land Management Ltd	Supportive of an SPD which would 'provide up to date guidance on targets and provision sought, which may vary depending on the local area'.	Support	
Combined CIL and AH policy			
0480 Taylor Wimpey (via Dacre Son & Hartley) 0480 Barrats Leeds (via Dacre Son & Hartley) 0480 Warner (via Dacre Son & Hartley) 0480 Kebbell (via Dacre Son & Hartley) 0480 Barrett York (via Dacre Son & Hartley) 0480 Keyland (via Dacre Son & Hartley) 0480 Miller (via Dacre Son & Hartley) 0480 Redrow (via Dacre Son & Hartley) 0480 Taylor Wimpey (via Dacre Son & Hartley) 0480 Chatford (via Dacre Son & Hartley) 0480 Mirfield (via Dacre	The policy requirement of Affordable Housing be linked into a combined CIL and Affordable Housing Policy to be addressed in full in the Core Strategy.	CIL is subject to special regulations set outside of the Development Plan Process. Given the complexities around both CIL and AH it is difficult to combine both. The Council is preparing a CIL charging schedule which will take into account affordable housing policy, given the complementary nature of CIL and affordable housing.	No change

<p>Son & Hartley) 5671 Great North Developments Ltd (via ID Planning) 5671 Consortium of Housebuilders Ltd (via ID Planning) 5671 Housebuilders Consortium 5671 Barratt David Wilson (via ID Planning)Homes 5671 Robert Ogden Partnerships Ltd (via ID Planning) 5671 ELE Northern Quarant Consortium (via ID Planning) 5671 Edmund Thornhill, Thornhill Estates (via ID Planning) 5671 Worthlea Estates Estates (via ID Planning) 5671 Edmund Thornhill, Thornhill Estates 5671 Redrows Homes (Yorkshire) ltd (via ID Planning) 1186 T G M F Emsley (via ID Planning)</p>			
<p>Positive Planning for AH</p>			
<p>0480 Taylor Wimpey (via Dacre Son & Hartley) 0480 Barrats Leeds (via Dacre Son & Hartley) 0480 Warner (via Dacre Son & Hartley) 0480 Kebbell (via Dacre Son & Hartley) 0480 Barrett York (via Dacre Son & Hartley) 0480 Keyland (via Dacre</p>	<p>Suggest Policy informs of a need to plan positively in a manner that addresses the need to deliver more AH across the district using as many traditional and innovative ways as possible.</p>	<p>Affordable housing is delivered thorough planning applications by section 106 and initiatives led by the Housing arm of the Council. The need to plan positively and be responsive to the traditional and innovative ways of maximising affordable housing is a priority.</p>	<p>No change</p>

<p>Son & Hartley) 0480 Miller (via Dacre Son & Hartley) 0480 Redrow (via Dacre Son & Hartley) 0480 Taylor Wimpey (via Dacre Son & Hartley) 0480 Chatford (via Dacre Son & Hartley) 0480 Mirfield (via Dacre Son & Hartley) 5671 Great North Developments Ltd (via ID Planning) 5671 Consortium of Housebuilders Ltd (via ID Planning) 5671 Housebuilders Consortium 5671 Barratt David Wilson (via ID Planning)Homes 5671 Robert Ogden Partnerships Ltd (via ID Planning) 5671 ELE Northern Quarant Consortium (via ID Planning) 5671 Edmund Thornhill, Thornhill Estates (via ID Planning) 5671 Worthlea Estates Estates (via ID Planning) 5671 Edmund Thornhill, Thornhill Estates 5671 Redrows Homes (Yorkshire) ltd (via ID Planning) 1186 T G M F Emsley (via ID Planning) 5895 Barratt David Wilson Homes Yorkshire Homes</p>			
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Specialist housing			
0420 Leeds Trinity University College (via White Young Green Planning).	Student accommodation which responds to specialist need should be exempt from AH and this should be referenced in the policy.	Noted. Purpose built student accommodation not falling into the C3 category is exempt from affordable housing given the nature of the accommodation	No change.
1935 McCarthy & Stone	Elderly specialist housing as referenced in the recent M Ball report, should be given similar status as affordable housing.	This is covered by policy H8.	No change
5105 Renew	Low cost housing should be part of the mix and address affordability. Equity stake housing should be AH.	Low cost cannot be considered as AH in accordance with the NPPF for planning purposes. The NPPF allows scope for shared equity to be considered as affordable housing.	No change
Affordable rent /tenures			
0420 Harrow Estates (via White Young Green)	Fails to adequately address affordable rent (submarket rent) category. RSL's are unduly restricted in their investment decisions by LA's.	The City Council wants to clarify the types of affordability in relation to household incomes. Within this framework different forms of AH such as affordable rent can be provided.	No change
5105 Renew	Support policy in relation to target related to income levels. Support scope for SPD to address types of AH provision are affordable to bottom decile and lower quartile. .	Support.	No change
5121 Directions Planning	Quartile and decile earnings inappropriate terminology.	Terminology reflects income brackets and is useful for understanding the lower income brackets.	No change
Empty properties/brownfield			
0023 Otley Conservation Task Force	Encourage town centre property owners to adopt 'Living over the shop' LOTS as a means of creating affordable housing, in market towns and town centres such as Otley. In conservation areas use of empty brownfield sites to create terraces.	Dealt with by policies P2 and P3, creating affordable dwellings would be reliant upon other sources of funding.	No change

Use of alternative site/self build			
0062 Leeds Civic Trust	Suggests allowing for provision, tied to the permission, on alternative sites where the need is greater. Include alternative methods of provision through encouraging similarly subsidised mutual self build schemes.	The NPPF cautions that agreements for off site housing provision need to contribute to the objective of creating mixed and balanced communities.	Minor changes 1. Amend policy to include 'affordable housing provision should be on site, unless off site provision or a financial contribution can be robustly justified. 2. Insert 'normally' the policy ie. Housing developments above a certain threshold should include a proportion of affordable housing to be normally provided on the development site.
Object to AH and reliance on private tenures			
2527 Leeds Residential Property Forum	Private tenures should not support the provision of social housing, adds to cost and makes development unviable. Private rented sector is having to provide for the less well off in society. Govt should bring in institutional investment. 'low cost' is ambiguous, and should be exempt from rent market housing.	The need for Affordable housing is acute, based on evidence set out in the SHMA 2011.	No change.
No provision for off site provision			
5696 Inner NW Area Committee Planning Sub group	The policy is unsound as it does not allow scope for the provision of AH off site or for contributions to be made in certain cases. Policy is contrary to NPPF	Agree	Minor changes 1. Amend policy to include 'affordable housing provision should be on site, unless off site provision or a financial contribution can be robustly justified. 2. Insert 'normally' ie. Housing developments above a certain threshold should include a proportion of affordable housing to be

			normally provided on the development site.
Supportive of provision of AH			
5121 Directions Planning	Supportive of the provision of AH in order to create a balanced community and suitable housing for all types of housing need.	Support	No change
Support policy			
5681 The Hatfield Estate 5681 Meadowside Holdings LTD 5681 The Diocese of Ripon and Leeds 5681 Lady Elizabeth Hastings Estate Charity 5681 AR Briggs and Co 5681 The Bramham Park Estate	It is important that the Core Strategy seeks to meet all housing needs and demands, policy provides an appropriate policy hook.	Support	No change

Appendix 2. Proposed changes to Core Strategy.

Affordable Housing

- 5.2.11 In conformity with national policy guidance, affordable housing will be required to meet local needs. The policy has been informed by the evidence base, including the Leeds Strategic Housing Market Assessment (Update 2011) (as referred to in PPS3, Annex C) and the Economic Viability Assessment 2010 (in accordance with PPS3 Para 29).
- 5.2.12 Since affordable housing planning policy was first developed in the early 1990s, Leeds has always been able to demonstrate a need for affordable housing (UDP paras 7.5.14 – 19, Assessment 2001/02, Assessment 2003, Assessment 2007 and Assessment 2011). Following national practice guidance, need for affordable housing was calculated to be 480 per annum 2003 and 1889 per annum in 2007. The most recent Strategic Housing Market Assessment (2011) identifies an annual need of 1158 affordable housing dwellings. Not all of this need will be met by the planning system, other methods of delivery such as grant funded schemes also play an important role in the delivery of affordable housing.
- 5.2.13 The Economic Viability Assessment 2010 explored what percentages of affordable housing and what mixes for example social rented /sub-market types of affordable housing would be viable. It did this for different geographical areas of Leeds and for different states of the market, firstly baseline (the depressed period of 2010), secondly mid point and thirdly height of the Market (2007). It concludes that in periods of buoyancy affordable housing could be delivered at 50% in high value areas but that in periods of adversity some areas are hardly able to sustain any affordable housing.
- 5.2.14 Affordable housing should meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and house prices. It should include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision.
- 5.2.15 Households vary in their ability to afford housing. The Strategic Housing Market Assessment 2011 (SHMA) uses evidence of household earnings combined with forecast growth in different types and sizes of household to assess affordability. The profile of earnings in Leeds is polarised and this is forecast to continue with growth in well paid professional and managerial jobs on the one hand and growth in low paid sales, service and elementary occupations on the other whilst the growth in medium paid occupations is predicted to be modest. This means there will continue to be a large proportion of households in Leeds that can afford very little. The SHMA concludes that 60% of affordable housing should be of the “social rented” type. Given changes in national definitions and funding for affordable housing, it is possible that the definition “social rented” as very low rent housing may be blurred with the meaning of “affordable rent”. As such it is important that the Core Strategy clarifies what is meant by different levels of affordability so that identified needs are met.

5.2.16 The SHMA suggests that households need earnings of at least £15,000 to afford more than “social rented” housing. This equates to approximately the lowest decile of earnings in Leeds. The affordability of affordable housing should be designed to meet identified needs of households in both lower quartile and lower decile bands of earnings. From an initial starting point of 40% of affordable housing to meet needs of households in lower quartile earnings and 60% lower decile earnings, an SPD will advise how these percentages may vary in different areas of Leeds and may vary over time as new evidence emerges.

5.3.17 Policy H5 provides an overall framework for the provision of affordable housing. It is appropriate that details such as thresholds and targets is provided through a Supplementary Planning Document. This will reflect market conditions and can be reviewed as economic conditions change and the life of the Core Strategy within the context of Policy H5.

POLICY H5: AFFORDABLE HOUSING

Housing developments above a certain threshold should include a proportion of affordable housing to be normally provided on the development site. The affordable housing provision should provide for a tenure mix in terms of submarket and social rented housing. Over the plan period to 2028 the threshold, amount of affordable housing and tenure splits may vary depending on housing needs and market conditions applicable at the time. An Affordable Housing Supplementary Planning Document will therefore provide up to date guidance on targets and provision sought, which may vary depending on the local area. An annual update to the SPD of affordable housing price benchmark figures will also be provided.

The broad range of provisions will be:

- i) A threshold between 10 and 15 dwellings will apply – affordable housing will be sought on any development at or above the threshold. There is no site size threshold.
- ii) Overall targets for affordable housing will vary from 5 to 50%.
- iii) Affordability of affordable housing to be designed to meet identified needs of households as follows;
 - 40% affordable housing for households on lower quartile earnings
 - 60% affordable housing for households on lower decile earnings

During the Core Strategy plan period, Affordable Housing SPDs will determine what particular thresholds, targets and affordability mix will apply to which areas of Leeds.

The affordable units should be a pro-rata mix in terms of sizes and types of the total housing provision, unless there are specific needs which indicate otherwise, and they should be suitably integrated throughout a development site.

Applicants may choose to submit individual viability appraisals to verify that the affordable housing target cannot be met. In such cases, affordable housing provision may be reduced accordingly.

Affordable housing provision should be on site, unless off site provision or a financial contribution can be robustly justified.

Elderly persons sheltered housing and low cost market housing should not expect the requirement for affordable housing to be automatically waived or reduced, although individual viability appraisals will be taken into account.

Secure arrangements in the form of S106 agreements, must be agreed to ensure delivery and that affordability embodied within affordable housing is maintained for future people of Leeds in housing need.

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Report author: Gareth Read
Tel: 0113 2478070

Report of the Director of City Development

Report to: Development Plan Panel

Date: 2nd JULY 2012

**LDF Core Strategy – Publication Draft, Analysis of Consultation Responses:
Policy H6 - Houses in Multiple Occupation (HMOs), Student Accommodation and
Flat Conversions**

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

Summary of main issues

1. The Core Strategy Publication Draft was subject to 6 weeks public consultation during February – April 2012. Section 3 of this report summarises the issues raised and the Table in Appendix 1 suggests how the City Council should respond. Appendix 2 illustrates how the text of the Core Strategy would need to be altered.

2. Of the wide range of issues raised, none are considered to warrant any major changes to the Core Strategy and only one or two minor text changes are considered necessary which are set out in Appendices 1 and 2.

Recommendations

Development Plan Panel is requested to:

- i). Endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval.

1.0 Purpose of this Report

- 1.1 Within the context of the Core Strategy Initial Report of Consultation (6th June), the purpose of this report is to review consultation responses in relation to Policy H6 - Houses in Multiple Occupation (HMOs), Student Accommodation and Flat Conversions. Appendix 1 attached, summarises the representations, key issues raised, the City Council's view and proposed action.

2.0 Background Information

- 2.1 Following Consideration by the Development Plan Panel and Executive Board, a 6 week period of public consultation has been undertaken, commencing on 28th February to 12th April 2012. Consistent with the LDF regulations, this is a targeted stage of consultation, with emphasis upon requesting responses in relation to the "soundness" of the plan. Within this context, the consultation material comprised of a range of documents, which were subsequently made available on line or as paper copies, including:

- Core Strategy Publication Draft (Main Document)
- Sustainability Appraisal (& Non Technical Summary)
- Habitats Regulations Assessment Screening
- Equality Impact Assessment Screening
- Draft Infrastructure Delivery Plan
- Draft Core Strategy Monitoring Framework
- Health Topic Paper
- Report of Consultation on Preferred Approach (October – December 2009)

Links were also incorporated to the consultation web pages to the evidence based material, which has been prepared to help inform the emerging document (including the Employment Land Review, Leeds City Centre, Town and Local Centres Study, Housing Growth in Leeds, Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment and the Leeds open space, sport and recreation assessment.

3.0 Main Issues

- 3.1 Support for the policy

Policy H6 received 26 supportive comments, these were from individuals, resident associations and other interested bodies. Some suggested whole support for the policy, whilst others were generally supportive of the principle but had other suggestions on specific sections of the policy. These, along with the objections are summarised below.

- 3.2 Concerns with the evidence base

There is concern that the Council does not have sufficient robust evidence to justify the policy. The policy does not provide evidence on the number of HMOs, where

these are located across the city, or whether excessive concentrations of HMOs cause harm.

3.3 Purpose Built Student Accommodation

Differing views on whether the policy should favour purpose built student accommodation as it does now.

3.4 Equality

As HMOs are predominantly occupied by young people there has been concern expressed that the Equality Impact Assessment is not robust enough in dealing with this issue.

Also on equality, several respondents had views (both for and against) on whether the policy should be applied differently in certain areas of the city that already have high concentrations of HMOs.

3.5 Focus on 'balance and health of communities'.

Some of the terms used in the document have come under criticism, as they are not defined. These include 'health' and 'wellbeing' which are both used in policy H6. The use of 'balance' has also been highlighted as it has been suggested that it is not a valid concern of planning law.

3.6 Impact on housing

The policy will have an impact on housing within Leeds and has been criticised for not identifying the need/demand for HMOs within the policy. Landlords are also concerned that should they invest to let to single occupants, they would then be unable to let to multiple occupants in the future should market conditions change.

3.7 Policy has never been subject to formal consultation

The current consultation process was undertaken to assess the soundness of the Core Strategy. On this basis it has been suggested that policy H6 has not been subjected to formal consultation, rather only as to whether it is sound.

3.8 Use of a Supplementary Planning Document is not suitable for further policy.

Policy H6 states that supplementary planning advice will set ceilings for the proportion of HMOs desirable in different geographies of Leeds. The suitability of this approach has been questioned.

3.9 Additional comments on the text.

Several other comments have been made in relation to the policy, these include suggestions to alter specific wording for clarity, but not changing the over all aim of the policy. Other objections relate to the inclusion of parking standards, a requirement for street level access and a minimum size for conversions. Further

comments relate to the monitoring of the policy and suggestions to include a proviso regarding flood risk.

4.0 Corporate Considerations

As noted above, the Core Strategy, forms part of the Local Development Framework and once adopted will form part of the Development Plan for Leeds.

4.1 Consultation and Engagement

- 4.1.1 As outlined in this report, the Core Strategy Publication draft has been subject to a further 6 week period of consultation. This has been undertaken in accordance with the LDF Regulations and the City Council's adopted Statement of Community Involvement (SCI).

4.2 Equality and Diversity / Cohesion and Integration

- 4.2.1 An Equality Impact Assessment Screening was undertaken on the Core Strategy Publication draft, prior to consultation (see Core Strategy Executive Board Report, 10th February 2012). This concluded that equality, diversity, cohesion and integration issues had been embedded as part of the plan's preparation. For information and comment, the Screening assessment has also been made available as part of the supporting material for the Publication draft consultation. Within this overall context, it will be necessary to continue to have regard to equality and diversity issues, as part of the ongoing process of preparing the Core Strategy, including considering representations and next steps.

4.3 Council Policies and City Priorities

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

4.4 Resources and value for money

- 4.4.1 The DPD is being prepared within the context of the LDF Regulations, statutory requirements and within existing resources.

4.5 Legal Implications, Access to Information and Call In

- 4.5.1 The DPD is being prepared within the context of the LDF Regulations and statutory requirements. The DPD is a Budgetary and Policy Framework document and as such this report is exempt from call-in by Scrutiny.

4.6 Risk Management

4.6.1 The Core Strategy is being prepared within the context of the LDF Regulations and the need to reflect national planning guidance. The preparation of the plan within the context of ongoing national reform to the planning system and in responding to local issues and priorities, is a challenging process. Consequently, at the appropriate time advice is sought from a number of sources, including legal advice and advice from the Planning Advisory Service and the Planning Inspectorate, as a basis to help manage risk and to keep the process moving forward.

5. Conclusions

5.1 This report provides an overview of the issues raised about Policy H6. It is not considered that any of the issues raised are compelling enough to justify any major changes to the Core Strategy; nine of the issues generate minor wording changes and all of the others warrant no further changes.

6. Recommendations

6.1 Development Plan Panel is requested to:

i). endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval.

7. Background documents¹

7.1 A substantial number of documents are available representing various stages in preparation of the DPD and the background evidence base and Equalities Impact Assessment Screening. These are all available on the City Council's web site (LDF Core Strategy Pages) web pages or by contacting David Feeney on 247 4539.

¹ The background documents listed in this section are available for inspection on request for a period of four years following the date of the relevant meeting. Accordingly this list does not include documents containing exempt or confidential information, or any published works. Requests to inspect any background documents should be submitted to the report author.

Appendix 1:

Core Strategy Publication Draft - Analysis of Consultation Responses

Policy H6 - Houses in Multiple Occupation (HMOs), Student Accommodation and Flat Conversions

Representor	Representor Comments	LCC Initial Response	Action (i.e. ' <u>no change</u> ' to the Publication draft, or ' <u>Proposed Change</u> ' to the Publication draft)
Concern over evidence to support policy.			
Leeds HMO Lobby	Policy on HMOs could be more fully justified	<p>There has been a marked shift in UK tenure trends over the last 10 years towards the private rented sector. In Headingley for example the evidence shows at least 40% of properties are now HMOs, far exceeding the national average and this is a concern for many residents. The Council uses a mixture of evidence to support the policy, from Council Tax data (a student property is exempt for paying Council Tax) to licensing statistics. However, it is acknowledged that we do not have a complete list of HMOs, particularly those housing non students, within Leeds. There are 147,000 properties within the Article 4 Direction area, and it is not practical or possible to undertake a fully comprehensive survey.</p> <p>H6 is a general policy that relates to the Article 4 Direction area. Its aim is to avoid excessive concentrations but it does not include 'tipping points' or thresholds which are sometimes used to determine the detrimental impacts of HMO concentration. The policy should not be that prescriptive because HMO concentration can change rapidly and the policy needs to be valid</p>	No change.
Bury & Walker Solicitors <i>representing</i> Leeds Residential Property Forum	Council does not have proper information as to the supply of HMO accommodation and detailed information regarding need/demand. Also, little or no information in relation to non student occupation.		
National Landlords Association	'Tipping points' as promoted by National HMO Lobby should not be used as the basis for planning policy. Must be based on substantive, objective empirical evidence of local problems.		
Parklane Properties	What evidence is there to justify policy?		
Leeds University Union	Not based on robust and credible evidence i.e pressure on private housing reducing.		

		throughout the plan period. On this basis the evidence available is considered to justify the policy in its current form.	
Inner NW Area Committee Planning Sub Group	Should refer to evidence of problems with high concentrations of HMOs outlined in 'Evidence Gathering: Housing in Multiple Occupation and possible planning responses - Final Report (September 2008)'.	This report listed the associated problems with high concentrations of HMO which provide clarity.	PC (minor). Include list of impacts from the report in para 5.2.21
Purpose built student accommodation.			
Leeds HMO Lobby	CS talks about meeting housing need. Purpose built accommodation should be encouraged to release private HMOs for family housing.	Policy broadly supports new purpose built student accommodation.	No change.
White Young Green <i>representing</i> Leeds Trinity University College	Policy should make reference to supporting additional student accommodation onsite through the intensification of existing accommodation and development of additional accommodation provided within the boundaries of the existing campus.	Policy already supports additional student housing on existing campuses.	No change.
Inner NW Area Committee Planning Sub Group	Should reflect problems with high concentrations of students rather than high concentrations of student accommodation.	The focus of Part B is on purpose built student accommodation.	No change.
Leeds University Union	Council should re-evaluate the impact of favouring purpose built accommodation over private housing for students in the city.	Purpose built accommodation is an important method of housing students and should be encouraged. Policies regarding HMOs are not retrospective or designed to force students into purpose built accommodation.	No change.
Equality – Young People.			
Bury & Walker Solicitors <i>representing</i> Leeds Residential Property Forum	Would have a disproportionate effect on young people. Age is a protected characteristic under the Equality Act 2010. Council's EIA does not reflect this or consider H6 effectively.	Could expand further on how the policy will effect young people within the EIA.	No change. EIA will be reviewed before submission.
Equality – Distribution of HMOs			
Inner NW Area Committee Planning Sub Group	Case for different ceilings for different areas needs to be made.	The policy refers to 'ceilings' though in practice the nature of any potential future policy has yet to be determined. Referring to 'ceilings' set by supplementary advice can be misinterpreted and should be clarified.	PC (minor) – Remove reference to ceilings.
Leeds HMO Lobby	Different ceilings on future HMO policy will disadvantage inner city groups who will have higher thresholds. EIA (p10) does not consider this.		
Re'New	Implementation of the policy should reflect the		

	different concentrations of HMOs. Article 4 could be used to prevent an increase in HMOs above a threshold in areas with few HMOs, or where an area is returning to single occupancy residential development.		
Supports the policy and considers it to be sound.			
Leeds HMO Lobby Jessica Kirk Mr Lee Davidson Turnways & Laurel Bank Residents' Association Mr Martin Staniforth Cllr John Illingworth Ash Road Resident's Association Ashley Inwood Mr & Mrs Eveleigh and Michael Bradford Kate Evans Re'New Moor Park Residents Association Becketts Park Residents Association Inner NW Area Committee Planning Sub Group Jonathan Long Mr Peter Kirk Mr Andrew Barclay Mr Andrew Pomeroy Mark Rutter Dr Ian Steel Mrs Linda Robbins Rachel Harkess Mr Pantelis Ellis Tinios Mr Alistair Stead Mr Howard Eaglestone Dr David Salinger		Over all support for the policy.	No change
Universities			

White Young Green <i>representing</i> Leeds Trinity University College	Request that paragraph 5.2.18 is re-drafted to say "As a city with three universities", to reflect Trinity receiving university status.	Trinity is currently a University College, the text as it stands could be considered incorrect.	PC (minor) - Change text to refer to Leeds as a University City.
Inner NW Area Committee Planning Sub Group	Text is incorrect, Leeds has three Universities.		
Focus around 'balance and health of communities'			
Bury & Walker Solicitors <i>representing</i> Leeds Residential Property Forum	'Balance' is not a valid concern of planning law. It is outside the scope of planning powers. The proposal misunderstands and misapplies the concept of a mixed community in terms of the NPPF.	'Balance' and 'balanced communities' is mentioned as an aim of planning throughout national legislation including the NPPF. The term 'mixed community' is used throughout planning and is interchangeable with 'balanced' and 'sustainable'.	No change. No change.
Inner NW Area Committee Planning Sub Group	Should address loss of housing suitable for families which has had a significant impact on the balance and sustainability. Term 'health' and 'wellbeing' are confusing, should be replaced with 'sustainability.'	The text implies this, but could possibly make this clearer. 'Health' and 'wellbeing' are both mentioned in the NPPF. These terms are considered as clear as 'sustainability'.	PC (minor) – amend text of 5.2.18 to clarify. No change.
Rentinc & Parklane Properties	Planning has nothing to do with 'balance of communities' and not sure what would be considered a high concentration of HMOs.	The need for balanced communities is mentioned throughout national policy.	No change.
Impact on Housing.			
Bury & Walker Solicitors <i>representing</i> Leeds Residential Property Forum	SHMA identifies a need/demand for HMOs. Policy doesn't reflect this.	The policy recognises that the SHMA anticipates growth in the need for HMOs	No change.
Re'New	Landlords are concerned that should they invest to let to single occupants they would then be unable to let to multiple occupants in the future should market conditions change.	This matter needs consideration and has also been raised during consultation workshops. However, it is too detailed for inclusion in the Core Strategy and should be considered elsewhere.	No change.
Policy has never been subjected to formal consultation.			
Bury & Walker Solicitors <i>representing</i>	Policy H6 has not been subject to prior public consultation as part of its formulation and	Policy H6 was included in the Preferred Approach, albeit under the heading 'Location of	No change.

Leeds Residential Property Forum	development.	Specialist Housing'. The policy included references to the distribution of specialist housing and HMOs were one form considered. The policy was originally written before the change in the Use Class Order and has been expanded since this to include HMOs.	
Scope of policy.			
Re'New	The policy is dominated by issues relating to HMOs for students but increasingly shared housing is a form of affordable housing as it enables young workers to meet their needs in an affordable format. The text should reflect that.	Text does mention young people and young workers who can not afford to buy properties. Perhaps could be clearer.	PC (minor) – look to include references to young people and other groups reliant on HMOs.
Re'New	The text should include reference to welfare reform proposals that restrict the housing benefit paid to people aged 25 – 35	The text makes reference to anticipated demand for HMOs from young people reliant on housing benefit.	No change.
SPD not suitable for further policy.			
Bury & Walker Solicitors <i>representing</i> Leeds Residential Property Forum	Using SPD rather than DPD avoids examination. Manchester Inspector concluded this approach was not appropriate.	The Core Strategy is a strategic document that will remain in place until 2028. HMO distribution has changed rapidly over the past 10 years and may change further in the future. Additional planning advice may be needed to deliver the strategic aims of Policy H6 and the Council is considering this. However, not all of these approaches involve the publication of an SPD for HMOs and on this basis the text in Policy H6 is potentially misleading.	PC (minor) – Remove specific reference to supplementary planning advice.
National Landlords Association	Highly inappropriate to implement this policy through an SPD, and also avoids scrutiny.		
Additional comments on the text			
Inner NW Area Committee Planning Sub Group	Should also mention Sui Generis large HMOs.	Reference to Sui Generis HMOs could be added to the text.	PC (minor) – Add reference to Sui Generis HMOs
	Term 'high concentrations' should be used instead of 'over concentrations'.	The document uses all of these terms but its meaning is still clear.	No change.
	Fails to mention parking.	Parking is considered elsewhere in the document. Policies T1 & T2 consider residential parking in the city and this can include HMOs.	No change.

	B)iv) Term 'quiet' should be removed. Should also mention harm to residential amenity.	Could be more clear on this point.	PC (minor) – Remove 'quiet' from the text of H6 B iv).
Rentinc & Parklane Properties	In terms of conversions, feel minimum size of 100m2 gross would exclude properties that are capable of conversion. Should not set standards for car parking. Should not be a requirement for level access from the street.	This policy is in the UDP and has been through that examination process, as well as being quoted in section 78 appeals. No evidence has been provided of why it should be a different figure. Parking is considered as part of any application involving conversions. The policy states level access should be used 'where possible'.	No change. No change. No change.
Miscellaneous.			
Mr Cedric Wilks	This policy requires very strict monitoring.	CS policies will be subject to monitoring.	No change.
Irene West	A careful mix of long term residents and student housing helps all concerned to maintain a better place for all to live.	Encouraging mixed communities is an aim of the policy.	No change.
Ms Katy Hockridge	Discriminates against people who need to rent their house out to three people.	The definition of a small HMO was introduced through the creation of Class C4 of the Use Class Order.	No change.
Environment Agency	Conversions should only be acceptable where a place of safety including safe access and egress is demonstrated.	Risk of flooding will be assessed during the application process. Policy EN5 Part (i) deals with this issue.	No change.

Appendix 2:

Houses in Multiple Occupation, Student Accommodation, and Flat Conversions

5.2.18a Houses in Multiple Occupation (HMOs) are an increasingly popular part of the housing market within Leeds. As rooms can be rented individually they provide affordable accommodation used primarily by students, young people and those on lower incomes. Whilst the need for this type of accommodation is not in dispute, HMOs tend to be grouped together in certain inner city areas, becoming the dominant type of housing which can lead to social and environmental problems for local communities.

5.2.18b ~~As a city with two universities and a number of specialist colleges,~~ According to figures published by Unipol, Leeds had 43,500 students in 2010/11 of which approximately 30,500 sought accommodation through the private rented sector. *The City's Universities and specialist colleges are an important part of the Leeds economy, but* significant growth in student numbers in the past has led to high concentrations of student housing in areas of Headingley, Hyde Park and Woodhouse. This generated concerns about loss of amenity to long term residents *as well as wider concerns about the loss of housing suitable for families.*

5.2.19 Leeds' SHMA 2010 suggests a levelling off in growth in student numbers in the early years of the Plan which raises question marks over the future of approximately 4000 surplus student bed-spaces. However, demand is expected to continue for many students wanting to live in shared private residential houses which are now classed as HMOs.

5.2.20 The SHMA 2010 anticipates growth in the need for HMOs in the early years of the Plan to accommodate young people reliant on housing benefit and because of strong demand for private rented accommodation from working people unable to buy. This could affect all areas of Leeds, but is likely to be focussed on the inner areas popular for rented property.

5.2.21 Changes in occupation of houses from dwelling-house (class C3 of the use class order) to *small* shared houses (class C4) will require planning permission in the area affected by the HMO Article 4 Direction. This includes all of inner Leeds and the adjoining suburbs. *Changes of occupation to large shared houses (sui generis) already require planning permission in every part of the city. The government has recognised that high concentrations of HMOs in an area can lead to the following impacts:*

- *Increased anti-social behaviour, noise and nuisance*
- *Imbalanced and unsustainable communities*
- *Negative Impacts on the physical environment and streetscape*
- *Pressures upon parking provision*
- *Increased crime*
- *Growth in the private sector at the expense of owner-occupation*
- *Pressure on local community facilities*

- *Restructuring of retail, commercial services and recreational facilities to suit the lifestyles of the predominant population.*

5.2.22a Core Strategy policy needs to balance the need for growth in HMOs with the need to avoid ~~over~~ *high* concentrations which cause loss of amenity and undermine the health and stability of communities. ~~Ease of access to work and universities without needing a car also needs to be considered.~~ *New HMOs should be located in sustainable locations which allow ease of access to work and education by means of sustainable transport, whilst reducing the need to use the private car. Proposals for new HMOs should also look to address detailed local amenity issues such as impacts on neighbours and local parking pressures.*

5.2.22b The decade 2001 – 2010 witnessed considerable development of new purpose built student accommodation particularly in and around the north west sector of the City Centre. Growth in this accommodation is to be welcomed in order to meet need and to deflect pressure away from private rented houses in areas of over-concentration. Nevertheless, care is needed to ensure that purpose built accommodation continues to be located with good access to the universities and does not itself become over-concentrated.

5.2.23 Conversion of houses into flats will be one of the means of meeting need for smaller households. However, this has to be reconciled with the importance of protecting local amenity and creating good standard dwellings with sufficient parking space and security. 'Deconversion' of previously converted flats back into dwelling houses is sometimes sought in order to cater for large families. This will usually be considered acceptable and, if involving only two units to one, does not normally need planning permission.

POLICY H6: HOUSES IN MULTIPLE OCCUPATION (HMOs), STUDENT ACCOMMODATION, AND FLAT CONVERSIONS

- A) Within the area of Leeds covered by the Article 4 Direction for Houses in Multiple Occupation (HMOs), development proposals for new HMOs will be determined:
- i) To ensure that a sufficient supply of HMOs is maintained in Leeds,
 - ii) To ensure that HMOs are distributed in areas well connected to employment and educational destinations associated with HMO occupants,
 - iii) To avoid detrimental impacts through high concentrations of HMOs, which would undermine the balance and health of communities.

Additional policy may be needed in the future to deliver the strategic aims of Policy H6. ~~Based on these criteria, supplementary planning advice will set ceilings for the proportion of HMOs desirable in different geographies of Leeds.~~

- B) Development proposals for purpose built student accommodation will be controlled:
- i) To help extend the supply of student accommodation taking pressure off the need for private housing to be used,
 - ii) To avoid the loss of existing housing suitable for family occupation,
 - iii) To avoid excessive concentrations of student accommodation (in a single development or in combination with existing accommodation) which would undermine the balance and wellbeing of communities,
 - iv) To avoid locations which are not easily accessible to the Universities by foot or public transport or which would generate excessive footfall through quiet residential areas.
- C) Development proposals for conversion of existing houses into flats will be accepted where all the following criteria apply:
- i) The property is not a back-to-back dwelling;
 - ii) The property is of sufficient size (min. 100m sq gross) and the internal layout is shown to be suitable for the number of units proposed;
 - iii) The impact on neighbouring dwellings is not likely to be detrimental to the amenity of their occupants by virtue of the conversion alone or cumulatively with a concentration of converted dwellings, HMOs, or residential institutions;
 - iv) Where there is a demand for family sized accommodation and the property has (or has the potential for provision of) good access to suitable space for private recreation, provision is normally made for at least one family sized unit in the proposed mix of flats;
 - v) Sufficient easily accessible and appropriately located off and on street car and cycle parking is incorporated;
 - vi) The proposed dwellings provide satisfactory internal living accommodation in terms of daylight, outlook and juxtaposition of living rooms and bedrooms;
 - vii) Each dwelling has safe and secure (and where possible, level) access from the street and any parking areas and suitable accessible enclosures are provided for refuse storage.

Sufficiency of supply' is to be measured with reference to the SHMA, Unipol Data, University Admission Forecasts and the effects of Housing Benefit rule changes



Report author: Paul Bingham
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Report of the Director of City Development

Report to: Development Plan Panel

Date: 2 July 2012

**LDF Core Strategy – Publication Draft, Analysis of Consultation Responses:
Policy SP4 – Regeneration Priority Area and
Policy SP5 – Aire Valley Leeds Urban Eco Settlement.**

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

Summary of main issues

1. The Core Strategy Publication Draft was subject to 6 weeks public consultation during February – April 2012. Section 3 of this report summarises the issues raised about regeneration and Aire Valley and the Table in Appendix 1 suggests how the City Council should respond. Appendix 2 illustrates how the text of the Core Strategy would need to be altered.
2. Of the wide range of issues raised, none are considered to warrant any major changes to the Core Strategy, only one or two minor text changes which are set out in Appendices 1 and 2.

Recommendations

Development Plan Panel is requested to:

- i). Endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval.

1.0 Purpose of this Report

- 1.1 Within the context of the Core Strategy Initial Report of Consultation (6th June), the purpose of this report is to review consultation responses in relation to Policy SP4 (regeneration priority areas) and Policy SP5 (the Aire Valley Leeds Urban Eco Settlement). Appendix 1 attached, summarises the representors, key issues raised, the City Council's view and proposed action. Appendix 2 illustrates how the text of the Core Strategy would need to be altered.

2.0 Background Information

- 2.1 Following Consideration by the Development Plan Panel and Executive Board, a 6 week period of public consultation has been undertaken, commencing on 28th February to 12th April 2012. Consistent with the LDF regulations, this is a targeted stage of consultation, with emphasis upon requesting responses in relation to the "soundness" of the plan. Within this context, the consultation material comprised of a range of documents, which were subsequently made available on line or as paper copies, including:

- Core Strategy Publication Draft (Main Document)
- Sustainability Appraisal (& Non Technical Summary)
- Habitats Regulations Assessment Screening
- Equality Impact Assessment Screening
- Draft Infrastructure Delivery Plan
- Draft Core Strategy Monitoring Framework
- Health Topic Paper
- Report of Consultation on Preferred Approach (October – December 2009)

Links were also incorporated to the consultation web pages to the evidence based material, which has been prepared to help inform the emerging document (including the Employment Land Review, Leeds City Centre, Town and Local Centres Study, Housing Growth in Leeds, Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment and the Leeds open space, sport and recreation assessment.

3.0 Main Issues

- 3.1 The key issues arising under this topic are as follows:

Policy SP4

- Lack of clarity about whether regeneration priority programme areas constitute strategic sites as referred to in the National Planning Policy Framework;
- More clarity required on what public sector interventions and private sector investment exists in regeneration priority areas, the prioritisation of these measures and consideration of infrastructure needs;
- Policy SP4 should include "Growth Areas" as well as "Regeneration Priority Areas". Leeds-Bradford corridor and Aire Valley Leeds should be re-designated

- as “Growth Areas”. South East Leeds (former mining communities) should be included as an additional regeneration area (including communities of Allerton Bywater, Micklefield, Ledsham, Ledston, Mickletown/Methley and Swillington;
- The Rim of the city centre, the Kirkstall Road Renaissance Area and the whole of the south of the city centre should be identified as additional or extended regeneration priority areas;
 - No clear definition of what the urban eco settlement proposals mean or how they consider viability;
 - Failure to fully acknowledge the importance of economic investment and need for employment in South Leeds, and the opportunities presented by the diversification of the White Rose Centre, Capital Park and Elland Road sites to include additional retail, leisure, hotels, residential, restaurants supported by enhanced public transport facilities and employment/training initiatives.
 - Concerns from the Highways Agency over potential highway capacity issues on the motorway network as a result of the Leeds-Bradford corridor proposals and offer to work with Council to resolve these.

Policy SP5

- There is a policy vacuum to the south of the city centre (as shown on Maps 5 and 6). The Aire Valley UES area should be extended to include Holbeck Urban Village and/or the Pottery Fields areas (around Crown Point);
- The housing and employment land targets for the area are unrealistic and not based on robust evidence on deliverability. Housing target should be 200 units a year or 3,200 in total;
- Concerns from the Highways Agency over potential highway capacity issues on the motorway network as a result of the Aire Valley Leeds proposals and offer to work with Council to resolve these;
- Not enough reference to local amenity offered by pubs in the area;
- Further reference to principles of waterside development as a basis for formulating masterplans required;
- Reference should be made to listed buildings amongst the physical constraints to benefit from measures to bring forward sites;
- Map 6 lacks clarity as to what areas identify;
- Green infrastructure should be a high priority for the Urban Eco Settlement;
- Concern over loss of Green Belt and existing green space, corridors and infrastructure as a result of the proposals. Other locations should be considered;
- No reference to timescales for development.

4.0 Corporate Considerations

As noted above, the Core Strategy, forms part of the Local Development Framework and once adopted will form part of the Development Plan for Leeds.

4.1 Consultation and Engagement

- 4.1.1 As outlined in this report, the Core Strategy Publication draft has been subject to a further 6 week period of consultation. This has been undertaken in accordance with

the LDF Regulations and the City Council's adopted Statement of Community Involvement (SCI).

4.2 Equality and Diversity / Cohesion and Integration

4.2.1 An Equality Impact Assessment Screening was undertaken on the Core Strategy Publication draft, prior to consultation (see Core Strategy Executive Board Report, 10th February 2012). This concluded that equality, diversity, cohesion and integration issues had been embedded as part of the plan's preparation. For information and comment, the Screening assessment has also been made available as part of the supporting material for the Publication draft consultation. Within this overall context, it will be necessary to continue to have regard to equality and diversity issues, as part of the ongoing process of preparing the Core Strategy, including considering representations and next steps.

4.3 Council Policies and City Priorities

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

4.4 Resources and value for money

4.4.1 The DPD is being prepared within the context of the LDF Regulations, statutory requirements and within existing resources.

4.5 Legal Implications, Access to Information and Call In

4.5.1 The DPD is being prepared within the context of the LDF Regulations and statutory requirements. The DPD is a Budgetary and Policy Framework document and as such this report is exempt from call-in by Scrutiny.

4.6 Risk Management

4.6.1 The Core Strategy is being prepared within the context of the LDF Regulations and the need to reflect national planning guidance. The preparation of the plan within the context of ongoing national reform to the planning system and in responding to local issues and priorities, is a challenging process. Consequently, at the appropriate time advice is sought from a number of sources, including legal advice and advice from the Planning Advisory Service and the Planning Inspectorate, as a basis to help manage risk and to keep the process moving forward.

5. Conclusions

5.1 This report provides an overview of the issues raised about Policy SP4 (regeneration priority areas) and Policy SP5 (the Aire Valley Leeds Urban Eco Settlement). It is not considered that any of the issues raised are compelling

enough to justify any major changes to the Core Strategy; two of the issues generate minor wording changes and all of the others warrant no further changes.

6. Recommendations

6.1 Development Plan Panel is requested to:

i). Endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval..

7. Background documents¹

7.1 A substantial number of documents are available representing various stages in preparation of the DPD and the background evidence base and Equalities Impact Assessment Screening. These are all available on the City Council's web site (LDF Core Strategy Pages) web pages or by contacting David Feeney on 247 4539.

¹ The background documents listed in this section are available for inspection on request for a period of four years following the date of the relevant meeting. Accordingly this list does not include documents containing exempt or confidential information, or any published works. Requests to inspect any background documents should be submitted to the report author.

Appendix 1:

Core Strategy Publication Draft - Analysis of Consultation Responses

Policy SP4: Regeneration Priority Programmes Area

Representor/Agent	Representor Comments	LCC Initial Response	Action
Support comments			
Mr C & Mr A Haigh & other clients (Agent: Directions Planning)	Welcome and support identification of Regeneration Priority Area, especially South Leeds. There is an opportunity to deliver housing growth east of Morley to delivery growth and create a more sustainable community.	Support noted.	No change.
Lack of clarity about role of regeneration priority programme areas			
Home Builders Federation	The role of the four regeneration areas is ambivalent as it is unclear whether the areas constitute strategic sites referred to in the NPPF. Not clear whether they are earmarked to provide the majority of housing in the Main Urban Area (SP1). Failure to identify strategic sites is contrary to the NPPF.	The four regeneration priority areas do not constitute strategic sites as referred to in the NPPF. Nor are they specifically earmarked to provide majority of housing in the Main Urban Area. This is not stated nor implied in SP4 or SP6. Only Aire Valley Leeds has a specific housing delivery target set out in SP5. New housing is distributed according to the settlement hierarchy and housing market areas under SP7. Furthermore, Regeneration Priority Areas are not focused solely on housing delivery, they are based on the Council's investment programme which seeks to address a number of issues set out in Paragraph 4.47. It is not accepted that the decision to not	No change.

Representor/Agent	Representor Comments	LCC Initial Response	Action
		include strategic sites in the plan is contrary to the NPPF as this type of designation is only required for sites which are fundamental to delivery of the plan.	
Muse Developments (White Young Green)	Policy generally supported but there is no clarity as to what public sector intervention measures or private sector investment exists. There is no prioritisation of measures or consideration of infrastructure needs or how to create a sense of place.	<p>General support noted.</p> <p>The level of detail provided in the supporting text to the policy is considered to be appropriate for the Core Strategy. The plan identifies the current investment programme of the Council to support regeneration. Delivery of regeneration programmes will be achieved through a variety of mechanisms overseen by Programme Boards which will require a flexible approach depending, for example, on available funding streams.</p> <p>The Infrastructure Delivery Plan (referenced under Policy ID1) sets out infrastructure needs for the district including those in the Regeneration Priority Areas. The Core Strategy includes policies to promote good design and a sense of place, for example Policy P10.</p>	No change.
Policy should include “Growth Areas” as well as “Regeneration Priority Areas”. Leeds-Bradford corridor & Aire Valley Leeds should be re-designated as “Growth Areas”. South East Leeds (the former mining areas) should be included as an additional regeneration area (including communities of Allerton Bywater, Micklefield, Ledsham, Ledston, Mickleton/Methley & Swillington.			
Redrow; Keyland; Warner; Taylor Wimpey; Ashdale; Barrett Leeds; Miller; Chatford; Mirfield;	As above	The representation makes no reference to the criteria that would be used to identify a growth area. As this approach is not part of the spatial strategy there is no clear basis for re-designating Lead-	No change.

Representor/Agent	Representor Comments	LCC Initial Response	Action
Barrett York; Kebbell (Agent: Dacre, Son & Hartley)		Bradford corridor or Aire Valley Leeds.	
T G M F Emsley (Agent: ID Planning) Redrow Homes	<p>Specific comments: Do not support the identification of the Leeds-Bradford corridor and the Aire Valley as Regeneration Priority Areas. The Leeds-Bradford corridor as a whole is not deprived and the majority of the Aire Valley is greenfield rather than brownfield land.</p> <p>South East Leeds (former mining communities) comprises of the communities of Allerton Bywater, Micklefield, Ledsham, Ledston and Methley Junction which Map 2 identifies as being a deprived area.</p>	<p>The designation of Regeneration Priority Area is based on more than the indices of deprivation, although this is clearly an important basic consideration, it also identifies areas where there are genuine opportunities for development and investment to tackle under-performance.</p> <p>Aire Valley Leeds is located within and close to areas falling with the bottom 10% of the indices of deprivation. There is 450 hectares of development land available, brownfield and greenfield, in close proximity to these areas. Most of the area is made up of urban development and is therefore brownfield in nature. This represents a major regeneration opportunity for which the SP4 designation is fully justified.</p>	
Redrow Homes (Yorkshire)	<p>Specific comments: An additional regeneration area should be added under Policy SP4: "South East Leeds (former mining communities)". To include Allerton Bywater, Micklefield, Mickleton/Methley & Swillington.</p>	<p>The Leeds-Bradford corridor is a joint initiative between the two councils recognising the need to realise the economic potential of the corridor based on the key themes of transport, housing quality, green infrastructure and business growth. Within Leeds, the inner parts of the corridor also fall with areas of high deprivation.</p>	
Banks Development	<p>The regeneration priority areas exclude the mining communities of South East Leeds. In a period of recession new housing will principally be delivered into 'safe' market areas such as Mickleton/Methley rather than the Main Urban Area.</p>	<p>There is no evidence to suggest how the South East Leeds former mining communities better meet the definition of a Regeneration Priority Area than the</p>	

Representor/Agent	Representor Comments	LCC Initial Response	Action
		<p>areas identified in the plan.</p> <p>In Policy SP7 Outer South East Leeds is identified as location for 4,600 new houses and Outer South 2,600. The Key Diagram specifically identifies Kippax, Allerton Bywater and Micklefield as potential locations for new housing.</p>	
Additional Regeneration Priority Areas & Extensions			
English Heritage	The RIM (of the City Centre) referred to in para 4.4.10 should be referenced as a regeneration area in the policy.	The RIM area around the city centre has not been identified in itself as one of the investment programme areas to which to policy relates, although all the areas identified do include specific parts of the RIM where investment programme will be targeted.	No change.
West Properties	The Kirkstall Road Renaissance Area should be recognised in policy as a focus for new development which maximises brownfield regeneration opportunities in a highly accessible location.	<p>The Kirkstall Road Renaissance Area has not specifically been identified as one of the investment programme areas to which the policy relates.</p> <p>General policies such as SP1 prioritise development of brownfield land and highly accessible locations.</p>	No change.
Montpellier Estates	Concerned that there is a policy vacuum between the Aire Valley and Inner South regeneration areas shown on Maps 5 & 6. The East Leeds, Aire Valley & South Leeds regeneration should run into each other to facilitate: better connectivity; use of resource across regeneration areas; recognition of public-sector funding into Holbeck Urban Village and potential impact of future HS2 proposals. Such a change is important as	<p>Representations have previously been made to the informal consultation on the Aire Valley AAP boundary extension (2011) and consultation on the South Bank Planning Framework (2010) to request the extension of the boundary in other parts of the southern half of the city centre. The requested changes were not agreed.</p> <p>It is accepted that a wider UES/AAP.</p>	No change.

Representor/Agent	Representor Comments	LCC Initial Response	Action
	Regeneration Areas are referenced in other policies.	<p>boundary could potentially be justified but there is a need to focus resources on the more immediately deliverable development sites in the South Bank area (such as the former Tetley's brewery site) where discussions have taken place with landowners and the planning framework adopted, and in particular on the delivery of a city centre park.</p> <p>The land between the South Bank and the M621 is mainly in use as viable commercial or light industrial concerns which contribute to the employment and economy of Leeds and have less immediate redevelopment potential. Holbeck Urban Village is subject to its own development framework.</p> <p>Policy SP4 is flexible towards the identification of future regeneration areas if justified by evidence. This could take into account issues such as future HS2 proposals as and when they emerge.</p> <p>Policy CC2 sets out specific proposals for uses and connections for the south of the city centre which includes all the areas referred to in the representation and it is not therefore accepted that exclusion of the area from the Aire Valley UES area creates a policy vacuum.</p>	
Comments on specific regeneration priority programme areas			
Templegate Developments (Agent: Barton)	Support 4 regeneration priority programme areas including the Aire Valley.	General support noted. The UES is defined in Paragraph 4.5.2	No change.

Representor/Agent	Representor Comments	LCC Initial Response	Action
Willmore)	<p>No clear definition of what the urban eco settlement proposals mean, or what should be aimed for and when. No objection to the overall objectives but needs to consider viability and what can be realistically achieved.</p>	<p>reflecting its status at the Leeds City Region project. This level of detail is considered to be appropriate for the Core Strategy.</p> <p>Detailed proposals on Urban Eco Settlement will be set out in the Aire Valley Leeds Area Action Plan which will take into account viability considerations.</p>	
Land Securities & Evans Property Group (Agent: Quod)	<p>Paras 4.4.4 – 4.4.11 fail to fully acknowledge the importance of economic investment and opportunities to reverse socio-economic deprivation. The policy need to be broadened to encourage, promote and stimulate private sector-led investment in Priority Regeneration Areas.</p> <p>Paras 4.4.20 – 4.4.23 are too narrowly focussed on housing and do not reflect the basic need for employment and the South Leeds Investment Strategy published in June 2011.</p> <p>Suggest revised paragraphs which identify common problems in South Leeds such as low incomes, low educational attainment, high unemployment and high deprivation; the importance of housing renewal and job creation and investment; and the creation of jobs opportunities based on existing assets such as the White Rose Shopping Centre, Capitol Park and Elland Road through diversification including additional retail, leisure, hotels, residential and restaurant/catering supported by enhanced public transport facilities and employment /</p>	<p>Issues relating to socio-economic deprivation are considered to be covered adequately in the general supporting text to the policy (para 4.47) which applies to all four regeneration priority areas. Paragraph 4.4.9 makes reference to improving the employment prospects of residents in these areas.</p> <p>Para 4.4.22 makes reference to the South Leeds Investment Strategy as an important document promoting investment in the area. The word emerging should be deleted for clarity. However, the wording suggested is considered to be too detailed for the Core Strategy. The other areas are not site specific in terms of detail, other than the Aire Valley Leeds area where an AAP is being prepared and previous consultations have taken place.</p>	<p>Minor change: delete 'emerging' before South Leeds Investment Strategy in para 4.4.22 to reflect current status.</p>

Representor/Agent	Representor Comments	LCC Initial Response	Action
	training initiatives (including a potential Skills Academy).		
Highways Agency	Development in the Leeds – Bradford corridor (paras 4.4.17 – 4.4.19) could have an adverse impact on the operation of the M621 (J1). The HA's model has identified potential additional capacity and congestion issues during peak periods on the M621 at 2018 and 2028. Will work with Leeds City Council to resolve outstanding issues.	Leeds City Council are currently working with the Highways Agency and their consultants to assess the impacts of the proposed Core Strategy on the Strategic Road Network. This work will provide a more detailed examination of the impacts than has been possible to date. The intention is to reach an agreed position on the impacts and to agree appropriate mitigation where necessary.	No change.

Policy SP5: Aire Valley Leeds Urban Eco Settlement

Representor/Agent	Representor Comments	LCC Initial Response	Action
General support and other comments			
Templegate Developments (Agent: Barton Willmore)	Support the identification of the Aire Valley as the only strategic location within the district which has been afforded significant growth. Housing growth level and employment land requirements are appropriate. The developer's sites at Temple Green and Skelton Grange can deliver significant development supported by a masterplan.	Supports and comments noted.	No change.
Stuart Andrew MP	Support regeneration and job creation in the Aire Valley given the proximity to the motorway network.		
WARD (Wharfedale Airedale Review Development)	Proposals seem sensible and beneficial for city. South East Leeds has the best transport infrastructure because of easy links to the		

Representor/Agent	Representor Comments	LCC Initial Response	Action
	motorway and rail network.		
The Hatfield Estate; The Ledston Estate; The Bramham Park Estate; AR Briggs & Co; Meadowside Holdings; Lady Elizabeth Hastings; The Diocese of Ripon & Leeds (Agent: Carter Jonas)	No comments but reserve right to do so if matters change.		
Muse Developments (Agent: White Young Green)	Support policy.		
There is a policy vacuum to the south of the city centre (as shown on Maps 5 & 6). The Aire Valley Leeds UES area should be extended to include Holbeck Urban Village and/or the Pottery Fields areas (around Crown Point).			
Leeds Civic Trust	Specific comments: The Aire Valley UES area should be extended to include 'Leeds City Centre South' which has the potential to accommodate family housing, offices, a school, leisure and other facilities – a fully sustainable community.	Representations have previously been made to the informal consultation on the Aire Valley AAP boundary extension (2011) and consultation on the South Bank Planning Framework (2010) to request the extension of the boundary in other parts of the southern half of the city centre. The requested changes were not agreed.	No change.
Montpellier Estates	Specific comments: The Aire Valley should be extended to include Holbeck Urban Village and Pottery Fields.		
Aspinall Verdi	Specific comments: The East Leeds, Aire Valley & South Leeds regeneration areas should run into each other to facilitate: better connectivity; use of resource across regeneration areas; recognition of public-sector funding into Holbeck Urban Village and potential impact of future HS2 rail proposals. Important because Regeneration Areas are	It is accepted that a wider UES/AAP boundary could potentially be justified but there is a need to focus resources on the more immediately deliverable development sites in the South Bank area (such as the former Tetley's brewery site) where discussions have taken place with landowners and the planning framework	

Representor/Agent	Representor Comments	LCC Initial Response	Action
	referenced in other policies.	<p>adopted, and in particular on the delivery of a city centre park.</p> <p>The land between the South Bank and the M621 is mainly in use as viable commercial or light industrial concerns which contribute to the employment and economy of Leeds and have less immediate redevelopment potential. Holbeck Urban Village is subject to its own development framework.</p> <p>Policy SP4 is flexible towards the identification of future regeneration areas if justified by evidence. This could take into account issues such as future HS2 proposals.</p> <p>Policy CC2 sets out specific proposals for uses and connections for the south of the city centre which includes all the areas referred to in the representation and it is not therefore accepted that exclusion of the area from the Aire Valley UES area creates a policy vacuum.</p>	
The housing and employment land targets for the area are unrealistic and not based on robust evidence on deliverability.			
DPP	Specific comment: The area will not be able to deliver the amount of housing proposed, especially in the short to medium term , as it is a small area with poor market perception. An optimistic amount would be 200 units a year equating to a total of 3,200 units over the plan period, significantly short of the proposed number.	The Aire Valley area extends over 1,300 hectares, from the city centre to the edge of the main urban area of Leeds. It includes a range of development sites totalling 450 hectares. Three major housing developments are under construction and 303 new homes were completed in the year 2011/12. There is no evidence provided to support the representor's assertion that delivery will	No change.
Hileys Solicitor (Agent: LDP)	Specific comment: Significant level of employment and housing is not fully justified		

Representor/Agent	Representor Comments	LCC Initial Response	Action
Planning)	<p>within the Core Strategy or evidence base. Need more robust evidence on deliverability in the light of the significant contribution made by the area.</p>	<p>be significantly lower than this.</p> <p>Although the economic climate for development is currently difficult, the SHLAA process has assessed the suitability, availability and deliverability of potential housing sites in the Aire Valley. This evidence is available on the Council's website. Further work has been undertaken further refine the SHLAA, taking a realistic and flexible approach to deliverability to identify the target figure of 6,500 – 9,000 homes over the long term period of the plan to 2028. Some of these sites are not immediately developable due to lack of infrastructure and other constraints but can be unlocked for development in the medium to long term. The sites will be allocated through the Aire Valley Area Action Plan which will include proposals for infrastructure delivery.</p> <p>The Aire Valley currently contains over 250 hectares of land allocated or committed for employment development. The Employment Land Review process carried out an assessment of the suitability, availability and deliverability and recommended the retention of the majority of the land in the portfolio of employment sites. Certain sites were recommended for removal based on deliverability but additional sites have been identified which were consulted on in an informal consultation 142 hectares</p>	

Representor/Agent	Representor Comments	LCC Initial Response	Action
		of land is part of the Aire Valley Leeds Enterprise Zone which will assist with deliverability of employment land in the area.	
Other issues			
Highways Agency	<p>Proposed development in the Aire Valley (up to 35,000 additional jobs) will generate substantial traffic regardless of the extent to which investment in sustainable modes is successful.</p> <p>HA modelling information shows traffic capacity and congestion issues by 2018 and 2028 on the M621, M62 and M1 (J44 to 46).</p> <p>Further work is expected to be completed shortly. The HA will work with Leeds City Council with the objective of resolving outstanding matters.</p>	Leeds City Council are currently working with the Highways Agency and their consultants to assess the impacts of the proposed Core Strategy on the Strategic Road Network. This work will provide a more detailed examination of the impacts than has been possible to date. The intention is to reach an agreed position on the impacts and to agree appropriate mitigation where necessary.	No change.
CAMRA	The Aire Valley UES does not make enough reference to the local amenity of the areas pubs. Cross Green has lost a number of pubs. Existing pubs need to be included in any plan including the Grade II* listed Garden Gate in Hunslet.	The level of detail requested for the policy is not appropriate for the Core Strategy. The emerging Aire Valley Leeds Area Action Plan will consider the need for social facilities, such as pubs, in more detail.	No change.
British Waterways	<p>The waterway needs to be the starting point for formulating a masterplan for the area to take full advantage of the waterside setting and ensure that compatible uses are located along its length.</p> <p>Development based on the waterways should be based on the following principles:</p> <ul style="list-style-type: none"> • Canal should be starting point for 	The importance of the district's waterways are recognised in the Core Strategy (for example paragraph 2.8). However, the level of detail sought is not appropriate for the Core Strategy. Comments will be taken into account through the preparation of the Aire Valley Leeds Area Action Plan which will incorporate design principles for the area and include more	No change.

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>consideration of development;</p> <ul style="list-style-type: none"> • Should be considered as a space and leisure & commercial resource forming part of public realm; • Siting, layout and orientation of buildings & boundary treatments should optimise views of the canal and improve access; 	<p>detailed proposals in the form of area framework for major areas of change, which will include waterside sites.</p>	
<p>Airebank Developments (Agent: White Young Green)</p>	<p>Policy generally supported but specific reference should be made to listed buildings so those sites which accommodate listed buildings will benefit from measures put in place to address physical constraints</p>	<p>General support noted.</p> <p>Whilst the viability issues associated with bringing listed buildings back into use are recognised in general terms it is not appropriate for listed buildings to be identified specifically under physical constraints. Re-use of listed buildings can be a trigger to support high quality new development.</p> <p>There is nothing to exclude sites with listed buildings under the current policy wording.</p>	<p>No change.</p>
<p>Harrow Estates (Agent: White Young Green)</p>	<p>Policy and Map 6 lacks clarity as to what key areas identify.</p>	<p>Accept that Map 6 should be referenced more clearly in the supporting text to Policy SP5.</p>	<p>Minor change – amend supporting text paras 4.5.1 to 4.5.4 to make clearer reference to the specific areas shown on Map 6.</p>
<p>Yorkshire Wildlife Trust</p>	<p>As the Aire Valley will be an “eco settlement” green infrastructure should be a high priority within the development and included within the policy. Key areas of existing green space which link to the wider green infrastructure network or areas where new green space could be created should be identified and</p>	<p>Agree that green infrastructure in a high priority for the Aire Valley and this is recognised under para. 4.5.2 of the Core Strategy. The emerging Aire Valley Area Action Plan will identify a green infrastructure network in the area supported by policies based on the</p>	<p>No change.</p>

Representor/Agent	Representor Comments	LCC Initial Response	Action
	protected from development.	strategic network identified in Policy G1.	
CPRE Yorkshire & Humber	The location of the proposed UES is a concern. The proposed location would involve the loss of Green Belt, existing green corridors and infrastructure. The loss of green space to up to 9,000 homes and 250 hectares of employment land would be detrimental to the area and inconsistent with national policy and other parts of the Core Strategy. Would prefer the Council to consider other locations.	<p>The vast majority of new housing and employment development proposed for the Aire Valley will take place on land which is either brownfield or currently allocated on the proposals map for development. This is not currently green space or another green designation and includes city centre and inner city sites. The Aire Valley boundary includes only a small portion of Green Belt east of the M1 around Skelton Lake.</p> <p>Given the Core Strategy is required to set out proposals to meet overall housing and employment needs and the potential for brownfield development and other development in urban area is being prioritised through the spatial strategy, deleting Aire Valley sites and promoting alternatives would inevitably involve a far greater land take from the Green Belt.</p> <p>The emerging Aire Valley Area Action Plan will include detailed proposals for the retention and provision of green infrastructure in the area based on the strategic network identified in Policy G1. This is referenced under para 4.5.2 of the Core Strategy.</p>	No change.
Renew	No reference to timescales for development. Account should be taken of changing housing market conditions and locational preferences. Successful family housing at Yarn Street is a positive to build upon.	The Aire Valley area has a range of development sites which can be brought forward over different time periods. Some sites are available to be developed immediately whilst others require	No change.

Representor/Agent	Representor Comments	LCC Initial Response	Action
		<p>provision of new infrastructure or removal of constraints and pahsed for later in the plan period.</p> <p>The emerging Aire Valley Area Action Plan will provide detail on the phasing of development and provision of infrastructure.</p>	

Appendix 2: Proposed changes to Core Strategy

4.4 Regeneration Priority Areas

- 4.4.1 There needs to be a clear focus on parts of the district where there is a concentration of neighbourhoods performing below city and national averages across a range of indicators, but that also present opportunities for investment that will have a positive and lasting impact on those neighbourhoods and the city as a whole.
- 4.4.2 The Council, working with a number of key partners at the national and local level, seeks to address regeneration and housing needs citywide through a range of approaches and tools. These include:- joint ventures and partnerships with the private sector, improved use of public sector assets, the Homes and Communities Agency's Affordable Homes Framework, planning obligations and proposed changes to the use of business rates, new investment mechanisms and initiatives (such as the Enterprise Zone at Aire Valley Leeds, the New Homes Bonus, Private Rental Sector Initiative and the Empty Properties Fund – the latter of which will allow the Council to generate additional income for re-investment in its priorities through building more homes, improving the quality of existing ones and bringing empty ones back into use as decent affordable rented accommodation), existing Council programmes, such as the Private Sector Lettings Scheme and the Affordable Housing Programme, and continued close collaboration with local communities and their representatives. Collectively, these approaches have the potential to stimulate economic growth and create more new jobs, to increase the number of new, affordable and sustainable homes in Leeds, and to also improve the availability, accessibility and quality of the city's private rented sector to better meet the needs of its growing population.
- 4.4.3 Current and planned regeneration activity largely focuses on those Leeds neighbourhoods that feature in the country's 10% most deprived (target neighbourhoods), as measured via the Government's Indices of Multiple Deprivation (IMD), 2010. This equates to 92 of Leeds' Lower Super Output Areas covering an approximate population of 150,000. The city also has smaller and more isolated pockets of deprivation that need to be taken into account on an ongoing basis. A range of information and intelligence sources, including the IMD and the Leeds Neighbourhood Index, will be used to identify areas in need of regeneration and to inform appropriate interventions.

Regeneration Priority Programmes

- 4.4.4 The approach to district wide regeneration should remain flexible and responsive to the changing needs of localities and neighbourhoods. Given the length of the plan period, it is anticipated that new priorities will arise which the LDF will need to reflect and respond to in terms of appropriate resource allocation.
- 4.4.5 The Council's Regeneration Priority Programmes focus on four spatial areas (as set out in the Council/HCA Local Investment Plan 2011-15):
- East Leeds

- Aire Valley Leeds
- Leeds Bradford Corridor (incorporating the West Leeds Gateway)
- South Leeds

Map 5 Regeneration Priority Programme Areas

- 4.4.6 The Programmes adopt an enabling and partnership approach to regeneration, through cross-sector working to realise opportunities for investment and development that will assist in tackling a range of issues that can collectively cause neighbourhoods to under-perform.
- 4.4.7 A wide range of interconnected issues contribute to such under-performance, ranging from poor quality physical environment and buildings, lack of community involvement and empowerment, poor community and retail facilities, low take-up of public sector services, long term unemployment, low skills levels, poor educational attainment and health, in addition to lack of housing choice, quality and affordability.
- 4.4.8 The Core Strategy aims to support investment priorities that can demonstrate positive and lasting improvements to the neighbourhoods within the priority programme areas.
- 4.4.9 Therefore, support will be prioritised for those development opportunities of strategic importance that have potential to:
- Improve the quality of life for residents in the target neighbourhoods and localities,
 - Improve the employment prospects of residents in the target neighbourhoods,
 - Build the capacity of local communities to improve their neighbourhoods,
 - Provide choice, quality and affordability of housing,
 - Stimulate private sector investment,
 - Significantly improve the connectivity and image of neighbourhoods,
 - Add value to existing public sector investment through both the public and private sectors.
- 4.4.10 In addition to the Regeneration Priority Programme Areas, the 'Rim' concept has been developed to help understand the complex mix of issues affecting the area immediately adjoining the City Centre, much of which overlaps the four regeneration priority programme areas. The 'Rim', stretching approximately one km from the City Centre boundary, is separated from the City Centre by the Inner Ring Road and other road, rail and waterway networks. As well as making physical access difficult, the infrastructure contributes to a generally poor environment with few linkages. As is the case with the current regeneration priority programmes, regeneration opportunities will need to focus on reconnecting the 'Rim' area to the City Centre so that it can contribute to the longer term vitality, economic growth and renewal of Leeds.
- 4.4.11 For example, Chapeltown in particular is a 'Rim' neighbourhood with much regeneration potential. This centres around a unique combination of regeneration opportunities, including - its strong track record of enterprise development and business start-up, its strategic location as a key northern gateway to the city and the number of recent and current investment schemes in the area, including the

Townscape Heritage Initiative and Sharing the Success (Local Enterprise Growth Initiative), that can be built on to deliver further lasting improvements.

SPATIAL POLICY 4: REGENERATION PRIORITY PROGRAMME AREAS

The following Regeneration Priority Programme Areas identified on the Key Diagram will be given priority for regeneration funding and resources:

- East Leeds
- Aire Valley Leeds
- Leeds Bradford Corridor (incorporating West Leeds Gateway SPD)
- South Leeds

Additional Council led regeneration initiatives outside of the Regeneration Priority Programme Areas that can demonstrate a positive impact on their neighbourhoods will be supported. Priority will be given to developments that improve housing quality, affordability and choice, improve access to employment and skills development, enhance green infrastructure and greenspace, upgrade the local business environment, and improve local facilities and services.

The Regeneration Priority Programme Areas will be kept under review through the Council's Regeneration Priority Programme (and supporting evidence base), with any revisions reflected in future LDF documents.

4.4.12 The current investment opportunities within each priority programme are identified below. It is recognised that these may change over time in light of Government policy and associated investment opportunities, the economic climate and demographic change across the city. A detailed evidence base has been compiled by the City Council, which sets out the need, in terms of neighbourhood deprivation, alongside the opportunities for sustained improvement within each of the regeneration priority programme areas. This material is updated annually to inform the targeting and monitoring of regeneration activity.

East Leeds

4.4.13 The character of East Leeds is wide-ranging. It contains one of Europe's largest concentrations of Council-owned housing, as well as a proliferation of very dense terrace housing within the inner-city. Much of the latter is back-to-back and does not comply with current housing decency standards. This extent and mix of dwellings presents a challenge and opportunity for housing-led regeneration.

4.4.14 The primary aim of the East Leeds regeneration priority programme is to assist in the development of sustainable and vibrant communities by targeting some of the city's most deprived and underperforming neighbourhoods for improvements. This is underpinned by the development of new housing and complements wide-scale improvement to existing Council stock. Where funding is available private sector housing will also be targeted for improvement. There are significant areas of land across East Leeds, both brownfield and allocated sites, including the East Leeds Extension, that offer the potential for redevelopment to meet local housing needs and create a more diverse mix of tenures. Improved green infrastructure, green space, and support for local employment, enterprise and training opportunities are

other vital elements of the programme, that combined will assist in changing negative outside perceptions of the area.

4.4.15 The regeneration priority neighbourhoods where the Council is actively seeking improvement within East Leeds are: - Harehills, Gipton, Lincoln Green, Burmantofts, Halton Moor, Osmondthorpe and Seacroft.

4.4.16 Meeting the housing and regeneration challenge in East Leeds will require significant investment. Therefore the Council will work in partnership with the private sector and other public bodies to seek and encourage innovative approaches that can realise the potential of sites in these areas to contribute to the regeneration of the area.

Leeds Bradford Corridor

4.4.17 Leeds Bradford Corridor is a strategic economic collaboration between Leeds and Bradford Councils. Its aim is to realise the economic potential of the area west of Leeds and east of Bradford city centres and achieve better transport connections between the two cities. This is being achieved by a focus on four key areas of work:- housing improvement, improved foot, cycle, rail and road access, improvements to green infrastructure, and increased business competitiveness and growth.

4.4.18 At this stage, Leeds' main contributions to the Corridor are taking place in inner West Leeds. This area is home to a substantial population of residents and businesses and over half of its neighbourhoods feature in the country's 10% most deprived. West Leeds Gateway SPD sets out the strategic direction for the area and supports the creation of more vibrant and successful neighbourhoods with improved connectivity to the rest of the city and the City Region. The SPD provides guidance on a variety of strategic development sites with potential to improve the area through the delivery of affordable housing and mixed-use development.

4.4.19 The regeneration priority neighbourhoods where the Council is actively seeking improvement within inner West Leeds area:- New Wortley, Armley and parts of Bramley.

South Leeds

4.4.20 A range of regeneration activity driven by housing development is either planned or underway across South Leeds area. Major housing development schemes in Beeston Hill and Holbeck are being delivered and activity is focussed on the refurbishment of a large number of existing Council homes, construction of new Council homes and other significant environmental improvements.

4.4.21 A major housing scheme for Beeston Hill and Holbeck will be delivered from 2012, focussing on the refurbishment of a large number of existing Council homes, construction of new Council homes and other significant environmental improvements. Parts of the back-to-back housing stock have been refurbished, though some of the oldest, least sustainable housing of this type has been cleared, in preparation for new development.

4.4.22 However, the area also has some considerable development potential due its strategic location as a key gateway to the city relationship to the Holbeck Urban Village area and direct access to the motorway network. It also contains a large

amount of land forming part of the Council's affordable housing portfolio. As reflected within Middleton's spatial master plan (a Council and Aire Valley Homes partnership document), and the emerging South Leeds Investment Strategy, this land could act as a catalyst for infrastructure improvements and additional investment across the programme area.

4.4.23 The regeneration priority neighbourhoods where the Council is actively seeking improvement within South Leeds are: - Beeston Hill, Holbeck, Middleton, Belle Isle and parts of Hunslet.

4.5 Aire Valley Leeds

4.5.1 .Aire Valley Leeds (AVL) is a major economic development and regeneration within the country and city region situated to the south east of the City Centre. It extends to over 1,300 hectares and contains over 450 hectares of sites, which are available for development in the short to medium term, as well as areas of longer term potential. The area sits within the Main Urban Area of the Settlement Hierarchy extending from the M1 motorway into the City Centre along both banks of the River Aire Corridor (see Map 6) and forms a substantial and transformational development opportunity of national significance. AVL has an existing employment base of 800 businesses, employing around 30,000 people and also provides a considerable opportunity for local jobs growth with capacity to support some 35,000 new jobs. Many of the neighbourhoods within and surrounding AVL are within the country's 10% most deprived (most are located within the East Leeds and Inner South Leeds regeneration programme areas), and a key aim is to link residents to current and future economic opportunities within AVL.

4.5.2 The unique selling point for AVL remains the delivery of a sustainable new district for the city and its region, delivering new jobs and homes. AVL, which has been identified as one of Leeds City Region's Urban-Eco Settlements, will promote sustainable development by seeking the delivery of commercial and residential areas which have high quality environment, energy efficient buildings and operations, low carbon and green business, sustainable transport, community facilities and linked areas of green infrastructure including a new city park in the South Bank area of the City Centre. Delivery of these ambitions will require major improvements to the area's infrastructure such as new public transport routes, bridges, schools and health facilities. In terms of regeneration and housing growth, good initial progress is underway in the delivery of a sustainable low carbon community, commencing with the H2010 housing development at Yarn Street in Hunslet, which incorporates a combined heat and power plant. *Map 6 shows the key locations that have been identified as having potential to accommodate major housing and mixed use development within the UES; The South Bank, Hunslet Riverside and Skelton Gate.*

4.5.3 In addition, a significant part of the AVL area (142 hectares) alongside the East Leeds Link Road has recently been approved by Government as an Enterprise Zone (see Map 6). This will help stimulate economic growth by simplifying procedures for planning applications and offering business rate discounts to new business. In turn, this will help provide the catalyst for an area, which will make a significant and lasting contribution to the economic viability and the region and Leeds.

4.5.4 In reflecting the overall strategic role of AVL as part of the Core Strategy, in contributing to job and housing growth, Strategic Policy 5, sets out a series of aspirations for the area. These will be delivered through the preparation of the AVL Area Action Plan which is currently underway and is to provide a framework for site allocations and infrastructure requirements to complement the wider regeneration programme.

SPATIAL POLICY 5: AIRE VALLEY LEEDS URBAN ECO-SETTLEMENT

Aire Valley Leeds (Urban Eco–Settlement) is identified (see Key Diagram) as a strategic location, providing between 6,500 and 9,000 new homes, and at least 250 hectares of land for employment uses (including research and development, industrial, and warehouse development).

A review of existing allocations, commitments, and other opportunities in the area will be undertaken through the Aire Valley Leeds Area Action Plan. The most suitable sites for the above uses will be retained, and co-ordinated measures put in place to address any infrastructure and other physical constraints to development of the land. Sites which are less suitable may be re-allocated for other uses.

Insert

Map 6 Aire Valley Leeds – *Key locations*

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Report author: Liz Bennett

Tel: 78228

Report of the Director of City Development

Report to: Development Plan Panel

Date: 2nd July 2012

LDF Core Strategy – Publication Draft, Analysis of Consultation Responses: Policy SP11 ‘Transport Infrastructure and Investment Priorities’, Policy T1 ‘Transport Management’ and Policy T2 ‘Accessibility Requirements for New Developments’).

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

Summary of main issues

1. The Core Strategy Publication Draft was subject to 6 weeks public consultation during February – April 2012. Section 3 of this report summarises the issues raised and the Table in Appendix 1 suggests how the City Council should respond. Appendix 2 illustrates how the text of the Core Strategy would need to be altered.
2. Of the wide range of issues raised to the transport policies, SP11, T1 and T2, none are considered to warrant any major changes to the Core Strategy, only one or two minor text changes which are set out in Appendices 1 and 2.

Recommendations

Development Plan Panel is requested to:

- i). Endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval.

1.0 Purpose of this Report

- 1.1 Within the context of the Core Strategy Initial Report of Consultation (6th June), the purpose of this report is to review consultation responses in relation to SP11 'Transport Infrastructure and Investment Priorities', T1 'Transport Management' and T2 'Accessibility Requirements for New Developments'. Appendix 1 attached, summarises the representations, key issues raised, the City Council's view and proposed action. Appendix 2 illustrates how the text of the Core Strategy would need to be altered..

2.0 Background Information

- 2.1 Following consideration by the Development Plan Panel and Executive Board, a 6 week period of public consultation has been undertaken, commencing on 28th February to 12th April 2012. Consistent with the LDF regulations, this is a targeted stage of consultation, with emphasis upon requesting responses in relation to the "soundness" of the plan. Within this context, the consultation material comprised of a range of documents, which were subsequently made available on line or as paper copies, including:

- Core Strategy Publication Draft (Main Document)
- Sustainability Appraisal (& Non Technical Summary)
- Habitats Regulations Assessment Screening
- Equality Impact Assessment Screening
- Draft Infrastructure Delivery Plan
- Draft Core Strategy Monitoring Framework
- Health Topic Paper
- Report of Consultation on Preferred Approach (October – December 2009)

Links were also incorporated to the consultation web pages to the evidence based material, which has been prepared to help inform the emerging document (including the Employment Land Review, Leeds City Centre, Town and Local Centres Study, Housing Growth in Leeds, Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment and the Leeds open space, sport and recreation assessment.

3.0 Main Issues

- 3.1 There is overall support for the general aspirations of SP11, T1 and T2, with 55 representations received. A number of the representations were multi stranded comments. In total 59 specific topic related comments have been identified and numbered in Appendix 1, of which 35 relate to SP11, 11 to T1, and 13 to T2.
- 3.2 Following the analysis of the consultation responses to SP11, T1 and T2 , insufficient evidence was put forward for a major change to be recommended to any of the above policies. These policies are still considered to be sound, however several minor changes are proposed as result of the consultation. These changes have been outlined in Appendix 2.

- 3.3 In addition to this a number of representors were seeking a greater level of detail on transport policies from the Core Strategy than the strategic level document is designed to provide. These have been signposted to the relevant supporting documents, principally Local Transport Plan 3.
- 3.4 SP11 - 'Transport Infrastructure and Investment Priorities'; consultation responses with regards to this policy were focussed on Public Transport and the Highway.
- Public transport responses from the surrounding district councils centred on rail, namely the electrification of the Harrogate Line and the Tram Train Link to Leeds Bradford International Airport.
 - Detailed representations were received from the Highways Agency with regard to the policies effect on the strategic road network.
- 3.5 T1 - 'Transport Management'; consultation responses with regard to this policy focussed on the Parking SPD and the Park and Ride Strategy.
- T1 was deemed unsound by a number of representors as the Parking Policy defers detailed matters to an SPD.
 - Metro and the Highways Agency provided detailed feedback on the Park and Ride Strategy.
- 3.6 T2 - 'Accessibility Requirements for New Developments'; consultation responses with regard to this policy focussed on developer contributions and the Community Infrastructure Levy and the inflexibility of the Accessibility Standards.
- A number of representations were received regarding the Community Infrastructure Levy and the negotiation of travel improvements through developer contributions. Representors outlined that obligations should be specific to the development.
 - Several representors felt that the Accessibility Standards should be modified to differentiate between main urban and other locations.
 - Concerns raised regarding the inflexibility of the Accessibility Standards with regards to Primary Health, with specific reference to the recent NHS reforms that have removed practice boundaries.

4.0 Corporate Considerations

As noted above, the Core Strategy, forms part of the Local Development Framework and once adopted will form part of the Development Plan for Leeds.

4.1 Consultation and Engagement

- 4.1.1 As outlined in this report, the Core Strategy Publication draft has been subject to a further 6 week period of consultation. This has been undertaken in accordance with the LDF Regulations and the City Council's adopted Statement of Community Involvement (SCI).

4.2 Equality and Diversity / Cohesion and Integration

- 4.2.1 An Equality Impact Assessment Screening was undertaken on the Core Strategy Publication draft, prior to consultation (see Core Strategy Executive Board Report, 10th February 2012). This concluded that equality, diversity, cohesion and integration issues had been embedded as part of the plan's preparation. For information and comment, the Screening assessment has also been made available as part of the supporting material for the Publication draft consultation. Within this overall context, it will be necessary to continue to have regard to equality and diversity issues, as part of the ongoing process of preparing the Core Strategy, including considering representations and next steps.

4.3 Council Policies and City Priorities

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

4.4 Resources and value for money

- 4.4.1 The DPD is being prepared within the context of the LDF Regulations, statutory requirements and within existing resources.

4.5 Legal Implications, Access to Information and Call In

- 4.5.1 The DPD is being prepared within the context of the LDF Regulations and statutory requirements. The DPD is a Budgetary and Policy Framework document and as such this report is exempt from call-in by Scrutiny.

4.6 Risk Management

- 4.6.1 The Core Strategy is being prepared within the context of the LDF Regulations and the need to reflect national planning guidance. The preparation of the plan within the context of ongoing national reform to the planning system and in responding to local issues and priorities, is a challenging process. Consequently, at the appropriate time advice is sought from a number of sources, including legal advice and advice from the Planning Advisory Service and the Planning Inspectorate, as a basis to help manage risk and to keep the process moving forward.

5. Conclusions

- 5.1 There is overall support for the general aspirations of SP11, T1 and T2. There are no recommended major changes, however, some minor changes have been recommended to strengthen SP11, T1 and T2 where appropriate.
- 5.2 Ongoing consultation is required with key stakeholders such as the Highways Agency and Metro, to ensure that the impacts of SP11 are mitigated where

necessary. This will be achieved through the scheme development process and the infrastructure delivery plan. Consultation is also needed with neighbouring districts as part of both the Local Transport Plan process and adoption of the Core Strategy.

6. Recommendations

6.1 Development Plan Panel is requested to:

i). Endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval.

7. Background documents¹

7.1 A substantial number of documents are available representing various stages in preparation of the DPD and the background evidence base and Equalities Impact Assessment Screening. These are all available on the City Council's web site (LDF Core Strategy Pages) web pages or by contacting David Feeney on 247 4539.

¹ The background documents listed in this section are available for inspection on request for a period of four years following the date of the relevant meeting. Accordingly this list does not include documents containing exempt or confidential information, or any published works. Requests to inspect any background documents should be submitted to the report author.

Appendix 1:

Core Strategy Publication Draft - Analysis of Consultation Responses
SP11 'Transport Infrastructure and Investment Priorities'

Representor/Agent	Representor Comments	LCC Initial Response	Action (i.e. 'No change.' to the Publication draft, or 'Proposed Change' to the Publication draft)
Template Developments. Harrogate Borough Council	<u>1.Support</u> <u>1a.General</u> Support overall aspirations of SP11.	Support is welcomed.	No change.
Leeds Bradford International Airport.	Support is given to SP11(ii).	Support is welcomed.	No change.
Templegate Developments.	<u>1b. Park and Ride</u> Support put forward for the park and ride strategy specifically with regards to the Aire Valley.	Support is welcomed.	No change.
Bradford Council Highways	<u>1c. Transport Infrastructure</u> Welcomes the recognition of the importance of infrastructure to serve new development within the areas identified under SP4 specifically the Leeds Bradford Corridor.	Support is welcomed.	No change.
Aspinall Verdi	Support is given to the Leeds City Centre Emerging Transport Strategy Map 11, secondary access routes across the southern part of the city Jack Lane/ Ninevah Road and Water Lane to Whitehall Road.	Support is welcomed.	No change.

Carter Jonas (The Diocese of Ripon and Leeds, The Bramham Park Estate, Lady Elizabeth Hastings Estate Charity, Meadowside Holdings, The Ledston Estate, The Hatfield Estate, AR Briggs and Co.)	Support in principle that transport infrastructure should keep up with and support economic growth. Proposals which increase the capacity of the transport network are supported as are demand management measures.	Support is welcomed.	No change.
Harrogate Borough Council. Highways Agency Metro. Mr Brian Berry Leeds Civic Trust	<p><u>2. SP 11 General</u></p> <p>Appropriate emphasis needs to be given to the importance of public transport movements between Leeds and Harrogate, as well as recognition that the highway has reached capacity. The progression of rail and bus options is vital.</p> <p>Does SP11(iii) include the strategic road network?</p> <p>Policy strengthening required for SP11(iv) to include walking.</p> <p>There is the assumption in SP11 that climate change is man made.</p> <p>The effectiveness of SP11 has been queried, given the details provided in LTP3 and IDP, the whole section unsound.</p>	<p>The importance of the links between Leeds and Harrogate are illustrated in Map 9, and outlined in SP11(i) 'Public transport improvements for bus and rail networks to increase radial route capacity to the city.'</p> <p>Yes. See minor change.</p> <p>Walking is included in SP11(v).</p> <p>Paragraph 5.5.30 outlines the national and local position with regards to climate change and gives details of the Leeds Climate Change Strategy.</p> <p>We consider SP11 to be sound. LTP3 provides the framework for local transport planning and delivery, and considers the transport needs of people, freight and businesses, as well as the impact of the transport system on residents, communities, organisations and the natural environment. It also takes into account relevant national, regional and local policies, priorities,</p>	<p>No change to SP11, but a new section on Duty to Cooperate will be provided in the Core Strategy</p> <p>Minor Change. SP11(iii) to include 'and the strategic road network'</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>

Leeds Civic Trust	There is no mention of importance of retaining character with regards to highways scheme or analysis of environmental impacts.	<p>strategies and plans, including land use planning.</p> <p>The strategy is designed to improve the four key themes of the journey: Transport Assets (such as the roads, traffic lights and bus stops that make up the network), Travel Choices (helping customers make the most sustainable choice about when and how they travel), Connectivity (providing an integrated, safe, reliable transport journey) and Enhancements (improving the overall system to provide more capacity for journeys in the future).</p> <p>Highway design is too detailed to be covered in the Core Strategy. The Council's 'Street Design Guide' which reflects the national guidance set out in Manual for Streets' outlines our commitment to 'innovative designs that are appropriate for the context character and location of a site'.</p> <p>The environmental impacts associated with transport are outlined in 4.9.7 of the Core Strategy as well as in LTP3, objective 2 and proposal 5.</p>	No change.
Issue	<u>3. A Well Connected District Maps</u>		
British Waterways.	The Towpath needs to be annotated to Map 11 to make the Core Strategy sound.	It is not accepted that the omission of the towpath from Map 11 makes the Core Strategy unsound. However the City Centre Transport Strategy is emerging, an updated map including the tow path will be included in future publication drafts.	Minor change. Updated City Centre Transport Strategy Map to be included.
Directors Planning.	The A660 between Leeds and Otley is not included on Map 9	The key diagram (SP11, Map 9) is a tool to give a spatial representation of the Core Strategy's Transport Policy. For the purposes of clarity all radial routes from the city centre have not been included, only those with associated improvements. New Generation Transport is the Major scheme proposal for the A660, this is detailed on this diagram	No change.
	<u>4. CIL</u>		

Directors Planning.	Infrastructure improvements that are brought forward in association with a development. These matters to be should addressed through a CIL charging schedule.	T2 (iii) refers to developer contributions and the introduction of a Community Infrastructure levy. CIL allocations have not yet been determined. Section 6.25 of the Core Strategy outlines details with regards to planning obligations and the community Infrastructure levy. The Council is currently preparing a CIL which it hopes to have adopted by 2014 at the latest.	No change.
Directors Planning.	<u>5. Cycling</u> Proposed amendment to SP11(iv) to include other cycle network improvements other than the Leeds Core Cycle Network (LCCN), specifically with regards to links between Otley and Harewood	The LCCN Phase 1 prioritises funding for 17 radial routes to increase accessibility to Leeds City Centre. Phase 2 of this will focus on increasing local connectivity. The Otley to Harewood route is included in Phase 2. This is a longer term aspiration which is currently unfunded. T2(ii) outlines the potential for developer contributions for cycle provision	No change.
Harrogate Borough Council	<u>6. Rail</u> Appropriate emphasis needs to be given to electrification of the rail link between Harrogate Knaresborough and York, and the associated provision of associated rolling stock. Tram Train (Phase 1 and Phase 2) on the key diagram and map 9 to be combined into one 'Electrification Phase'	The wider issue of electrification has been addressed in the Network RUS Electrification Strategy, published in May 2009, states that 'electrify Leeds to York via Harrogate, and convert Leeds to York via Harrogate service to electric traction'. The provision of additional rolling stock is outlined in the IDP, as well as local rail network electrification schemes of which further feasibility work is required. The supporting documents LTP3 and the Draft Rail Plan7, give further details of Harrogate line improvements. The draft Rail Plan7 includes the aspiration to electrify the line and provide modern trains, as well as the provision of Tram-Train from Leeds to LBIA. The Tram Train phase 1 and phase 2 on the key diagram and map 11 reflects the aspirations of the draft Rail Plan 7.	No change.

Bradford Metropolitan District Council	The key diagram should show the LBIA Tram Train Link utilising Wharfedale line via Shipley.	The draft Rail Plan7, forms part of LTP3 and is the strategy sets out West Yorkshires plans to improve rail travel for customers. The plan confirms that a future tram train link to LBIA would spur from the Harrogate Line.	No change.
Leeds Bradford International Airport.	The key diagram tram train link should be recognised as a long term proposal. In the shorter to medium term, expanding bus routes and frequency, should be the way forward.	The key diagram is a tool to give a spatial representation of the Core Strategy's Transport Policy. Broader timescales for infrastructure schemes are given in the IDP.	No change.
Gareth Brown.	Potential new stations have not been put forward as part of proposed electrification. Suggested new stations include Thorpe Park, Halton Dial, Elland Road, White Rose Centre. Support of Tram Train as the future mass public transport system for the city.	Any consideration of new stations needs to take account of the impact on existing services/capacity, together with the potential demand arising from the station. There are few locations where line capacity can be maintained without costly additional works to provide passing loops for express services. In addition, new stations within the urban area of Leeds would not provide much journey time advantage over buses or NGT.	No change.
Directors Planning.	Request to provide protection of railway lines for Otley station, where there is a long term aspiration to bring a station and railway line back.	At present there is no plan to bring Otley rail station back into use. The draft Rail Plan7, forms part of LTP3, and is the strategy that sets out West Yorkshires plans to improve rail travel for customers. The Pool to Otley disused railway is protected for use as a cycle track. This is detailed in the IDP.	No change.
Leeds Civic Trust.	<u>7. Public Transport</u> Paragraph 9.9.4 refers to 'Growth focused on city and town centres currently well served by Public Transport'. The statement is unsound especially for town centres off peak.	We consider this to be sound.	No change.
Metro.	Policy SP11(vii) includes major strategic and as well as local site mitigation infrastructure. Capacity on public transport network needs to be included as part of an assessment of	SP11(vii) covers both major and minor infrastructure. Bus and rail depots are too detailed to be covered within the Core Strategy, as schemes are developed these details can be	No change.

<p>Mr Cedric Wilks.</p> <p>Mr Brian Berry.</p>	<p>infrastructure requirements, including development sites for new bus and rail depots as well as park and ride sites.</p> <p>Policy strengthening required with regards to SP11(ix) to include transport provision for movements within the Aire Valley.</p> <p>Congestion will continue due to lack of funding for the Tramway. Examples of integrated transport include France and Germany.</p> <p>First Bus price increases have been above the rate of inflation. The use of buses to ease pressure on transport infrastructure need to be undertaken in conjunction with fare regulation..</p>	<p>included in the IDP.</p> <p>ix) 'within' to be included.</p> <p>SP11(i) Includes public transport investments and improvements in a rapid transit system (New Generation Transport), this supersedes Leeds' aspirations for Supertram. A 'Best and Final' funding bid was submitted in September 2011. Further work is being undertaken on the business case and a final decision is anticipated mid-2012. If this is granted the scheme could be operational by 2019.</p> <p>Within the current deregulated bus market LCC have no control over the provision or cost of bus services. Metro do provide financial support for evening and Sunday services, however, budgets are limited. Metro plans to introduce a Quality Contract Scheme or Partnership that would make Metro responsible for setting routes, fares, timetables and quality standards.</p>	<p>Minor change. ix) 'within' to be included.</p> <p>No change.</p> <p>No change.</p>
<p>Highways Agency</p>	<p><u>8. Park and Ride</u></p> <p>Concerns have been raised that the impact of Park and Ride on the network has not been thoroughly tested.</p>	<p>Leeds City Council are currently working with the Highways Agency and their consultants to access the impact of the Core Strategy on the Strategic Road Network. This work will provide a more detailed examination of the impacts than has been possible to date. The intention is to reach an agrees position on the impacts and agree appropriate mitigation where necessary.</p>	<p>No change.</p>
<p>Highways Agency</p>	<p><u>9. Highways</u></p> <p>Concerns raised regarding the operation of the M1 and M621, and the interaction with the</p>	<p>Leeds City Council are currently working with the Highways Agency and their consultants to assess</p>	<p>No change.</p>

	<p>primary road network. Concern over the lack of evidence on traffic impacts of the Core Strategy as a whole. The policy is unsound with regard to the axis of proposed development between Wakefield and Allerton Bywater, Rothwell and the Aire Valley and its affects on the M62/M1/M621. The HA will work with LCC and therefore can declare the policy sound in this respect.</p> <p>Map 11. Specific detailed comments on the emerging City Centre Transport Strategy, currently unsound.</p>	<p>the impacts of the proposed Core Strategy on the Strategic Road Network. This work will provide a more detailed examination of the impacts than has been possible to date. The intention is to reach an agreed position on the impacts and to agree appropriate mitigation where necessary.</p>	
Leeds Civic Trust.	<p>Map 9 shows the over emphasis on routes into Leeds City Centre and not in residential areas and town centres</p>	<p>Targeted highway schemes for residential areas and town centres are covered under SP11(iii).</p>	No change.
Mr Stuart Andrew.	<p>Apperley Bridge, Kirkstall Forge, and the Horsforth and Rodley roundabout schemes will only help with population growth. Given the proposed population growth in the plan, more needs to be done to outline how additional journeys will be coped with.</p>	<p>Accessibility is a key consideration when allocating new developments, so that the use of existing public transport corridors will be maximised where appropriate. The IDP provides more detail of the interventions.</p> <p>Individual developments will also be required to deliver infrastructure improvements in their immediate locality where appropriate. It is not practical to identify such interventions within the Core Strategy or Infrastructure Delivery Plan.</p> <p>In addition to this travel planning/smarter choices are likely to play a significant role in order to accommodate the level of growth envisaged in the Core Strategy.</p>	No change.
Directors Planning.	<p>It is expected that highways schemes, include the Otley link road and possibly a second</p>	<p>The East of Otley Relief Road Scheme is detailed in the IDP, and will be added to the Key Diagram.</p>	No change.

<p>ELE Northern Quadrant Consortium.</p> <p>Aspinall Verdi</p>	<p>bridge.</p> <p>Orbital Relief Road associated with ELE, appears in the Key Diagram but is not mentioned in SP11.</p> <p>Leeds City Centre Emerging Transport Strategy, Map 11, we would like to see a similar secondary access route around the back of pottery fields, bringing crown point retail park into the city. The proposal for a River Aire crossing between Criterion Place and the proposed city park should to be marked on Map 11.</p>	<p>The route is protected for a new road link between A659 and A660. Outline costs are not available, as it is likely that this scheme will be brought forward in the longer term or with associated developer funding.</p> <p>SP11(iii) highlights the importance of alleviating congestion and assisting improved connectivity for local and strategic orbital movements. The IDP includes details on East Leeds Orbital Road as part of the East Leeds Extension.</p> <p>A revised map is to be included showing a draft circulation system. The inclusion of a footbridge is too detailed for this map.</p>	<p>Minor change. East Leeds Orbital road to be added to Key Diagram.</p> <p>Minor change. Updated City Centre Transport Strategy Map to be included.</p>
<p>Leeds Civic Trust.</p> <p>Mr Brian Berry.</p> <p>Mr Keith Sharkey</p>	<p><u>10. Demand Management</u></p> <p>There is no reference to demand management, and/ or greater control of parking.</p> <p>The Transportation Strategy needs to look at parking spaces and widening roads that experience a lot of congestion at peak times</p> <p>Lack of commitment to address transport infrastructure and congestion by locality.</p>	<p>Demand management and parking control is covered in Policy T1 and cross referenced in SP11.</p> <p>The Councils Parking Strategy is outlined in T2. The Parking SPD will provide further details of this strategy.</p> <p>Road widening is not always a desired or viable option in terms of reducing congestion. SP11(iii) provides for targeted highway schemes to reduce congestion.</p> <p>SP11 is intended to give an overview of spatial priorities across the district. The IDP gives details of schemes both district wide and by area.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>

Policy No. T1 'Transport Management'

Representor/Agent	Representor Comments	LCC Initial Response	Action (i.e. ' <u>no change</u> ' to the Publication draft, or ' <u>Proposed Change</u> ' to the Publication draft)
<p>Morley Town Council.</p> <p>Carter Jonas, Meadow Holdings LTD, The Hatfield Estate, AR briggs and Co, The Diocese of Ripon and Leeds, The Bramham Park Estate, The Ledston Estate, Lady Elizabeth Hastings Estate.</p> <p>White Young Green Planning, Leeds Trinity University.</p> <p>Highways Agency.</p>	<p><u>1. Support</u></p> <p>Support for the Parking Strategy T1 (iii).</p> <p>Safe and efficient movement of people, goods and services, is fundamental to the sustained economic growth and wellbeing , measures which enhance and increase the capacity of local transport infrastructure are supported.</p> <p>Support is given to the principle of the Council providing support to encourage and incentivise sustainable travel choices.</p> <p>Supports is given to the proposed policy and will make practical contributions to the Influencing travel behaviour.</p>	<p>Support is welcomed.</p> <p>Support is welcomed.</p> <p>Support is welcomed.</p> <p>Support is welcomed.</p>	<p>No Change.</p> <p>No Change.</p> <p>No Change.</p> <p>No Change.</p>
	<p><u>2. Parking Policies</u></p> <p><u>2a. Parking SPD</u></p>		

Home Builders Federation, White Young Green Planning.	This policy is unsound as it defers detailed matters that may have cost implications to a Parking SPD.	Parking standards are too detailed to be contained within the Core Strategy. The parking standards will be expressed in the SPD as a maxima. The parking SPD is due for consultation in Autumn 2012, and will be published concurrently with the Core Strategy submission	No Change
Highways Agency, Metro.	<u>2b. Consultation Request</u> Request for consultation on Parking SPD	The Parking SPD is due to go out to formal consultation in Autumn 2012.	No Change
Mr Raymond Brooke.	<u>2c. Car parking concerns in locality</u> Car parking concerns in Garforth.	T1 sets out the broad strategy for parking policies across the city, with further details to be outlined in the Parking SPD. The Town and District Car Parking Strategies form part of this SPD. The Garforth Parking Strategy was approved in May 2012, and now forms a framework for future management of parking in the town centre.	No Change.
Metro.	<u>3. Park and Ride</u> Policy strengthening required with regards to Park and Ride iii(b). The policy should include the requirement for bus priority measures and consideration of revenue support implications.	It is not the role of the Core Strategy to specify in detail the components of specific interventions. It provides a broad policy which includes the measures to be taken forward. Specific scheme development will be undertaken in cooperation with Metro.	No change.
Metro.	<u>4. Demand Management</u> This policy does not have any reference to demand management as referenced in the LTP3. The Transport for Leeds work as outlined in the LTP should be incorporated.	While the actual phrase 'demand management' is not used, policy T1 contains the elements that are normally referred to as demand management. A cross reference to the LTP3 will be included.	Minor change - cross reference to LTP3 Proposal 11.
Mr Cedric Wilks.	A65 Guiseley requires traffic management due to traffic problems.	There is not a specific highway scheme intervention listed for the A65 within Guiseley. However improvements within the Northwest Area of Leeds Include, A65 Quality Bus Scheme, Horsforth Roundabout Improvements, within the Infrastructure Delivery Plan. T2 also highlights the importance of Information, Sustainable Travel Proposals and Parking Policies in managing congestion.	No change
	<u>5. Rail</u>		

Banks Development.	Support for the proposal to site railway stations within Leeds, with the recommendation that consideration also be given to the reintroduction at Mickletown.	<p>SP11 refers to support for new rail stations where appropriate. Any consideration of new stations needs to take account of the impact on existing services/capacity, together with the potential demand arising from the station. There are few locations where line capacity can be maintained without costly additional works to provide passing loops for express services. In addition, new stations within the urban area of Leeds would not provide much journey time advantage over buses or NGT.</p> <p>Draft Rail Plan7, forms part of LTP3 and is the strategy sets out West Yorkshire's plans to improve rail travel for customers and what we want to achieve. The reintroduction of a railway station at Mickeltown is not being considered as part of this plan.</p>	No change.
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Policy No. T2 Accessibility Requirements for New Developments'

Representor/Agent	Representor Comments	LCC Initial Response	Action (i.e. ' <u>no change</u> ' to the Publication draft, or ' <u>Proposed Change</u> ' to the Publication draft)
<p>British Waterways, Mr Raymond Brook, Hammerson UK.</p> <p>Carter Jonas, The Bramham Park Estate, Lady Elizabeth Hastings Estate Charity, The Hatfeild Estate, Meadowside Holdings Ltd, The Diocese of Ripon and</p>	<p><u>1. Support</u></p> <p>General support for Policy T2.</p> <p>Support the principle that development proposals should come forward in locations which are accessible or can be made accessible by a choice of transport modes.</p>	<p>Support is welcomed.</p> <p>Support is welcomed.</p>	<p>No Change.</p> <p>No Change.</p>

Leeds, The Ledston Estate, AR Briggs and Co.			
Highways Agency, Metro.	<p><u>2. Developer Contributions – Community Infrastructure Levy (CIL). T2(ii)</u></p> <p>Stakeholders should be partner to any future discussion on CIL and the allocation of CIL funds.</p>	<p>Section 6.25 of the Core Strategy outlines details with regards to planning obligations and the community Infrastructure levy. The Council is currently preparing a CIL which it hopes to have adopted by 2014 at the latest. The timescales for the adoption of CIL are not yet available but it is anticipated that consultation will take place with key partners as part of this process.</p>	No Change.
Home Builders Federation.	<p>Concern raised regarding the mandatory provision for travel Improvements through developer contributions from major developments.</p>	<p>Details of planning obligations and CIL process are as above. The criterion for development contributions are not mandatory. T2(ii) does not refers to major development but to developments in general. Policy T2 (ii) states that developer contributions may be required and will be secured where appropriate through section 106 agreements/ and or CIL'.</p>	No Change.
British Library.	<p>Concern raised regarding the negotiation of travel improvements through developer contributions, and that obligations are specific to the proposal in question.</p>	<p>CIL allocations have not been determined. Details of planning obligations and CIL process are as above</p>	No Change.
British Waterways.	<p>Where appropriate planning obligations secured from the development of sites within the canal corridor should be framed positively to benefit canal infrastructure.</p>	<p>T2 (ii) refers to improvements to transport provision.</p>	No Change.
Harrow Estates Via White Young Green planning.	<p><u>3. Accessibility Standards</u></p> <p><u>3a. Inflexibility/ Settlement Hierarchy</u> Paragraph 5.4.3 states that Accessibility Standards have been based on a RSS base. However they take no account of the settlement hierarchy. More onerous standards applied in the MUA should reduce to more appropriate standards for smaller settlements. The standards lack flexibility.</p>	<p>The Accessibility Standards have been developed to define the minimum standards that a new development will need to meet. The standards are set to ensure that all new developments occur in sustainable locations which are accessible to a range of key destinations.</p>	No Change

Hammerson UK.	The policy should allow flexibility for developments which accord with the principle with the Spatial Development Strategy and Spatial Policies. T2 should allow for exceptions to the criteria on a case by case basis.	As above.	No Change
McGregor Brothers Ltd.	Concerns raised regarding the inflexibility of the Accessibility Standards with regards to Primary Health, with specific reference to the recent NHS reforms that have removed practice boundaries.	It is accepted that patients may use public transport to access primary health care facilities. The accessibility standards will be modified to include 'within a 20 minute walk or a 5 minute walk to a bus stop offering a direct service at a 15 min frequency'.	Minor change 'or a 5 minute walk to a bus stop offering a direct service at a 15 min frequency'
Highways Agency.	<u>3b. Travel to Work Time</u> Travel to work time in the accessibility standards is ambitious, 30 mins for the main urban area (MUA) and 40 mins to employment in major settlements. Bus timetable indicate that journeys from some outer parts of the MUA into the city centre are in excess of 40 mins.	The travel to work times in the accessibility standards for the MUA and extensions to it refer to 'the population within a 30 min journey time to employment.' This stated journey time is not to the city centre, but to employment areas within the MUA.	No Change.
Metro.	<u>3c. LTP3 Alignment</u> The Accessibility Standards need to be aligned more closely with LTP3 and the use of Public Transport Accessibility Levels (PTAL) as well as accession assessments.	The Accessibility Standards have been developed to define the minimum standards that a new development will need to meet in order to ensure that development occurs in sustainable locations. PTAL is not sufficiently developed to replace the accessibility standards at this current time. It is also less transparent which is a significant drawback.	No Change.
Leeds Residential Property Forum	<u>4. T2(v) Parking Provision</u> Concern regarding the inclusion of this provision. Car parking standards should be expressed as a maxima not minima and should not discourage HMO accommodation.	Parking Standards will be expressed in the Parking SPD as a maxima. The Parking SPD is due for public consultation shortly, and will be published concurrently with the Core Strategy consultation responses.	No change.
Mr Raymond Brooke.	<u>5. Maintenance of Cyclepaths and Footways</u> Concerns regarding funding for ongoing maintenance as a result of provision from T2.	Maintenance is not covered in the Core Strategy. The LTP3 sets out further details with regards to maintenance of Cyclepaths and Footways.	No Change.

Appendix 2:

SPATIAL POLICY 11: TRANSPORT INFRASTRUCTURE INVESTMENT PRIORITIES

The delivery of an integrated transport strategy for Leeds will be supported, which includes a range of infrastructure improvements and other interventions in accordance with the objectives of West Yorkshire Local Transport Plan 3 and the Leeds City Region Transport Strategy (2009). The Infrastructure Delivery Plan and the Key Diagram give further details of the scope of these improvements/interventions. These infrastructure improvements/interventions are also supported by the demand management measures outlined in Policy T1.

Spatial Priorities

- (i) Public transport improvements for the bus and rail networks (including supporting the role of Leeds City Station, enhancing Leeds' role as a regional transport hub, and new rail stations where appropriate) and investment in a rapid transit system to increase radial route capacity to the city and town centres and to improve reliability together with investment in the provision of Park and Ride facilities;
- (ii) Surface access improvements to support growth of Leeds Bradford International Airport (see also Spatial Policy 12);
- (iii) Targeted highway schemes to alleviate congestion and assist improved connectivity for local and strategic orbital movements, *and the strategic road network*;
- (iv) Expansion of the Leeds Core Cycle Network to improve local connectivity;
- (v) Improved facilities for pedestrians to promote safety and accessibility, particularly connectivity between the 'Rim' and the City Centre;
- (vi) Measures to deliver safer roads;
- (vii) The provision of infrastructure to serve new development (including within regeneration areas defined in Spatial Policy 4 and urban extensions);
- (viii) Supporting the development of infrastructure for new low carbon technologies;
- (ix) Transport improvements to connect to and from *and within* the Aire Valley Leeds development area (see Spatial Policy 5);
- (x) Supporting High Speed Rail as a longer term intervention to serve Leeds and the wider City Region by providing a substantial enhancement to inter-city connectivity.
- (xi) Provision for people with impaired mobility to improve accessibility

Routes designated in the emerging transport strategy or programmed works will be protected from development. Current proposals are identified on the Key Diagram, the Leeds Transport Strategy map (Map 9) and saved UDP Policies.

POLICY T1: TRANSPORT MANAGEMENT

To complement the provision of new infrastructure *and Proposal 11 of the Local Transport Plan*, the Council will support the following management priorities:

- (i) Develop and provide tailored, interactive, readily available information and support that encourages and incentivises more sustainable travel choices on a regular basis.
- (ii) Sustainable travel proposals including travel planning measures for employers and schools. Further details are provided in the Travel Plan SPD and the Sustainable Education Travel Strategy.
- (iii) Parking policies controlling the use and supply of car parking across the city:
 - a) To ensure adequate parking for shoppers and visitors to support the health and vitality of the city and town centres.
 - b) Delivering strategic park and ride for the city which supports the City Centre vision and provides greater traveller choice.
 - c) To support wider transport strategy objectives for sustainable travel and to minimise congestion during peak periods.
 - d) Limiting the supply of commuter parking in areas of high public transport accessibility, such as the City Centre.

Further details will be provided in the Parking Policy SPD.

POLICY T2: ACCESSIBILITY REQUIREMENTS AND NEW DEVELOPMENT

New development should be located in accessible locations that are adequately served by existing or programmed highways, by public transport and with safe and secure access for pedestrians, cyclists and people with impaired mobility:

- (i) In locations where development is otherwise considered acceptable new infrastructure may be required on/off site to ensure that there is adequate provision for access from the highway network, by public transport and for cyclists, pedestrians and people with impaired mobility, which will not create or materially add to problems of safety, environment or efficiency on the highway network.
- (ii) Developer contributions may be required for, or towards, improvements to the off site highway and the strategic road network, and to pedestrian, cycle, and public transport provision. These will be secured where appropriate through Section 106 Agreements and/or the Community Infrastructure Levy, and by planning conditions.
- (iii) Significant trip generating sites will need to provide Transport Assessments/ Transport Statements in accordance with national guidance.
- (iv) Travel plans will be required to accompany planning applications in accordance with national thresholds and the Travel Plans SPD.
- (v) Parking provision will be required for cars, motorcycles and cycles in accordance with current guidelines.

See Appendix 2 for the specific accessibility standards to be used across Leeds.

ACCESSIBILITY STANDARDS

The Tables below show the accessibility standards for the principal development types in relation to the whole of the Core Strategy, and in particular to Policy T2, 'Accessibility Requirements and New Development'.

Table 1 - Accessibility Standards and Indicators for Employment and Social Infrastructure Uses

	Employment	Primary Health / Education	Secondary Health / Education	Leisure and Retail
Leeds Main Urban Area, major settlements, extensions to the Leeds MUA, and extensions to major settlements	Accessibility Standards			
	Offices to be located within 5 min walk to a bus stop offering a 15 min service frequency* to a major public transport interchange. Industrial and distribution / warehousing development to be located within 10 min walk of a bus stop.	Located within a 5 min walk of bus stop offering a 15 min service frequency*.	Located within 5 min walk of a bus stop offering a 15 min service frequency* to a major public transport interchange. In major settlement extensions, within 5 min walk of a bus stop / 10 min walk to a rail station and should ensure that arrival and departure of public transport services coincide with visiting hours / start and finish times.	Within 5 min walk of a bus stop offering a 15 min service frequency* to a major public transport interchange.
	Accessibility Indicators			
	In MUA and extensions to it, population within 30 min journey time. In extensions to major settlements, population within 40 min journey time.	In MUA, population within 20 min journey time. In extensions, population within 30 min journey time plus population within 20 min walk in major settlement extensions.	In MUA, population within 40 min journey time. In extensions, population within 60 min journey time.	Population within 30 min journey time.
Smaller settlements	Accessibility Standards			

and other rural areas	Within 5 min walk of a bus stop/ 10 min walk of a rail station. Ensure that arrival and departure of services coincide with work start and finish times.	Located within 10 min walk of a bus stop/ rail station. Ensure that arrival and departure of services coincide with appointments / start and finish times of schools.	Located within 10 min walk of a bus stop/ rail station. Ensure that arrival and departure of services coincide with visiting hours / start and finish times.	Located within 5 min walk of a bus stop offering 15 min service frequency* to a major public transport interchange.
	Accessibility Indicators			
	Population within 30 min journey time	Population within 40 min journey time.	Population within 60 min journey time.	Population within 30 min journey time.

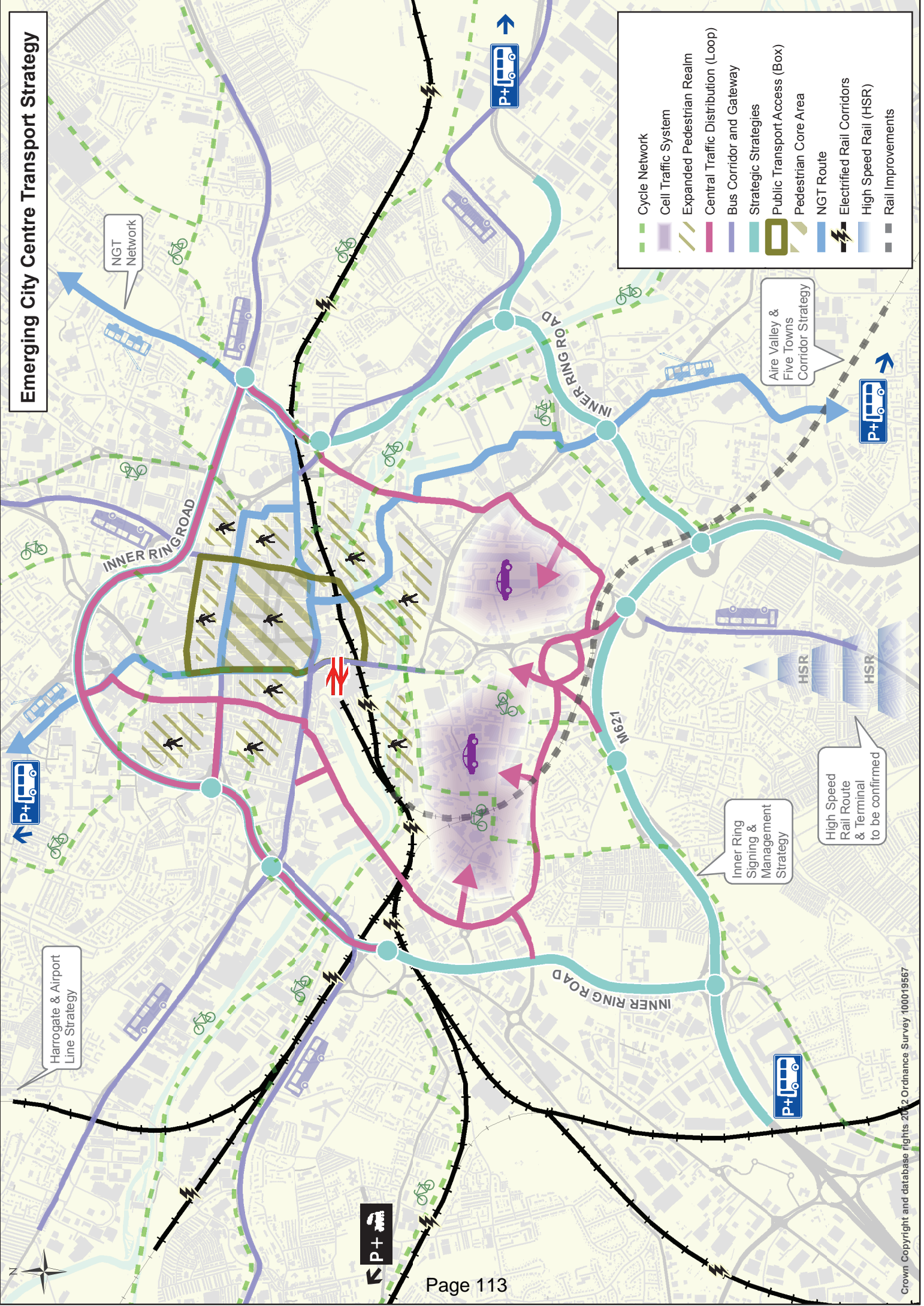
Table 2 - Accessibility Standards for Housing Developments in Leeds (5 dwellings or more)

	To Local Services	To Employment	To Primary Health / Education	To Secondary Education	To Town Centres/ City Centre
5 or more dwellings in all areas of Leeds District	Accessibility Standards				
	In MUA and extensions to it, within a 10 min walk. Elsewhere, within 15 min walk.	Within 5 min walk to a bus stop offering a 15 min service frequency* to a major public transport interchange.	Within a 20 min walk <i>or a 5 minute walk to a bus stop offering a direct service at a 15 min frequency.</i>	Within a 30 min direct walk or 5 min walk to a bus stop offering a 15 min service frequency* to a major public transport interchange.	Within a 5 min walk to a bus stop offering a direct 15 min frequency service*.
	Accessibility Indicators				
	In MUA and extensions to it, number/ size of facilities within 10 min walk. Elsewhere, within 15 min walk.	In MUA and extensions to it, number/size of facilities within 30 min journey time. Elsewhere, within 40 min journey time.	Number/size of facilities within 20 min walk.	Number/size of facilities within 30 min journey time.	Number/size of facilities within 30 min journey time.

Notes: Local services are defined as: small convenience shops, grocers, post offices, newsagents etc., Major public transport interchanges are defined as: the city centres of Leeds, Bradford and Wakefield, Walk times are based on a speed of 3 mph., All bus and rail frequencies relate to weekday daytime service levels.

* Or, where appropriate, 10 min walk to a rail station offering a 30 min frequency service.

Emerging City Centre Transport Strategy



- Cycle Network
- Cell Traffic System
- Expanded Pedestrian Realm
- Central Traffic Distribution (Loop)
- Bus Corridor and Gateway
- Strategic Strategies
- Public Transport Access (Box)
- Pedestrian Core Area
- NGT Route
- Electrified Rail Corridors
- High Speed Rail (HSR)
- Rail Improvements

NGT Network

Aire Valley & Five Towns Corridor Strategy

Harrogate & Airport Line Strategy

Inner Ring Signing & Management Strategy

High Speed Rail Route & Terminal to be confirmed

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