

## Appendix 5 City Council response to the comments made:

Theme	Main issues raised through consultation	How the issue has been addressed in the Preferred Options
<b>1a. General approach / Conformity with other plans, policies and programmes</b>	1. Has a sufficient range of alternatives been presented such as more limited growth or no growth of certain types of development?	Previous work undertaken by the consultants, GVA Grimley considered a wide range of alternative uses and some, such as major retail, were dismissed by the Council. The full consideration of Issues and then Alternative Options, the Sustainability Appraisal and other work such as the Employment Land Review have lead to the structure and scale of development in the Preferred
	2. Do the options presented conform with national and regional policy (RSS, PPS6, PPG13)?	The Preferred Options are consistent with National Policies and are in general conformity with RSS and has had proper regard to other relevant plan, polices and strategies.
	3. Is an approach which reallocates employment land for other uses consistent with AVL's regional role as an employment location e.g. in the RES?	The Aire Valley remains a key resource for employment land with the objective of creating around 29,000 jobs to serve both city wide and regional requirements.
	4. Should the AAP consider a wider mix of uses on major sites?	The plan includes a wide mix of uses. Not all uses are appropriate on all sites. The purpose of the plan is to indicate the most appropriate mix of uses.
	5. What does the AAP need to say in terms of delivery?	The Implementation & Delivery section sets out an indicative programme to deliver the necessary development and infrastructure.
	6. Has sufficient consultation taken place with key landowners and stakeholders?	Most landowners and stakeholders have been consulted and partnership working has been on going with many landowners. The consultation events have been widely publicised and will continue to be widely publicised to get as many landowners and stakeholders involved in preparation of the plan as possible
<b>1b. Infrastructure / Remediation / Knostrop WWTW</b>	1. Is the remediation of Knostrop necessary when the area can be developed for industrial / distribution uses without the need for remediation?	A study is underway to assess the implications of improvements to Knostrop. Further work will be needed to determine what works would be necessary to allow housing development in close proximity to Knostrop. Other land in Area 6 will require extensive remediation to facilitate any development and a study is underway to assess the implications of contamination and ground conditions, which will direct

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		a comprehensive remediation strategy for the area of the valley.
	2. How are accurate costs for infrastructure and remediation to be established?	In addition to the above, the council is working with landowners and English Partnerships to identify other areas of study where information on infrastructure and remediation costs will inform the content and delivery of the plan.
	3. Are accurate costs needed before appropriate land uses can be identified?	Considerable work has already been completed or is underway to determine these costs and this is being used to inform the land use allocations. Work in this area will continue during preparation of the plan.
	4. Is the evidence base there in terms of infrastructure / remediation costs to support the preferred option and draft plan?	As described above, continued work is needed on the evidence base to support the contents and proposals in the plan and to ensure the plan is deliverable.
	5. Is it realistic to expect an uplift in land value to pay for abnormal infrastructure costs? Is there an opportunity for public sector pump priming?	Where the uplift in land values is the output of investment in infrastructure then it seems reasonable that landowners/developers should contribute to that enabling or beneficial infrastructure. This is reflected in Table 7.1 of the Preferred Options Report. The opportunity for public sector investment, including pump priming will be fully explored.
<b>2a. General Employment issues</b>	1. What are the employment land requirements generated by firms needing to relocate from other sites/premises in Leeds e.g. where they are displaced through redevelopment for other uses and are these accounted for?	The Employment Land Review takes on board such needs and these are reflected in the level of employment land provision.
	2. Will the chance that land could be developed for higher value uses in the future delay implementation of employment generating developments?	The proposed implementation programme allows for an adequate supply of employment land throughout the plan period. Key employment sites on the ELLR frontage will be available for development in line with the opening of the road
	3. How can the AAP support the Leeds Growth Area business clusters approach? What land supply does this require? Does the plan need to be restrictive in terms of what employment uses are permitted on some sites in order	Business clusters are encouraged by Preferred Option 1C and even though no sites have specifically been allocated for such a purpose, a wide range of sites are available.

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	to support clusters?	
	4. Should waterside locations be targeted for technology/knowledge-based industry which would benefit from an enhanced working environment?	Sites are promoted for Research & Development use, in waterside locations (Areas 2C and 2B).
	5. What can the AAP do to ensure that local people have the necessary skills to have access to new jobs being created in the area?	Section 7.5 of the preferred option report explains how this issue will be addressed.
<b>2b. Offices</b>	1. Should the AAP adopt the PPS6 sequential approach by ruling out further office development on sites located outside the City Centre boundary (where it does not already have planning permission)?	PPS6 is national guidance which must be a material consideration in allocating any sites. Preferred Option 3 B) iii allows for further limited office development based on a defined set of area specific criteria.
	2. Should exceptions to the sequential approach be allowed using a criteria-based approach?	See above
	3. If so, what criteria are relevant?	See above
	4. To what extent will office development help to make public transport more viable? Are restrictions on car use also necessary?	Public transport is vital to the successful regeneration of AVL and the number of employees who utilise the service is important. To this end office development has been identified as a use that can support the provision of high quality and frequent public transport services. Preferred Option 4D refers to transport policy measures under consideration to achieve a higher modal share for non-car modes of travel, including the use of demand management measures.
	5. Should office development be excluded from sites located in flood risk zones?	The implications of the emerging Strategic Flood Risk Assessment (SFRA) for Leeds and PPS25 need to be fully considered. PPS25 considers offices to be a “less vulnerable use” and they would be acceptable in flood risk zones provided they meet appropriate levels of mitigation.
	6. How can the plan ensure that office developments will not have an adverse impact on listed buildings e.g. in the Fearn’s Island area and Temple Newsam?	Preferred Option 7 (7Bvii) makes reference to the need for development to preserve and enhance historic buildings and areas and their setting and the plan will include policies to require this.
	7. Is there potential for more office development on Skelton	The Preferred Options propose a mixed use development of housing

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	Business Park?	and offices on the site which is likely to reduce the office floorspace developed on the site compared to the existing planning consent. This is considered to have greater regeneration benefits than a larger office development on the site.
<b>2c. Industry / Distribution</b>	1. What impact will AVL allocations for industry/distribution have in terms of providing a balanced portfolio of sites in Leeds?	The sites allocated and retained for industry/warehousing are prime sites. The larger sites along the ELLR and smaller sites in established industrial areas will ensure a quality portfolio of sites for such uses.
	2. Is there unsatisfied demand for industrial sites in Leeds which needs to be catered for in AVL?	The Employment Land Review examined the need for industrial uses, including latent demand.
	3. How will existing B2/B8 consents be reconciled with aspirations for introducing alternative uses?	The AAP cannot stop landowners implementing an existing consent but in expressing the wider vision for the area, it can indicate alternatives, which carry sufficient weight and merit to delay such premature implementation and allow further consideration of the potential uses which may have a more beneficial impact on the regeneration of the area.
<b>2d. Housing</b>	1. What is the appropriate level of housing provision to provide maximum opportunity for local people without a negative impact on nearby low demand areas?	A local Housing Market Assessment (HMA) was carried out and this concluded there would be little adverse impact on local housing markets. The emerging district wide HMA will influence the type and scale of housing proposed in AVL.
	2. Which locations are most suitable to ensure good access by sustainable transport modes e.g. cycling, walking and public transport?	The most suitable locations are alongside public transport corridors and close to transport nodes or interchange. A comprehensive network of paths and cycle routes are proposed to improve access in general and specifically to improve access to jobs and the waterfront.
	3. How can the AAP best ensure that residential development is supported by good local facilities and services? What scale of provision is required?	A Social Infrastructure Framework (SIF) will be prepared for each new self contained residential community based on accessibility to services and local needs. This will ensure the appropriate scale of provision. The general requirement for local facilities to support residential development is set out in Preferred Option 2.
	4. Should new housing be located close to the motorway? What impacts will this have in terms of commuting	The motorway and other environmental issues need to be addressed in any housing proposals. A transport assessment will assess the impact

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	patterns, congestion and air quality? Is Skelton Business Park a suitable location in this context?	of any development proposals.
	5. Is student accommodation an appropriate land use for AVL, particularly for Areas 1, 2 and 4/6?	The emerging HMA will help the Council consider potentially appropriate locations for student accommodation.
	6. Is housing viable in AVL and can it deliver the higher values needed bearing in mind remediation and new infrastructure requirements?	The delivery model will examine land values and infrastructure costs and help determine what may be viable and what may need subsidy.
	7. What impact would a competing major residential scheme have on the delivery of the EASEL proposals?	A local Housing Market Assessment (HMA) was carried out and this concluded there would be little adverse impact on local housing markets. Development of sites in EASEL will soon be underway and phasing of residential development sites in AVL will assist in the release of general market housing.
	8. Is it appropriate for the AAP to promote new housing allocations ahead of existing commitments and allocations and in advance of a Core Strategy Sustainability Appraisal which will identify and test strategic options?	The AVLAAP can only consider development within its own boundaries and ensure that the mix of development is the most appropriate to deliver its sustainable regeneration. Ideally this would follow from, and be informed by the Core Strategy. However, the existing housing commitments identified in the Leeds UDP Review 2006 are unlikely to be affected given the higher housing provision targets identified in the emerging RSS.
	9. Is 4,000 dwellings an appropriate minimum threshold for major housing development? Can a lower number be justified within a mixed use urban extension with employment and leisure uses?	A Social Infrastructure Framework (SIF) will be proposed for each new community based on accessibility and local needs. This will ensure the appropriate scale of provision and help identify thresholds.
	10. Are residential allocations in flood risk areas appropriate and if so under what circumstances?	Residential development should be avoided in high flood risk areas; however PPS25 recognises that this may heavily compromise the viability of communities and includes an “exceptions test” which needs to be satisfied. This includes the need to demonstrate that: “the development provides wider sustainability benefits to the community that outweigh flood risk...”. The plan outlines the sustainability benefits which will be derived from including housing in the range of

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		uses.
	11. How will the biodiversity implications of new housing development be taken into account?	PPS9 and the Council's Biodiversity and Waterfront Development SPD provide advice on incorporating biodiversity into planning policies and documents. The next stage of plan preparation will draft detailed policies particular to development in AVL.
	12. How will affordable housing issues be addressed?	The Council's SPD and the emerging HMA will provide advice on the levels of affordable housing that are appropriate for Leeds and the AAP will need to consider how this applies to this area and to the proposed new communities.
	13. What consideration needs to be given to land for gypsies and travellers?	The need to provide sites for gypsies and travellers is being considered through the Regional Spatial Strategy and a sub regional assessment which is likely to be available in April 2008.
	14. Are waterside locations suitable for high quality, high density housing?	Waterside locations can provide a suitable location for high quality and high density housing but other land uses (also of high quality) are also appropriate in such locations. Please refer to Waterfront Strategy (SPG21).
<b>2e. Leisure</b>	1. What are the implications of PPS6 and PPG13 for out-of-centre major leisure development? Are these facilities better located in or on the edge of the City Centre? Would an out-of-centre site undermine the City Centre?	In principle major leisure facilities should be located in centre or on its edge, however, if the facility is of a type or scale which cannot be accommodated in the centre, then a sequential test will need to identify a suitable site.
	2. Should leisure uses on a regional or sub-regional scale be accommodated in AVL?	See above
	3. Is there a role for a mixed use area with cinemas, restaurants, bars and cafes in the area?	See above. Some uses, such as a bar, cafe or restaurant which add life and vitality to the waterfront for example will be encouraged in appropriate locations providing the scale and the number of such uses is also appropriate.
<b>2f. Recreation</b>	1. What opportunities are there for creating a new riverside park?	Riverside park/s are proposed (see character area 2B.1 and 6D.2)
	2. How can the AAP reconcile biodiversity and riverside access issues?	Careful consideration in line with guidance both national (PPS9) and local (Waterfront Biodiversity SPD and SPG 21) needs to be given to

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		protect environmental aspects but also to open up public access to enjoy such locations and the natural environment.
	3. Should the AAP be encouraging immersion sports bearing in mind the River Aire is not a designated bathing water?	Further investigations are required before putting forward such a policy.
	4. Should the river corridor be designated as part of a strategic green corridor network?	There is obvious scope to extend green infrastructure into the valley, particularly from Skelton Lake and the other wetlands (1000ha managed by RSPB) further down stream to the south east.
<b>2g. Waste Management</b>	1. Are there potential synergies between a Sustainable Energy Plant and existing and potential AVL businesses?	Such synergies need to be fully explored and could add to the sustainability of the development of AVL.
	2. Which location would be suitable for a SERP and how do they relate proposals for alternative uses such as housing?	No specific site has been identified but the potential of AVL to accommodate such a facility has been recognised.
<b>2h. Retail</b>	1. What scale of new retail provision is appropriate? In what circumstances would there be a need to designate new centres and where are these best located?	New centres will form the focus for the provision of a Social Infrastructure Framework (SIF) within new housing communities and the scale will be appropriate to the scale of that housing or the local community it seeks to serve.
<b>3. Transport issues</b>	1. Should development be limited to what the existing/improved network can accommodate?	Such a restriction would not allow all the existing employment land to be developed or to create the number of new jobs identified in the Community Plan (Vision for Leeds). The preferred options seek to make the best use of the existing network by providing and promoting more sustainable modes of transport.
	2. How can the AAP maximise access by sustainable modes of transport? Should the AAP set a target for modal share?	A target for modal share has been identified. Increasing access to sustainable modes of transport is essential to optimising development potential.
	3. How can the AAP ensure that public transport alignments are maximised e.g. through the location of high trip generating developments?	The selection of alignments must consider potential patronage as part of a viability assessment.
	4. Are demand management measures required and if so what?	Demand management is advocated, however the details are not yet determined.
	5. What does the AAP need to say about M1 widening?	This does not form part of any current Highway Agency proposal.

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	6. Should a site/s be allocated for a Park & Ride facility?	2 P&R sites are proposed at J7 of the M621 and J45 of the M1.
	7. To what extent will capacity constraints on the rail network impact on proposals for new railway stations?	Railway capacity is an important factor and further work is needed by BR to firm up any proposals.
	8. What connections are required to surrounding residential communities?	Connections to EASEL and to the south are vital to improve access to jobs, by sustainable modes of transport.
	9. What potential is there for using the canal to transport freight?	There is potential, BWB have plans to open up a new inland dock near Skelton Grange Bridge
<b>4b. Area 2 (Hunslet Riverside)</b>	1. What are appropriate uses for the Hunslet East (EWS) site – industry or mixed use development (residential, offices, leisure, cultural uses)?	Mixed use development is proposed, including housing, light industry, freight and a linear park. Research & Development use is encouraged.
<b>4c. Area 5 (Skelton Business Park)</b>	1. Is SBP an appropriate location for mixed use development, including residential?	The mixed use proposal, will include residential, social infrastructure, P& R and public transport links to enhance it as a sustainable development location.
	2. Is SBP PPG3 compliant as a location for new housing?	Any housing proposal must address the issues within PPS3.
	3. Is SBP an appropriate location for a Park & Ride facility and a terminus for a High Quality Public Transport link?	An initial study indicated a P&R at J45 in combination with a high quality public transport link (rapid transit) would be appropriate in this location.
	4. What are the implications of the existing landfill site adjacent to SBP?	The licence for this operation and its restoration are due for completion in 2012. Any proposals on SBP must take full cognisance of some controlled gas emissions.
<b>4d. Other locations</b>	1. Can Thwaite Mills and the surrounding area become a focus for expanded leisure/educational activity along the river corridor?	The plan proposes to improve the existing situation and does advocate this area as a recreational focus.
<b>5a. AAP boundary</b>	1. What are the implications of overlapping boundaries between the AVL and CCAAPs?	The overlap has been removed (see preferred options para 3.2)
<b>5b. Environmental issues</b>	1. How should the AAP take account of flood risk issues, particularly the sequential test and the vulnerability of each land use?	The Plan must have due regard to the emerging SRFA (May 07) & PPS25 and consider its application and what exceptions may be appropriate.
	2. How should the AAP reconcile biodiversity interest with development?	Careful consideration in line with guidance both national (PPS9) and local (Waterfront Biodiversity SPD) needs to be given to protect



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		environmental aspects.
<b>5c. Health issues</b>	1. What can the AAP do to decrease negative health impacts?	The SA addresses the impact on health and makes recommendations.
<b>5d. River corridor</b>	1. Should the AAP encourage mixed use development along the waterfront?	Mixed use development is proposed in such locations, as this has the potential to be a quality area to live, work and enjoy recreation.
	2. How can access to and use of the waterway be improved?	Access along both banks of the waterways is proposed in the Plan and the Waterfront Strategy (SPG21). The AAP also promotes an extensive and comprehensive network (including several new bridges) of path and cycle routes (and bridleways), throughout the valley and connections to the surrounding communities.
	3. How can the AAP ensure there is access along the waterfront for pedestrians and cyclists?	See above
<b>5e. Urban design issues</b>	1. How can the AAP promote high quality design and a sense of place in AVL?	A Draft Design Strategy has been produced and is being used to encourage and foster a high quality design led approach.