



Core Strategy Selective Review

Leeds Local Plan

Report of Consultation

Submission Draft

Development Plan Document

June 2018

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1 Introduction

- 1.1 This document summarises the process involved in preparing and conducting consultation on the Core Strategy Selective Review (“the Plan”). It also provides a summary of the outcomes of the consultation, and how they informed subsequent stages in the Plan’s preparation process.
- 1.2 In accordance with regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, this includes providing details of;
- which bodies and persons the local planning authority invited to make representations under regulation 18,
 - how those bodies and persons were invited to make representations under regulation 18,
 - a summary of the main issues raised by the representations made pursuant to regulation 18,
 - how any representations made pursuant to regulation 18 have been taken into account; and
 - the number of representations made pursuant to regulation 20 and a summary of the main issues raised in those representations.
- 1.3 It should be emphasised also, that an integral part of the City Council’s engagement and consultation process has been the Duty to Cooperate. In reflecting legal requirements and compliance, the City Council’s approach to the Duty to Co-operate is set out in a separate Background Paper, which needs to be read in conjunction to the Report of Consultation.
- 1.4 The Plan preparation commenced in 2016 as a stand alone Development Plan Document for introducing the nationally described space standards and optional access standards for new housing. Consultation took place on the scope of the initial DPD in the summer of 2016 (Regulation 18), but it was subsequently agreed by the Council’s Executive Board (8th February 2017) to undertake a wider selective review of the Core Strategy, which included a need to update other elements, including the housing requirement. The revised scope of the Core Strategy Selective Review incorporated the housing standards work. Formal agreement to undertake the CSSR was resolved by the Council’s Executive Board of 8th February 2017.

2 Consultation Principles

- 2.1 The City Council adopted its Statement of Community Involvement (SCI) in 2007. The SCI sets out the Council’s approach for involving the community in the preparation and revision of Local Development Documents and planning applications. It outlines how the community can get involved in the planning process and how the Council will facilitate this involvement. The main methods of community engagement are outlined in the SCI, including a list of key consultation structures and organisations in Leeds which the Council

consults on in the preparation of plans. It also includes a list of community and stakeholder groups to be consulted as minimum requirements under the planning regulations.

2.2 In 2012, the Government implemented changes to planning legislation as part of its modernising planning agenda. The Town and Country Planning (Local Planning) (England) Regulations 2012 came into force on 6th April 2012. The 2012 regulations revoked the Town and Country Planning (Local Development) (England) Regulations 2004 and any subsequent amendments. These changes in legislation simplified and streamlined the local plan document preparation process. In addition, the 'Duty to Cooperate' was introduced via primary legislation. This reduced the separate stages of front loading through public consultation. Whilst the SCI precedes these changes, the approach it sets out in relation to how the community and stakeholder groups will be engaged in the plan making process remains relevant. The SCI is detailed in the Council's Local Development Scheme as being subject of review and update. This process is underway (delayed due to other priority plan making activities) and a revised SCI will be prepared during 2018.

2.3 In accordance with the SCI, and consultation good practice, the following principles were used to guide consultation on the CSSR throughout the plan preparation process:

- Empower local people to participate in the Plan;
- Recognise the diversity of Leeds and make sure everyone who may be affected is encouraged to have their say, this includes reaching out to people we may not have heard from in the past and holding events at accessible times and locations;
- Make sure the consultation promotes good community relations and positive feelings about the future of Leeds and the planning process;
- Clear communications that will keep people informed at all stages of the process, making information easy to access and understand;
- Make use of existing planned events, meetings and other opportunities to communicate;
- Consultation material will be relevant and interesting to those who will be affected by the Plan;
- Exceed the minimum legal requirements for involving people and making sure we follow the Councils Statement of Community Involvement.

3 Summary of Consultation Activity

Housing Standards Development Plan Document

3.1 Consultation on housing standards took place between 13th June 2016 and

28th July 2016 on the scope of a stand-alone plan to introduce the nationally described space standards and optional access standards for new housing. A webpage was created setting out proposals and a leaflet was designed and circulated to raise awareness. Notifications were sent to over 800 people and organisations and an article in Planning magazine of 15th June 2016 also raised awareness among the profession.

- 3.2 Officers undertook a number of meetings about the proposals with particular interest groups, including groups representing older people and disabled people and regeneration officers and the Home Builders Federation. **Appendix 1** provides further details of consultation held on the DPP to include who was consulted and consultation material.

Participation in preparation of the Strategic Housing Market Assessment 2017

- 3.3 As a key part of the evidence base for the Plan the Council were keen to ensure that a wider range of interest groups and individuals helped influence and agree Leeds' Strategic Housing Market Assessment (SHMA).
- 3.4 Arc4 consultancy was commissioned to prepare the SHMA in January 2017. It took 6 months to prepare the main document. The preparation process included engagement with a "Reference Group" comprising a range of local interested housing parties. In setting up the Group invitations were sent out to around 60 people with local housing interests including neighbouring local authorities, registered providers, landlords and estate agents, house builders, older people, community interests, city councillors and officers of related council services (economic policy, adult social care, children's services, intelligence/strategy, housing, regeneration and health). The make-up of the group of 30 people and the topics and conclusions of Reference Group meetings are set out at **Appendix 2**
- 3.5 The first meeting took place on 27th February 2017 where the proposed methodology was explained, questions answered and contacts established for future work. Further details are set out in **Appendix 2**.
- 3.6 The second meeting of the Reference Group took place 13th July 2017 to present the interim findings of the SHMA which covered the housing requirement, affordable housing, and types of housing need in different areas. Questions were replied to. A note of these is provided at **Appendix 3**.

Consultation on the scope of the Plan (Regulation 18) - Summer 2017

- 3.7 This consultation took place from Monday 19th June to 31st July 2017 and invited the public to comment on the proposed scope of the Plan.
- 3.8 In terms of consultation material, a CSSR "Scope and Content" document was made available setting out the proposed areas for review, reasons, evidence and alternatives considered. This was supported by a Statement of Representation (**Appendix 4.01**), newspaper advertisement (**Appendix 4.02**) and response form (**Appendix 4.03**). The consultation material comprised the

following documents:

- Leeds Core Strategy Selective Review – Scope and Content, June 2017
- Evidence for Core Strategy Selective Review – Scope and Content, June 2017
- Sustainability Appraisal Scoping Report – Scope and Content, June 2017
- Statement of Representation – Scope and Content, June 2017
- Report to Executive Board, 8 February 2017 (agree the initial scope of the review)

3.9 The consultation was publicised by sending out notification emails and letters to over 800 individuals and organisations on the Council's Core Strategy database (i.e. those who had commented on the adopted Core Strategy as well as all statutory consultees and neighbouring local authorities). These are listed in **Appendix 4.05**. The Council's libraries and one-stop-shops were used as reference points and a web-page was created with information and viewable / downloadable documents. The Council also held a widely advertised "drop-in-session" at the centrally located Civic Hall for people to ask questions and find out more about the Plan.

Consultation on Publication Draft CSSR (Regulation 19) February to March 2018

3.10 Public consultation took place between Friday 9th February and Friday 23rd March 2018 inviting the public to comment on proposed policy and paragraph changes to the adopted Core Strategy and on various supporting documents. The consultation material comprised the following documents:

- Proposed Policy and Paragraph Changes, Publication Draft Plan, February 2018
- Sustainability Appraisal, Publication Draft Plan, February 2018
- Sustainability Appraisal Non-Technical Summary, Publication Draft Plan, February 2018
- Strategic Housing Market Assessment, 2017
- Private Rented Market in Leeds, 2017
- Demographic Analysis & Forecasts, 2017
- Economic Viability Study Update, 2018
- Review of Implementation of Green Space Policy G4, 2017
- Permitted Dwelling Size Measurement Exercise, 2017
- Accessible Housing Need Assessment 2018
- RIBA Case for Space 2011
- DCLG Housing Standards Review – Cost Impacts, EC Harris 2014
- Review of Changes to EN1 and EN2 following Written Ministerial Statement 2015
- Air Quality Background Paper, Publication Draft Plan, February 2018

- Duty to Cooperate, table of Impacts 2018, Publication Draft Plan, February 2018
- Appropriate Assessment Screening, Publication Draft Plan, February 2018
- Statement of Representations, Publication Draft Plan, February 2018
- Response Form, Publication Draft Plan, February 2018
- Guidance Note

3.11 Notification emails and letters were sent to over 1,000 individuals and organisations – those on the Council’s database plus an additional number of new consultees from the scoping stage of the CSSR. All statutory consultees and neighbouring local authorities were notified. The Council’s libraries and one-stop-shops were used as reference points and a web-page was created with information and viewable / downloadable documents. The Council also held “drop-in-sessions” at the centrally located Civic Hall for people to ask questions and find out more about the Plan. .

Summary of Responses Received to Regulation 18 Consultation - Summer 2017

3.12 69 responses were received to the Regulation 18 consultation on the Core Strategy Selective Review. A full summary of the responses is set out in **Appendix 6**. These are ordered by policy area and additional areas proposed for review.

3.13 In summary community respondents agreed with reviewing the housing requirement but not extending the plan to 2033; they considered a reduced housing requirement as an opportunity to reconsider the need for Green Belt and green field housing sites proposed in the Submission draft Site Allocations Plan. The housing industry respondents considered the review of the housing requirement premature and stressed that the assessment should have regard to the economic growth aspirations of Leeds and be robustly conducted. They were also concerned about the viability of housing development with changes to affordable housing requirements, onerous greenspace requirements and new requirements for dwellings to meet space and access standards. Suggestions for additional areas of review included employment and retail needs up to 2033, and reviewing need for community infrastructure.

3.14 All responses were analysed and assessed by officers and helped support the drafting of proposed submission draft policies. A Summary of Core Strategy Selective Review Regulation 18 Consultation, responses received at and how they were taken into account is included at **Appendix 6**.

Summary of Responses Received to Regulation 20 Consultation (Feb-March 2018)

3.15 Over 200 respondents submitted duly made representations on the proposed Submission Draft policies of the Plan (also referred to as the “Publication Draft”). The majority of responses were made to Policies SP6 and SP7 concerning the housing requirement and distribution. This included a standard letter signed by approximately 83 people concerned about housing numbers

and green belt release in the Aireborough area of Leeds. A good proportion of responses were from the development industry and from organisations representing particular interests. A number of parish councils and neighbourhood forums also put in representations. A summary of issues raised by policy area is set out in **Appendix 8**. The section below deals with the detailed issues raised in the representations and Leeds City Council's response to them.

- 3.16 In numerical terms, representations received at Regulation 19 stage are set out below. The number of representations relates to specific points made within each of those issues. The table sets out whether issues and representations were Objections, Supports or Neutral.

POLICY	SP6	SP7	H5	H9	H10	G4	G5	G6	EN1	EN2	EN4	EN8	Total
Reps	328	112	128	115	151	122	6	4	30	24	2	40	1,062
Object	299	95	119	104	132	91	4	2	24	21	2	33	926
Support	29	17	9	11	16	28	2	2	5	3	0	7	129
Neutral	0	0	0	0	3	3	0	0	1	0	0	0	7

Detailed Assessment of Representations Received to Regulation 20 and LCC Responses

The Housing Requirement for 2017 – 2033 – Policy SP6

- 3.17 328 individual representations on this matter have been received. 299 objecting to the policy and 29 supporting it.
- 3.18 The consultation responses follow three themes: first, some local people and community groups are supportive of the lowering of the CS figure; second, object on the basis that the lowest figure should have been used (a standard letter from 83 residents in Aireborough follows this theme); third, housebuilders suggest the figure is too low, fails to have regard to the job growth scenarios of the Leeds Growth Strategy and ignores the higher growth scenarios of the SHMA 2017 without justification. The allowances for windfall development, empty homes and demolitions are also questioned.
- 3.19 In response, the approach taken is derived from the SHMA, has been objectively assessed and is in line with national guidance and scores comparatively more favourably when assessed against wider policy objectives in the sustainability appraisal. The approach takes the household projections as a starting point and reflects the District's role within the wider City Region and ambitions for job growth providing a level of realistic uplift so as to ensure that Leeds provides sufficient homes to match estimated jobs and address affordable housing needs. This aligns with the spatial strategy in the CS and the distribution of homes throughout Leeds.
- 3.20 Nonetheless it is recognised that much concern of local people stems from previous targets set in an upward economic cycle and delivery subsequently affected by a downturn. To that end, the publication draft policy is amended by the addition in the Submission draft Plan of a further paragraph at 4.6.6 .

This seeks to ensure that the Council is not subjected to blunt and generic penalties in national guidance around land supply that have no bearing on the effects of wider macro-economic events on the local housing market, local circumstances and the attitudes of house builders.

- 3.21 Regarding the proposed plan period for housing supply of 2017 – 2033 some residents felt that this was a deliberate attempt to obscure and confuse the public over the calculation of the housing requirement and its alignment with the Site Allocations Plan (SAP). They suggested the period of 2012 – 2028 should be retained, or at least dwelling requirements calculated for 2012-28 and 2028-33. In response, the officers are of the view, and Development Plan Panel endorsed, that the approach is in line with national guidance and any other plan period would not be sound as the NPPF advocates that plans are for a minimum of 15 years. Notwithstanding this the Council has addressed the broader point by taking specific steps to ensure that the overlapping plan periods of CSSR and SAP are complementary and not detrimental to the Green Belt (as paragraph 2.8 explains).

Housing Distribution – Policy SP7

- 3.22 112 representations on this matter have been received. 95 objecting to the policy and 17 supporting it.
- 3.23 Calls for the HMCAs to be revised have been considered because some consider that there are anomalies in the boundaries between areas. Due to the HMCAs being inextricably linked with the SAP and the wider evidence base, amendments are neither desirable nor technically beneficial to the Plan. Some resident and community responses claim that there is no case to build on Green Belt with a lower housing requirement and that the distribution should be varied to reflect this factor. In such a circumstance the agreed spatial strategy of the Adopted CS would not be addressed and local needs would fail to be met locally. Moreover, pressure would be placed on a city centre and inner area which is already taking a significant proportion of housing, with consequent implications for infrastructure. In contrast, the development industry felt there needs to be a wide distribution of housing land supply in different housing markets in order to optimise overall delivery of housing. The Council agrees and is satisfied that the framework of the Adopted CS, SAP and CSSR will deliver this objective.
- 3.24 It is also suggested that the HMCA percentages lack evidence of delivery, and there are concerns from developers about deliverability and achievability of the targets given that the City Centre, Inner and East HMCAs account for nearly 50% of the distribution. The inference being that relatively low market areas would find it harder to build more homes. This is a familiar criticism from some landowners and parts of the housebuilding industry, keen to see more greenfield and Green Belt release in Leeds. Monitoring reveals that this is not the case and in 2016/17, 46% of all new homes completed were in the City Centre, Inner and East Leeds HMCAs, in line with the CS indicative target of 48% and forecast to continue on the basis of: i) planning permissions granted in these areas, ii) the front loading of specific projects such as the East Leeds Extension and South Bank proposals and iii) the Council's regeneration

interventions on brownfield land throughout these HMCAs e.g. Council House Building Programme, Housing Investment Land Strategy, and Private Sector Acceleration Programme. Moreover, the EVS supports a continued focus of development in these areas.

- 3.25 The proposal to delete the aspect of Policy SP7 which related to the settlement hierarchy, on the basis that they are now unnecessary and duplicate Policy SP1, has met with very limited representation.

Affordable housing – Policy H5

- 3.26 128 representations on this matter have been received. 119 objecting to the policy and 9 supporting.
- 3.27 Responses from the local community raised concerns about the non-affordable remainder of dwellings on a site being accessible to middle income households. The Council acknowledges that planning policy can only do so much in the delivery of affordable housing and that policies on the matter are limited by the viability tests sets out in Government guidance. In addition, there are other routes for the provision of affordable housing and in Leeds over the past 5 years of the 2,002 affordable homes built 25% are from planning permissions; the remainder are from HCA, Registered provider and City Council programmes. Moreover, the housing mix policies of the CS seek to ensure a greater delivery of 1-bed and 2-bed homes, which in general can be more affordable market options. The spatial strategy of the CS (remaining unchanged by the CSSR) aims to deliver a balanced spread of housing opportunities through all market areas but with a focus on the City Centre and Inner areas. It was also noted from a handful of representors, that on-site delivery should be the priority. There may be occasions where off site provision is the most appropriate solution given the individual circumstances and the Council would not want to restrict flexibility in this regard.
- 3.28 Housebuilders have objected to the increase in the proportion of affordable housing sought in the City Centre and Inner areas. They claim that it has the propensity to affect investment decisions on new housing schemes in the City Centre, and is without evidential foundation. They also point to viability issues raised in the EVS about Zone 2. This approach of housebuilders reflects a misunderstanding of the methodology of the EVS. The Council is confident that the modest increases are justified by the SHMA and the EVS and reflect evidence of improving markets, which in turn allow for greater numbers of much needed affordable homes in the City Centre and Inner areas.
- 3.29 Build-to-rent developers have objected to the affordable housing requirements for build-to-rent in Policy H5. It is suggested that the 20% national target is not applicable locally unless it is viability tested, which Leeds have not done. The Council contend that the policy offers flexibility to follow two options both of which have been viability tested; one using the Council's affordable housing policy targets and thresholds (including for social rented and intermediate housing); the other being the commuted sum equivalent. The national guidance option may be viable in certain instances subject to local assessment.

Housing Standards (i) Nationally Described Space Standards – Policy H9

- 3.30 115 representations on this matter have been received. 104 objecting to the policy and 11 supporting.
- 3.31 Housebuilders have contended that the Council has not demonstrated a need for the policy approach and that they have no evidence that housing is not of sufficient quality to meet needs. They also note that the policy will affect their ability to provide smaller dwellings. In response the Council maintains that it is imperative for meeting wider BCP objectives that the general health and wellbeing benefits that accrue from living in well-designed homes are needed in Leeds. The Council recognises that better space standards offer a multitude of both privacy and sociability benefits which new residents in Leeds should be entitled to share. These include: impacts on family life; the opportunity for children to engage in uninterrupted private study, which increases educational attainment and also applies to adults working from home, thus ensuring a better work-life balance and less pressure on transport infrastructure; the importance of adaptability to changing needs and lifestyles and physical requirements.
- 3.32 There were also concerns raised that space standards will impact and inhibit capacities of sites. This is not the case and the changes to the greenspace policy taken together with the proposals to increase dwelling sizes do not create lower densities or stymie delivery of dwellings.

Housing Standards (ii) Accessible Housing Standards – Policy H10

- 3.33 151 representations on this matter have been received. 132 objecting to the policy and 16 supporting.
- 3.34 The main concern raised was from housebuilders about the need for the policy and the viability of the proposals. They also contended that the policy should only apply to specific geographical areas. The Council considers that the aging population in Leeds creates a pressing need for the design and delivery of new homes which are accessible. The EVS has justified that the policy is viable. The Council is of the view that needs for accessible dwellings be met throughout all areas.
- 3.35 Some consider that the policy is hard to comprehend. In response the Council has revised the policy wording and supporting paragraphs to make them clearer.

Green Space – Policy G4, G5 and G6

- 3.36 132 representations on this matter have been received. 97 objecting to the policy, 32 supporting and 3 Neutral.
- 3.37 Concern was raised from housebuilders that the policy is not viable and that the EVS does not explicitly consider the approach by bedroom. The Council confirms that this is not the case and the EVS has appropriately justified the policy.

Climate Change Reduction - Policies EN1, EN2

- 3.38 54 representations on this matter have been received. 45 objecting to the policy and 8 supporting it and 1 neutral.
- 3.39 Developers and housebuilders have raised concerns that the policy is too onerous and will render schemes unviable. They also consider that the policy goes beyond what national guidance envisages. The Council wishes to see quality extended to all aspects of new development including as it relates to climate change adaptation and mitigation and the policy is considered to be justified in meeting these objectives in a manner which has been shown to raise no viability issues for developers (in the EVS). The additional requirements are further evidenced in a new background paper on water consumption (available on the Councils web-site).

Electric Vehicle Charging Infrastructure – Policy EN8

- 3.40 40 representations on this matter have been received. 33 objecting to the policy and 7 supporting.
- 3.41 The main comment received related to the viability of installing electric vehicle charging and a concern that the Council requires significantly more expensive “fast-charge” points. This is not the case and the Council considers that up front infrastructure costs are minimal as has been set out in the EVS. One representor expressed concern that developers of flats could avoid the provision of charging points by not dedicating spaces to dwellings. The Council has recognised this and amended the policy to address that issue.

3.42 Extending the Plan Period

Regarding the proposed plan period change to 2017-2033 some residents have raised concerns that this is confusing and that the 2012-2028 should be retained.

Viability Assessment

- 3.43 A significant number of comments on the matters above relate specifically to concerns about viability of development. To be compliant with national guidance local planning authorities need to ensure that plan policies do not render schemes unviable. GVA, the consultants who authored the EVS, were sent all representations relating to viability; to consider whether they raised any soundness issues for the evidence base. It is considered that the submission draft policies remain viable and are deliverable at a strategic plan level and therefore do not need to be amended on that basis. Setting policies which are viable at a strategic level to willing landowners and developers at the plan making stage is a fundamental desire of Government to provide clarity for investors and speed up of decision making at the planning application stage.

Further Representations on Matters Not Covered by the CSSR

3.44 Representations were also received on the following matters that are not within the scope of the CSSR:

- Review the need for employment land up to 2033
- Review strategic Green Belt
- Review green, social and community infrastructure to support communities where housing growth is proposed
- Review transport infrastructure and transport priorities
- Review of housing site release policy H1 and housing mix policy H4.

3.45 This is a selective review of the Core Strategy and focuses on specific policy areas which are in need of review at this time. However it is also recognised that a more comprehensive review will be required in the future which addresses all wider policy areas given the Core Strategy was adopted in November 2014. Local planning authorities must review and update as necessary policies in their Local Plans every 5 years.

Reference Table of Representations and Representor

3.46 **Appendix 8** sets out in detail the issues raised through the consultation process, who made them¹ and how they have been taken into account.

Leeds Site Allocations Plan

3.47 Throughout the preparation of the Plan the Council has been highly aware of the interrelationship between the Core Strategy Selective Review and the advanced Site Allocations Plan. The Site Allocations Plan has had the following chronology:

- Initial Submission Draft Site Allocations Plan – May 2017
- Stage 1 hearing sessions (employment, retail, greenspace, Gypsies and Travellers and Travelling Showpeople) – October 2017
- Revised Submission Draft Site Allocations Plan – March 2018
- Stage 2 hearing sessions (housing) – July 2018

3.48 A Local Plan newsletter has been produced and updated (**Appendix 9**) which explains the complementary but distinct relationship between the Adopted Core Strategy, the Site Allocations Plan and the Core Strategy Selective Review. Furthermore, following concerns from local resident groups at a Development Plan Panel meeting in 2017 a specific meeting was arranged to provide clarity to local resident groups on the complementary nature of the SAP and CSSR. Minutes of the meeting are at **Appendix 10**.

1

4 Conclusion

- 4.1 This report sets out the activities and approach to consultation on the Core Strategy Selective Review. The activities and consideration given to responses received are considered by the Council to fully comply with Regulations 18 and 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Appendix 1. Consultation on the Regulation 18 Stage of the Housing Standards Development Plan Document

Introduction

Part 1 of this paper summarises what consultation activity was undertaken to advertise, notify and elicit opinion on the City Council's proposals for adopting the nationally described space standards and optional standards for accessible dwellings. Part 2 also sets out a summary of consultation responses received.

A formal 6 week period of consultation took place between 13th June 2016 and 28th July 2016, but wider engagement took place outside of these dates.

Part 1: Consultation Activity

The consultation activity undertaken divides into two categories: i) notification and awareness raising and ii) meetings with particular interest groups to explore and scope the issues.

Notifications and Awareness Raising

- i. Webpage. A webpage was added to Leeds City Council's website explaining the intention of the Plan to adopt the optional standards in relation to minimum internal space and accessibility, and setting out how and when people could comment, as well as the proposed timetable for preparing the Plan (see appendix 1.01)
- ii. PDF Leaflet. A leaflet was designed using the standard Leeds City Council LDF livery to catch attention. This was available on line, and circulated at meetings and with notification emails and letters (see appendix 1.02).
- iii. Notifications. Emails and letters were sent to over 800 people and organisations who had been involved in consultation on other planning documents including statutory consultees, councillors, MP/MEPs, businesses, housebuilders, agencies, media outlets, education bodies, planning consultants, environmental organisations, Aire Valley Leeds stakeholders, libraries and one-stop-shops and Town and Parish Councils.
- iv. Planning Magazine Article. An item was included in the 15th June 2016 edition of Planning Resource Magazine (see appendix 1.03).

Meetings with Interest Groups

Officers met with groups considered to have particular interest in the application of the national housing standards, including groups who represent occupiers likely to benefit from dwellings designed to minimum size and access standards, officers involved with area regeneration in Leeds and house builders who will have to adapt their building models to comply with the standards.

- i. Meeting with Leeds Older Persons Forum 13/5/16. Officers explained how the standards can only be introduced through a development plan process subject to examining impact on deliverability of dwellings, viability and need. Questions were raised around the nature of the viability study, need for bungalows and the potential to set minimum percentages of accessible dwellings. Subsequently, officers provided the Housing Standards Plan PDF leaflet for the forum to circulate to all its members (See appendix 1.04)
- ii. Meeting with the Access and Use-Ability Group 11/5/16. Officers explained how the standards can only be introduced through a development plan process subject to examining impact on deliverability of dwellings, viability and need; that Leeds is one of the first Local Authorities pursuing this. The Group welcomed the

initiative and commented that they would like to continue to be involved with the preparation process (See appendix 1.05).

- iii. Meeting with LCC Regeneration Officers 25/5/16. Officers explained the strands of evidence gathering underway to inform the plan preparation. Questions concerned whether separate minimum percentages of M4(2) and M4(3) dwellings are needed for affordable housing? It was suggested that consultation needs to include Registered Providers and LCC as a landowner. (See Appendix1.06).
- iv. Meeting with Home Builders Federation 5/7/16. HBF representatives were familiar with the national space standards. Planning officers explained the timetable for introduction. Leeds' Access Officer explained more about the standards for accessible dwellings. Issues raise included:
 - a. Application of the standards in Leeds before policy adoption
 - b. Need for recognition that the policy could impact differently on different housing market areas
 - c. Concern about impact on affordability and viability including the impact of LCC's greenspace requirements
 - d. Need for a transition period to enable house builders to adapt their house types
 - e. The HBs research into customer satisfaction already reveals 63% satisfaction with internal layouts of new homes – is the policy really needed?
 - f. Need for consultation with specialist providers of retirement accommodation such as McCarthy and Stone

Appendix 1.01 Webpage for Housing Standards Development Plan Document

Consultation – Housing Standards Development Plan Document (DPD)

Housing Standards Development Plan Document

In 2015 the Government published as part of the Housing Standards Review, nationally described space standards and introduced new accessibility standards for dwellings. The Council's aspirations include growth and quality of housing and the Council has committed to prepare a Development Plan Document (DPD) which will allow the national standards to be applied to new housing development in Leeds.

Housing Standards Review

The National Housing Standards Review sets out optional standards in relation to minimum internal space requirements and accessible housing. National Planning Guidance is clear that these standards can only be progressed through the Local Plan process and require justification of need and viability before they can be adopted.

Current Consultation

The early consultation is primarily concerned with identifying the key issues facing Leeds and preparing evidence of need and viability for the Housing Standards DPD. This Plan seeks to introduce internal design standards for minimum size of dwellings and accessible housing. It is hoped that this initial consultation will encourage debate and identify further issues and options, view [early consultation flyer](#).

How to comment

The Plan is subject to formal public consultation for 6 weeks from **23rd June 2016 until 28th July 2016**

You are invited to respond in the following way:

By Email: LDF@leeds.gov.uk or alternatively by

Post: Housing Standards DPD, Plans and Policies Group, The Leonardo Building, 2 Rossington Street, Leeds, LS2 8HD.

Next Steps

The comments received as part of this consultation will inform the preparation of a Publication Draft Housing Standards DPD. There will be a further opportunity to comment during a formal public consultation period later this year. The broad production timetable is outlined below.

The Plan will be subject to Examination by an independent planning inspector who will adjudicate on whether it is "sound". This means checking that it has been prepared in the proper way, justified in terms of evidence, effective and consistent with national policy. In particular, the Inspector will need to judge if there is a need to introduce the standards and the effect on viability of housing development, taking into account all planning policy requirements.

Timetable

The broad timetable for preparing the Plan is as follows:

- i Evidence gathering, scoping and early consultation: Spring 2016
- ii Drafting the Plan for Publication: Summer 2016
- iii Formal public consultation (6 weeks) and assessment of comments: Autumn 2016
- iv Submission with any necessary modifications: Winter 2016/17
- v Examination: Summer 2017
- vi Adoption Summer/Autumn 2017(subject to receipt of Inspector's report)

If you have any questions about the Plan please contact us at: ldf@leeds.gov.uk

Housing Standards Development Plan document

This Plan will introduce internal design standards for new houses and apartments. Decisions on planning applications will have to take account of the new standards on:
i) **minimum size of dwellings** ii) **accessible housing**

The Council intends to formally consult on the plan in the **Autumn 2016**. There is expected to be a public examination in **Spring 2017**.

During Spring – Summer 2016 the Council is preparing evidence of need and viability and is talking to people, groups and organisations with a particular interest.



to be involved please contact:

Robin Coghlan 0113 247 8131 robin.coghlan@leeds.gov.uk

Nasreen Yunis 0113 247 8133 nasreen.yunis@leeds.gov.uk

Rachel Smalley 0113 247 8102 rachel.smalley@leeds.gov.uk



Council to consult on new space standards

15 June 2016 by Jamie Carpenter, Be the First to Comment

Leeds City Council has launched a consultation on plans for a development plan document (DPD) that would seek to introduce internal design standards for new houses and apartments, including on the minimum size of dwellings.



Leeds: council to consult on internal space standards

An early consultation, which runs until 28 July, is primarily concerned with identifying key issues facing Leeds and preparing evidence of need and viability for the housing standards DPD, the council said.

A council document said that decisions on planning applications would have to take account of the new standards on minimum size of dwellings and accessible housing.

The consultation follows the publication last year of the government's national housing standards review, which sets out optional standards in relation to minimum internal space requirements and accessible housing.

Planning practice guidance says that, where a local planning authority wishes to require an internal space standard, they should only do so by reference in their local plan to the nationally described space standard.

The standards include a minimum gross internal floor area and built-in storage area of 84 square metres for a three-bedroom, two-storey home.

Housing Standards Plan – Early Engagement

Meeting with Leeds Older Peoples Forum 13/05/2016

Present:

Robin Coghlan	LCC Planning Policy
Nasreen Yunis	LCC Planning Policy
Rachel Smalley	LCC Access Officer
	Representative from Leeds Older Persons Forum (LOPF)
	Representative from Leeds Older Persons Forum

What is the Housing Standards Plan?

Robin explained that the plan aims to introduce i) housing space standards and ii) housing access standards, in line with Government planning policy guidance.

Nasreen explained that local authorities can only introduce the full set of space standards described by the Government; they cannot introduce a partial or varied set of standards. Authorities have to demonstrate a need and show that housing development will remain viable.

Rachel explained the access standards. Previously there were 43 different access standards; different local authorities applied them differently. Hence, the Government replaced all these with a new set of optional standards. Three categories are specified:

- M4i “Visitable Dwellings” provide a baseline standard. It requires a downstairs loo, and higher positioned sockets
- M4ii “Accessible and Adoptable Standard” is roughly equivalent to “Lifetime Homes”. It requires level access, which means that upper floor flats require a lift, and requires larger loos and door widths. Useable for wheelchair users on a temporary basis. Adaptability means good widths and that toilet walls are reinforces for grab rails.
- M4iii “Wheelchair User Dwellings” which split into two sub-categories of “Adaptable” and “Accessible”. Market housing should be wheelchair adaptable so that all the equipment can be easily added if / when needed. Wheelchair accessible housing is only appropriate when wheelchair users are to take up occupation immediately, including local authority allocations.

Nasreen explained the timescales: Collation of the evidence of need and viability during Spring – Summer 2016. Publication of the plan in Autumn 2016 with a 6 week consultation period to follow. Submission of the plan for examination in public in Spring 2017 and adoption in Summer 2017.

Robin provided LOPF with summary leaflets of what the Housing Standards Plan is about.

Questions from LOPF

- Q. Will the viability study be commissioned externally?
- A. Yes, it needs professional expertise, to accord with RICS codes of practice and be robust enough for examination
- Q. Can the plan require bungalows? There is a tremendous demand for bungalows.
- A. The M4 ii and iii standards apply to all forms of housing. Housing doesn't have to be in bungalow form to be accessible. Bungalows take up land inefficiently, so would impact on viability. Therefore, a greater number of accessible dwellings can be provided as houses or flats than as bungalows.
- Q. Would the optional accessibility standards be introduced as minimum percentages?
- A. Yes. The percentages would be based on need and viability. The need evidence will take account of the aging population and trends of health conditions. Input will be sought from Public Health services.

**Access and Use-Ability Group (AUAG) Meeting
Wednesday 11 May 2016
Civic Hall, Room 4**

Present

Independent Chair, Leeds Involving People
Representative from Leeds Deaforum
Representative from Disability Hub
Representative from Disability Hub
Representative representing disabled young people
Rachel Smalley – Access Officer, City Development
Nasreen Yunis – Principle Planner, City Development
Alice Fox – Communities Team

Apologies

Representative from Leeds Deaforum
Representative from Leeds Deaforum
Representative representing disabled young people
Representative from Moortown Primary School

1.0 Welcome and introductions

1.1 Chair welcomed everyone and introductions and apologies were made.

2.0 Matters Arising

2.1 The minutes were agreed to be an accurate account.

3.0 Supplementary Planning Guidance (SPG) – Rachel Smalley

4.0 Optional Housing Standards Development Plan - Nasreen Yunis

4.1 Nasreen explained that she works with the Forward Planning Implementation Team. She gave a brief introduction to the Optional Housing Standards Review.

In March 2015, the government set out a new approach to housing standards, the aim of simplifying standards as different local authorities have different approaches. The government is clear on what local authorities can and cannot do. We can look at minimum space for new build and also accessible housing only.

Leeds would like to adopt these national housing standards, and in order to do so, must demonstrate that there is a need for it. For example, we need to highlight if there a problem in Leeds where houses are too small, and demonstrate viability.

Nasreen explained that a government inspector has the final decision about if Leeds' proposal is robust. A report went to the Executive Board on 20 April and it was agreed to progress putting together a housing standards document. Nasreen will lead on the minimum space section and Rachel Smalley will lead on the access component.

They are aiming to have a draft plan by the end of the summer, and there will be a 6 week statutory public consultation in the autumn. Further modifications to the document will be made by the end of 2016, and the council will undergo an Examination in spring 2017 with adoption in summer 2017.

The AUAG agreed that they would like to be involved with this programme.

4.2 Nasreen said that they are currently undertaking the needs assessment. The government is very prescriptive and have set minimum space requirements. Leeds has the option of either adopting government standards or no standard at all. This is seen as a positive initiative for Leeds and we are ahead of most local authorities. Not all local authorities are adopting it.

4.3 Rachel explained that the accessible housing standards consist of 1 baseline standard and 2 optional standards. The baseline standard is mandatory and quite poor regarding access, for example, it does not enforce level access, or downstairs toilets etc.

The 2 optional standards are much better:

- Category 2 housing is very similar to the old lifetime homes standard. It is not designed for fulltime wheelchair users, but is relevant to households where wheelchair users visit, and to those with some mobility restrictions.
- Category 3 is aimed at wheelchair user dwellings that is either fully wheelchair accessible, or easily adaptable for wheelchair users.

Both Category 2 and 3 are easier and cheaper to adapt. All accessible housing standards can only apply to new build dwellings, and are not applicable to old buildings that are being converted into flats.

Rachel made it clear that the council has to deliver within the confines of what the government prescribe.

4.4

Representative from Disability Hub said that he is confident that a good piece of work will be delivered. It is always good to have external independent support and there should be a partnership between them all. Nasreen stated that it's about the quality of housing.

Representative from Disability Hub asked if some information can be circulated about the programme.

<p>Action: Rachel and Nasreen to provide a summary of the Optional Housing Standards. They will come back to the AUAG with the pre-public consultation in September.</p>

5.0 Greek Street site visit – Alice Fox

6.0 Review of Terms of Reference

7.0 Any Other Business

7.1 None

Next Meetings

Wednesday 15 June, 1-3pm, Room 1, Civic Hall – this meeting will focus on simplified spaces

Thursday 30 June, 5.30pm-6.30pm – site visit to Greek Street to view the layout that applies on Thursday, Friday evenings and at weekends.

Housing Standards Plan – Early Engagement

Meeting with Regeneration / Housing Growth officers 25/05/2016

Present:

Robin Coghlan	LCC Planning Policy
Adam Brannen	LCC Regeneration
Maggie Gjessing	LCC Regeneration
Mark Mills	LCC Regeneration
Sarah May	LCC Regeneration
Martin Blackett	LCC Asset Management

What further evidence is needed to support the Housing Standards Plan?

Robin explained the strands of evidence gathering underway, i) viability, ii) measuring performance of permitted dwellings against NDSS, iii) effects on site design and capacity. A further strand would be understanding impact on housing affordability, particularly with regard to marginal housing markets where household affordability is limited.

It is accepted that the other evidence will help understand affordability and viability in marginal housing markets, but we could go further. One avenue would be to explore opinion of house builders known to work in marginal areas; Strata, Keepmoat and Gleeson were cited.

Other matters covered:

- What are other LAs doing? Only London has introduced Housing Standards so far.
- What is the evidence for requiring 30% M4(2) and 3% M4(3) dwellings? And is there a case for a tenure split between market and social housing?

Who else needs to be consulted?

- LCC as a house builder / land owner
- Registered Providers – Maggie and Sarah will advise best way to involve RPs

Next steps

Robin agreed to set out proposals for involving house builders, perhaps with structured questions, so that responses can be formally recorded as a piece of evidence

Leeds Housing Standards DPD Meeting with the HBF: Regulation 18 Consultation, 5th July 2016

Present:

Robin Coghlan (RC), Nasreen Yunis (NY), Daniel Golland (DG), Rachel Smalley (RS) - Leeds City Council (LCC)

Simon Grundy (SG) - WYG, interest in floorspace standards and student accommodation

Matthew Good (MG) - Home Builders Federation

Mark Jones (MJ) - Barratt Homes

CURRENT WEIGHT GIVEN TO PLANNING APPLICATIONS

SG raised concerns about space standards policy being applied to planning applications currently. Immediate application means effect of policy cannot be taken into account in land purchases. Not enough strong advice being given to Members. RC said we would pass on concerns to Steve Butler. There is inconsistency between panels and therefore produces uncertainty, which may be deterring investment. Issue has been raised in HBF letter of 7th March. The HBF welcome the introduction of DPD to provide certainty, but needs some intervention to help understand the current weight given to the standards. Hopefully LCC can reply soon.

STUDENT HOUSING

SG highlighted a concern about impact on student housing. SG states that an average scheme generally proposes studios at 28sqm. LCC members believe that there is an oversupply of student housing, however this ignores the shifting patterns of students from HMOs to central PBSA, and PBSA is releasing existing HMOs back to residential property. Westfield Road application has three standards – bronze, silver and gold standard. RC enquired about satisfactory surveys for student accommodation. SG said he would explore this. RC brought up the issue about interchange of student occupation and general market occupation. SG referenced the Kirkstall Design Centre application where size standards were a significant factor in the appeal decision.

CURRENT MARKET

MG stated that the market is in flux due to the decision to leave the EU, and the space standards may have a critical effect on any certainty. SG stated that there is a concern about land supply and any viability testing needs to be holistic.

TIMETABLE

The proposed timetable by NY was:

- Reg 18 formal 6 week period - 13th June to the 28th July
- Approval of document for formal 6 week consultation.
- Submission winter 2016-17
- Adoption Summer 2017

APPLICATION OF ACCESS STANDARDS

RS provided an overview of the M4(1), M4(2) and M4(3) standards. M4(2) is similar to lifetime homes (BS9266) but slightly less onerous. M4(3) divides into “adaptable” and “accessible”. The latter has to be kitted out with all equipment, and needs to be in dwellings that are to be allocated to wheelchair user households. There are however a lot of implementation issues e.g conversion of existing buildings, overlap of building regulations and planning. The FAQs in Ms document are also being changed.

GENERAL DISCUSSION ON SPACE STANDARDS

There is considerable concern about the impact of policy on different housing market areas. SG notes that development industry agrees there is a need for quality housing, but not at expense of non-delivery.

MJ brought up the RIBA surveys that asked lots of questions about housing standards, but may have ignored the issue of price in people’s preferences. Affordability has to be key. The size standards may limit choice, particularly at lower end of the market. There is also the impact of greenspace requirements. MJ states that there is a need for a transitional period and that it should be built in to adopted policy. House builders need time to adjust their house types, e.g. Barretts has 300 house types. MJ states that any post adoption transition period needs to be at least 12 months.

MJ highlighted that an independent Customer Satisfaction survey was taken by the HBF. The results state that 63% are very satisfied with the internal layout of their new home. The results also showed evidence that residents are satisfied with current levels of storage.

National Guidance footnotes were added in May 2016.

Regarding Greenspace Policy, SG mentioned that Hilltop Works has had issues with G4, however there was a pragmatic solution. However, generally a 80sqm/dwelling requirement does not work for high density housing schemes.

Regarding elderly person accommodation, there will probably be an impact on specialist providers. Therefore there is an agreed need for consultation with McCarthy & Stone.

Appendix 2. Leeds SHMA 2017 – Reference Group Meeting 27th February 2017

Note of Questions and Answers

Output 1: New dwellings needed in Leeds	
1. Should the SHMA be using data sources other than Zoopla to understand the rented housing market?	Yes, including stakeholder interviews and follow-up of additional sources.
2. Clarify the time period for the SHMA?	1 st April 2017 – 31 st March 2033 in line with NPPF
3. Will the housing needs of full time students and people needing residential care be accounted for in the Objectively Assessed Need of the SHMA?	Yes in so far as they generate a need and in line with PPG
4. Reliability of projections in a context of Brexit. Should we be testing previous projections?	The reliability of projections inevitably diminishes the further ahead the projection is looking. Therefore, whilst a 20 year projection will hold good for the first 5 years, the need for review will increase thereafter. Will test implications of Brexit on international migration assumptions.
5. Is loss of housing stock to AirBnB a problem in Leeds?	Known to be a problem in London. The SHMA will seek to understand the quantity of second homes, but outright loss of dwellings to holiday accommodation is not thought to be an issue in Leeds. An initial search reveals that there are currently 51 properties for let for total occupancy on Air BNB.
6. Straightening out existing HMCA boundaries?	The HMCAs have been adopted in the Core Strategy, used in the Site Allocations Plan and have been largely accepted. However, one of the tasks of the SHMA is to review whether new evidence is strong enough to change the boundaries. There kinks in the detailed boundary are because they follow census output area boundaries, which would be problematic to iron out without losing continuity of statistical analysis.
7. Could the same scenarios used in the 2011 SHMA be repeated?	Yes. Broadly the same steps will be taken, but the effects could be different because of new circumstances. It will be difficult to compare a “like for like” OAN between 2017 and 2011.
8. Can the proposed use of assumptions be floated for comment, for example whether to use a 5 or 10 year historic trend?	LCC will highlight and share with the Reference Group the key areas where assumptions will need to be taken. Such assumptions will be driven by evidence, including past trends and market indicators We would expect the “right” assumption to be chosen in appropriate circumstances. The SHMA should set out justifications. However, the formation of the Reference

	Group with email connection provides potential to seek views on assumption options if there is a choice.
9. Will account be taken of environmental constraints in the SHMA.	The SHMA will go as far as advising what the OAN is in standard scenarios. LCC then has a further job to synthesize other evidence to set the housing requirement in line with the NPPF. Environmental constraints or ambitions for exceptional economic growth will be factors for consideration alongside the realities of dealing with any unmet OAN within the wider sub-region via the Duty to Cooperate
Output 2: Affordable Housing	
10. Will the SHMA take account of different levels of affordability in different geographical areas of Leeds? Eg use of standard benchmarks such as not more than 25% of income to be spent on rent	Yes. There will be big variations in the price of housing and of earnings/income in different parts of Leeds that will be considered in the SHMA.
11. Is it realistic to expect backlog affordable need to be fully addressed over a fixed period, eg 5 or 10 years?	Backlog affordable housing need is part of the standard calculation, so has to be addressed. In practice the backlog never diminishes as would be expected in theory.
12. What is the benchmark “25% of income on rent” based on?	It was in the original national guidance. It is possible for the SHMA to test alternatives.
13. There is a danger of policies exacerbating inequalities by assuming that housing need should be met in the locations where it is generated. Regard should be given to people’s aspirations to live in different areas.	The SHMA should uncover where people are seeking to move to. It should also uncover when people want to stay in a locality with their friends and relatives.
Output 3: Need of household types and sub-areas	
14. The SHMA needs to understand the effects of housing benefit and other national changes on the private rental market. It needs to be realistic about the potential for the build-to-rent market.	Agreed. Issues should be fleshed out in further research and stakeholder interviews
15. Housing provision is a critical element of addressing social care needs, particularly older households, special needs households and younger households with complex health needs.	Agreed. Further dialogue with the care sector needs to be facilitated.
16. The SHMA needs to recognise that HMCA’s have many differences such as transport connections and commuting patterns. Important not to over-standardise.	The aim is to understand if the pattern of existing housing stock is suited to meeting the pattern of demographic change and aspiration, and identify shortfalls in particular house types /sizes. The SHMA should provide a framework for all HMCA’s which can provide context for more local housing need assessments.

Appendix 3. Draft Note of Leeds SHMA Reference Group Meeting 13th July 2017

Leeds City Museum Denny Room

Attendance

Representative (Community Planning Interests), Michael Bullock (Arc4), Robin Miller (Edge Analytics), David Feeney (LCC), Rachel Burton (Edge Analytics), Representative (Aireborough Neighbourhood Development Forum), David Cooke (CPRE), Matthew Good (HBF), Becky Lomas (Johnson Mowat), Clare Pearson (Edge Analytics), Tom Barrett (Kirklees Council), Liz Bailey (Public Health), Martyn Broadest (Connect Housing), Enya Booth (Connect Housing), Gill Ritchie (Harrogate Council), Rob Ellis (Wakefield Council), John Brooks (Indigo Planning), Nev Smith (LCC), Simon Latimer (Bradford Council), Alex Bartle (Bradford Council), Peter Baker (Leeds Civic Trust), Paul McGrath (LCC), Sarah May (LCC), Grace Ellison (LCC), Cllr Jim McKenna (LCC), Nasreen Yunis (LCC), Mark Finch (Rushbond), Cllr R Lewis (LCC), Jess Byrne (Barratt Homes), Robin Coghlan (LCC), Martin Elliot (LCC).

Introduction

The meeting was introduced by Cllr Peter Gruen who explained that the Core Strategy Selective Review (CSSR) process was at an early technical stage and that this meeting was to take soundings from the reference group on the initial headline outputs of the Strategic Housing Market Assessment (SHMA).

Presentations and Discussion

Consultants Robin Miller (Edge Analytics) and Michael Bullock (Arc4) gave presentations setting out the emerging findings of the SHMA covering the three strands of work a) Objectively Assessed Housing Need, b) Affordable Need and c) Market Need.

Points raised by members of the reference group were recorded as part of the workshop discussion. No specific conclusions were drawn at this stage

Objectively Assessed Need

Robin Miller explained the demographic analysis and forecasts for the SHMA. He clarified that the methodology used was the same as that used for the 2011 SHMA which informed the Adopted Core Strategy. This starts with the official projections, checks mid-year estimates, uses the POP GROUP model and considers of migration and employment led trends.

He explained how the historic forecasts have varied for Leeds, and that with hindsight the 2008 based sub-national population and household forecasts gave the highest recent growth, including over estimation of international migration in 2003/4 and 2004/5.

Current analysis has produced a range of 11 demographic and employment scenarios.

Michael Bullock explained that his work with Arc4 used 2 models of housing growth: Local Plan Advisory Group (LPEG) and National Planning Practice Guidance (PPG).

The LPEG model is promoted by Government in its Housing White Paper, but not yet adopted as national practice and may be subject to further change as a result of consultation likely to be released this month. It produces a requirement for Leeds of 3,456 dwellings per annum or 55,296 dwellings over the plan period (2017 – 2033).

The PPG model produces a range of scenarios using a series of steps:

- a) Latest government population / household statistics
- b) Adjustments to reflect local circumstances including migration and household formation
- c) Employment trends
- d) Market signals
- e) Uplift for affordable housing delivery

Michael Bullock illustrated that the scenario using the Regional Econometric Model economic forecast of March 2017, with an adjustment for economic activity rates (including a reflection of the Office of Budgetary Responsibility), coupled with a partial return to 2011 headship rates and accounting for market signals gives a requirement of 3,478 dwellings per annum or c.55,000 dwellings over the plan period.

The following comments and questions were raised about this part of the SHMA:

- Clarification of the plan period – it was noted that the revised plan period would be between 2017 and 2033
- Clarification of un-attributable population change – it was clarified that this had been taken into account and did not inflate Leeds' base population figures
- The implications for Core Strategy Policy SP6 and the geographic spread of housing need – this is for the CSSR policy development to address; the SHMA will provide details of tenure and housing mix in different locations
- Timescales for the CSSR and the relationship with the Site Allocations Plan – the SAP is now at Examination and the CSSR is at early stages and is not going to be adopted until at least Winter 2018.
- Comparison of the emerging requirement (c. 3,500 pa) with actual completions over recent years – it was noted that average completions over the past five years are 2,800 homes per annum but that that has been affected by the recession
- Acknowledgement that not so many houses had been built in Leeds as expected and the question of backlog during the first 5 years of the Core Strategy plan period – it was noted that there remains a backlog of 4,500 homes against CS requirements and how to deal with this will need to be considered through the CSSR
- Is the backlog a reflection that the CS housing requirement (70,000) was wrong – it was noted that whilst it is tempting to conclude this; the CS figure was correct at the time it was Examined and subsequently Adopted and was based on the same methodology being used now. It was also commented that every LA is different & Government guidance waxes & wanes. We need to be careful about double counting. Some of the OAN adjustments may also cover same households covered in the backlog of houses not built
- What detailed assumptions were used for migration, OBR, commuting & economic participation – consultants have used assumptions which are considered to be most realistic past on past trends and their experience in other work
- Is a headship rate adjustment justified or is this a symptom of suppressed demand? - the consultants view is that a partial return to higher headship rates is a sensible middle way forward
- Is aspiration enhanced by Government incentives (eg help-to-buy)? Maybe only minimally because current financial support turns into a repayable loan after 5 years.

Affordable Housing

Michael Bullock explained the methodology for calculating affordable housing need. It is based on national planning practice with the following steps

- a) Backlog assuming it needs to be cleared over 10 years
- b) Newly arising need
- c) Supply of affordable lets and new dwellings
- d) Conclusion of an annual need for 1,230 affordable dwellings

The following comments and questions were raised about this part of the SHMA:

- What assumption of market rental affordability should be used: 25 or 30%? Is 25% rooted in any evidence? Is use of a 3.5x mortgage multiplier a bit low? The assumptions of 25% income and 3.5x mortgage were part of original national guidance.
- Comments that for those on low incomes, the remaining income doesn't go very far! National Housing Federation's research on Leeds suggests that you need 7.1 x average earnings to buy a home.
- It was explained that the backlog of affordable housing is the number of existing households in need who can't afford market housing. The model assumes that the backlog will be reduced to zero over a 10 year period
- Of the 3500 affordable dwellings expected to be built in the pipeline: are they social rent or intermediate? It was clarified that the biggest need is for social rent.
- In terms of the size of affordable dwellings required, the highest need appear to be for 1 & 2 bed dwellings. This is thought to be a reflection of current housing benefit policies but in practice households tend to demand larger dwellings.
- According to Leeds' Authority Monitoring Report the current affordable housing target of 1185pa has never being met.
- Problems of viability are widespread. A recent example of a development of 51 dwellings in Armley offering zero AH & zero Greenspace was cited.
- It is necessary to take account of "the planning balance" which may differ in different LAs.

Market Demand

The Household Survey has helped to really understand housing needs at a sub-district level, providing evidence of households who are planning to move in the open market. It considers current dwelling stock, aspirations and expectations and is able to identify where there are shortfalls of types/sizes of dwellings in different areas. Results suggest broad alignment between the sizes of dwellings making up the existing stock and the sizes of dwellings needed in the future, which means that the mix of new dwellings needs to continue to provide a broad mix. The needs of older persons indicate that 2/3 of respondents hope to stay in their current accommodation with support. Of those seeking new accommodation slightly more than half want the same size accommodation and slightly less than half would like smaller property.

The following comments and questions were raised about this part of the SHMA:

- We focus on numbers, but need an understanding of the actual needs of people. In the case of the SHMA, the household survey has helped to obtain information directly about the housing needs of people in Leeds rather than relying solely on the detached nature of secondary data.
- Is a bespoke Core Strategy Policy for elderly persons housing needed? The Core Strategy already has policy on Independent Living but the SHMA will provide evidence to consider policy change as necessary.

Next Steps

The discussion on the three areas of SHMA analysis provided useful pointers to feed into technical work preparing the Core Strategy Selective Review. At this stage data conclusions cannot be considered firm or final.

Appendix 4. Description of Consultation Activity

Core Strategy Selective Review Regulation 18 Consultation Description of Consultation Activity

1. Introduction

- 1.1. During the consultation the public were invited to make representations about the scope of the review, whether the areas of focus outlined were appropriate or whether other matters ought to be addressed also. It was also an invitation for any evidence of importance to be drawn to the Council's attention.
- 1.2. This report provides an account of the consultation methods used.
- 1.3. It should be noted that Regulation 18 consultation was undertaken over the summer 2016 on the Housing Standards Development Plan Document (HSDPD) which was later subsumed into the Core Strategy Selective Review. The consultation activity for the HSDPD is set out in a separate document.

2. Consultation Period

- 2.1. The consultation period for the Core Strategy Selective Review ran from Monday 19th June to 5pm, Monday 31st July 2017.

3. Documents

- 3.1. The main document issued as part of the consultation was the *Leeds Core Strategy Selective Review - Scope and Content*. This set out the proposed areas for review including an explanation of why those areas were in need of review, what evidence was being relied upon and what alternatives had been considered.
- 3.2. A number of supporting documents were also prepared:
 - i. Statement of Representation (Appendix 4.01). This is a requirement of Regulation 18 and summarised the proposals for the selective review explaining the different ways that people can find out more and make representations.
 - ii. Newspaper advertisement (Appendix 4.02). This also summarised proposals for the selective review explaining the different ways that people can find out more and make representations. It was placed in the Yorkshire Evening Post on 19th June 2017.
 - iii. Response Form (Appendix 4.03).

4. Notifications

- 4.1. Letters (appendix 4.04) were emailed or posted to over 800 individuals and organisations (Appendix 4.05). This included the statutory consultees and neighbouring local authorities as well as those who had made comments on the Core Strategy during its preparation up to adoption in 2014.

5. Use of Libraries and One-Stop-Shops

- 5.1. The Council's libraries and One-Stop-Shops were notified of the CSSR consultation by letter (Appendix 4.06). A short explanation was given to staff about the CSSR along with a copy of the Statement of Representation to be put on their noticeboards.

6. Web Page

- 6.1. A web page went live just before the Regulation Consultation period began on Monday 19th June. A copy of the webpage is provided in Appendix 4.07. It provides a brief explanation of the proposed scope & content of the selective review, information on the consultation and how people are able to make comments, a note of the Drop-in-Session and ability to download key documents including the Scope & Content Paper, the Statement of Representation, the response form, the Sustainability Appraisal Scoping Report and the Executive Board Report (February 2017) agreeing the commencement of the CSSR.

7. Drop-in-Session Friday 21st July

- 7.1. A drop-in-session was held between 1.30pm and 6.30pm at Leeds Civic Hall, in Leeds city centre. It was advertised on the CSSR webpage, local newspaper advertisement and statement of representation.



**Local Plan
Planning and Compulsory Purchase Act 2004
Town and Country Planning (Local Planning) (England) Regulations 2012 - Regulation 18
LEEDS CORE STRATEGY SELECTIVE REVIEW CONSULTATION**

The Leeds Core Strategy was adopted in 2014 and sets out the strategic planning policy framework for the district to 2028.

The Council proposes to review the following parts of the Core Strategy:

- Reviewing the housing requirement in Policy SP6 and extending the plan period to 2033.
- Incorporating National Housing Space and Accessibility Standards for new housing.
- Updating policy on affordable housing set out in H5.
- Reviewing the requirement for greenspace in new housing developments by amending Policy G4.
- Incorporating new national policy regarding Code for Sustainable Homes by updating the wording of Policies EN1 and EN2.

From the time the Core Strategy has been in operation, since its adoption November 2014; it has become apparent that a number of policy areas are in need of review because of new circumstances, evidence and/or the general effectiveness of policies. The proposed Core Strategy Review seeks to address this. As the Core Strategy was recently adopted in November 2014, only limited selective alterations to the Plan are considered necessary. The selective review will result in a series of focused amendments to the adopted core strategy. This approach is consistent with the NPPF, which states in paragraph 153 that *“each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances”*.

This is the first consultation stage in the preparation of the Core Strategy Review. The next stage known as “Publication” will involve drafting proposed policies which will be subject to public consultation in early 2018. The Plan will be subject to examination in public by an independent Inspector before it can be adopted by the Council.

The Council's proposals for the review and supporting documents including the Sustainability Appraisal Scoping Report are available for inspection at the Development Enquiry Centre, Leonardo Building, 2 Rossington Street, Leeds, LS2 8HD (Monday - Friday 8:30am - 5pm, Wednesday 10am - 5pm) and at libraries and one-stop centres within Leeds District.

All the information and relevant documents are published on the Council's website. To view or download the proposals go to www.leeds.gov.uk/csr

There will be a drop-in consultation event where you can discuss the scope of the Review with officers on Friday 21st July 2017 1:30pm – 18:30pm at the Civic Hall, East Room, Leeds, LS1 1UR.

You can also telephone Leeds 0113 37 87993 or e-mail corestrategyreview@leeds.gov.uk for further information.

Comments should be submitted during the consultation period using the standard form from **Monday 19th June 2017 to 5pm Monday 31st July 2017**. The Council would prefer to receive comments via e-mail, as this saves money. You can write to us if you do not have access to a computer using the address above.

Unless you specify otherwise, if you make a representation, we will notify you of future stages (including further public consultation).

Let us know if you have special needs and we will make arrangements to make sure your views are registered.



**Local Plan
Planning and Compulsory Purchase Act 2004
Town and Country Planning (Local Planning) (England) Regulations 2012 -
Regulation 18**

LEEDS CORE STRATEGY SELECTIVE REVIEW CONSULTATION

The Leeds Core Strategy was adopted in 2014 and sets out the strategic planning policy framework for the district to 2028.

The Council proposes to review the following parts of the Core Strategy:

- Reviewing the housing requirement in Policy SP6 and extending the plan period to 2033.
- Incorporating National Housing Space and Accessibility Standards for new housing.
- Updating policy on affordable housing set out in H5.
- Reviewing the requirement for greenspace in new housing developments by amending Policy G4.
- Incorporating new national policy regarding Code for Sustainable Homes by updating the wording of Policies EN1 and EN2

This is the first consultation stage in the preparation of the Core Strategy Review. The next stage known as "Publication" will involve drafting proposed policies which will be subject to public consultation in early 2018. The Plan will be subject to examination in public by an independent Inspector before it can be adopted by the Council.

The Council's proposals for the review and supporting documents including the Sustainability Appraisal Scoping Report are available for inspection at the Development Enquiry Centre, Leonardo Building, 2 Rossington Street, Leeds, LS2 8HD (Monday - Friday 8:30am - 5pm, Wednesday 10am - 5pm) and at libraries and one-stop centres within Leeds District.

All the information and relevant documents are published on the Council's website. To view or download the proposals go to www.leeds.gov.uk/csr

There will be a drop-in consultation event where you can discuss the scope of the Review with officers on Friday 21st July 2017 1:30pm – 18:30pm at the Civic Hall, East Room, Leeds, LS1 1UR.

You can also telephone Leeds 0113 37 87993 or e-mail corestrategyreview@leeds.gov.uk for further information.

Comments should be submitted during the consultation period using the standard form from Monday 19th June 2017 to 5pm Monday 31st July 2017. The Council would prefer to receive comments via e-mail, as this saves money. You can write to us if you do not have access to a computer using the address above.

Unless you specify otherwise, if you make a representation, we will notify you of future stages (including further public consultation).

Let us know if you have special needs and we will make arrangements to make sure your views are registered.



Response Form

RefNo.

Leeds Local Development Framework Core Strategy Selective Review

Please use this response form to provide your views on the proposed scope of the Core Strategy Review:

- Reviewing the housing requirement in Policy SP6 and extending the plan period to 2033.
- Incorporating National Housing Space and Accessibility Standards for new housing.
- Updating policy on affordable housing set out in H5.
- Reviewing the requirement for greenspace in new housing developments by amending Policy G4.
- Incorporating new national policy regarding Code for Sustainable Homes by updating the wording of Policies EN1 and EN2.

The proposed Core Strategy Selective Review documents are available for inspection at the Development Enquiry Centre, Development Department, Leonardo Building, 2 Rossington Street, Leeds, LS2 8HD (Mon – Thu 08:30–17:00, Fri 08:30–16:30), Libraries and One Stop Centres/Community Hubs, (please see Leeds City Council website for opening times).

The documents are also published on the Council's website. To download the proposals please visit www.leeds.gov.uk/csr

Consultation forms must include a name and address otherwise your comments will not be taken into account.

Your details	If the details opposite are for an agent, enter the client's details here
Title <input type="text"/>	Title <input type="text"/>
Name <input type="text"/>	Name <input type="text"/>
Organisation <input type="text"/>	Organisation <input type="text"/>
Address <input type="text"/>	Address <input type="text"/>
Postcode <input type="text"/>	Postcode <input type="text"/>
Telephone/Mobile <input type="text"/>	Telephone/Mobile <input type="text"/>
Email <input type="text"/>	Email <input type="text"/>

You can return completed response forms to: corestrategyreview@leeds.gov.uk or via post
Core Strategy Review, Policy and Plans, The Leonardo Building, 2 Rossington Street, Leeds, LS2 8HD

We need to receive your comments by 5pm, 28th July 2017

Data Protection

The council is required by law to publish the comments you send us about the Plans, including your name and postal address. Your comments will be made available for the public to read in council offices and online. Your telephone number, email address, and signature will not be published. In addition, the council is required to provide all information submitted to us, including all personal information, to the Planning Inspectorate and their designated Programme Officer as part of the public examination of the Core Strategy Review. The Planning Inspectorate may use your personal information to contact you during the public examination process. All data provided to the Planning Inspectorate and their programme officer will be shared in accordance with the Data Protection Act 1998. Please note that we cannot provide anonymity or accept comments marked 'private' or 'confidential'. Comments that include offensive, racist, discriminatory, threatening and other non-relevant statements will be destroyed.

1. Any parts of the review you think are unnecessary and your reasons? Do you feel the following areas of the review are appropriate?

1.1. Reviewing the housing requirement and plan period

█

1.2. Incorporating national housing standards for size and accessibility of new dwellings

█

1.3. Updating affordable housing policy

█

1.4. Reviewing the requirement for greenspace in new housing developments

█

1.5. Incorporating new national policy on sustainable homes

█

2. Any additional parts of the adopted Core Strategy you feel should be reviewed and why?

Quote policy/para/page number where relevant

█

The evidence currently being prepared for the Core Strategy Review includes:

- Strategic Housing Market Assessment – to assess housing need
- Evidence to justify introduction of National Housing Standards
- Evidence of Greenspace under-delivery

3. Any comments on this evidence or additional evidence you feel should be undertaken?

Please provide clear references for the evidence you are commenting on.

█

4. Any other comments

█

Please use another page if necessary.



City Development
Plans and Policies Group
The Leonardo Building
2 Rossington Street
LEEDS
LS2 8HD

Contact: Robin Coghlan
Tel: 0113 3787635

Email:
corestrategyreview@leeds.gov.uk
Our ref: CSR/REG18/

Date: 19th June 2017

Dear Sir/Madam

Leeds Local Plan – Leeds Core Strategy Selective Review

I am writing to you because you have previously commented on the preparation of Leeds' Core Strategy which was adopted in 2014. The Core Strategy forms part of the Council's Local Plan and sets out the strategic planning policy framework for Leeds to 2028. The City Council has commenced early consultation on a selective review of the Core Strategy. The Council proposes to review the following parts of the Core Strategy:

- Reviewing the housing requirement in Policy SP6 and extending the plan period to 2033.
- Incorporating National Housing Space and Accessibility Standards for new housing.
- Updating policy on affordable housing set out in H5.
- Reviewing the requirement for greenspace in new housing developments by amending Policy G4.
- Incorporating new national policy regarding Code for Sustainable Homes by updating the wording of Policies EN1 and EN2

It should be noted that the proposal to incorporate national housing space and accessibility standards has been carried forward from the proposal made in 2016 to incorporate these standards into a separate Housing Standards Plan. Consultation on that took place in June 2016.

The evidence currently being prepared for the Core Strategy Review includes the preparation of the Strategic Housing Market Assessment (SHMA) 2017 to re-calculate housing need, evidence of the need to justify introduction of National Housing Standards and evidence of greenspace under-delivery.

This consultation on the Core Strategy Review concerns the following questions:

- i. Are the topics proposed for review necessary?
- ii. Are there additional parts of the adopted Core Strategy that ought to be reviewed as well?
- iii. Has sufficient evidence been presented to support the proposed areas of review and/or is additional evidence needed?

The comments received as part of this consultation will inform the preparation of a Publication Draft Core Strategy Review which will then be published for a formal 6 week public consultation period when comments will be invited.

Subsequently the Core Strategy Review will be considered by an independent Government appointed inspector.

You are invited to respond by 5pm, 31st July 2017.

The Council would prefer to receive your response by e-mail to corestrategyreview@leeds.gov.uk as this saves money. If you do not have access to a computer you may write to us at the above address.

Details of this consultation, along with FAQs and an update on other parts of the Local Plan can be found online at www.leeds.gov.uk/csr

Yours sincerely,



Martin Elliot
Head of Policy and Plans Group
City Development

Appendix 4.05 Organisations notified of Regulation 18 consultation

A660 Joint Council	Barrett+Barrett architects ltd
AAH Planning	Bartle & Son
Abbott Associates	Barton Willmore
Aberford Parish Council	Barton Willmore Planning Partnership-Northern
Ackroyd Dent & Co	Barwick in Elmet & Scholes Parish Council
Adair Paxton	Barwick-in- Elmet & Scholes Nhood DevPlan Steering
Adel & Wharfedale Branch Labour Party	Becketts Park Residents Association
Adel Neighbourhood Forum	Belmont Design Services Limited
Adlington	Bidswell
Advent Development	Bidwells
Age UK	BNP Paribas
Agfa	Boston Spa Parish Council
Aggregate Industries	Bowland Ecology Ltd
Aggregate Industries UK Ltd	Brackenridge Hanson Tate
Ainscough Strategic Land	Bradford Council - Highways
Aire and Calder Rivers Group	Bradford Metropolitan District Council
Aireborough Civic Society	BRADLEY STANKLER PLANNING
Aireborough Neighbourhood Forum	Bramhope and Carlton Parish Council
Airport Operators Association	Brassington Rowan Chartered Surveyors
Allerton Bywater Parish Council	British Geological Survey
Alliance for Green Socialism	British Telecom Repayment Projects
Alliance Planning	British Toilet Association
Allsop & Co	Bryan G Hall
Alwoodley Parish Council	Burley Lodge Centre
Alyn Nicholls and Associates	Bury & Walker Solicitors
AMEC E&I Ltd	Calderdale Metropolitan Borough Council
Ancient Monuments Society	CAMRA
Andrew Martin Associates	Can Plan Chapel Allerton Neighbourhood Plan
Arcus Consultancy Services Ltd	Canal & River Trust
Arqiva Services Ltd	CANPLAN (Chapel Allerton Neighbourhood Plan)
Arriva Yorkshire	Carey Jones Architects
Arthington Parish Council	Carplus
ARUP	Carter Jonas
Ash Grove Residents	Carter Towler LLP
Ash Road Resident's Association	Cass Associates
Aspinall Verdi	CB Richard Ellis Ltd
Atkins Global	CBI Yorkshire & Humber
AWS Surveyors & Property Consultants	CBRE Ltd
Banks Development	CDP Limited
Bardsey Parish Council	Centre for Comparative Housing Research
Bardsey-cum-Rigton Parish Council	
Barratt Homes & David Wilson Homes Yorkshire West	

Centrica Plc
Chair, Oulton and Woodlesford Neighbourhood Forum
Church Commissioners
CITU
City of York Council
Civil Aviation Authority
Clifford Parish Council
Collingham-with-Linton Parish Council
Commercial Boat Owners Association
Commercial Estates Group
Concord (Leeds Interfaith Fellowship)
Connect Housing
Council for British Archaeology
CPRE
CPRE Yorkshire & Humber
CPRE, Yorkshire
Craven District Council
Crown Estate Office
Crowtrees Gardens Association
Cunnane Town Planning
Dacre Son & Hartley
Dandara Ltd
David Lock Associates
David Storrie Associates
DB Schenker Rail (UK) Ltd
Dennis Gillson & Son
Design Council
Development Planning Limited
DHA Planning
Diocese of Wakefield
Directions Planning
Disability Rights Commission
Disabled Persons Transport Advisory Committee
DLA Landscape
DLP Planning Ltd
DPP UK LTD
Drighlington Parish Council
Drivers Jonas
Drivers Jonas Deloitte
Drummond & Churchwood Residents
DTZ
East Keswick Parish Council
East Midlands Trains

Ecology Building Society
Ecotec Research & Consulting
ECUS Ltd
EE (UK) Ltd
England and Lyle
Environment Agency
Equality and Human Rights Commission
ERS
Evans Property Group
EWS
Fairburn Parish Council
Far Headingley Village Society
Federation of Small Businesses
Fields in Trust
Firstplan
Framptons
Freight Transport Association
Freightliner
Friends of Allerton Grange Fields
G L Hearn
Galliford Try Housebuilding
Garforth One Stop Centre
Genesis Project
Gent Visick
George Wimpey Strategic Land
Gerald Eve
Gildersome Parish Council
GL Hearn
GL Hern (Harford Manor Ltd)
Gladman Developments
Golder Associates (UK) Ltd
Great & Little Preston Parish Council
Greater Yorkshire Forestry Authority
Gregory Property Developments
Guiseley and Menston Green Belt Action Group
GVA Grimley Ltd
Gypsy Roma Traveller Achievement Service
Hallam Land Management
Hallam Land Management Limited
Hanson Aggregates Ltd
Harewood House Truct
Harewood Parish Council
Harrogate Borough Council
Hartley Planning Consultants

Headingley Development Trust Ltd
Headingley Network
Health & Safety Executive
Heaton Planning Ltd
Highways England
Historic England
Home Builders Federation
Home Housing Association
Homes and Communities Agency
Horsforth Civic Society
Horsforth Town Council
Hull City Council
Humberts Leisure
Hutchison 3G UK Ltd
Hyde Park Olympic Legacy Group
Ian Bath Planning
Iceni Projects
ID Planning
Ilkley Town Council
Indigo Planning
Inland Waterways Association, W Riding Branch
IoD Yorkshire
J & J Design
Jehovah's Witnesses
JMP Consultants
John Dagg Barrister MRTPI
John Hill Associates
Johnson Brook
JVH Town Planning Consultants
JWPC
Keyland Developments Limited
Keyland Developments Ltd
King Sturge
Kingston Communications (HULL) Plc
Kippax Parish Council
Kirk Deighton Parish Council
Kirkby Overblow Parish Council
Kirklees Metropolitan Council
Kirkwells
Knight Frank
KPMG
Lambert Smith Hampton
LDP Planning
Ledsham Parish Council

Ledston Parish Council
Leeds Ahead
Leeds Bradford International Airport
Leeds Centre for Integrated Living
Leeds Chamber Property Forum
Leeds Christian Community Trust
Leeds City Council
Leeds City Credit Union
Leeds Civic Trust
Leeds Connecting Communities
Leeds Cycling Action Group
Leeds Financial Services
Leeds guide
Leeds Gypsy Traveller Exchange
Leeds HMO Lobby
Leeds Hotels Association
Leeds Involvement Project
Leeds Involvement Project/ Older Peoples Group
Leeds Justice for Travellers
Leeds Local Access Forum
Leeds Local Involvement Network (LINK)
Leeds Older Peoples Forum
Leeds Property Forum
Leeds Racial Equality Council
Leeds Residential Property Forum (LANDLORDS)
Leeds Society for Deaf & Blind People
Leeds Teaching Hospitals NHS Trust
Leeds Tenants Federation
Leeds University Union
Leeds Youth Council
Leeds, York and North York Chamber of Commerce
Leith Planning Ltd
Levvel
Lidl UK
Linden Homes Strategic Land
Lister Haigh Ltd
LNT Construction
Lower Washburn Parish Council
Malcolm Walker Town planning Consultants
Manor West Developments Ltd
Marine Management Organ Management Organisation

MARK BREARLEY & COMPANY
Marshalls
Martin Walsh Associates
Maven Plan Ltd
McCarthy & Stone (Developments) Ltd
MEPC
Methley Estates
Metro
Micklefield Parish Council
Ministry of Defence
Mobile Operators Association
Mone Bros. Limited
Montagu Evans LLP
Moor Park Residents Association
Morley Town Council
Mosaic Town Planning
Nathaniel Lichfield & Partners
Nathaniel Lichfield & Partners
Nathaniel Lichfield and Partners
National Express East Coast
National Federation of Gypsy Liaison Groups
National Grid
National Landlords Association
National Offender Management Service
Natural England Consultation Service
Nature After Minerals
Network Rail
New Wortley Residents Action group
New Wortley Residents Association
Newton Kyme cum Toulston Parish Council
NHS Leeds
Nigel Tapp and Co
Normanton Town Council
North Yorks Moors Forest District
North Yorkshire County Council
North Yorkshire Police Authority
Northern Powergrid
Northern Trust
Npower Renewables Limited
O2 – Telefónica UK Ltd Core Strategy Team
Office of Rail Regulation
Older Peoples Reference Group
Osborne Clarke
Otley and Yeadon Labour Party

Otley Conservation Task Force
Otley Town Council
Otley Town Partnership
Oulton Civic Society
Parklane Properties
PC Outlet Ltd
PDS Planning & Development Solutions Ltd
Peacock & Smith
Peacock and Smith
Peacock and Smith Ltd
Pegasus Planning Group
People in Action
People in Action Learning Disability Forum
Persimmon Homes
Persimmon Homes West Yorkshire
Peter Baker Associates
Peter Pendleton & Associates
Physical Education Service
Pickard Properties
Pinsent Masons
Pioneer
Planning for Tennis
Planning Potential
Planning Prospects Ltd
Planning, Design & Building
Planware Ltd
Polskie Forum Polish newsletter
Pool in Wharfedale E News
Pool in Wharfedale Parish Council
Quod
Rail Freight Group
Railfreight
Ramblers' Association
Rawdon Billing
Rawdon Model Boat Club
Rawdon Parish Council
RED Property Services
Redrow Homes (Yorkshire) Ltd
Re-new
RenewableUK
Rentinc
Richard Mills Counselling
Road Haulage Association - Northern Region
Robert Halstead Chartered Surevyor

Royal Armouries
RPS Group Plc
RSPB
Rural Solutions
Rushbond Plc
RWE Npower
SAA UK
Sanderson Associates
Sanderson Wetherall
Sandgate Residents Action Group
Save Our Scholes Action Group
Savills
Savills Leeds
Saxton cum Scathingwell and Lead Parish Council
Scarcroft Parish Council
Scholes Community Forum
Selby District Council
Shadwell Parish Council
Shantona Womens Centre
Sherburn in Elmet Parish Council
Sherwoods Property Investment Consultants
SIGMA Planning Services
Signet Planning
Skills Funding Agency
SLR Consulting
Smiths Gore
Society for the Protection of Ancient Buildings
South Headingley Community Asso
South Milford Parish Council
Spawforth Associates
Spawforths
Spofforth with Stockeld Parish Council
Sport England
SSA Planning Limited
St George's Church Crypt
St Margaret Thornbury & St James Woodhall
Stephenson Day Property Investment Consultants
Steven Abbott Associates
Stevens Scanlan
Stewart Ross Associates
Storeys: ssp
Strutt & Parker LLP
Stutton with Hazlewood Parish Council

Sustrans
Swillington Parish Council
Tadcaster Parish Council
Tarmac Ltd
Taylor Woodrow Developments
Taylor Young
Terrence Higgins Trust
The Coal Authority
The Co-operative Group Ltd
The Courthouse Planning Consultancy
The Diocese of Ripon & Leeds
The Garden History Society
The Georgian Group
The Gypsy Council
The Irish Traveller Movement in Britain
The JTS Partnership
The Land Development Practice
The Lawn Tennis Association
The Planning Bureau
The Theatres Trust
The Thorpe Park Hotel
The Twentieth Century Society
The Victorian Society
The Vodafone House
Thomas Eggar LLP
Thorner Parish Council
Thorp Arch Parish Council
Total Number: 458 Organisations
Town Centre Securities
Towngate Estates Ltd
Towngate Plc
Traveller Law Reform Project
Turley
Turley Associates
Turnways Laurel Bank Residents
united utilities (Transco)
Unity Housing Association
University of Leeds
URS Infrastructure and Environment UK Ltd
Volition
Voluntary Action Leeds
W A Fairhurst & Partners
WA Fairhurst & Partners
Wakefield Metropolitan District Council

Walker Morris
Walker Singleton Chartered Surveyors
Walsingham Planning
Walton & Co
Walton Parish Council
WARD (Wharfedale & Airedale Review Development)
Weatheralls
Weetwood Residents Association
West & Machell
West Properties Ltd
West Waddy ADP
West Yorkshire Archaeology Advisory Service
West Yorkshire Combined Authority
West Yorkshire Fire & Rescue Service
West Yorkshire Fire and Rescue Service

West Yorkshire Police Authority
Wetherby Civic Society
Wetherby Town Council
White Rose Forest
White Young Green
Wildblood MacDonald Architects
WYG Planning & Design
Wykebeck Way Community Forum
X Leisure
Yorkshire Ambulance Service NHS Trust
Yorkshire Housing
Yorkshire Local Councils Associations
Yorkshire Planning Aid
Yorkshire Water Services
Yorkshire Wildlife Trust



All LCC Libraries

Plans and Policies Group
The Leonardo Building
2 Rossington St
Leeds LS2 8HD

Contact: Robin Coghlan
Tel: 0113 3787635
robin.coghlan@leeds.gov.uk
Our reference: CSR/REG18/
19th June 2017

Leeds Local Plan – Core Strategy Selective Review

Dear Colleague

I am writing to request that the attached letter is displayed or made available for inspection.

We are proposing a selective review of the Core Strategy and would like to undertake some early consultation. It would be appreciated if you could place this document for public view until the 1st August 2017.

All the evidence supporting the Review is available online at www.leeds.gov.uk/csr but if anyone requires any paper copies please contact us using the number above.

If you have any queries or need any assistance please do not hesitate to contact Robin Coghlan on 0113 3787635 or robin.coghlan@leeds.gov.uk. Your assistance is greatly appreciated.

Yours faithfully

A handwritten signature in black ink, appearing to read "Martin Elliot".

Martin Elliot
Head of Plans and Policy Group
City Development

Appendix 4.07 Web Page

The screenshot shows the Leeds City Council website. At the top left is the Leeds City Council logo. To the right are links for Sign In, A to Z, Newsroom, Contact us, and Accessibility. Further right is a language selection dropdown and font size controls (A-, A+). Below this is a banner with the URL leeds.gov.uk, a date indicator for LEEDS MONDAY 31 JULY, and a search bar with a red Search button. A navigation menu below the banner includes links for Residents, Sports, Leisure, Business, Your council (highlighted), Where I live, What's on, and MyLeeds login. Below the navigation menu is a breadcrumb trail: Home > Your council > Core Strategy Selective Review. The main content area features the title 'Core Strategy Selective Review' and a paragraph stating that Leeds City Council is undertaking a selective review of the Leeds Core Strategy (Adopted Nov 2014), with the scope agreed by the Executive Board covering the following areas:

- Reviewing the housing requirement in Policy SP6 and extending the plan period to 2033
- Incorporating National Housing Space and Accessibility Standards for new housing
- Incorporating new national practice into policy regarding Code for Sustainable Homes by updating the wording for Policies EN1 and EN2
- Updating policy on affordable housing set out in H5.
- Reviewing the requirement for greenspace in new housing developments by amending Policy G4.

The first stage of the review involves evidence gathering and public consultation on its scope. This information will then be taken into account by the Council to prepare a draft plan review (the Publication Draft) for public consultation in winter 2017/18. There will then be an opportunity for the Plan to be further modified prior to Submission to the Secretary of State and the holding of an examination in public by an independent planning inspector.

Consultation on the scope of the Review (Regulation 18)

Reviewing the housing requirement.
Evidence of a need to review the housing requirement comes from the Department of Communities and Local Government's 2014 household projections released in 2016 which suggest a reduced rate of household growth in Leeds compared with earlier projections. These projections are a starting point and further work to understand the effects of economic growth forecasts and other signals is necessary. The Council has commissioned consultants to undertake a Strategic Housing Market Assessment (SHMA) to provide this analysis.

Extending the Plan Period to 2033
This is considered necessary because by the time the Core Strategy Review is finalised in 2018, this will be 6 years after the original adoption of the Core Strategy. It is usual practice to plan for at least a 15 year time horizon, which accords with national planning policy (NPPF Paragraph 47).

Incorporating housing standards for National Space and Accessibility Standards for New Housing
The Council commenced preparation of a Development Plan Document to introduce these national standards in April 2016 as a result of the Housing Standards Review. Public consultation on the scope and evidence gathering took place during summer 2016. However rather than pursue a separate Development Plan Document for the proposed standards, it is proposed these will now form part of the Core Strategy rather than in a stand-alone plan. Evidence for the standards will introduce internal design standards for new houses and apartments. Decisions on planning applications will have to take account of the new standards on:

- Minimum size of dwellings
- accessible housing.

On the right side of the page, there is a 'Related Pages' section with three links: Core Strategy Adoption, Housing Standards Development Plan Document, and Strategic Housing Market Assessment (SHMA).

Incorporating new national practice into policy regarding Code for Sustainable Homes

This is a formality to bring the wording for implementing Policies EN1 and EN2 into the Core Strategy from a separate document. This arises from the Government's withdrawal of the Code for Sustainable Homes in March 2015 which required the Council to create a separate document "Implementation of Core Strategy Policies EN1 and EN2" which is on Leeds City Council's website.

Updating policy on affordable housing

The need to update the affordable housing policy of the Core Strategy will come from the Strategic Housing Market Assessment (SHMA) which will re-calculate the need for affordable housing. It is also anticipated that the Housing White Paper will introduce new national policy on "starter homes" which will need to be addressed. Any proposed policy changes affecting the quantity or affordability of affordable dwellings sought will need to be subject to viability testing.

Reviewing the requirement for greenspace in new housing developments

In the process of reviewing the effect of new policy for housing space standards and revised affordable housing policy on viability of housing development it may also be necessary to review the effect on existing greenspace policy. Any changes to the policy will also need to demonstrate viability testing.

Commenting on the Scope of the Review

This period of consultation commences on **Monday 19th June and ends at 5pm, Monday 31st July 2017.**

You are invited to make representations about what the scope of the review should contain and whether the areas of focus outlined are appropriate or whether you think there are other matters that should be addressed.

It is also an opportunity for you to draw to the Council's attention any evidence that you think will be important in undertaking the review.

Drop-in Session

There will be a drop-in consultation event where you can discuss the scope of the Review with officers on **Friday 21st July 2017 1:30pm – 6:30pm at the Civic Hall, East Room, Leeds, LS1 1UR.**

Consultation Documents

[Leeds Core Strategy Selective Review - Scope and Content](#)
[Statement of Representation](#)
[Response Form](#)
[Sustainability Appraisal Scoping Report \(PDF 6MB\)](#)
[Local Plan Newsletter](#)

Submitting your Responses

Any comments in relation to the selective review should be sent using the response form where possible and be submitted via:

Email: corestrategyreview@leeds.gov.uk, or by
Post: Core Strategy Selective Review, Policy and Plans, The Leonardo Building, 2 Rossington Street, Leeds, LS2 8HD


Comments should be received by **5pm, 31st July 2017**

Next Steps

Responses received will be taken into account by the Council to prepare a draft plan review (the Publication Draft) for public consultation in winter 2017/18.

Documents

-  [Leeds Core Strategy Selective Review - Scope and Content](#)
-  [Statement of Representation](#)
-  [CSSR Review Response Form](#)
-  [Sustainability Appraisal Scoping Report June 2017 \(PDF 6MB\)](#)
-  [Executive Board Core Strategy Review Report](#)

To view documents in PDF format you will require the free  [Adobe Acrobat Reader](#)

Did you find the information you were looking for?

Yes No

Appendix 5. Regulation 19 Consultation Activity

Core Strategy Selective Review Regulation 19 Consultation Description of Consultation Activity

1. Introduction

- 1.1. During the consultation the public were invited to make representations on the proposed content of the CSSR and supporting documents as per the Regulation Statement (Appendix 5.01).
- 1.2. This report provides an account of the consultation methods used.

2. Consultation Period

- 2.1. The consultation period for the Publication Draft of the Core Strategy Selective Review ran from Friday 9th February to 5pm, Friday 23rd March 2018.

3. Documents

- 3.1. The main document issued as part of the consultation was the *Leeds CSSR Publication Draft Proposed Policy and Paragraph Changes*. This set out the proposed changes and additions to the adopted Core Strategy. It covered the following areas: housing requirement, housing distribution, a new plan period for housing supply, new policy on housing space standards and accessibility standards, updating affordable housing policy, updating green space policy, updating policies on use of renewable energy and sustainable construction, and a new policy on electric vehicle charging infrastructure.
- 3.2. A number of supporting documents were also made available:
 - i. Core Strategy Selective Review Sustainability Appraisal Non-Technical
 - ii. Sustainability Appraisal Draft Report 2018
 - iii. Report of Consultation 2018
 - iv. Strategic Housing Market Assessment, 2017
 - v. Economic Viability Study Update, 2018
 - vi. Review of Implementation of Green Space Policy G4, 2017
 - vii. Permitted Dwelling Size Measurement Exercise, 2017
 - viii. Accessible Housing Need Assessment 2018
 - ix. RIBA Case for Space 2011
 - x. DCLG Housing Standards Review – Cost Impacts, EC Harris 2014
 - xi. Review of Changes to EN1 and EN2 following Written Ministerial Statement 2015
 - xii. Air Quality Background Paper, 2018
 - xiii. Duty to Cooperate. CSSR Publication Draft. Table of Impacts 2018
 - xiv. Statement of Representations
 - xv. Appropriate Assessment Screening
 - xvi. Response Form (Appendix 5.03)
 - xvii. Guidance Note

4. Notifications

- 4.1. Letters (Appendix 5.04) were emailed or posted to over 1000 individuals and organisations. This included the statutory consultees and neighbouring local authorities as well as those who had made comments on the Core Strategy during its preparation up to adoption in 2014 and on the scoping (Regulation 18) consultation on the CSSR in 2017. A list of organisations notified is set out at Appendix 5.05

5. Advertising

- 5.1. Leeds City Council published an advertisement in the Yorkshire Evening Post a day before commencement of the consultation period giving details of the CSSR proposals and an explanation of how people could make representations (Appendix 5.02).

6. Use of Libraries and One-Stop-Shops

- 6.1. The Council's Central Library was given the main documentation including the proposed policy and paragraph changes and response forms which were circulated to all libraries and One-Stop-Shops.

7. Web Page

- 7.1. The CSSR web page was update just before the Regulation 19 Consultation period began on 9th February. A copy of the webpage is provided in Appendix 5.06. It provides a brief explanation of the proposals of the selective review, information on the consultation and how people are able to make comments, a note of the Drop-in-Session and ability to download key documents including the Proposed Policy and Paragraph Changes and various supporting documents.

8. Drop-in-Sessions

- 8.1. Two drop-in-session were organised for Thursday 1st March and Thursday 15th March held between 2pm – 7pm at Leeds Civic Hall, in Leeds city centre. The first was advertised as being open to all interests and the second was aimed at developers and planning consultants. However, wintery weather on 1st March prompted a re-advertisement opening up the second session of 15th March to all people and interests. The sessions were advertised on the CSSR webpage, local newspaper advertisement and statement of representation.



**Statement of Representations Procedure
Planning and Compulsory Act 2004**

Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Leeds Core Strategy Selective Review Publication Draft

The Leeds Core Strategy sets out the strategic town planning policy framework for the district to 2028.

The Council proposes to review the following parts of the Core Strategy:

- Reviewing the housing requirement in Policy SP6, housing distribution in SP7, and extending the Plan period to 2033
- Introducing new policy on housing standards for minimum space standards, and accessibility standards for new housing in policies H9 and H10
- Updating policy and requirement on affordable housing by amending Policy H5
- Reviewing the requirement for greenspace in new housing developments by amending Policy G4
- City Centre Green Space, making minor amendments to Policies G5 and G6
- Incorporating new national policy regarding Code for Sustainable Homes by updating the wording of Policies EN1 and EN2 and a consequential change to EN4
- Introducing a new Policy for Electric Vehicle Charging Infrastructure (EN8)

Since the adoption of the Leeds Core Strategy in November 2014; it has become apparent that a number of policy areas are in need of review to respond to new circumstances, evidence and/or the general effectiveness of policies. The Core Strategy Selective Review seeks to address this. As the Core Strategy was recently adopted in November 2014, only focused selective alterations to the Plan are considered necessary. The selective review will result in a series of focused amendments to the adopted Core Strategy. *The scope of the Review was consulted on in 2017.*

Representations are invited on the Publication Draft plan for a period of six weeks beginning on **9th February 2018 until 23rd March 2018**. Representations should be made in writing or by email and returned to the addresses below no later than 5pm on **23rd March 2018**. Guidance notes and consultation documents are available to view on the Council's website at www.leeds.gov.uk/localplan

Representations should relate only to the proposed Publication draft plan policies and can be submitted by using the response form, email or by post to the address below:

Online Form: www.leeds.gov.uk/localplan
Email: CoreStrategyReview@Leeds.gov.uk
Post: Leeds Core Strategy Selective Review Publication Draft Consultation
Leeds City Council
Planning services - Policy and Plans Group
9 Floor East
Merrion House
110 Merrion Centre
LEEDS
LS2 8BB

Where a groups share a common view on how they wish to see the revisions to the Plan changed, it would be more efficient and save resources if the group submit a single representation appending the names and addresses of those represented. Where requested, all named representatives will be notified of future stages.

Please note that copies of all comments (including names and addresses) will be made available for the public to view, and therefore, cannot be treated as confidential. Data will be processed and held in accordance with the Data Protection Act 1998. Please do not include sensitive personal information within the body of your representation.



**Statement of Representations Procedure
Planning and Compulsory Act 2004
Regulation 19 of the Town and Country Planning (Local Planning)
(England) Regulations 2012**

Leeds Core Strategy Selective Review Publication Draft

The Leeds Core Strategy sets out the strategic town planning policy framework for the district. The Council proposes to review a focused number of policy areas, including the housing requirement.

Representations are invited on the Publication Draft plan for a period of six weeks beginning on **9th February 2018 until 23rd March 2018**.

Representations should be made in writing or by email and returned to the Council no later than **23rd March 2018 (5pm)**. All documents and guidance notes on making a comment are available to download from the Council's website www.leeds.gov.uk/localplan, the Council's principal planning office (Leonardo Buildings, 2 Rossington Street, Leeds, LS2 8HD until 19th February and then Merrion House, 110 Merrion Centre Leeds, LS2 8BB) as well as key documents in local libraries and one stop shops.

If you require any further information, please contact us on **0113 37 87993** or email CoreStrategyReview@Leeds.gov.uk

Core Strategy Selective Review

Response Form



9th February to 23rd March 2018

The Core Strategy Selective Review has been drafted and this is your chance to comment on it before it is submitted to the Secretary of State for independent examination by a Planning Inspector. We would like to hear your views on the Plan.

How do I find out more?

Some of this form is technical because the Council must follow planning regulations. There is a guidance note to help complete this form available at www.leeds.gov.uk/localplan

How do I comment on the Plan?

The easiest way to take part is online at www.leeds.gov.uk/localplan where you will find a link to the consultation material. You can also find a copy of the Plan at your local Library, One Stop Centre or at the planning offices in Leeds City Centre.

Completed forms may also be returned by email to:

CoreStrategyReview@leeds.gov.uk

or post / by hand to:

Core Strategy Selective Review
Publication Draft Consultation
Leeds City Council
Policy & Plans Group 9th Floor
East
Merrion Centre
110 Merrion Centre Leeds
LS2 8BB

Should you need assistance please phone us on: (0113) 37 87993

Ref:

(For Official Use Only)

**ALL COMMENTS SHOULD BE RECEIVED NO LATER THAN
5PM ON 23rd MARCH 2018.**

Data Protection

The council is required by law to publish the comments you send us about the Plans, including your name and postal address. Your comments will be made available for the public to read in council offices and online. Your telephone number, email address, and signature will not be published. In addition, the council is required to provide all information submitted to us, including all personal information, to the Planning Inspectorate and their designated Programme Officer as part of the public examination of the Core Strategy Selective Review. The Planning Inspectorate may use your personal information to contact you during the public examination process. All data provided to the Planning Inspectorate and their programme officer will be shared in accordance with the Data Protection Act 1998. Please note that we cannot provide anonymity or accept comments marked 'private' or 'confidential'. Comments that include offensive, racist, discriminatory, threatening and other non-relevant statements will be destroyed.

If you have difficulty filling in this form we can make special arrangements to suit your needs – please let us know.

PART 1 – Your Details

* These fields must be completed

	Personal Details / Client Details	Agent Details (if applicable)
Title	<input type="text"/>	<input type="text"/>
First Name*	<input type="text"/>	<input type="text"/>
Last Name*	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address*	<input type="text"/>	<input type="text"/>
Post Code*	<input type="text"/>	<input type="text"/>
Phone/ Mobile	<input type="text"/>	<input type="text"/>
Email (we'd prefer to contact you by e-mail)	<input type="text"/>	<input type="text"/>

PART 2 – What comment do you wish to make? Please use a separate form for each policy/part of the plan you wish to comment on.

- 2.1 Which Policy or paragraph number do your comments relate to?
(You can make your comments in Section 3.3)

- 2.2. Do you wish to comment on any of the supporting documents?
(If so, please list them here and make your comments in Section 3.3)

You should not make comments related to the Site Allocations Plan on this form; it is subject to separate consultation. Comments made here will not be passed to the Site Allocations Inspectors.

PART 3 – Is the Plan sound? Please give evidence in support of your comments in Part 2

At this stage, before the Plan is sent to the Secretary of State for Public Examination, we are asking for your views about the 'soundness' of the Plan. An independent Inspector will examine the Plan against the 'tests of soundness' (These terms are explained in the guidance note)

(Please read the guidance notes on how to complete this section.)

3.1. Do you consider the Plan to be sound?

YES (go to Q3.3) NO (go to Q3.2)

3.2 Which test of soundness are your comments about? (You must select at least one option)

Positively prepared Effective Justified Consistency with National Policy

3.3 Please set out why you think this part of the Plan is sound / unsound?

Your comments should succinctly cover all the evidence & supporting information necessary to support/justify your representation using headings to deal with specific issues. Please continue on a separate sheet if necessary. There will not be another opportunity to make further comments before the Plan is submitted for examination.

3.4 Please set out what change(s) you consider necessary to make the Plan sound.

You will need to say why this change will make the Plan sound. It helps us if you can be as precise as possible and provide any suggested revised wording. Please continue on a separate sheet if you need to.

PART 4 – Is the Plan legally compliant?

4.1 Do you consider the Plan to be legally compliant (please refer to the guidance notes on how to complete this section)

YES

NO

4.2 Which part of legal compliance is your comment about? (You must select at least one option)

Local Development Scheme

Statement of Community Involvement

Consultation Of appropriate Statutory

Bodies Duty To Cooperate

Planning and Compulsory Purchase Act 2004

Sustainability Appraisal Report

Town & Country Planning (Local Planning) Regulations

4.3 Please give details of why you consider the Plan is/ or is not legally compliant.

PART 5 – Take part in the public examination

5.1. Your comments will be taken into account by the Planning Inspector. Would you like to take part in the forthcoming Public Examination?

Yes

No

The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination.

PART 6 – Future Updates

6.1 Would you like to be notified of any of the following? (please tick as appropriate)

The submission of the Plan for public examination

The publication of the Inspector's report

The Adoption of the Plan

Please sign and date this form

Signature:

Date:



City Development
Policy and Plans Group
9 Floor East
Merrion House
110 Merrion Centre
LEEDS
LS2 8BB

Contact: David Feeney
Tel: 0113 37 87993
Email: sap@leeds.gov.uk

Date: 9th February 2018

Dear Sir/Madam

Leeds Core Strategy Selective Review - Consultation

The Leeds Core Strategy sets out the strategic town planning policy framework for the district to 2028. You are receiving this letter because you are on our database of people interested in the Core Strategy. If you feel that you should not be on our database please contact us.

Since the Core Strategy has been in operation a number of policy areas are now in need of review because of new circumstances, evidence and/or the general effectiveness of policies. The Core Strategy Selective Review seeks to address this. The Core Strategy was adopted in November 2014, therefore only focused selective alterations to the Plan are considered necessary. The remainder remains up to date.

The selective review will result in a series of focused amendments to the adopted Core Strategy. I am writing to you to let you know that the Council proposes to review / update the following matters:

- Reviewing the housing requirement in Policy SP6, housing distribution in Policy SP7, and extending the plan period to 2033
- Introducing new policy on housing standards for minimum space standards, and accessibility standards for new housing in Policies H9 and H10
- Updating policy on affordable housing set out in Policy H5
- Reviewing the requirement for greenspace in new housing developments by amending Policy G4
- City Centre Green Space, making minor amendments to Policies G5 and G6
- Incorporating new national policy regarding Code for Sustainable Homes by updating the wording of Policies EN1 and EN2 and a consequential change to the EN4.
- Introducing a new Policy for Electric Vehicle Charging Infrastructure (Policy EN8)

What do you need to do?

This is your opportunity to submit comments on the matters listed above. These will be considered by the Council prior to the Publication Draft Plan being submitted to the Secretary of State for approval.

This consultation is running for a period of 6 weeks from the **9th February 2018 until 5pm on 23rd March 2018**.

As part of the consultation, there will also be an opportunity for you to come to a drop in session;

- (1) General / community drop in session – Thursday 1st March at Leeds Civic Hall in East room from 2pm to 7pm
- (2) Developers and consultants – Thursday 15th March at Leeds Civic Hall in East Room from 2pm to 5.30pm

What can you comment on?

The consultation relates only to the Core Strategy Selective Review and therefore **only** comments relating to the Review will be considered. Your comments should set out why you do or do not believe the Core Strategy Selective Review is appropriate / sound.

Comments relating to the following matters will be considered if received on or before **23rd March 2018 (5pm)**.

- Amended Policy SP6 (housing requirement)
- Amended Policy SP7 (housing distribution)
- Amended Policies EN1 and EN2 (new national policy regarding Code for Sustainable Homes) and a consequential change to EN4.
- New Policy EN8 (electric vehicle charging infrastructure)
- Amended Policy G4 (greenspace)
- Amended Policy G5 and G6 (city centre greenspace)
- Amended Policy H5 (affordable housing)
- New Policy H9 (Housing Standards for Minimum Space Standards)
- New Policy H10 (accessibility standards for new housing)
- Extending the Plan Period to 2033

What you can't comment on?

Please note that because the Core Strategy Selective Review is at Publication Draft Stage, only comments on the focused amendments (as set out above) will be accepted as valid.

Any comments specifically relating to Site Allocations Plan submitted in response to this consultation would not be valid as the SAP and CSSR are subject to different plan-making processes. The SAP has its own consultation (see www.leeds.gov.uk/yourcity)

How to view and comment on the Core Strategy Selective Review

The focused amendments are listed on the Council's web-site (www.leeds.gov.uk/localplan). Comments can only be received between **09th February and 23rd March 2018 (5pm)**.

Please relate your comments to the specific Policies. You can also read the documents at all Libraries / Community Hubs and One Stop Centres as well as the Council's main planning office at Merrion House.

Whilst we would prefer to receive your comments using the response form at (www.leeds.gov.uk/localplan) this saves the Council money,

you may also email comments to: CoreStrategyReview@Leeds.gov.uk

Or write to:
Leeds Core Strategy Selective Review
Leeds City Council
Planning services -Policy and Plans Group
9 Floor East, Merrion House
110 Merrion Centre
LEEDS
LS2 8BB

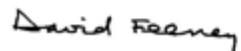
Next Steps

All representations received during the consultation period will be considered by the Council. In addition, they will be sent to the Planning Inspectorate, as part of the examination of the Plan by a Government appointed Planning Inspector.

Leeds Local Plan Newsletter

A newsletter which gives an update on planning policy documents in Leeds can be viewed at www.leeds.gov.uk/ldf.

Yours Faithfully



David Feeney
Head of Strategic Planning

Appendix 5.05 Organisations notified of Regulation 19 consultation

A and J Architects	Armley Forum. Theaker Lane Tenants
A660 Joint Council	Arqiva Services Ltd
AAH Planning	Arriva Yorkshire
Abbott Associates	Arthington Parish Council
Aberford Parish Council	ARUP
Ackroyd Dent & Co	Ash Grove Residents
ACS Stainless Steel Fixing Ltd	Ash Road Resident's Association
Adair Paxton	Ashmore & Associates
Adel & Wharfedale Branch Labour Party	Aspinall Verdi
Adel Neighbourhood Forum	Atkins Global
Adlington	Atlas Property Consultants
Advent Development	Avant Homes
Age UK	AWS Surveyors & Property Consultants
Agfa	Bache Treharne LLP Surveyors
Aggregate Industries	Banks Development
Aggregate Industries UK Ltd	Bardsey Parish Council
Ainscough Strategic Land	Bardsey-cum-Rigton Parish Council
Aire and Calder Rivers Group	Barnsley Council
Aireborough Civic Society	Barratt David Wilson Homes Yorkshire Homes
Aireborough Neighbourhood Forum	Barratt Homes & David Wilson Homes Yorkshire West
Airport Operators Association	Barrett+Barrett architects ltd
Akeler Group of Companies	Barron Homes
Al Hussain Education Centre	Bartle & Son
Allerton Bywater Parish Council	Barton Willmore
Alliance for Green Socialism	Barton Willmore Planning Partnership-Northern
Alliance Planning	Barwick and Scholes Parish Council
Allied Glass Containers	Barwick in Elmet & Scholes Parish Council
Allotments Federation	Barwick-in- Elmet & Scholes Nhood DevPlan Steering
Allsop & Co	Bayford & Co (Developments) Ltd
Alternative Windows (Leeds) Ltd	Becketts Park Residents Association
Alvis Vickers	Belmont Design Services Limited
Alwoodley Men's Group	Benoy
Alwoodley Parish Council	Bidwells
Alyn Nicholls and Associates	Bidwells Property Consultants
AMEC E&I Ltd	Blazefield Group
Ancient Monuments Society	BNP Paribas
Andrew Martin Associates	Boston Spa Parish Council
Apollo Lighting Ltd	Bovis Homes Group PLC
Arcadia Group Ltd	
Arcus Consultancy Services Ltd	
Arla Foods	

Bowland Ecology Ltd
Brackenridge Hanson Tate
Bradford Council - Highways
Bradford Metropolitan District Council
Bradley Stankler Planning
Bramhope and Carlton Parish Council
Brassington Rowan Chartered Surveyors
British Geological Survey
British Telecom Repayment Projects
British Toilet Association
British Trust for Conservation Volunteers
Bryan G Hall
BTCV
Burley Lodge Centre
Bury & Walker Solicitors
c/o Seacroft Sure Start
Calderdale Metropolitan Borough Council
Campaign for Better Transport
CAMRA
Can Plan Chapel Allerton Neighbourhood Plan
Canal & River Trust
CANPLAN (Chapel Allerton Neighbourhood Plan)
Carey Jones Architects
Carplus
Carter Jonas LLP
Carter Towler LLP
Cass Associates
CB Richard Ellis Ltd
CBI Yorkshire & Humber
CBRE Ltd
Central Retail Surveyors
Centre for Comparative Housing Research
Centrica Plc
Chair, Oulton and Woodlesford Neighbourhood Forum
Chapel Allerton Hospital
Chapelton Community Centre Action Group
Charity of Thomas Wade and Others
Christie & Co
Church Commissioners
CITU
City of York Council
Civil Aviation Authority
Clifford Parish Council

Collingham-with-Linton Parish Council
Commercial Boat Owners Association
Commercial Development Projects Ltd
Commercial Estates Group
Concord (Leeds Interfaith Fellowship)
Connect Housing
Corrocoat Ltd
Council for British Archaeology
CPRE
CPRE Yorkshire & Humber
Craftwork Cards Ltd
Craven District Council Craven District Council
Cross Country Trains
Crown Estate Office
Crowtrees Gardens Association
Cunnane Town Planning
Damian Walsh Associates
Dandara Limited
Dandara Ltd
David Lock Associates
David Storrie Associates
David Wilson Homes Northern
DB Schenker Rail (UK) Ltd
Deloitte Real Estate
Delta Carpets Ltd
Dennis Gillson & Son
Department for Education
Department for Education and Skills
Department for Transport, Rail Group
Department of Health
Dependable Services
Design Council
Development Planning Limited
DHA Planning
Diocese of Wakefield
Direct Workforce Ltd
Directions Planning
Disability Rights Commission
Disabled Persons Transport Advisory Committee
Dixon Wimbush
DLA Landscape
DLP Planning Ltd
DPDS Consulting

DPP UK LTD
Dresler Smith Chart Surveyors
Drighlington Conservation Group
Drighlington Parish Council
Drivers Jonas
Drummond & Churchwood Residents
Dynamic Capital and Investments
East Keswick Parish Council
East Leeds Youth Service
East Midlands Trains
Easymobile Limited
Ecology Building Society
Ecotec Research & Consulting
ECUS Ltd
Eddisons
EE (UK) Ltd
EKOS Consulting UK Limited
England and Lyle
Entec
Environment Agency
Equality and Human Rights Commission
ERS
Evans Property Group
Everbuild Building Products Ltd
EWS
Fair Play Yorkshire & the Humber Region
Fairburn Parish Council
Far Headingley Village Society
Fawley Watson Booth
Federation of Small Businesses
Fields in Trust
First Bus
First Transpennine Express
Firstplan
Focus Group Users and Carers for C.R.U
Fox Lloyd Jones
Framptons
Freight Transport Association
Freightliner
Freshfayre Ltd
Friends of Allerton Grange Fields
Friends of the Earth
Frost Planning
Galliford Try Housebuilding

Garforth Neighbourhood Forum
Gee Squared Ltd
Genesis Project
Gent Visick
George Wimpey Strategic Land
George Wimpey UK Ltd
Gerald Eve
Gildersome Parish Council
GJ Planning
GL Hearn
GL Hern (Harford Manor Ltd)
Gladman Developments
Golder Associates (UK) Ltd
Governor Leeds Prison
Great & Little Preston Parish Council
Greater Yorkshire Forestry Authority
Gregory Property Developments
Grenville Smith & Duncan
Groundwork Leeds
Guiseley and Menston Green Belt Action Group
Guiseley Parish
GVA
Gypsy Roma Traveller Achievement Service
H M Prison Service
Hague Nicholls
Hallam Land Management
Hallam Land Management Limited
Handley Gibson
Hanover Housing Association
Hanson Aggregates Ltd
Harewood House Truct
Harewood Parish Council
Harrogate Borough Council
Hartley Planning Consultants
Harvey Burns & Co
Headingley Development Trust Ltd
Headingley Network
Health and Safety Executive
Heaney Micklethwaite
Heaton Planning Ltd
Hesco CCP Ltd
Highways England
Hill Woodhouse (PM) Ltd
Historic England

HM Prison Service Headquarters
Home Builders Federation
Home Housing Association
Homes and Communities Agency
Horsforth Civic Society
Horsforth Town Council
Hourigan Connolly
Huddleston with Newthorpe Parish Council
Hull City Council
Humberts Leisure
Hunslet Carr Residents Association
Hunters (Yorkshire) Ltd
Husband and Brown
Hutchison 3G UK Ltd
Hyde Park Olympic Legacy Group
Iago European Consultants
Iain Simpson & Co
Iceni Projects
ID Planning
Ilkley Town Council
Indigo Planning
Inland Waterways Association, W Riding Branch
IoD Yorkshire
James Wellings Surveyors
Jehovah's Witnesses
Jennifer Lampert Associates Ltd
JLL
JMP Consultants
Jobcentre Plus
John Crawley & Co
John Dagg Barrister MRTPI
John Hill Associates
John Potts Limited
Johnson Brook
Jones Homes (Northern) Ltd
Justice for Travellers
JVH Town Planning Consultants
JWPC
Kearby with Netherby Parish Council
Keepmoat-partnerships
Keyland Developments Limited
King Sturge
Kingston Communications (HULL) Plc
Kippax Parish Council

Kirk Deighton Parish Council
Kirkby Overblow Parish Council
Kirklees Metropolitan Council
Kirkwells
Kms Consultants & Associates Ltd
Knight Frank
KPMG
Labour Councillor Neil Dawson Morley South Ward
Lafarge Aggregates Ltd
Lambert Smith Hampton
Lawson Hubbard Lowe
LCC - Plans Panel City Centre
Learning Partnership
Ledsham Parish Council
Ledston Parish Council
Leeds PCT
Leeds Ahead
Leeds Bradford International Airport
Leeds Centre for Integrated Living
Leeds Chamber Property Forum
Leeds Christian Community Trust
Leeds City Council
Leeds City Credit Union
Leeds Civic Trust
Leeds Connecting Communities
Leeds Co-operative Society
Leeds Cycling Action group
Leeds Federated Housing
Leeds Financial Services
Leeds Geological Association
Leeds guide
Leeds Gypsy Traveller Exchange
Leeds Head Injury Team
Leeds Health Focus
Leeds HMO Lobby
Leeds Hotels Association
Leeds Involvement Project
Leeds Involvement Project/ Older Peoples Group
Leeds Justice for Travellers
Leeds Local Access Forum
Leeds Local Involvement Network (LINK)
Leeds Metropolitan University
Leeds Older Peoples Forum

Leeds Prison
Leeds Property Forum
Leeds Property Rentals
Leeds Racial Equality Council
Leeds Residential Property Forum (LANDLORDS)
Leeds Society for Deaf & Blind People
Leeds Teaching Hospitals NHS Trust
Leeds Tenants Federation
Leeds Youth Council
Leeds, York and North York Chamber of Commerce
Leith Planning Ltd
Level
Liberal Democrat Otley and Yeadon Councillors
Liberty Retail Properties Ltd
Lidl UK
Linden Homes Strategic Land
Link Communication
Lionel D Levine & Co LLP
Lister Haigh Ltd
Little Woodhouse Community Association
LNT Construction
London Container Services
Lower Washburn Parish Council
LSS Waste Management Ltd
Mahmood Newsagents
Malcolm Walker Town planning Consultants
Manor West Developments Ltd
Marine Management Organ Management Organisation
Mark Brearley & Company
Marshalls
Martin Walsh Associates
Mason Capitano
Maven Plan Ltd
Mawsons
McCarthy & Stone (Developments) Ltd
Member of the Headingley Development Trust
MEPC
Mercado Carpets Ltd
Methley Estates
Michael Buswell Surveyors
Michael Steel & Co

Micklefield Parish Council
Ministry of Defence
Mobile Operators Association
Mone Bros. Limited
Montagu Evans LLP
Moor Grange Action Group
Moor Park Residents Association
Morley Town Council
Morley Town Manager
Mosaic Town Planning
Nabarro McAllister & Co
Nathanial Lichfield & Partners
National Coal Mining Museum (NCM)
National Express East Coast
National Federation of Gypsy Liaison Groups
National Grid
National Grid Property Developments Limited
National Landlords Association
National Offender Management Service
Natural England Consultation Service
Nature After Minerals
Neil Thornber Com
Network Rail
Neuro Outpatients
New Farnley Residents Association
New Farnley Vision Group
New Wortley Community Café
New Wortley Residents Action group
New Wortley Residents Association
Newall with Clifton Parish Council
Newlay Conservation Society
Newross Impex Ltd
Newton Kyme cum Toulston Parish Council
Nicholas Robinson & Partners
Nigel Tapp and Co
NJL Consulting
Normanton Town Council
North East (Inner) Area Committee
North Yorks Moors Forest District
North Yorkshire County Council
North Yorkshire Police Authority
Northern Powergrid
Northern Trust
Npower Renewables Limited

O2 – Telefónica UK Ltd Core Strategy Team
Office of Rail Regulation
Office of the Police and Crime Commissioner
Ogden Properties
Old Modernians Association
Older Peoples Reference Group
Otley and Yeadon Labour Party
Otley Conservation Task Force
Otley Town Council
Otley Town Partnership
Oulton Civic Society
Oulton Society
P & O Nedlloyd
P/L & A R Committee
Palmer & Co
Parklane Properties
PB Planning Ltd
PC Outlet Ltd
PDS Planning & Development Solutions Ltd
Peacock and Smith Ltd
Peartree Planning Consultants
Pegasus Group
Pegasus Planning Group
People in Action
People in Action Learning Disability Forum
Persimmon Homes
Persimmon Homes West Yorkshire
Peter Baker Associates
Peter Lund & Partners
Peter Pendleton & Associates
Physical Education Service
Pickard Properties
Pinderfields General Hospital
Pinsent Masons
Pioneer
Planning for Tennis
Planning Inspectorate (PINS)
Planning Potential
Planning Prospects Ltd
Planning, Design & Building
Planware
Planware Ltd
Polskie Forum Polish newsletter
Pool in Wharfedale E News

Pool in Wharfedale Parish Council
Pool Parish Council
Pope & Company
Portland House Investment Group
PSA Design
Pudsey Chamber of Trade
Quod
Rail Freight Group
Railfreight
Ramblers' Association
Rapleys LLP
Rawdon Billing
Rawdon Model Boat Club
Rawdon Parish Council
Real Time Training Ltd
Red Box Design Group
RED Property Services
Redrow Homes (Yorkshire) Ltd
Refugee Council
Re-new
RenewableUK
Renton and Parr
rg+p Planning
Richard Mills Counselling
Road Haulage Association - Northern Region
Roadway Container Logistics Ltd
Robert Halstead Chartered Surevyor
Roberts Mart & Co Ltd
Rockspring PIM (LLP)
Rodley Nature Reserve
Rosetta Landscape Design
Rothwell in Bloom/Music Festival/Community Forum
Rothwell OSC
Rowbotham & Partners
Rowland Burkitt
Royal Armouries
Royal Mail Property Holdings
RPS Group Plc
RSPB York Office
Rural Solutions
Rushbond Plc
Ruston Planning Limited
RWE Npower
SAA UK

Sanctuary Housing
Sanderson Associates
Sanderson Wetherall
Sandgate Residents Action Group
Save Our Scholes Action Group
Savills
Saxton cum Scathingwell and Lead Parish Council
Scarcroft Parish Council
Scholes Community Forum
Scientific Games International
Seacroft NP
Seacroft Surestart
Selby District Council
SEORA
Shadwell Parish Council
Shantona Womens Centre
Sherburn in Elmet Parish Council
Sherwoods Property Investment Consultants
Shulmans
Sicklinghall Parish Council
SIGMA Planning Services
Signet Planning
Simons Estates Limited
SK Design
Skelton Business Park
Skills Funding Agency
SLR Consulting
SLR Consulting Ltd
Smith and Company
Smiths Gore
Social Regeneration Consultants Ltd
Society for the Protection of Ancient Buildings
SORM
SORM - British Waterways
South Milford Parish Council
Spawforth Associates
Spofforth with Stockeld Parish Council
Sport England
SSA Planning Limited
St George's Church Crypt
St James's Hospital
St Margaret Thornbury & St James Woodhall
St Mary's Hospital

St Theresa's Retirement Club
Stainton Planning
Stanks and Swarcliffe residents Association
Steadman Brierley
Sten Architecture
Stephenson Day Property Investment Consultants
Steve Gibbins & Co
Stevens Scanlan
Stewart Ross Associates
Storeys: ssp
Strategic Projects Office
Strutt & Parker LLP
Stutton with Hazlewood Parish Council
Sustrans
Swillington Parish Council
Tadcaster Parish Council
Talk Mobile
Tangrum Housing Co-op
Tarmac Ltd
Taylor Woodrow Developments
Taylor Young
Terrence Higgins Trust
Tesco Mobile
Tesni Properties Ltd
Tetleys Motor Services Ltd
TETLOW KING PLANNING
The Coal Authority
The Co-operative Group Ltd
The Courthouse Planning Consultancy
The Diocese of Ripon & Leeds
The Garden History Society
The Georgian Group
The Gypsy Council
The Irish Traveller Movement in Britain
The JTS Partnership
The Laurels Action Group
The Lawn Tennis Association
The Planning Bureau
The Ridings Housing Association
The Theatres Trust
The Thorpe Park Hotel
The Twentieth Century Society
The Victorian Society
The Vodafone House

The Woodland Trust
Thomas Eggar LLP
Thorner Parish Council
Thornton Medical Centre
Thorp Arch Parish Council
Titchmarsh & Bagley
Titchmarsh and Bagley
Town Centre Securities
Towngate Estates Ltd
Towngate Plc
Transport 2000 - West Yorkshire Group
Traveller Law Reform Project
Tuffnells Parcel Express
Turley Associates
Turnways Laurel Bank Residents
TWPS Ltd
united utilities (Transco)
Unity Housing Association
University of Leeds
upBEAT Social Enterprises
URS Infrastructure and Environment UK Ltd
Veolia Environmental Services PLC
Vernon & Co
Vickers Oils
Victorian Society
Virgin Media
Volition
Voluntary Action Leeds
W A Fairhurst & Partners
Wakefield Metropolitan District Council
Walker Morris
Walker Singleton Chartered Surveyors
Walsingham Planning
Walton & Co
Walton Parish Council

WARD (Wharfedale & Airedale Review Development)
Watts and Partners
Weatheralls
Weeton Parish Council
Weetwood Residents Association
West & Machell
West Leeds Family Service Unit
West Waddy ADP
West Yorkshire Archaeology Advisory Service
West Yorkshire Combined Authority
West Yorkshire Fire and Rescue Service
West Yorkshire Police Authority
West Yorkshire Probation Service
Wetherby Civic Society
Wetherby Town Council
White Rose Forest
White Young Green
Wighill Parish Council
Wildblood MacDonald Architects
William Sutton Housing Association
Woodbine Terrace Residents Assoc
Woodhall Planning and Conservation
Wothersome Parish Council
WYG Planning & Design
Wykebeck Way Community Forum
X Leisure
Yew Tree Associates
York Consulting
Yorkshire Ambulance Service NHS Trust
Yorkshire Housing
Yorkshire Local Councils Associations
Yorkshire Water Services
Yorkshire Wildlife Trust
Total Organisations Notified: 688

Leeds Core Strategy Selective Review

Leeds City Council is undertaking a selective review of the Core Strategy.

The Leeds Core Strategy sets out the strategic town planning policy framework for the district to 2028. Since the adoption of the Leeds Core Strategy in November 2014; it has become apparent that a number of policy areas are in need of review to respond to new circumstances, evidence and/or the general effectiveness of policies.

The Core Strategy Selective Review seeks to address this. As the Core Strategy was recently adopted in November 2014, only limited selective alterations to the Plan are considered necessary. The selective review will result in a series of focused amendments to the adopted Core Strategy. The scope of the Review was consulted on in 2017.

The Council proposes to review the following parts of the Core Strategy:

- Reviewing the housing requirement in Policy SP6, housing distribution in SP7, and extending the Plan period to 2033
- Introducing new policy on housing standards with minimum space standards, and accessibility standards for new housing in policies H9 and H10
- Updating policy and requirement on affordable housing by amending Policy H5
- Reviewing the requirement for greenspace in new housing developments by amending Policy G4
- City Centre Green Space, making minor amendments to Policies G5 and G6
- Incorporating new national policy regarding Code for Sustainable Homes by updating the wording of Policies EN1 and EN2 and a consequential change to EN4
- Introducing a new Policy for Electric Vehicle Charging Infrastructure (EN8)

Period of Consultation

This consultation is running for a period of 6 weeks from the 9th February 2018 until 5pm on 23rd March 2018.

What can you comment on?

The consultation relates only to the Core Strategy Selective Review and therefore only comments relating to the Review will be considered. [The policies which are being reviewed are available to view online \(PDF 1.7MB\)](#).

Your comments should set out why you do or do not believe the Core Strategy Selective Review is appropriate / sound. In addition all background/evidence documents are set out in the documents section below.

Comments relating to the following matters will be considered if received on or before 23rd March 2018 (5pm).

- Amended Policy SP6 (housing requirement)
- Amended Policy SP7 (housing distribution)
- Amended Policies EN1 and EN2 (new national policy regarding Code for Sustainable Homes) and a consequential change to EN4
- New Policy EN8 (electric vehicle charging infrastructure)
- Amended Policy G4 (greenspace)
- Amended Policy G5 and G6 (city centre greenspace)
- Amended Policy H5 (affordable housing)
- New Policy H9 (Housing Standards for Minimum Space Standards)
- New Policy H10 (accessibility standards for new housing)
- Extending the Plan Period to 2033

Drop-in sessions

As part of the consultation there will also be an opportunity to attend drop-in sessions:

General / Community drop-in session

Thursday 1 March 2018, 2pm - 7pm

The East Room
Civic Hall
Calverley St
Leeds, LS1 1UR

Developers, consultants and community session

Thursday 15 March 2018, 2pm - 7pm

The West Room
Civic Hall
Calverley St
Leeds, LS1 1UR

Submitting your comments

If you would like to submit comments please do so by filling in the [response form \(PDF 0.3MB\)](#). There is also a [guidance note \(PDF 0.2MB\)](#) to assist with this. You can comment by filling in the response form in the following ways:

Email

CoreStrategyReview@Leeds.gov.uk

By post

Leeds Core Strategy Selective Review
Leeds City Council
Planning services - Policy and Plans Group
9 Floor East, Merrion House
110 Merrion Centre
Leeds
LS2 8BB

What happens next?

If you would like to comment then please use the response form and send it to us. All representations received during the consultation period will be considered by the Council. In addition, they will be sent to the Planning Inspectorate, as part of the examination of the Plan by a Government appointed Planning Inspector.

Publication Draft Plan Supporting Documents

The following documents support and provide the background evidence for the policies. The response form and guidance note are also available below.

- [Response Form \(PDF 0.1MB\)](#)
- [Guidance Note \(PDF 0.1MB\)](#)

- [Core Strategy Selective Review, Publication Draft, Proposed policy and paragraph changes \(PDF 2.7MB\)](#)
- [Core Strategy Selective Review Sustainability Appraisal Non-Technical \(PDF 1.3MB\)](#)
- [Sustainability Appraisal Draft Report 2018 \(PDF 8.2MB\)](#)
- [Report of Consultation 2018 \(PDF 0.8MB\)](#)
- [Strategic Housing Market Assessment, 2017 \(PDF 4.4MB\)](#)
- [Economic Viability Study Update, 2018 \(PDF 1.7MB\)](#)
- [Review of Implementation of Green Space Policy G4, 2017 \(PDF 0.8MB\)](#)
- [Permitted Dwelling Size Measurement Exercise, 2017 \(PDF 1.4MB\)](#)
- [Accessible Housing Need Assessment 2018 \(PDF 2.4MB\)](#)
- [RIBA Case for Space 2011 \(PDF 3.5MB\)](#)
- [DCLG Housing Standards Review – Cost Impacts, EC Harris 2014 \(PDF 1.9MB\)](#)
- [Review of Changes to EN1 and EN2 following Written Ministerial Statement 2015 \(PDF 0.8MB\)](#)
- [Air Quality Background Paper, 2018 \(PDF 3.4MB\)](#)
- [Duty to Cooperate, CSSR Publication Draft, Table of Impacts 2018 \(PDF 1MB\)](#)
- [Statement of Representations \(PDF 0.1MB\)](#)
- [Appropriate Assessment Screening \(PDF 0.5MB\)](#)

Appendix 6. Summary of Core Strategy Selective Review Regulation 18 Consultation Responses

Introduction

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

Summary by Topic

Housing Requirement and Plan Period

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

Housing Space Standards

1. Introduction of space standards are supported. [Cllr Tom Leadley](#)
2. Standards should apply to student accommodation. [Deryck Piper \(Little Woodhouse NPF\)](#). Should not apply to student accommodation. [Simon Grundy \(Carter Jonas\)](#), [David Smith \(Indigo Planning\)](#)

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

Housing Access Standards

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

Affordable Housing

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

Greenspace

1. Requirements of current Greenspace policy should not be watered down. [Cllr Tom Leadley. Conservative Group.](#)
5. The review of Greenspace policy (80sqm/dwelling) is needed to viability test and change an onerous requirement. [Rachel Flounders \(ID Planning\), Persimmon Homes, Chris Martin \(Barton Willmore\), Simon Grundy \(Carter Jonas\), Icen Projects \(Ideal Standard\)](#)
2. Concern about impact of Greenspace on PRS Schemes. [Dandara](#)
3. Commuted sums should be exceptional. [Cllr Tom Leadley](#)

4. Greenspace should not be provided on adjacent GB land, but be on-site. [Cllr Tom Leadley](#)
5. Policy should have regard to Government Policy on ancient woodland. [Forestry Commission](#).
6. Policy should extend to retrofitting existing spaces. [Deryck Piper \(Little Woodhouse NPF\)](#)
7. Expect review to improve delivery of greenspace to achieve Policy G3 Standards. [Natural England, David Smith \(Indigo Planning\)](#)
8. Policy should prevent existing greenspaces from being built on. [Horsforth Town Council](#).
9. Policy review should consider the role of eco-corridors/green infrastructure. [Jennifer Kirkby, Aireborough NDF, Aecom \(M&G\)](#)
10. Review should be addressed via an SPD. [Iain Bath Planning](#)
11. Implementation practice should also be reviewed. [Paul Leeming \(Carter Jonas\)](#)

EN1 and EN2

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

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

Procedural

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

Additional Matters for CSSR

1. Review the need for employment land up to 2033 for consistency and for highway modelling. [Highways England](#), [Chris Martin \(Barton Willmore\)](#), [Nicola Berry \(Pegasus Group\)](#), [North Yorkshire County Council](#), [Paul Leeming \(Carter Jonas\)](#), [Andrew Rose \(Spawforths\)](#), [Andrew Rose \(Spawforths for Miller Homes\)](#), [Matthew Shepherd \(Turley\)](#)
2. Review all CS Policies which are calculated on a fixed period should also be reviewed up to 2033. [Andrew Rose \(Spawforths for Miller Homes\)](#)
3. Review retail needs up to 2033. [Anna Turton \(Lichfields for CEG\)](#)
4. Review Distribution of Housing (SP7). [Simon Grundy \(Carter Jonas\)](#), [Paul Leeming \(Carter Jonas\)](#), [James Seabury \(Banks Property\)](#), [Joanne Austin](#), [Neil Beaumont](#), [Dawn Beaumont](#), [Adrienne Sykes](#), [Save Parlington Action Group](#), [Kathy Horne](#), [Karen Baxter](#), [Celia Moran](#), [Howard Bedford](#)
5. Review Spatial Strategy (Policy SP1). [James Seabury \(Banks Property\)](#)
6. Address community and natural infrastructure (schools, health, roads, greenspace) needs. [R&SE Tindall](#), [Jennifer Kirkby Aireborough NDF](#), [Yorkshire Greenspace Alliance](#), [Sue McQuire \(Garforth NPF\)](#), [Martin Fox](#), [Joanne Austin](#), [Neil Beaumont](#), [Dawn Beaumont](#), [Adrienne Sykes](#), [Save Parlington Action Group](#), [Kathy Horne](#), [Karen Baxter](#), [Celia Moran](#), [Howard Bedford](#)
7. Infrastructure (Policy ID2) to review the Community Infrastructure Levy. [Simon Grundy \(Carter Jonas\)](#), [Paul Leeming \(Carter Jonas\)](#)
8. Transport Infrastructure Priorities (Policy SP11). [James Seabury \(Banks Property\)](#)
9. Strategic Green Belt Review. [Yorkshire Greenspace Alliance](#), [Sue McQuire \(Garforth NPF\)](#), [Conservative Group](#), [Martin Fox](#), [Joanne Austin](#), [Neil Beaumont](#), [Dawn Beaumont](#), [Adrienne Sykes](#), [Save Parlington Action Group](#), [Kathy Horne](#), [Karen Baxter](#), [Celia Moran](#), [Howard Bedford](#), [James Seabury \(Banks Property\)](#)
10. Green Belt Policy exceptional circumstances development criteria. [Yorkshire Greenspace Alliance](#)
11. Green Belt land review at Leeds Bradford Airport. [Charles Johnson LBA](#)
12. Housing site release phasing, including availability of PDL. [Yorkshire Greenspace Alliance](#), [Sue McQuire \(Garforth NPF\)](#), [Martin Fox](#), [Simon Grundy \(Carter Jonas\)](#), [Paul Leeming \(Carter Jonas\)](#), [James Seabury \(Banks Property\)](#)
13. Housing Density (Policy H3). [Yorkshire Greenspace Alliance](#)
14. Housing Mix (Policy H4). [Simon Grundy \(Carter Jonas\)](#), [Paul Leeming \(Carter Jonas\)](#)
15. Address air Quality. [R&SE Tindall](#), [Dr Alistair Watson \(Otley NF\)](#), [Jennifer Kirkby](#), [Aireborough NDF](#)
16. Sustainability Issues affecting Otley. [Dr Alistair Watson \(Otley\)](#)
17. The evidence base needs to be extended to sustainability issues: environment, place making, community infrastructure. [Jennifer Kirkby](#), [Aireborough NDF](#)
18. More research is needed on the effects of large scale housing development on flooding and traffic/air quality. [Norma Kaczmar](#)
19. A strong link with neighbourhood plans is needed. [Jennifer Kirkby](#), [Aireborough NDF](#)
20. The proposed siting of the HS2 depot at the Aire Valley Crofton site would sterilise 25 - 35ha of employment land that ought to be made up elsewhere. [Andrew Rose \(Spawforths\)](#)
21. Bring forward defunct employment sites (such as the Ideal Standard site), Otley. [Iceni Projects \(Ideal Standard\)](#)
22. Policy H4 (housing mix) should not be applied prescriptively. [David Smith \(Indigo Planning\)](#)

Appendix 7. Summary of issues raised at Regulation 20 stage and Council responses

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
SP6-1	Calculation. Support the soundness of the proposed Housing Requirement.	Matthew Roe (Unite), Weetwood Residents Association, Anthony Lord, Selby District Council, Bramhope & Carlton PC, Highways England, Farsley Residents' Action Group, Leeds Federated Housing Association, Leeds Civic Trust, George Hall	10	S	Support noted	None
SP6-2	Calculation. The Housing Requirement for the plan period should be much lower. A range of lower figures have been suggested including the 2,649 p.a. (42,384 plan period) DCLG consultation figure. The effect of a higher figure means that unnecessary Green Belt and/or green field housing sites as well as land at risk of flood will be brought forward for development.	Cllrs D and A Blackburn, Neil Hunt, Leeds Conservative Group, Cllr Dawn Collins, Peter & Pat Bell, Aireborough Neighbourhood Development Forum, Rawdon Parish Council, Cllr Terry Wilford, Dr R Buxton, John Davies, Stuart Andrew MP, Save Parlington Action Group, Joanne Austin, Barwick & Scholes PC, Howard Bedford, Richard Taylor, Chris McGougan, JD Brearley, Sheila Amodia, Andrew Price, John Binnie OBE, John Clemmence, Graham Branston, Mr & Mrs Oldroyd, Andrew Thompson, Peter & Janette Mawson, Jennifer Newby, Trevor Newby, David Sarkar, Wetherby Civic Society, Andrea Jenkyns MP, Sharon Tate, Gary and	42	O	The proposed 51,952 housing requirement figure is sound. Notwithstanding this the Council accepts that the penalties of the NPPF as regards underdelivery are cause for concern especially where such underdelivery is not as a result of lack of land supply.	Insert para 4.6.6 as follows: <i>"In reflecting the wider and longer term aspirations of the District (and its Regional role) the housing requirement takes into account the benefits of economic uplift. However, the Council will need to closely monitor the delivery and implementation of the housing requirement, including the roles and responsibilities of house builders throughout Leeds, seek to ensure effective build-out rates and assess any causes of under-delivery. Notwithstanding this commitment, wider economic drivers and uncertainties, such as the UK's departure from the European Union, could potentially impact upon these aspirations, requiring bespoke local solutions, which maintain the Core</i>

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
		Lynne Swinnerton, Belinda Peacock, Catherine Hardaker, Glenn Hardaker, Morley Town Council, Cllr Tom Leadley, MT Middlemiss, Linda Gardner, PK Farncombe, Garforth Neighbourhood Forum				<i>Strategy's overall approach. This overall approach is intended to ensure that the City is as resilient as possible in delivering agreed priorities whilst managing unforeseen change against the context of national planning policy and its penalties for under delivery."</i>
SP6-3	Calculation. It is not explained why the REM Core projection of 2,587 dwellings / 3,650 jobs is not preferred?	Cllr Dawn Collins	1	O	LCC has used the REM2017 projection which makes an adjustment for the Office of Budget Responsibility (OBR) forecast of reduced economic activity and the market signals adjustment recommended in the SHMA 2017.	None
SP6-4	Calculation. The Core REM scenarios should be used set out in Tables 7, 8 and 9 of the Edge Demographic Analysis Report. The REM2017 Core figure of 2,604 dwellings should be used with a market signal uplift of 115 giving a net requirement of 2,719 (43,504). The 115 comes from the affordable housing uplift used by DCLG in its consultation of September 2017.	Save Parlington Action Group, Joanne Austin, Barwick & Scholes PC, Howard Bedford,	4	O	The SPAG calculation omits any adjustment for the Office of Budget Responsibility (OBR) forecast of reduced economic activity. It uses the simple affordability adjustment rather than the more substantive market signals adjustment recommended in the SHMA 2017.	None
SP6-5	Calculation. The SHMA 2017 uses the OBR forecasting selectively. It incorporates an adjustment for economic activity rates but not its forecast of job growth. This is illogical and discredits the methodology.	Save Parlington Action Group, Joanne Austin, Barwick & Scholes PC, Howard Bedford,	4	O	The employment growth forecast for Leeds has been taken from the Regional Econometric Model (REM). In order to consider the relationship between future economic and demographic change, the analysis has presented a range of dwelling growth outcomes using economic assumptions underpinning the REM and alternative economic activity rates. The OBR provides a national-level	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					forecasts of labour force changes which have been applied to local economic activity rates.	
SP6-6	Calculation. The method of calculating the Housing Requirement of 3,247 / annum (51,952) is not clearly explained in the SHMA 2017.	Neil Hunt, Cllr Dawn Collins, Mike Ashworth WYG (Strata, Harrow Estates), Graham Connell, WYG (Holmes & Son), Phil Brock WYG (Avant Homes), Rawdon Parish Council, Peter Cleave, Deloitte (Caddick), Wetherby Civic Society, Jonathan Dunbavin, Tom Cook & Richard Irving IDP (Miller Homes, Linden Homes, Thornhill Estates, Sir Robert Ogden Pts, Redrow Homes, J Wilson & Diocese WYD, Taylor Wimpey, Ogden Group, Great North Developments, Barnaway & Hamber, Park Lane Homes et al), Matthew Smedley, AECOM (M&G Real Estate), Paul Leeming, Carter Jonas (Hatfield Estate, AC Developments, AR Briggs, Linden Homes/Lady Hastings, S Burnett/Lady Hastings, Lady Hastings), HBF, CPRE West Yorks,	31	O	The explanation is set out in the report to Executive Board of 7 th February 2018. The proposed requirement figure is the SHMA ADJUSTMENT scenario which adjusts the REM17 scenario (set out in the SHMA 2017) by omitting the partial headship rate adjustment of 231 dwellings p.a. (3,696 plan period).	None
SP6-7	Calculation. The housing requirement is too much of a numerical calculation, without regard to meeting needs. Planning for needs, particularly the need for older people to find	CPRE West Yorks	1	O	National Planning Policy expects local authorities to use Office of National Statistics projections as the starting point. This will remain the case under the draft revised NPPF. The Council	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	appropriate accommodation and the need for affordable housing should be a more central part of the process. There is no evidence that the numerical requirement will meet identified needs. This could lead to an unsustainable outcome of green field and Green Belt land being used without peoples actual needs being met.				has other policies to seek appropriate provision of affordable housing and housing for older people and those with mobility needs.	
SP6-8	Calculation. The proposed Housing Requirement fails to consider the SHMA 2017 recommendation for a market signals uplift	Mike Ashworth WYG (Strata, Harrow Estates), Graham Connell, WYG (Holmes & Son), Phil Brock WYG (Avant Homes)	5	○	The proposed Housing Requirement does include an uplift of 380 dwellings p.a. for market signals (see SHMA 2017 paras 5.57 – 5.58)	None
SP6-9	Calculation. The demographic starting point for the housing requirement calculation should be the PG Long Term. This reflects under delivery of housing between 2006/7 and 2015/16 (SHMA 2017 Table 4.3).	Mike Ashworth WYG (Strata, Harrow Estates), Graham Connell, WYG (Holmes & Son), Phil Brock WYG (Avant Homes),	5	○	As set out in para 5.28 of the SHMA 2017 the SNPP -2014 is the latest 2014 based projection and accords with PPG Para 2a-016 which expects the latest available information to be considered.	None
SP6-10	Calculation. The demographic starting point for the housing requirement calculation should be the PG 10 Year, i.e. 2,282 dwellings	Wetherby Civic Society	1	○	As set out in para 5.28 of the SHMA 2017 the SNPP-2014 is the latest 2014 based projection and accords with PPG Para 2a-016 which expects the latest available information to be considered.	None
SP6-11	Calculation. A return or partial return headship rate adjustment to that of 2008 based values should be incorporated	Mike Ashworth WYG (Strata, Harrow Estates), Graham Connell, WYG (Holmes & Son), Phil Brock WYG (Avant Homes), Stuart Natkus Barton Willmore (Barratt & DW Homes, ONE Consortium), Rob Moore Savills (Bramham Park), Johnson-Mowatt	9	○	The latest evidence continues to suggest that the rate of household formation is failing to return to historical levels. The Council may take account of any such return through future review of the Plan.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
SP6-12	Calculation. LCC's decision not to include a headship rate adjustment is supported	Save Parlington Action Group, Joanne Austin, Barwick & Scholes PC, Howard Bedford, Wetherby Civic Society	5	S	Support noted	None
SP6-13	No allowance has been made for second homes or vacancy.	Peter Gleave, Deloitte (Caddick)	1	O	Paragraph 5.10 of the SHMA 2017 explains that housing vacancy has been factored in to the housing requirement calculation figures.	None
SP6-14	Calculation. The vacancy rate assumed by the SHMA 2017 is 3.4% when the 2011 Census gives the vacancy rate for Leeds as 3.6%	Mike Ashworth WYG (Strata, Harrow Estates), Graham Connell, WYG (Holmes & Son), Phil Brock WYG (Avant Homes),	5	O	The SHMA 2017 has assessed more recent data including Council Tax records which indicate a lower level of vacancy (Table 3.1) and falling levels of vacancy from 2005 to 2015. 3.4% is an up to date and informed assumption about vacancy	None
SP6-15	Calculation. The REM 2017 is the wrong economic scenario for Leeds. The HIGH GROWTH scenario of employment growth is more appropriate reflecting the ambitions of Leeds' growth strategy and infrastructure including HS2. A requirement of only 51,952 will depress economic growth costing some £6b of GVA for Leeds. The CSSR should be positively planning for housing delivery. Actual job growth from 1998-2008 and 2009-2015 was in excess of 5000 jobs p.a. A higher requirement is also needed to help catch up on the under-delivery of dwellings against adopted Core Strategy targets over recent years.	Mike Ashworth WYG (Strata, Harrow Estates), Graham Connell, WYG (Holmes & Son), Phil Brock WYG (Avant Homes), Stuart Natkus Barton Willmore (Barratt & DW Homes, ONE Consortium, Chartford Homes, Stonebridge Homes), Rob Moore Savills (Bramham Park), Simon Grundy Carter Jonas (Avant Homes), Mark Lane DPP (Linden Homes, Bellway Homes), Johnson-Mowat, Ian Bath (KCS Developments), James Benyon, Quod (Landsec), Tim Waring, Quod, (Stirling Investment), Sam Ryan, Turley (Gallagher Estates), Jonathan Dunbavin, Tom	39	O	The HIGH GROWTH scenario relies on a forecast of job growth that is considered to be too aspirational and would lead to an excess of homes against likely levels of job growth. Should job growth expectations reach and be sustained at the HIGH GROWTH level there will be an opportunity for the Council to review the housing requirement or to take other action to increase the delivery or supply of housing.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
		Cook & Richard Irving IDP (Miller Homes, Linden Homes, Thornhill Estates, Sir Robert Ogden Pts, Redrow Homes, J Wilson & Diocese WYD, Taylor Wimpey, Ogden Group, Great North Developments, Barnaway & Hamber, Park Lane Homes et al), John Flemming (Gladman Developments), Paul Leeming, Carter Jonas (Hatfield Estate, AC Developments, AR Briggs, Linden Homes/Lady Hastings, S Burnett/Lady Hastings, Lady Hastings), HBF, Emma Winter, Carter Jonas (Harewood Estate)				
SP6-16	The Council's proposed requirement (3,247dpa), and the SHMA recommendation (3,478dpa) are too low to meet the high affordable housing need identified (1,230 affordable dwellings per annum – SHMA 2017). A higher requirement would assist in delivering the affordable housing requirement.	Strata Homes Ltd submitted by WYG Planning	1	O	The SHMA 2017 built in a market signals affordable housing uplift to the proposed housing requirement.	None
SP6-17	Calculation. Support for LCC's decision not to include an allowance for under-delivery of housing in the period 2012 – 2017.	Save Parlington Action Group, Joanne Austin, Barwick & Scholes PC, Howard Bedford, Morley Town Council, Cllr Tom Leadley	5	S	Support noted	None
SP6-18	Calculation. The Office of Budget Responsibility (OBR) adjustment regarding job growth is necessary to	Mike Ashworth WYG (Strata, Harrow Estates), Graham Connell, WYG	9	O	In the realm of economic forecasting it is safer to go with a blend of REM and OBR forecasts (which is part of the	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	take account of increased economic activity rates.	(Holmes & Son), Phil Brock WYG (Avant Homes), Stuart Natkus Barton Willmore (Barratt & DW Homes, ONE Consortium, Chartford Homes, Stonebridge Homes)			calculation of the proposed housing requirement) rather than rely entirely on the OBR forecasts.	
SP6-19	Calculation. Evidence on how economic activity rates have been used in the SHMA 2017 is not set out fully. If the predicted increase in activity rates fails to materialise the scale of housing need will have been seriously underestimated.	Johnson-Mowat	1	○	The SHMA has assessed the value of building in the economic activity rates of the Office of Budget Responsibility employment forecasting. As there are divergent trends the choice to use the mid-point between REM2017 and OBR scenarios is the safest approach.	None
SP6-20	Calculation. Assumed reductions in unemployment are not optimistic enough. Rates could easily fall to 4.6% in Leeds below the 5% assumed in the SHMA by 2033.	Stuart Natkus Barton Willmore (Barratt & DW Homes, ONE Consortium, Chartford Homes, Stonebridge Homes),	4	○	With future world and European economic uncertainties it is safer to go with the conservative reduction to 5%	None specifically but note amendment to para 4.6.6 of the Plan as noted in response to SP6-02 above
SP6-21	Calculation. Assumed reductions in unemployment are over optimistic.	Mike Ashworth WYG (Strata, Harrow Estates), Graham Connell, WYG (Holmes & Son), Phil Brock WYG (Avant Homes),	5	○	There is a clear trend of falls in unemployment which it is appropriate to include.	None
SP6-22	Calculation. The uplift for market signals should be 319 rather than 380. The SHMA (para 5.48) used a 50:50 split for owned and rented, but the market is really 60:40 which means the uplift should be only 14%.	Wetherby Civic Society	1	○	The 50/50 split is considered to be reasonably representative of the local market.	None
SP6-23	In para 5.50, a reduction in housing completions is identified but, for no stated reason, this is ignored and the target is not reduced despite a 34% reduction. Presumably a reduction to target should result, but we are not sufficiently expert to apply a suitable percentage.	Wetherby Civic Society	1	○	The relationship of falling historic completions to housing need could be interpreted in a variety of ways, not necessarily implying a reduction in the need.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made						
SP6-24	Calculation. It is not clear why the alternative options for a housing requirement have been dismissed.	Neil Hunt	1	O	The explanation is set out in the report to Executive Board of 7 th February 2018. The HIGH GROWTH scenario relies on a forecast of job growth that is too optimistic. The REM2017 scenario contains an unrealistic assumption of partial return of headship rates to pre-recession levels. The DCLG Consultation scenario could be damaging to Leeds' economic growth prospects and ability to meet Leeds' housing needs	None						
SP6-25	Calculation. Employment forecasts can be achieved with a lower housing requirement.	Neil Hunt	1	O	Table 5.6 of the SHMA 2017 illustrates that the REM2017 scenario of 3,478 dwellings p.a. considers economy / jobs but the 2017 DCLG does not. The latter would need a 40% uplift to align with job growth.	None						
SP6-26	Calculation. The proposed Housing Requirement of 51,952 will attract in-migrants and impact on the growth and regeneration of neighbouring planning authorities.	Neil Hunt	1	O	The housing requirement of 51,952 would have a relatively neutral impact on in-commuting from outside Leeds. The commuting ratio of 0.874 – 0.875 is maintained, which compares with the 2011 census ratio of 0.87	None						
SP6-27	Calculation. The proposed Housing Requirement of 51,952 is not deliverable because completions over the last 10 years have averaged under 1800 /annum.	Neil Hunt	1	O	Housing completions in Leeds between 2004/5 and 2017/18 (14 years) average 2,772 dwellings per annum. The ten year averages during this period are approximately 2,700 dwellings. The requirement is deliverable but relies on an active city centre and inner area market to ensure that homes are built in sustainable locations. <table border="1"> <thead> <tr> <th>Year</th> <th>Completions</th> </tr> </thead> <tbody> <tr> <td>2004-5</td> <td>2,633</td> </tr> <tr> <td>2005-6</td> <td>3,436</td> </tr> </tbody> </table>	Year	Completions	2004-5	2,633	2005-6	3,436	None
Year	Completions											
2004-5	2,633											
2005-6	3,436											

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					2006-7 3,327 2007-8 3,576 2008-9 3,828 2009-10 2,238 2010-11 1,686 2011-12 1,931 2012-13 1,801 2013-14 3,195 2014-15 2,226 2015-16 3,296 2016-17 3,306 2017-18 2,333 Average 2,772	
SP6-28	<p>Para 2.28 of the adopted Core Strategy anticipates population to grow from 755,580 in 2010 to 860,616 by 2028, an increase of 105,480.</p> <p>Para2.16 of the adopted Core Strategy states that the average household size was 2.36 persons. So for a projected increase of 105,480 only another 44,600 houses are required</p> <p>But as 13,272 houses have been built/sites identified and permission granted since 2010, only another 31,422 houses are actually required</p>	Garforth Neighbourhood Forum	1	O	The proposed housing requirement works on the period 2017 – 2033 with evidence of need derived from the SHMA 2017.	None
SP6-29	Windfall Allowance. The Council has not updated its evidence to justify a 500 dwelling p.a. allowance.	Mike Ashworth WYG (Strata, Harrow Estates), Graham Connell, WYG (Holmes & Son), Phil Brock WYG (Avant Homes), John Flemming (Gladman Developments)	6	O	Evidence to justify the 500 dwelling p.a. windfall allowance has been updated and is sound and in line with NPPF/PPG	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
SP6-30	Windfall Allowance. The Council's windfall allowance of 500 dwellings p.a. is supported	Save Parlington Action Group, Joanne Austin, Barwick & Scholes PC, Howard Bedford	4	S	Support noted	None
SP6-31	Windfall Allowance. Evidence of 3,500 to 4000 windfall dwelling between 2012 and 2017 suggests an allowance of 700 – 800 would be more appropriate.	Aireborough Neighbourhood Development Forum	1	O	The proposed allowance of 500 dwellings p.a. is conservative to ensure sufficiency of housing land supply.	None
SP6-32	A windfall allowance of 1,000 dwellings / annum should be made. In the 12 months 1/4/16 – 31/3/17 1480 dwellings were on windfall sites.	Wetherby Civic Society	1	O	The proposed allowance of 500 dwellings p.a. is conservative to ensure sufficiency of housing land supply.	None
SP6-33	Windfall Allowance. The allowance should be calculated for a 2012-33 plan period.	Richard Taylor	1	O	The period 2012 – 2017 is now in the past so it would be inappropriate to have such a long time in the plan period.	None
SP6-34	Windfall Allowance. The definition of windfall is confused. It should be explained more carefully.	Aireborough Neighbourhood Development Forum	1	O	Agreed. The adopted Core Strategy set out an explanation of windfall in paragraph 4.6.9: "The windfall allowance for Leeds is based upon two components of windfall. First of all, it enables sites not assessed by the SHLAA partnership (due to their size or the timing of their delivery) to be considered as part of overall housing delivery. The allowance also takes into account the fact that not all sites which will deliver housing over the Plan period have been identified at the start of the period." This full explanation was not carried forward into the proposed text, so it is accepted that more explanation would be helpful.	Insert text explaining windfall into paragraph 4.6.5 after "...source of land for development." New text: "Windfall comprises two components: dwellings of schemes of less than the SHLAA threshold (less than 5 dwellings in most cases) and dwellings of schemes that were unpredicted in the SHLAA"
SP6-35	Windfall Allowance. The windfall allowance should be deleted; instead the Council should treat the	Paul Leeming, Carter Jonas (Hatfield Estate, AC Developments, AR Briggs, Linden Homes/Lady	6	O	Para 48 of the NPPF says LPAs may make an allowance for windfall subject to evidence. The proposed allowance of 500 dwellings p.a. is conservative to	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	contribution of small sites to housing supply as a bonus.	Hastings, S Burnett/Lady Hastings, Lady Hastings)			ensure sufficiency of housing land supply.	
SP6-36	Plan Period. The plan period needs to be extended to 2034, 2035 or 2037 to ensure there is a full 15 year period from when the plan is adopted expected early 2019. The 2018 NPPF consultation draft says strategic policies should have a minimum 15 year period from adoption (Para 22).	Simon Grundy, Carter Jonas (Avant Homes), Mark Lane DPP (Linden Homes, Bellway Homes), Johnson-Mowat, Taylor Cherrett, Turley (Vastint), John Flemming (Gladman Developments), Paul Leeming, Carter Jonas (Hatfield Estate, AC Developments, AR Briggs, Linden Homes/Lady Hastings, S Burnett/Lady Hastings, Lady Hastings), HBF,	13	O	The NPPF policy currently uses the word “preferably” in advising on a minimum 15 year time frame and it does not say “from adoption” (para 157). Plans submitted within 6 months of adoption of the Revised NPPF will be tested for soundness against the original NPPF. If the CSSR is adopted in early 2019 as expected it will have a 14 year time frame from 2019/20 to 2032/33.	None
SP6-37	Plan Period. It is unfortunate that plan period for Core Strategy employment land policy runs until 2028 while the period for housing supply policy is proposed to run to 2033. Close monitoring will be necessary to ensure an integrated approach to land use and development, including commuting patterns and demands on infrastructure in adjoining authorities. Adverse cross boundary impacts on North Yorkshire should be mitigated in 5 year review of plan policies in line with the emerging NPPF revisions.	Mark Rushworth (North Yorkshire County Council), Aireborough, Neighbourhood Development Forum	2	O	Agreed that monitoring the effects of having two plan periods will be necessary. No obvious problems are envisaged from running two plan periods. Both housing and employment supply policy conform with the overall spatial strategy and are designed to meet targets, so the concerns of North Yorkshire about commuting patterns and infrastructure should not materialise.	In order to aid understanding of the evolution of the Core Strategy, a new section will be inserted ahead of the Introduction entitled “Changes to the Core Strategy”. This will explain introduction of the CSSR changes including the difference in plan periods. Consequential amendments will be necessary to paragraph 1.12 of Chapter 1 “Introduction”.
SP6-38	Plan Period. The current plan period of 2012 – 2028 should be retained	Stuart Andrew MP, Jennifer Newby, Trevor Newby, David Sarkar, Gary and Lynne Swinnerton, Catherine Hardaker, Glenn Hardaker, PK Farncombe	8	O	It makes sense to begin the plan period at the point of commencement of plan preparation. The Strategic Housing Market Assessment has calculated housing needs for the 2017 – 2033 period.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
SP6-39	Plan Period. The plan period should retain 2012 as the start point. Otherwise the under-delivery to date of approximately 8,000 homes will be overlooked.	Stuart Natkus Barton Willmore (Barratt & DW Homes, ONE Consortium Chartford Homes, Stonebridge Homes), Stuart Andrew MP	5	O	The SHMA 2017 calculates housing need on the basis of current circumstances which includes the stock of housing and the population without the homes that were under-delivered against adopted Core Strategy targets. As such the SHMA 2017 takes us into a new paradigm where backlog in the previous period has to be ignored; otherwise it would involve double counting.	None
SP6-40	Plan Period. Support the plan period of 2017 – 2033	Rawdon Parish Council, Linda Gardener	2	S	Support noted.	None
SP6-41	Plan Period. The plan should include two plan period requirements: one for 2012 – 2028 and another for 2028 – 2033	Aireborough Neighbourhood Development Forum, Andrew Thompson, Peter & Janette Mawson	3	O	A period to 2028 is unnecessary as the current Site Allocations Plan will be examined against the adopted Core Strategy.	None
SP6-42	Plan Period. As the revised dates will have an impact on neighbourhood plans (NPs), all adopted and emerging NPs should be compensated for having to match the new time scales.	Andrew Price, Graham Branston, Peter & Janette Mawson, Catherine Hardaker, Glenn Hardaker, PK Farncombe	6	O	It is inevitable that with the passage of time, higher level policy will change. Neighbourhood Plans will therefore date over time, but there is no obligation for organisations changing higher level policy to provide compensation.	None
SP6-43	Wording. In order to be “positively prepared” (NPPF para 182), the housing requirement should be expressed as a minimum.	Mike Ashworth WYG (Strata Homes), Phil Brock WYG (Avant Homes), Johnson-Mowat, Peter Gleave, Deloitte (Caddick), Jonathan Dunbavin, Tom Cook & Richard Irving IDP (Miller Homes, Linden Homes, Thornhill Estates, Sir Robert Ogden Pts, Redrow Homes, J Wilson & Diocese WYD, Taylor Wimpey, Ogden Group,	16	O	Agree. This would be consistent with the adopted policy which says “...at least 3,660 per year...”	Insert “at least” before 3,247 dwellings in policy SP6

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
		Great North Developments, Barnaway & Hamber, Park Lane Homes et al), Taylor Cherrett, Turley (Vastint)				
SP6-44	Wording. The Draft Revised NPPF proposes new policies expecting local authorities to support provision of smaller housing sites. The Council should take this on board.	Tom Cook IDP (Park Lane Homes et al)	1	O	It is expected that the CSSR will be submitted within 6 months of adoption of the Revised NPPF and will therefore be tested against the current NPPF. In any case, 24% of housing and mixed sites proposed for allocation in the SAP and 29% of housing / mixed sites allocated in the AVL Plan are small sites (<0.5ha) and the Council supports SME house builders through various council programmes.	None
SP6-45	Wording. Replacement of the word “achieve” with “support” in Policy SP6 makes the spatial strategy of SP6 subsidiary to SP7 distribution of housing by HMCA.	Aireborough Neighbourhood Development Forum	1	O	The replacement word “support” makes no difference to the subsidiarity of Policy SP7	None
SP6-46	Wording. The similarity of difference between the term brownfield and PDL needs to be clarified between the text and the policy. (point ii)	Aireborough Neighbourhood Development Forum	1	O	The adopted Glossary of the Core Strategy already explains that PDL and “brownfield” are interchangeable terms.	None
SP6-47	Wording. Clauses ii and iii are supported for stating “least impact on Green Belt”	Weetwood Residents Association, Garforth Neighbourhood Forum	2	S	Support noted.	None
SP6-48	Wording. Clause ii is in conflict with the NPPF for “preferring” brownfield and regeneration sites. Policies may “encourage” this but not prioritise it.	John Flemming (Gladman Developments),	1	O	The clause was found sound by the Inspector to the adopted Core Strategy.	None
SP6-49	Wording. Clause iii should be reworded to say the least impact upon Green Belt <i>land including Rural Land</i>	Wetherby Civic Society	1	O	The SAP proposes to re-designate most of the Rural Land east of Wetherby as Green Belt, in which case the Rural Land designation will no longer exist in Leeds. It would therefore be inappropriate to add “including Rural Land” to Policy SP6	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
SP6-50	Wording. Clause iv cannot be achieved with higher densities and extensions to dwellings.	Garforth Neighbourhood Forum	1	O	Other policies of the Core Strategy seek appropriate density and design solutions for development. These are not incompatible with seeking to enhance distinctiveness and quality of life	None
SP6-51	Wording. Clause vi refers to “green infrastructure”. It should be clarified that this includes river systems, otherwise known as “blue infrastructure”.	Environment Agency	1	O	The glossary of the Core Strategy says that river corridors form part of Leeds’ green infrastructure.	None
SP6-52	Wording. Clause vi. Support	Garforth Neighbourhood Forum	1	S	Support noted	None
SP6-53	Wording. Clause vii says “generally avoiding or mitigating areas of flood risk”. The NPPF requires flood risk to be avoided as a first step, and only where unavoidable, should mitigation be considered.	Environment Agency	1	O	Agree. The EA made similar comments to Policies EN5 and EN6 in the preparation of the adopted Core Strategy. The EA has confirmed by email of 14/5/18 that it is satisfied with the change proposed to bullet point vii.	Reword clause vii to say “Avoiding areas of flood risk and only where this is not possible, then mitigating flood risk”
SP6-54	Wording. Agree, but new drainage infrastructure is needed in areas with antiquated and stretched systems	Garforth Neighbourhood Forum	1	O	The clause is concerned with avoidance of flood risk and cannot be extended to support delivery of drainage infrastructure.	None.
SP6-55	Wording. Add wording to the effect that “ <i>the Council will, where appropriate, support developers seeking large scale complex regeneration with powers required for site assembly, if necessary, provided the outputs are assessed to be in the best interests of the community</i> ”. This will ensure that the most suitable, sustainable, brownfield sites in the City Centre, which often have complex land assembly issues, are prioritised and can be delivered effectively.	Taylor Cherrett, Turley (Vastint)	1	O	The adopted Core Strategy already contains advice on the use of compulsory purchase to help land assembly in town centres and regeneration areas at para 6.14	None
SP6-56	The housing requirement should assume Purpose Built Student	Matthew Roe (Unite)	1	O	The NPPF consultation proposes that LAs set ratios based on census data.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	Accommodation (PBSA) bedspaces contribute to the housing requirement on the ratio of 3 PBSA bedspaces equating to 1 conventional housing unit.				LCC's monitoring report uses a ratio of 4:1.	
SP6-57	Policy SP6. The Housing Requirement should give more weight to the “type” of houses being affordable homes for sale and rented social housing.	Cllrs D and A Blackburn, Cllr Terry Wilford	3	○	Affordable housing provision is covered by Policy H5	None
SP6-58	Para 4.6.1 reference to the population change between 2010 to 2028 should be updated with an explanation of the relationship with the proposed housing requirement.	Matthew Smedley, AECOM (M&G Real Estate), Morley Town Council, Cllr Tom Leadley, Garforth Neighbourhood Forum	4	○	Agree to change Para 4.6.1. The population should be updated to the proposed plan period in accordance with the proposed housing requirement. New data sourced from SHMA 2017 Table 5. Keep population numbers of paragraph 2.28 unchanged. They reflect the population growth anticipated from 2010 up to 2028	Update the period and population figures of the opening sentence of paragraph 4.6.1, “ <i>It is anticipated that the population of Leeds will rise from 784,458 in 2017 to 856,819 in 2033.</i> ”
SP6-59	Para 4.6.1 original commitment to promote environmental quality has not been achieved in Aireborough. Ten year increase in dwellings completed (2400) relying on existing infrastructure	Aireborough Standard Letter, Andrea Edwards,	2	○	Wording carried forward from adopted Core Strategy	None
SP6-60	Para 4.6.1 leaves out the original wording referring to consultation with key stakeholders	Aireborough Standard Letter, Andrea Edwards, Timothy Ryan,	3	○	This wording referred to the consultation exercise with communities and the development industry in 2011 which generated the Housing Growth Principles set out in Para 4.6.2	None
SP6-61	Para 4.6.2 The principle to facilitate development of brownfield and regeneration sites means that housing requirement should be reconsidered for areas like Aireborough. Aireborough has used up all its brownfield and regeneration land. There should be a greater focus on other areas with capacity	Aireborough Standard Letter, Andrea Edwards, Timothy Ryan	3	○	The principle to facilitate development of brownfield and regeneration sites remains. However, there also needs to be balanced provision of housing related to the Leeds Settlement hierarchy.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
SP6-62	Para 4.6.3 says Policy SP6 will be implemented through the SAP. The SAP Examination should be postponed until the revised CS has been adopted.	Aireborough Standard Letter, Andrea Edwards, Timothy Ryan, Garforth Neighbourhood Forum	4	O	Not a matter for the Core Strategy	None
SP6-63	Para 4.6.4. The calculations are complex, difficult to follow and take no account of over-achieving HMCAs. Is the land freed up by demolition (2400 dwellings) being included in the windfall allowance? The demolition and windfall calculation in paras 4.6.4 – 5 do not add up correctly.	Aireborough Standard Letter, Andrea Edwards, Stuart Natkus Barton Willmore (Barratt & DW Homes, ONE Consortium, Chartford Homes, Stonebridge Homes), Aireborough Neighbourhood Development Forum, Timothy Ryan, Jonathan Dunbavin, Tom Cook & Richard Irving IDP (Miller Homes, Linden Homes, Thornhill Estates, Sir Robert Ogden Pts, Redrow Homes, J Wilson & Diocese WYD, Taylor Wimpey, Ogden Group, Great North Developments, Barnaway & Hamber, Park Lane Homes et al)	19	O	The demolition factor is a recognition of how many dwellings will need to be replaced so there is no net loss. It does not form part of the calculation of the Windfall Allowance. However, whilst the paragraph records the net requirement (51,952) and the loss of dwelling total (2,400) correctly, the sum of the two – the gross requirement (53,856) is incorrect. The sum is 54,352. This may explain why the paragraph was found to be complex and difficult to follow.	Replace 53,856 with 54,352 in paragraphs 4.6.4 and 4.6.5. Consequentially, replace 45,856 with 46,352 in paragraph 4.6.5 and Policy SP6
SP6-64	Para 4.6.4. Demolition figure is reduced from 250 to 150 with no explanation or evidence.	Aireborough Neighbourhood Development Forum	1	O	Evidence is available of a lower rate of demolitions expected over future years.	None
SP6-65	Para 4.6.4. It would be better to regard demolitions and other losses a negative windfall which could be monitored accordingly.	Morley Town Council, Cllr Tom Leadley	2	O	It is better to have agreed estimates of windfall and demolitions based on evidence of historic trends in order to plan for the quantity of allocations that will be needed.	None
SP6-66	SP6. Considerations ii, iii, iv and v have not been met in Aireborough. The SAP should be paused until the CS has been adopted	Aireborough Standard Letter, Andrea Edwards, Timothy Ryan	3	O	The review of the Core Strategy is about whether the proposed SP6 considerations are sound, not how they have been applied in different	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					areas of Leeds. Whether the SAP is paused is not a matter for the CSSR.	
SP7-1	Table 2. The proposed deletion of Table 2 would remove guidance that helps direct the location of housing to the most sustainable locations related to the settlement hierarchy: 70% to within existing settlements helping to align homes with jobs and making use of existing infrastructure; 21% to the edge of the MUA or Major Settlements. This has more clarity on the application of Policy SP1. Table 2 should be reinstated.	Mark Lane DPP (Linden Homes, Bellway Homes)	2	O	With the proposed reduced housing requirement, if the percentages of Table 2 were retained, it may not be possible to achieve delivery of both Table 2 and Table 3 (HMCA distribution) simultaneously.	None
SP7-2	Table 2. The proposed deletion of Table 2 is welcomed in providing greater flexibility to identify the most suitable sites for allocation.	Jonathan Dunbavin, Tom Cook & Richard Irving IDP (Miller Homes, Linden Homes, Thornhill Estates, Sir Robert Ogden Pts, Redrow Homes, J Wilson & Diocese WYD, Taylor Wimpey, Ogden Group, Great North Developments, Barnaway & Hamber, Park Lane Homes et al)	11	S	Noted	None
SP7-3	Evidence. There is no new evidence to justify the percentage targets for distribution of housing by HMCAs even though a smaller housing requirement is proposed and time has elapsed with new sites now available.	Mike Ashworth WYG (Strata, Harrow Estates), Graham Connell, WYG (Holmes & Son), Phil Brock WYG (Avant Homes), Johnson-Mowat, Save Parlington Action Group, Joanne Austin, Barwick & Scholes PC, , James Benyon Quod (Landsec), Tim Waring, Quod (Stirling Investment), Historic England, Jonathan	23	O	The original evidence to justify the adopted policy SP7 was not needs based; it was based on a supply picture of potentially deliverable sites drawn from the SHLAA that established percentage targets for different areas. The City Council considers that the HMCA distribution of the adopted plan is still pertinent with an lower housing requirement and lapse of time.	None

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		Dunbavin, Tom Cook & Richard Irving IDP (Miller Homes, Linden Homes, Thornhill Estates, Sir Robert Ogden Pts, Redrow Homes, J Wilson & Diocese WYD, Taylor Wimpey, Ogden Group, Great North Developments, Barnaway & Hamber, Park Lane Homes et al)				
SP7-4	HMCA Percentage Targets. No objection	Highways England	1	S	Support noted.	None
SP7-5	<p>HMCA Percentage Targets. The proportion of housing assumed for the inner HMCAs (City Centre, Inner and East) is too high and may not be deliverable according to the Bradford Road / East Ardsley Appeal decision.</p> <p>The focus on inner HMCAs means the ability to provide sufficient family housing may be threatened because these areas tend to over-provide small apartments; as a consequence greater housing supply will be needed in other areas capable of providing a wider range of house types to meet all needs.</p>	Mike Ashworth WYG (Strata, Harrow Estates), Graham Connell, WYG (Holmes & Son), Phil Brock WYG (Avant Homes), Stuart Natkus Barton Willmore (Barratt & DW Homes, ONE Consortium, Chartford Homes, Stonebridge Homes), Iain Bath (KCS Developments), Sam Ryan, Turley (Gallagher Estates), Graham Connell, WYG (Holmes & Son), Peter Gleave, Deloitte (Caddick), Jonathan Dunbavin, Tom Cook & Richard Irving IDP (Miller Homes, Linden Homes, Thornhill Estates, Sir Robert Ogden Pts, Redrow Homes, J Wilson & Diocese WYD, Taylor Wimpey, Ogden Group, Great North Developments,	26	O	Deliverability is demonstrated by proposed allocations in the Site Allocations Plan which proposes to identify and allocate sites for 11,909 dwellings. This is considerably more than 15.5% of the proposed quantity of dwellings to be identified based on the proposed Housing Requirement (51,952 + 2,400 – 8000 = 46,352). Of 46,352, 15.5% is 7,185 dwellings.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
		Barnaway & Hamber, Park Lane Homes et al)				
SP7-6	HMCA Percentage Targets. No regard has been given to the number of dwellings built in each HMCA since 1/4/12	Morley Town Council, Cllr Tom Leadley	2	O	The proposed new housing requirement is based on a fresh assessment of need at 2017 without any additions for past under-delivery. Similarly, the HMCA percentages should not have regard to past housing supply.	None
SP7-7	HMCA Percentage Targets. The 3% figure for Aireborough is too high given that SP6 consideration iii seeks least impact on Green Belt purposes, given that Bradford is proposing cross-boundary development and given that Aireborough has over-delivered housing in the past. Aireborough, between 2000 and 2009 built 4% of Leeds target and from 2010 to 2015 built 7% of Leeds target	Aireborough Standard Letter, Andrea Edwards, Aireborough Neighbourhood Development Forum, Timothy Ryan,	4	O	With the proposed new housing requirement the 3% figure for Aireborough reduces from 2,300 to 1,391. This means the pressure on Green Belt and infrastructure in Aireborough will be reduced. Bradford is supportive of the change. Previous rates of dwelling completions in a HMCA are not an indication of capacity and appropriateness for development in the future.	None
SP7-8	HMCA Percentage Targets. The distribution should be reconsidered giving more weight to the principles in paragraph 4.6.7 but also deliverability and the requirement to meet the local needs of individual settlements including Gildersome and Shadwell.	Phil Brock WYG (Avant Homes), Iain Bath (KCS Developments)	2	O	The principles of paragraph 4.6.7 are already imbedded in the distribution of Policy SP7. The Council considers that the targets are deliverable for all HMCAs, particularly now that a lower housing requirement is proposed overall. The idea of providing additional guidance on the dwelling requirements of individual settlements is a valid approach. However, Policy SP7 gives a broader steer at HMCA level which is an equally valid approach. To change or add new guidance on the particular requirements of particular settlements would require a considerable amount new work and public consultation	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made																																							
					which would delay adoption of the Plan.																																								
SP7-9	HMCA Percentage Targets. The HMCA areas have no clear or justified rationale. They do not relate well to rural and urban areas, nor to the 5 market zones identified in the 2007 SHMA.	Save Parlington Action Group, Joanne Austin, Kathy Horne, Garforth Neighbourhood Forum	4	O	The HMCAs were a product of the 2011 SHMA and were intended to reflect areas that house buyers distinguish and relate to when searching for homes to buy.	None																																							
SP7-10	HMCA Percentage Targets. They add up to 99.5% rather than 100%. What accounts for the 0.5%?	Matthew Smedley, AECOM (M&G Real Estate)	1	O	<p>The percentages of the adopted core strategy originally had fractions of percentage points that were rounded up. These are apparent from the numbers of dwellings in Policy SP7 Table 3 of the adopted Core Strategy as a percentage of the total of 66,000 dwellings to be allocated. It would not be appropriate to amend the percentages now.</p> <table border="1"> <thead> <tr> <th>HMCA</th> <th>Dwellings</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Airbr</td> <td>2,300</td> <td>3.5%</td> </tr> <tr> <td>CC</td> <td>10,200</td> <td>15.5%</td> </tr> <tr> <td>EL</td> <td>11,400</td> <td>17.3%</td> </tr> <tr> <td>IA</td> <td>10,000</td> <td>15.2%</td> </tr> <tr> <td>NL</td> <td>6,000</td> <td>9.1%</td> </tr> <tr> <td>ONE</td> <td>5,000</td> <td>7.6%</td> </tr> <tr> <td>ONW</td> <td>2,000</td> <td>3.0%</td> </tr> <tr> <td>OS</td> <td>2,600</td> <td>3.9%</td> </tr> <tr> <td>OSE</td> <td>4,600</td> <td>7.0%</td> </tr> <tr> <td>OSW</td> <td>7,200</td> <td>10.9%</td> </tr> <tr> <td>OW</td> <td>4,700</td> <td>7.1%</td> </tr> <tr> <td>Total</td> <td>66,000</td> <td>100.0%</td> </tr> </tbody> </table>	HMCA	Dwellings	%	Airbr	2,300	3.5%	CC	10,200	15.5%	EL	11,400	17.3%	IA	10,000	15.2%	NL	6,000	9.1%	ONE	5,000	7.6%	ONW	2,000	3.0%	OS	2,600	3.9%	OSE	4,600	7.0%	OSW	7,200	10.9%	OW	4,700	7.1%	Total	66,000	100.0%	None
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SP7-11	HMCA Percentage Targets. The percentages fail to reflect the strategic priorities of Policy SP1 which expects the largest amount of development in the Main Urban Area. HMCAs City Centre, Inner, East and North only sustain 56.5% of the total.	Save Parlington Action Group, Joanne Austin, Kathy Horne,	3	O	Whilst 56.5% of housing growth might not be the vast majority, it is nevertheless a majority and the largest amount of development. It should also be remembered that the percentages only apply to land to be “identified” for housing development. HMCAs such as the city centre and Inner tend to generate more windfall development because of unexpected sites becoming available.	None
SP7-12	HMCA Percentage Targets. There are anomalies in the distribution between HMCAs. For example Aireborough has major settlements of Guiseley, Yeadon and Rawdon and has a 3% target; Outer North East has only one major settlement, Wetherby, but a 8% target.	Save Parlington Action Group, Kathy Horne, Garforth Neighbourhood Forum	3	O	The availability of major settlements within HMCAs is only one of the many factors that affect suitability of locations for housing.	None
SP7-13	HMCA Percentage Targets. The percentage for Outer North East should be based on a dwelling requirement in Policy SP6 of 43,504 with allowances for demolitions (2,400) and windfall (8,000) giving a total allocation requirement of 37,904. In turn, the 8% apportionment would give a requirement for Outer North East of 3,032 dwellings.	Barwick & Scholes PC, Howard Bedford	2	O	The objection is not to Policy SP7 with its apportionment of 8%	None
SP7-14	HMCA Percentage Targets. More should be made of the Outer North East HMCA which only has 8%. Land around Shadwell is particularly sustainable.	Iain Bath (KCS Developments)	1	O	Whilst Outer North East (ONE) is the largest HMCA in terms of land area many settlements are small and lack basic facilities, employment and public transport. The 8% for ONE was considered appropriate for the adopted plan and the proposed reduction in the housing requirement and short lapse of	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					time do not create reason to alter the figure.	
SP7-15	HMCA Percentage Targets. The 8% target for Outer North East was conceived for the adopted Core Strategy based on SHLAA information of available suitable housing sites. The Parlington new settlement was not part of land availability at that time. It is an unsuitable unsustainable site contrary to national planning policies which questions the appropriateness of 8% as a target.	Historic England	1	O	Policy SP7 of the adopted Core Strategy contains the percentage 8% for Outer North East (ONE). Historic England (with the name English Heritage then) made no objection to that percentage in the preparation of the adopted Core Strategy or preparation of the Sustainability Appraisal of the adopted Core Strategy. Policy SP7 was examined and found sound by the planning inspector Anthony Thickett with 8% as the housing requirement target for ONE. The appropriateness of the Parlington site will be a matter for discussion at the SAP examination. There are many alternative housing supply options, of which the suitability and sustainability will need to be compared, but the target of 8% is not inappropriate.	None
SP7-16	HMCA Percentage Targets. Policy SP1 says Green Belt should not be built on when housing needs can be met elsewhere. The proposed housing requirement means that the housing target can be met without using Green Belt. No Green Belt land should be used in Aireborough until all Brownfield and Regeneration sites are used up in Leeds. The distribution of housing between HMCA's should reflect this.	Aireborough Standard Letter, Andrea Edwards, Timothy Ryan	3	O	Paragraph 4.1.4 to Policy SP1 says the strategy will entail, "...in exceptional circumstances (which cannot be met elsewhere), the selective use of Green Belt land where this offers the most sustainable solution." It is considered that a choice of housing land to meet needs throughout the District is necessary to accord with Leeds' spatial strategy. Therefore, some Green Belt land will still be needed in HMCA's where needs cannot be met elsewhere, for example where there is insufficient brownfield land.	None

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SP7-17	HMCA Percentage Targets. Aireborough needs breathing space for infrastructure delivery to catch up with housing development.	Aireborough Standard Letter, Andrea Edwards,	2	O	The proposed reduction in the housing requirement will reduce pressure on local infrastructure.	None
SP7-18	HMCA Percentage Targets. There should also be bespoke targets for size, type tenure and affordability of dwellings needed in each HMCA. Distribution Aims. SP7 simply provides a portfolio of sites. Instead, it should seek to advise on what types of housing are needed in different areas and sites in accordance with Para 34 of the draft revised NPPF. The relationship of HMCAs with Affordable Housing Zones of Policy H5 is unclear.	Aireborough Neighbourhood Development Forum Campaign for Protection or Rural England (CPRE) West Yorkshire	2	O	Leeds has other criteria based policies to deliver appropriate types of dwellings eg H4, H5 and H8. The Council has ability to take account of appropriate mix when planning applications are submitted.	None
SP7-19	A higher percentage of housing distribution within the Outer North East HMCA as part of SP7 would assist in the delivery of increased affordable housing provision.	KCS Developments Ltd submitted by IB Planning Ltd.	1	O	The percentage of dwellings for O.N.E. HMCA set by Policy SP7 carried forward from the adopted Core Strategy was determined by a range planning considerations mainly concerning sustainability of locations in relation to the Settlement Hierarchy. Affordable housing need alone is not sufficient to revise the targets.	None
SP7-20	SP7 Wording. The policy should be strengthened to support Purpose Built Student Accommodation within the City Centre HMCA	Matthew Roe (Unite)	1	O	It would be inappropriate for Policy SP7 to include a level of detailed advice on what types of housing are suited / needed in different HMCAs	None
SP7-21	Para 4.6.6. It is questionable whether the reference to “choice and competition in the market for land” can be achieved in the outer HMCAs because they have limited capacity for brown field land provision.	Save Parlington Action Group, Joanne Austin	2	O	The choice and competition in the market for land is needed for the whole of Leeds to provide the best opportunity for the housing requirement overall to be met. It is not intended to mean every HMCA needs to achieve such mix.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
SP7-22	Para 4.6.6. Providing a choice and competition in the market by allocating land in the green belt is contrary to Spatial policy 6iii.	Garforth Neighbourhood Forum	1	O	Clause iii of Spatial Policy 6 seeks least impact on Green Belt. To achieve delivery of Leeds' housing requirement, a broad distribution around the district is necessary, and this may require Green Belt land if there are no sustainable alternatives in particular areas.	None
SP7-23	Para 4.6.7. The policy should be reworded to acknowledge that the target figures are not housing need figures.	Save Parlington Action Group, Joanne Austin	2	O	Paragraph 4.6.7 says "Policy SP7 provides an indication of the overall scale and distribution of development that will need to be planned for (combining information from the SHMA and SHLAA) in different housing Market Characteristic Areas." This does not use say the targets are need figures, but the scale and distribution of development that needs to be planned for.	None
SP7-24	Para 4.6.7. Wording should be added to have regard to situations where housing provision in one HMCA might meet needs in another HMCA. An example would be the proposed development at Parlington in ONE HMCA being more strongly associated with Garforth in the neighbouring OSE HMCA, but isolated from local amenities.	Save Parlington Action Group, Joanne Austin, Kathy Horne,	3	O	The existing wording saying that the percentages are "intended as a guide rather than rigid targets" should be sufficient to deal with exceptional cases.	None
SP7-25	Para 4.6.7. The reference to the percentage figures being intended as a guide rather than rigid targets is supported.	Mike Ashworth WYG (Strata, Harrow Estates), Phil Brock WYG (Avant Homes), Iain Bath (KCS Developments), Matthew Smedley, AECOM (M&G Real Estate)	5	S	Support noted.	None
SP7-26	Para 4.6.7. The reference to the percentage figures being intended as a	Rothwell Neighbourhood Forum	1	O	Specific rigid figures would be too prescriptive to enforce.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	guide rather than rigid targets is open to abuse and is unsound.					
SP7-27	Para 4.6.7. Support for the reference to the Outer South West HMCA having capability to accommodate major growth. However, the role of the “Smaller Settlements” such as Gildersome, should not be overlooked.	Phil Brock WYG (Avant Homes),	1	O	Paragraph 4.6.7 only seeks to provide a brief summary of the spatial distribution, including brief mention of some of the areas of significant delivery expectations. It would not be appropriate to expand the summary to explain the capabilities of Smaller Settlements such as Gildersome.	None
SP7-28	Para 4.6.7. There should be recognition that some HMCAs share their housing market with other local authorities. For example Aireborough HMCA is shared with the Wharfedale part of Bradford.	Aireborough Neighbourhood Development Forum, J Baker	2	O	Leeds’ housing market is largely self contained although it is recognised that there is some interactive relationships between the Leeds housing market and neighbouring areas of Wharfedale and North Kirklees (SHMA 2017 Chapter 2). However, these associations have not changed Leeds’ housing requirement overall or HMCA targets for Aireborough or Outer South West. Therefore, there is no need to draw attention to these relationships in Paragraph 4.6.7.	None
H5 -1	Requirements for each zone as minimum requirements is not justified. Provides no certainty to developers as implies Council can request a higher affordable housing requirement. The draft policy states that affordable housing should be provided at the target levels, whereas the adopted policy states that affordable housing should normally be provided at the target levels.	Strata Homes Ltd, Walton and Co Harrow Estates Plc, Caddick PLC, F A Holmes and son	4	O	Affordable Housing targets are based on up to date evidence and are realistic and deliverable. Expressing the targets as minimum reinforces the Council’s commitment to delivery of affordable housing and allows for the potential for additional affordable housing where developers may wish to deliver this: to meet additional identified local needs or where a niche product is being marketed. Nonetheless achieving the policy basis is the expectation, not higher levels.	No
H5-2	The viability implications of a 35% minimum requirement will only be	Strata Homes Ltd, F A Holmes and son, Harrow	8	O	The Leeds EVS recognises that each zone is not homogenous. On this	No

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	exacerbated by the cumulative impact of other policies within the Core Strategy Selective Review.	Estates Plc, Park Lane Homes, D.G Fryer, N. Joyce, B. Timms, P. Joyce and M. Joyce			basis the EVS assessed the viability of small, medium and large scale development across the City linked to the affordable and CIL charging zones and the original beacon settlements within each of these zones as set out in Table 1 (page 15) of the EVS. The EVS demonstrates that the cumulative impact of maintaining the existing levels of affordable housing whilst also taking into consideration the other suggested policy approaches is within acceptable limits within Zone 1. Therefore there is no need for the affordable housing target to be reduced or other policy burdens removed.	
H5-3	Object to increase from 5% to 7% affordable housing in zones 3 and 4. An increase within zones 3 and 4 will lead to further pressure on the delivery of housing in these areas to include cumulative impact of other policies.	Caddick Developments, KCS Development Limited, Miller Homes, Vastint Leeds, Linden Gladman Developments Ltd, HBF, Park Lane Homes and R. Hills (East Rigton) Ltd, Linden Homes, Thornhill Estates, The Sir Robert Ogden Partnership, Redrow Homes, Mr John Wilson and The Diocese of West Yorkshire and the Dales, Taylor Wimpey, The Ogden Group, Great North Developments, Barnaway and Hamber, Inhibit, YP Real Estates Ltd, Park Lane Homes, D.G Fryer, N. Joyce, B. Timms, P. Joyce and M. Joyce, Hatfield Estate, Lady Elizabeth	29	O	The evidence which supports this increase is set out within Table 47 of the EVS update and demonstrates: <ul style="list-style-type: none"> • All of the scenarios modelled for small and medium sites generate a land value which exceeds the minimum benchmark land value. The EVS assumes a benchmark land value of £750,000 per acre. Land values range from c£974,000 to £1,552,000 per acre. • With respect to large sites 5 scenarios generate land values that fall below this minimum benchmark threshold. However, the values are only marginally lower in 4 of these scenarios. The lowest land value generated is for Scenario 1 which is just over £700,000 per acre. The results from the assessment also need to be considered in the context of the inherent viability cushions, over 	No

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		Hastings Estate Charity, AC Developments Yorkshire Ltd, A R Briggs & Co Ltd, Linden Homes& Lady Elizabeth Hastings Estate Charity, Mr S Burnett & Lady Eliz Hastings Estate Charity			and above the 10% viability tolerance included. Further to this the Council has also recently announced that it has increased the affordable housing benchmark prices in Leeds for 2018 / 2019. The EVS 2018 update is based on the previous rates which are, on average 2% lower, therefore providing a further viability cushion. Recognising this cautious approach taken to viability the Council does not believe there is a need for further viability testing or for the policy to be amended.	
H5-4	The viability of the policy and other changes should be assessed and the affordable housing requirement amended accordingly.	Harrow Estates Plc, Avant Homes, Harrow Estates Plc, Hatfield Estate, AC Developments Yorkshire Ltd, AR Briggs & Co Ltd, Linden Homes and Lady Elizabeth Hastings' Estate Charity, Mr S Burnett and Lady Elizabeth Hastings' Estate Charity, M&G Real Estate, Vastint, HBF, F A Holmes and son	12	O	The cumulative impact on viability of all the suggested policy changes has been tested. The results of this assessment are included within Section 13 of the EVS Update 2018. Taking into account the results from this exercise and the cautious and reasonable approach taken to viability the Council are satisfied that the policies within the CCSR are viable.	No
H5-5	Support the need to address the affordable housing requirements but concerns re zone 2 for both brownfield and greenfield sites, and for small sites and large sites within Zone 4 and cumulative impact of other policies. Unrealistic to negotiate sites on a one by one basis. Other targets should be reviewed. Targets for zones 2 and 4 should be reviewed.	Persimmon, Park Lane Homes and R. Hills (East Rigton) Ltd, Miller Homes, Linden Homes, Thornhill Estates, The Sir Robert Ogden Partnership, Redrow Homes, Mr John Wilson and The Diocese of West Yorkshire and the Dales, Taylor Wimpey, The Ogden Group, Great North Developments, Barnaway	17	O	The Council is keen to set viability at a strategic level and has done so through evidence in the EVS. Monitoring reveals that brownfield completions rest at 81% (5 year average) for the District and that 83% of all permissions involving affordable housing are policy compliant schemes (against Adopted CS policies). These figures do not indicate that there is an issue with brownfield land delivery in Leeds.	No

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		and Hamber, Park Lane Homes, D.G Fryer, N. Joyce, B. Timms, P. Joyce and M. Joyce, Gladman Developments			<p>The Leeds EVS 2018 update assessed four possible policy options for affordable housing. These are set out within Table 17 of the EVS, with further detail included within the sub text (paras 8.2 to 8.5).</p> <p>A further more refined test was also undertaken within the Inner Area (Zone 3) and City Centre (Zone 4), testing affordable housing at levels between 6% and 10%. This refined testing also included a sensitivity exercise which accounted for changes in the cost of remediation and site preparation. Para's 13.9 to 13.11 of the EVS provide further information on the scenarios tested.</p> <p>Taking into account the results Policy H5 has maintained the level of affordable housing within Zones 1 and 2 (i.e. Option 1) but increased the levels within the Inner Area (Zone 3) and City Centre (Zone 4) based on the findings of the refined testing within these areas.</p> <p>For Zone 2 the baseline appraisals include affordable housing at 15%, as per the requirements of Policy H5 of the adopted Core Strategy. However, Zone 2 is sub divided (Zones 2a and 2b) to align with the CIL charging zones.</p> <p>The EVS 2018 update demonstrates that greenfield/unconstrained sites</p>	

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					<p>within Zone 2b are viable generating land values which are higher than the minimum benchmark land values. Only large Brownfield sites in Zone 2b generated land values that fell below the minimum benchmark land value. However, the assessment of Brownfield sites assumes that all sites would be contaminated and require site preparation. In addition the remediation and site preparation costs are applied to 100% of the site area, whereas in reality there will be circumstances where only a small part of the site is contaminated. The assessment of Brownfield land is, therefore, very cautious. In addition some Brownfield sites may be awarded vacant building credit, thereby, further improving viability.</p> <p>Medium and large Greenfield sites within Zone 2a generated land values that fall below the minimum benchmark land value. For medium and large sites the EVS 2018 update adopts a minimum benchmark land value for Greenfield sites of £187,500 per acre. Within Zone 2a the land value for medium and large sites is around £140,000 per acre.</p> <p>However, it must be recognised that the housing market is not homogeneous and, therefore, land values will differ / vary across the City. The viability of development in Zone 2a is modelled exclusively on the basis of a low value beacon settlement</p>	

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					<p>whereas the other zones (including Zone 2b) include medium and high value beacon settlements. It is, therefore, to be expected that land values within Zone 2a will be lower than in the other zones and therefore unsurprising that the land values generated fall below the minimum benchmark land value.</p> <p>For Zone 4 the affordable housing target has been increased from 5% to 7%. The evidence which supports this increase is set out within Table 47 of the EVS update and demonstrates:</p> <ul style="list-style-type: none"> •All of the scenarios modelled for small and medium sites generate a land value which exceeds the minimum benchmark land value. The EVS assumes a benchmark land value of £750,000 per acre. Land values range from c£974,000 to £1,552,000 per acre. •With respect to large sites 5 scenarios generate land values that fall below this minimum benchmark threshold. However, the values are only marginally lower in 4 of these scenarios. The lowest land value generated is for Scenario 1 which is just over £700,000 per acre. <p>The results from the assessment also need to be considered in the context of the inherent viability cushions, over and above the 10% viability tolerance included. Further to this the Council has also recently announced that it has increased the affordable housing</p>	

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					benchmark prices in Leeds for 2018 / 2019. The EVS 2018 update is based on the previous rates which are, on average 2% lower, therefore providing a further viability cushion.	
H5-6	Be more proactive in setting affordable housing targets that account for likely market changes and are achievable over the lifetime of the Plan.	M&G Real Estate submitted by AECOM	1	○	Affordable housing targets are based on evidence. Any future changes in the housing market over the plan period would need to be based on evidence and undertaken as part of the local plan process.	No
H5-7	Targets do not meet need. No relationship made between the housing distribution, the allocation of sites, and the achievement of the levels and types of affordable housing needed.	CPRE West Yorkshire	1	○	The SHMA considers housing need, however the need must be shown to be viable as such affordable housing targets must balance both need and viability. The SHMA calculated an annual affordable housing need for the whole of Leeds of 1,230 dwellings. This would be 38% of the proposed housing requirement of 3,247 dwellings, but the EVS found that only certain percentage requirements were viable in the 4 zones of Leeds.	No
H5-8	With a requirement of 1,230 affordable dwellings per year, minimum target percentages in Policy H5 are unlikely to meet affordable housing need given viability appraisals submitted by developers.	Leeds Civic Trust	1	○	Meeting affordable housing need is a key Corporate objective and forms the basis of policy, however to be in line with national guidance and ensure delivery affordable housing must also be viable. The targets which have been viability tested and as such aim to maximise delivery of affordable housing.	
H5-9	No flexibility in terms of affordable housing quantum tenure, mix to take account of individual site characteristics, and to deliver viable development.	Strata Homes Ltd, Holmes and son, M&G Real Estate, Holmes and Son, Harrow Estates PLC	5	○	The policy sets out affordable housing requirements which are based on needs and viability.	No

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H5-10	Acute need for affordable housing.	Avant Homes, Hatfield Estate, AC Developments Yorkshire Ltd, AR Briggs & Co Ltd, Linden Homes and Lady Elizabeth Hastings' Estate Charity, Mr S Burnett and Lady Elizabeth Hastings' Estate Charity, Lady Elizabeth Hastings' Estate Charity	7	S	Noted.	No
H5-11	How is the Council planning to drive up delivery of one and two bedroom properties as set out in policy H4 of the Core Strategy which states that 50% of new homes should be two bedrooms and a further 10% one bedroom each year? Given the link to affordable housing of this type of housing, concern that too many executive four and five bedroom properties.	Cllr Andrew Carter on behalf of Leeds Conservative Group	1	O	The implementation of Policy H4 is not a matter for the CSSR instead its implementation is being monitored and managed as part of the Adopted Plan. Nevertheless, the SHMA 2017 provides evidence of need for different sizes of market dwellings in different areas of Leeds which should help Leeds achieve delivery of smaller more affordable market dwellings where these are needed.	No
H5-12	Object to individual viability appraisals to verify that the affordable housing target cannot be met and should not be a vehicle for applicants to avoid ensuring levels of affordable homes demanded are delivered	Barwick In Elmet and Scholes Parish Council, Rothwell Neighbourhood Forum, Save Parlington Action Group	3	O	Noted. Affordable housing targets have been viability tested and as such are realistic, there is no reliance on individual viability appraisals.	No
H5-13	Object to the removal of reference to the viability appraisals in the policy.	Inhibit, YP Real Estates Ltd, Caddick PLC, Vastint, YP Real Estates Ltd	5	O	The reasoned justification para 5.2.20 states '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'. This will assist in the implementation of the policy.	No

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H5-14	S106 agreement for an under-supply of affordable housing on viability grounds should include a claw-back provision on an agreed sales figure.	Leeds Civic Trust	1	O	Paragraph 5.2.20 expects the viability of permitted schemes to be reviewed if they are not implemented within 5 years. This has the dual purpose of discouraging land-banking and enabling claw back if the viability position has improved.	No
H5-15	On viability, any claims should be assessed by the District Valuer.	Leeds Civic Trust	1	O	When submitted to them, the Council considers viability appraisals in a comprehensive manner, involving the DV as necessary and appropriate. This approach has a history of working well in Leeds.	No
H5-16	Support the delivery of affordable housing and use of commuted sums as appropriate.	Cllr Andrew Carter on behalf of Leeds Conservative Group	1	S	Noted.	No
H5-17	The policy should not be supportive of accepting commuted sums in lieu of on-site affordable housing.	Morley Town Council, Cllr Tom Leadley, Garforth Neighbourhood Planning Forum, Save Parlington Action Group, Barwick In Elmet and Scholes Parish Council, Rothwell Neighbourhood Forum, Howard Bedford and family	7	O	Policy H5 is clear that on site as set out in national guidance is the preferred method of affordable housing provision, but reflects that in some cases on-site provision may not be possible / desirable. This is considered to help the effectiveness of the policy.	No
H5-18	Support.	Leeds Fed	1	S	Noted.	No
H5-19	Policy MX2-39, need for affordable housing and concentration in this area is not appropriate. The surrounding settlements require affordable housing and will not have appropriate affordable housing. Spread across settlements within each HMCA to enable social mobility for all.	Save Parlington Action Group, Barwick In Elmet and Scholes Parish Council, Howard Bedford and family	3	O	The Site Allocations Plan (SAP) deals with site specific requirements; this is not in the scope of the CSSR. The adopted Core Strategy sets out targets for the different affordable housing zones which are based on needs and viability evidence. Affordable housing policy aims to balance needs of those in all affordable housing zones.	No

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	Insufficient new affordable housing to meet local needs quickly.					
H5-20	Policy should be more flexible to state 'the council will seek affordable housing either on site, off site or financial contributions'. Should be recognised that in some cases off site affordable housing provides strategic need.	Walton and Co	1	O	The policy provides flexibility, provision should be on site unless off site provision or a financial contribution can be robustly justified.	No
H5-21	Para 5.2.19 should be extended to reflect the possibility that changes in circumstances or reduced demand effect the need for affordable housing in perpetuity.	Walton and Co	1	O	The policy is set within the context of the requirements for affordable housing as set out in National guidance, and is based on up to date needs and viability evidence. There is no evidence to suggest that need for affordable housing will decrease during the plan period.	No
H5-22	A higher percentage of housing distribution within the Outer North East would assist in delivering affordable housing need.	KCS Development	1	O	Affordable housing targets are based on evidence of need and viability. The targets in the ONE area are the highest in the plan to reflect its high market value and local needs.	No
H5-23	BTR-There is no national advice supporting the 20% threshold suggested, emerging policy guidance suggests that the level will be determined by local circumstances, and should be applied flexibly. The recently released Draft NPPF notes that BTR should be exempt from certain forms of affordable housing obligations (see paragraph 65 of the Draft text consultation of the NPPF March 2018), given the practical difficulties and tenure difficulties of introducing non-rental forms of tenure.	Inhibit, YP Real Estates Ltd, Walton and Co	3	O	Policy H5 offers Build To Rent (BTR) developers the choice of three options to satisfy affordable housing. The first foreshadows the draft NPPF of March 2018, including a requirement for 20% of dwellings to be affordable on the terms suggested therein. The second involves provision of on-site affordable dwellings at the percentages and terms set in the first paragraphs of Policy H5 and elaborated in the supporting text. For the city centre and inner areas where BTR schemes predominate, the percentage requirements are considerably lower than the 20% of the draft NPPF, but	No

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					the required levels of affordability are greater. The third option is a commuted sum based on the second option, which has in terms of cost effect. This approach means that developers can pick the option which is most financially preferable. This approach is considered to provide flexibility and effectiveness to the policy in response to a specific house building model.	
H5-24	Emerging national planning policy guidance cannot yet be relied upon so policy on build-to-rent should not be pre-empted.	Morley Town Council, Cllr Tom Leadley	1	O	The draft NPPF is the product of two earlier national consultations on affordable housing policy, which suggest the Government is close to settling on a preferred course. The expected adoption date for the final NPPF will enable any changes to be considered by the CSSR examination inspector.	None
H5-25	Build to rent developments in Leeds can either provide affordable housing on-site as advised in national guidance or in line with the first paragraphs of Policy H5. This allows house builders to avoid the need to deliver local housing for local needs.	Save Parlington Action Group, Barwick In Elmet and Scholes Parish Council, Howard Bedford and family	3	O	The policy ensures that BTR development will deliver local housing for local needs either on-site or via commuted sums to be spent in the local area.	None
H5-26	Integration of affordable dwellings throughout a development and avoidance of clustering.	Rothwell Neighbourhood Forum	1	O	Policy H5 promotes a pro rata mix to avoid clustering.	None
H5-27	The PPG states affordable housing should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1,000 square metres (gross internal	ID Planning	1	O	Noted and agreed	Delete 10 or more dwellings and insert 'On major housing developments of 10 or more new dwellings, affordable housing provision should be provided on-site at the target

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	area). This runs contrary to the proposed policy H5 and therefore should be amended as such.					<p>levels specified in the following zones'</p> <p>* Major development means either:</p> <ul style="list-style-type: none"> • provision of 10 or more dwellings (or where the number of dwellings is not known, development is to be carried out on a site having an area of 0.5 hectares or more) or • provision of a building or buildings where the floor space to be created would be 1,000 square metres or more; or • development on a site having an area of 1 hectare or more;
H5-28	Registered Providers are not willing to take on small numbers of affordable units in large apartment schemes as they cannot manage these units appropriately.	ID Planning	1	O	Para 5.2.21 provides flexibility for sites of 4 or less affordable housing dwellings to be converted into an equivalent financial contribution.	No
H5-29	Paras 5.2.16 and 5.2.19 refer to affordable housing dwellings being secured in perpetuity this is not appropriate.	M&G Real Estate	1	O	The policy is set within the context of the requirements for affordable housing as set out in National guidance, and is based on up to date needs and viability evidence. There is no evidence to suggest that need for affordable housing will decrease during the plan period.	No
H5-30	Para 5.2.17 be amended to add 'taking into account the needs of the area and the wider benefits of development supported by a relevant up-to-date	M&G Real Estate	1	O	The existing wording of the policy allows sufficient flexibility. The existing policy framework includes policies on mix, type, tenure and local housing	No

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	evidence'. The above changes place the emphasis on ensuring that an appropriate level and type of affordable housing is delivered across all new sites.				market assessments supported by viability evidence which the Council considers fully reflects the needs of local areas.	
H5-31	S106 agreement for an under-supply of affordable housing on viability grounds should include a claw-back provision on an agreed sales figure.	Leeds Civic Trust	1	○	Para 5.2.20 sets out requirements in relation to S106 agreements that are considered sound and sufficient in scope to support the policy	No
H5-32	Student accommodation, on-site provision would not be appropriate, this could be done either by a financial contribution.	Little Woodhouse Community Association and Little Woodhouse Neighbourhood	1	○	There is nothing in the wording of paragraph 5.2.21 to stop the Council seeking commuted sums in such circumstances.	No
H5-33	Purpose Built Student Accommodation should provide affordable housing and not be exempt.	Garforth Neighbourhood Planning Forum	1	○	Policy does not explicitly exempt student housing development. It is a matter of implementation. Major developments of dwellings are expected to provide affordable dwellings. Where a student scheme comprises dwellings as defined in the use class order affordable housing requirements will be justified.	No
H5-34	Affordable housing should be a priority for the council and provided for and reserved for the needs of the Local / Settlement area (not city wide) residents.	Garforth Neighbourhood Planning Forum	1	○	Affordable housing is a priority for the Council and policy H5 seeks to maximise this in the context of needs and viability evidence.	No
H5-35	Affordable housing is an inappropriate phrase and is too expensive, need for cheaper housing.	Alison Potts	1	○	The use of the terminology is in the context of national policy.	No
H9-1	Need has not been demonstrated. No need to introduce the NDSS. Local needs can be met without the introduction of the standards.	Strata Homes Ltd, Harrow Estates Plc, Leeds Bradford Airport, HBF, Gladman Developments	5	○	A need for the policy has been demonstrated. The policy aims to improve the quality of housing for the residents of Leeds who deserve high quality homes. The standards ensure that this is achieved on a consistent	No

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					basis to ensure dwellings meet minimum space standards.	
H9-2	Needs evidence is too small. The survey identifies that 38% of the homes did not meet the NDSS. Furthermore of those under standard over half were less than 10% below standard. Having reviewed the background paper we note that none of our own compliant dwellings were assessed.	Persimmon	1	O	The needs evidence is based on a selection of dwellings permitted from 1 st Jan 2012 to March 2016, for 680 dwellings. The selection of dwellings to be assessed was based on typologies: including a mix of geographical area, type of development, type of housebuilder and type of site / location. This is considered to provide a robust evidence base to support NDSS.	No
H9-3	SHMA doesn't identify need. The 2017 SHMA identified that approximately 55% of the new housing needed during the plan period is to be 1/2 (21.6%) and 3 (35.1%) bedroom housing. Thus the greatest need in the plan is for first time buyer and starter home size product.	Persimmon	1	O	There is no incompatibility of SHMA evidence and the need for minimum space standards. Whilst the SHMA identifies need for dwellings in terms of number of bedrooms needed, Policy H9 is necessary to ensure that dwellings meet minimum space standards and is based on other evidence.	No
H9-4	Clear evidence of need along with viability, has not been demonstrated.	Hatfield Estate, Lady Elizabeth Hastings Estate Charity, AC Developments Yorkshire Ltd, A R Briggs & Co Ltd, Linden Homes& Lady Elizabeth Hastings Estate Charity, Mr S Burnett & Lady Eliz Hastings Estate Charity, Persimmon, Gallagher Estates, Space partnerships Ltd, Gladman Developments, HBF, Park	28	O	The Permitted Dwelling size measurement background paper demonstrates need. The impact of Policy H9 is also tested within the Leeds EVS 2018 Update (refer to Section 9). However, the assumptions regarding space standards within the baseline appraisals, in the majority of cases, exceeded the National Space	No

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		Lane Homes, D G Fryer, N Joyce, B Timms, B Joyce and M Joyce, R Mills (East Rigton), Strata, Miller Homes, Linden Homes, Thornhill Estates, Sir Robert Ogden Partnership, Redrow Homes, Mr John Wilson, The Diocese of W Yorkshire and The Dales, Taylor Wimpey, The Ogden Group, Great North Developmetns, Barnaway and Hamber			<p>Standards. The notable exception to this was 1 and 2 bed apartments. Therefore, when testing the impact of Policy H9 the assessment only increased the sizes of the 1 and 2 bed apartments. As result the impact of Policy H9 was only evident in Zone 4 (City Centre) and showed a 3% reduction in land value.</p> <p>The Housing Standards Review – Cost Impacts Assessment September 2014 states that for relatively small areas (between 1 and 2 sq.m) 90% of the additional cost can usually be recovered through additional income. The study estimates that only 60% can be recovered for an additional 10sq.m of floorspace.</p> <p>With respect to the 1 and 2 bed apartments this would mean the sale price of a 1 bed apartment would increase by £4,300 an increase of 3.68%. The price of a 2 bed apartment would increase by £860 an increase of 0.69%.</p>	
H9-5	Policy to implement a blanket requirement will prevent the delivery of new residential developments in less affluent locations. NDSS should be subject to scheme viability considerations and should not apply	Space partnerships Ltd	1	O	Not everyone has benefitted fully from Leeds’ economic successes of the past. There remain significant issues of poverty and deprivation in the city which can partly be addressed by improving housing quality.	

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	to CIL zones 2A, 3 and 4, and should be aspirational in these areas.				<p>Technically, the impact of Policy H9 is tested within the Leeds EVS 2018 Update (refer to Section 9). However, the assumptions regarding space standards within the baseline appraisals, in the majority of cases, exceeded the National Space Standards. The notable exception to this was 1 and 2 bed apartments. Therefore, when testing the impact of Policy H9 the assessment only increased the sizes of the 1 and 2 bed apartments. As result the impact of Policy H9 was only evident in Zone 4 (City Centre) and showed a 3% reduction in land value.</p> <p>The Housing Standards Review – Cost Impacts Assessment September 2014 states that for relatively small areas (between 1 and 2 sq.m) 90% of the additional cost can usually be recovered through additional income. The study estimates that 60% can be recovered for an additional 10sq.m of floorspace.</p> <p>With respect to the 1 and 2 bed apartments this would mean the sale price of a 1 bed apartment would increase by £4,300 an increase of 3.68%. The price of a 2 bed</p>	

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					<p>apartment would increase by £860 an increase of 0.69%.</p> <p>The EVS 2018 update considers the viability of Policies H9 (minimum space standards) and H10 (accessibility standards) and the impact of both policies is considered to be within acceptable limits. Sections 9 and 10 of the EVS set this out. The cumulative impact of these policies along with other suggested policy changes, set out within the CSSR, has also been tested (refer to Section 13) and the cumulative impact is also considered to be within acceptable limits.</p>	
H9-6	The EVS considers the impact of introducing the NDSS. This assessment suggests that much of the additional costs up to 80% will be absorbed by higher sales revenues. This appears to completely ignore local price caps, over which new occupiers are unlikely to exceed and the effects of the additional costs on affordability.	Strata Homes Ltd, Harrow Estates Plc, Leeds Bradford Airport, Otley Town Partnership, McCarthy and Stone, Harewood Estate, Gladman Developments	7	O	The EVS 2018 update considers the viability of Policies H9 and the impact of the policies is considered to be within acceptable limits as set out in Sections 9 and 10 of the report respectively. The cumulative impact of these policies along with other suggested policy changes, set out within the CSSR, has also been tested (refer to Section 13) and the cumulative impact is also considered to be within acceptable limits.	No
H9-7	Affordability implications have not been properly considered. The additional build cost would be passed onto the purchaser in an area struggling with severe affordability	Persimmon, Strata Homes Ltd, Harrow Estates Plc, Leeds Bradford Airport, HBF	5	O	The standards aim to improve the quality of housing making it more usable for all to including those on lower incomes. The approach needs to be read in conjunction with wider	

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	pressures. This will need to be considered in the context of existing Policy H4.				policy ambitions in the Local Plan e.g. on housing mix. To that end, purchasers may well prefer to buy a higher quality 2-bed home than an under-sized 3-bed property. The Council recognises that the housing standards will require house builders to amend their current approach and models of delivery in some instances. Moreover, any additional costs of better quality homes need not necessarily be borne by the purchaser. The policy in time should, through land value adjustments over time, see some costs absorbed by the land owner. Policy H5 of the CSSR aims to tackle affordability by maximising affordable housing provision for those in the greatest need.	
H9-8	Should allow more scope for flexible housing which can be adapted	Vastint	1	O	The NDSS allow scope for innvotion in design.	
H9-9	The NDSS are also likely to reduce choice in the market. Developers provide entry level two, three and four-bedroom properties which may not meet the NDSS. These properties are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms	Strata Homes Ltd, Harrow Estates Plc, Leeds Bradford Airport, HBF	4	O	The Government recognised the need for and set national standards and there is no flexibility to deviate from these. NDSS need to be applied on a consistent basis, so that all residents have equality of access to suitably sized homes. This is a key objective of the Best Council Plan and reflects the spatial strategy of the Core Strategy which focusses the largest amount of development in the city centre, inner area and main urban area.	No

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H9-10	Reduction in diversity will minimise the available market for a site and could potentially impact upon delivery rates. The reduction in diversity will minimise the available market for a site and could potentially impact upon delivery rates.	Strata Homes Ltd, Harrow Estates Plc, Leeds Bradford Airport	3	O	The NDSS still allows for a large range of dwelling forms. The minimum space requirement will only deter unacceptably small dwellings.	No
H9-11	Specialist providers have a clearer idea of the needs of their residents and a 'one-size-fits-all' approach should not apply to any specialist forms of housing.	McCarthy and Stone	1	O	Age restricted housing should not be of a lesser standard in terms of space and quality compared to general market housing. NDSS improves the standards for all, including specialist housing.	No
H9-12	Current product range is fully suitable for those wanting to buy properties. Members would not sell homes below the enhanced standard size if they did not appeal to the market.	HBF, Persimmon	2	O	The aim of the NDSS is to improve the quality of housing to make homes more liveable and usable, not to reduce choice. The aim of the NDSS is to improve the quality of new dwellings and increase the proportion of the homes on the market which meet these standards.	No
H9-13	Flexibility needs to be provided when delivering new dwellings in terms of site specific or housing sector specific characteristics, size, scale and mix	Chartford Homes, Stonebridge Homes , Space partnerships Ltd, Inhibit	4	O	Choice should be provided in terms of size, scale and mix however within that a minimum standard should be applied to guarantee a good quality liveable homes in new dwellings.	No
H9-14	Needs to be flexibility to avoid stifling innovation in design.	Vastint	1	O	Applying the standard may allow more scope for innovative design and ensures good quality liveable homes. NDSS sets a standard floor area for the overall dwelling and bedrooms, not	No

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					defining any other part of the dwelling whether in its spatial layout or any three dimensional architectural form or function. Larger dwellings are clearly more adaptable to personal and community needs, therefore offer better resilience for Leeds housing stock in the future as and when changes in living pattern occur.	
H9-15	The explanatory text to the new policy sets out that the standards and requirements in the new policy H9 “reflect exactly the NDSS of 2015.” the NDSS clearly states that: “The requirements of this standard for bedrooms, storage and internal areas are relevant only in determining compliance with this standard in new dwellings and have no other statutory meaning or use.” Therefore, whilst the NDSS provides a national standard, it does not have a statutory status in the determining of planning applications.	Chartford Homes, Stonebridge Homes submitted by Barton Willmore	2	O	The guidance in bullet point 2 of the technical housing standards highlights the limitations which apply to the application of the standards proposed policy H9, is within the stated limitations highlighted in this response. The NDSS are proposed to form part of the Core Strategy Selective Review.	No
H9-16	Standards should be in a Supplementary Planning Document (SPD) for the plan period, to allow for flexibility in change of circumstances.	Chartford Homes, Stonebridge Homes submitted by Barton Willmore	2	O	National guidance is clear that NDSS can only be introduced through the Local Plan process. The need for quality homes is not likely to reduce during the plan period.	No

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H9-17	Policy is not required within the revised Core Strategy. It is overly prescriptive for a Core Strategy policy current building regulation requirements would be more than sufficient in addressing.	Caddick Developments Limited, KCS submitted by IB Planning, Park Lane Homes, R. Hills (East Rigton) Ltd, [D.G Fryer, N. Joyce, B. Timms, P. Joyce and M. Joyce], Miller Homes, Linden Homes, Thornhill Estates, The Sir Robert Ogden Partnership, Redrow Homes, Mr John Wilson and The Diocese of West Yorkshire and the Dales, Taylor Wimpey, The Ogden Group, Great North Developments, Barnaway and Hamber submitted by ID Planning	14	O	The Written Ministerial Statement and national planning guidance states that a local plan is the only appropriate vehicle to introduce NDSS. The Local Plan policy is therefore the only route a local authority can use to introduce planning requirements for NDSS. The building regulations do not include space standards.	No
H9-18	Should not be included within the revised Core Strategy. Duplication of text is not supported a cross reference is sufficient. This would ensure no conflict arises in standards if changes to national policy are made.	Caddick Development Walton and co	2	S	The Written Ministerial Statement and national planning guidance states that a local plan is the only appropriate vehicle to introduce NDSS. The Local Plan policy is therefore the only route a local authority can use to introduce planning requirements for NDSS. If the NDSS changed in the future the local plan policy could be amended via the modification to the Local Plan. Including a full policy aids clarity.	No
H9-19	Delivery rates are predicated on a range of issues including ensuring	Persimmon	1	O	Strategic Housing Land Availability Assessment	No

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	market affordability at relevant price points and maximising the absorption rates of sites and current standards, delivery rates which the plan is based upon could be comprised.				2017 Update sets out delivery rate assumptions. There is no evidence that homes will become more expensive or that the delivery of new housing will slow down. The quality of housing which has been designed in accordance with this standard may be greater than existing dwellings and therefore more attractive to purchasers. Policy H5 aims to maximise affordable housing for those in greatest need.	
H9-20	Efficient use of Land and the effect of Larger Dwellings on Land Supply. An increase in larger units will result in a decrease in housing density and a lower efficiency of land use. This reduced efficiency will generate fewer dwellings and impact viability.	Persimmon	1	O	The NDSS are not aiming to be onerous, they simply set out minimum space standards. In addition there are changes to Policy G4 which reduce the required quantity of Green Space which form part of the Core Strategy Selective Review. The revised policy G4 offers increased land capacity for accommodating dwellings to maintain the housing land supply, as the greenspace requirement is reduced.	No
H9-21	Housing White Paper 'Fixing our broken housing market states the Government will review the NDSS.	Persimmon	1	O	The policy is within the context of current national guidance, any changes in future national policy will be considered once it is adopted.	No
H9-22	NDSS has much more of a London centric focus which may not always take into account the nuances that exist in other areas of the UK.	YP Real Estates Ltd, Inhibit	2	O	The standards are a national standard.	No

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H9-23	The NDSS input assumptions do not adequately reflect the target BTR demographics. Assumes a level of occupancy which does not reflect how people live in apartments. For example, the NDSS occupancy for a 2 bedroom is 3 or 4 people whereas Inhabit (and many other BTR operators) intend for 2 bedrooms to be shared either by two flatmates or a couple.	YP Real Estates Ltd, Inhibit	2	O	<p>People accessing the BTR market should also be able to benefit from the NDSS.</p> <p>The aim of the NDSS is to improve standards for all. Where dwellings are shared by multiple persons, adequately sized alternative spaces ensure individuals have options of where to spend their time, including a suitably sized private space.</p> <p>Adequately sized private spaces ensure that the dwelling will accommodate the personal possessions of each occupant by ensuring there is enough floor space for adequate storage.</p> <p>Also, some owners and management operators of BTR may allow occupancy of 2 bedroom dwellings by 3 or 4 occupants. The minimum space standard will provide the flexibility to ensure that occupation b 3 or 4 occupants is not over-crowded. Over the life of the dwelling, there may be different owners or management companies.</p>	No
H9-24	BTR-The NDSS fails to take into consideration the differences in layouts and as such penalises smaller apartments with efficient layouts that are actually superior to ‘compliant’ counterparts that may have unused / underutilised space.	YP Real Estates Ltd, Inhibit	2	O	The introduction of national standards aims to improve the quality of housing overall. The NDSS has been drafted and tailored around different size units and one bedroom 2 person units feature in the H9 table.	

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					People accessing the BTR market should also be able to benefit from the NDSS.	
H9-25	BTR developments seek to promote communal space over private space, BTR apartments are often far more efficiently laid out and, despite being smaller, provide the same standard of living space as a NDSS compliant	YP Real Estates Ltd, Inhibit	2	O	The policy requirement for minimum space standards serves to ensure that <i>dwelling</i> s have sufficient space themselves. Space provides quality which allows customisation, personalisation and adaptability of a dwelling as well as practical features such as adequate storage. While provision of common amenities, facilities and high quality management services is welcomed, these are not seen as substitutes for suitably provisioned sized private dwellings. While common/communal facilities are welcomed as they assist in promoting activity and community in apartment developments, adequately sized private dwellings and personal spaces are also required for good quality living environments as they allow for a choice of spaces for residents of a development.	No
H9-26	Adequate car parking should be designed into all future developments based on occupancy.	James Paterson	1	O	This policy does not cover car parking or other elements of housing quality and is therefore out of the scope of the NDSS.	No
H9-27	Support	M&G Real Estate submitted by AECOM, Leeds Civic Trust, Alastair Walton,	6	S	Support Noted.	No

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		Leeds Fed, Otley Town Partnership, North Yorkshire County Council,				
H9-28	An explanatory note is missing re the 1b1p size, where it is reduced from 39 to 37 m2 if there is a shower room rather than a bathroom. The reference “2”, presumably, should refer to a footnote.	Leeds Civic Trusts	1	O	Noted.	Yes
H9-29	Space standards for student accommodation and HMOs should be incorporated in this or another policy rather than a future supplementary planning document. Any SPD should be expedited for the present and incorporated as policy in a further review, if not now.	Leeds Civic Trust, Little Woodhouse Community Association and Little Woodhouse Neighbourhood Plan.	3	O	Noted.	No
H9-30	Need for an appropriate transitional period.	HBF	1	O	The draft policy has been published for consultation, from the launch of the consultation to policy adoption. Developers will have had the opportunity to investigate the policies implications and incorporate the requirements into proposals	
H9-31	Support	CPRE West Yorkshire	1	S	Noted.	
H9-32	How will NDSS will be assessed when granting planning permission, not known how many people will be living in a particular house (eg. a one bedroom apartment may have either 1 or 2 people). Inclusion within the Policy about the method of	Garforth Neighbourhood Planning Forum, Rothwell Neighbourhood Forum	2	O	The Written Ministerial Statement and national planning guidance states that a local plan is the only appropriate vehicle to introduce NDSS. The Local Plan policy is therefore the only route a local authority can use to introduce planning requirements for NDSS. If the	

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	monitoring and policing of minimum standards i,e via Building Control mechanisms or the need for developer certification.				NDSS changed in the future the local plan policy could be amended via the modification to the Local Plan. Including a full policy aids clarity. NDSS form part of the Use of standard planning conditions and process.	
H9-33	Recognise that Leeds had its own housing standards. The "Leeds Standard".	Morley Town Council	1	S	National Planning Guidance is clear that standards for market housing can only be applied through the NDSS, any local standards can only apply to the Councils own stock. The Leeds Standard is not a planning policy, nor a material planning consideration. The Leeds Standard defines a number of features which Leeds City Council is incorporating into its own social housing development programme (Council House New Build Programme) and can only be used for this purpose.	
H9-34	Exemptions within the poorer HMCAs on viability grounds should be exceptional and individually justified, though flexibility should be shown on room sizes in Listed and convertible buildings to avoid scheme failures or untoward structural changes	Morley Town Council	1	O	NDSS set minimum standards only, there is scope for innovative design as part of the process.	
H9-35	Support student exemption, given that they do not fall under the same Use Class, are occupied differently and should therefore be treated differently	Unite Group Plc submitted by RPS	1	S	Noted.	
H9-36	BTR should also be exempt.	Inhibit, YP Real Estates Ltd	2	O	The aim of NDSS are to improve the quality of housing stock for all.	

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H10-1	Welcome/ support	<p>Rothwell Neighbourhood Forum submitted by Chair Mr P.L Ellis</p> <p>North Yorkshire County Council</p> <p>M&G Real Estate submitted by AECOM</p> <p>Leeds Federated Housing Association submitted by Stephen Ellis</p> <p>Campaign to Protect Rural England submitted by Mr Andrew Wood</p> <p>Leeds Civic Trust</p> <p>Morley Town Council submitted by Karen Oakley Town Clark</p>	7	S	Support noted	None
H10-2	Agree with this policy	Garforth Neighbourhood planning forum	1	S	Support noted	None
H10-3	Inclusive design is fundamental to improving the quality of life for disabled and older people.	<p>McCarthy & Stone Retirement Lifestyles Ltd. Submitted by The Planning Bureau Limited.</p>	1	S	Support noted	None
H10-4	Provisions will help to address the need to cater for all types of housing	North Yorkshire County Council	1	S	Support noted	None

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	to meet the wider needs of the whole community					
H10-5	Will ensure the plan positively addresses one of the protected characteristics identified in the Equality Act 2010.	North Yorkshire County Council	1	S	Support noted	None
H10-6	Accessible housing needs assessment provides a context of need for accessible housing within the Leeds district	Persimmon Homes (West Yorkshire)	1	S	Noted	None
H10-7	Enormous benefits of accessible housing	Tim McSharry Head of disability and diversity at Access Committee for Leeds	1	S	Support noted	None
H10-8	It is apparent from the SHMA Household Survey that such residents (identified) could benefit from the design features of M4(2) or M4(3) dwellings, therefore the general approach is supported.	M&G Real Estate submitted by AECOM	1	S	Noted- support for policy stance and methodology employed by the accessible housing needs assessment.	None
H10-9	Parlington (development) is more than capable of meeting the proportion of accessible dwellings required by Policy H10.	M&G Real Estate submitted by AECOM	1	S	Noted- response cites a specific development (Parlington Estate) which can provide the levels of M4(2) and M4(3) required by draft policy H10.	None
H10-10	Policy is crucial to ensuring that new homes are fit for purpose.	Campaign to Protect Rural England submitted by Mr Andrew Wood	1	S	Support noted	None
H10-11	Percentages are too low or far too low. The percentages of M4(2) and M4(3) dwellings should be higher	Leeds Older Peoples Forum (taken from briefing and notes of meeting 12/03/2018 Merrion House, Leeds)	5	O	The SHMA 2017 identified a need for at least 17% of dwellings to be accessible and 5% to be wheelchair standard. Taking into account future population demographic projections-	None

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	<p>Leeds should adopt the London percentages/ as Manchester, Sheffield Leicester and Reading are requiring.</p> <p>Should require 90% M4(2) and 10% M4(3)</p> <p>The aging of the population is increasing the need for housing with higher accessibility standards.</p>	<p>Alison Potts</p> <p>Alastair Watson Individual</p> <p>Peter Heald Director Otley Town Partnership</p> <p>Rachael Docking Senior Evidence Manager- Centre for Ageing Better</p>			namely our ageing population, have resulted in a higher 'need' figure. The accessible housing needs assessment was based on current population statistics at the point of assessment. The EVS 2018 update consider the viability of Policy H10 and concludes that the impact on viability is within acceptable limits and as such targets are appropriately set.	
H10-12	<p>Need to future proof all housing with a consistent approach throughout the country.</p> <p>Futureproofing- homes which are being built now need to be future proofed against future demographic change.</p>	<p>Leeds Older Peoples Forum (taken from briefing and notes of meeting 12/03/2018 Merrion House, Leeds)</p> <p>Alastair Watson Individual</p> <p>Rachael Docking Senior Evidence Manager- Centre for Ageing Better</p>	3	O	The viability assessment, taking into account the cumulative effects of all Local Plan policies does not currently show that higher percentages than those proposed are viable in Leeds.	None
H10-13	The policy should include homes for older people. Accessible homes criteria need to include homes suitable for older people....should ensure older people are able to remain in their homes	<p>Garforth Neighbourhood planning forum</p> <p>Alison Potts</p>	2	O	The optional accessible housing standards are designed to be suitable for a range of people with a range of impairments including older people.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	More housing for older people in line with demographics					
H10-14	Draft policy fails to provide proof of the core strategic leadership or review and monitoring frameworks which are core to embedding the policy in practice.	Tim McSharry Head of disability and diversity at Access Committee for Leeds	1	O	Proposals for monitoring Policy H10 are set out in the Core Strategy Monitoring Framework.	None
H10-15	<p>Policy should provide supporting text on Part M vol. 2 of the Building Regulations with regard to its student accommodation requirements.</p> <p>Note that the proportion of wheelchair accessible rooms in student housing (and hotels) is set by AD M vol 2 at 5% therefore there is no need to include them in this policy. However, it would be useful to add that information to Para 5.3.51 perhaps:</p> <p>“The Building Regulations define student accommodation as hotel accommodation in relation to part M, with accessible hotel accommodation being covered by Part M volume 2 of the Building Regulations, <i>which also sets the requirement of 1 in 20 rooms being wheelchair accessible.</i>”</p>	<p>Leeds Civic Trust</p> <p>Little Woodhouse Community Association and Little Woodhouse Neighbourhood Plan</p>	2	O	<p>Not considered to be appropriate, and could cause confusion. Draft policy H10 is focussed on the provision/creation of accessible housing.</p> <p>The accessible student accommodation requirements in part M volume 2 of the Building Regulations are not planning requirements, and to mention them in this policy would therefore be confusing as they are not a requirement, and Building Regulations requirements could change at some point in the future.</p>	None
H10-16	Questioning application of M4(3) wheelchair user dwellings: the council should not apply M4(3) via planning policy to market homes.	McCarthy & Stone Retirement Lifestyles Ltd. Submitted by The Planning Bureau Limited.	1	O	Draft policy H10 requires 2% ‘wheelchair user dwellings’ in accordance with M4(3) of Part M vol 1 of the Building Regulations.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					<p>Wheelchair user dwellings will be either wheelchair accessible or adaptable for wheelchair users.</p> <p>H10 has been drafted in accordance with current guidance in the form of planning practice guidance.</p>	
H10-17	<p>Building Regulations require provision of accessible dwellings</p> <p>Not appropriate, justified, needed or necessary for a development plan document to introduce a planning policy which requires the optional accessible housing standards.</p> <p>Should not form part of a Core Strategy document</p>	<p>Chartford Homes submitted by Barton Willmore</p> <p>Stonebridge Homes submitted by Barton Willmore</p> <p>Caddick Developments Limited Submitted by IB Planning Ltd</p> <p>KCS Developments Limited Submitted by IB Planning Limited</p> <p>Caddick PLC submitted by Deloitte Real Estate</p> <p>Redrow Homes submitted by ID Planning</p> <p>Miller Homes submitted by ID Planning</p>	17	O	<p>The Written Ministerial Statement and national planning guidance states that a local plan is the only appropriate vehicle to introduce optional accessible housing standards in the form of M4(2) and M4(3), and that they should not be introduced via SPG or neighbourhood plans.</p> <p>Local plan policy is therefore the only route a local authority can use to introduce planning requirements for accessible housing.</p> <p>There is currently no planning policy requiring accessible housing in Leeds. The resultant need is highlighted in the accessible housing needs assessment.</p> <p>The Building Regulations baseline standard of M4(1) is not an accessible housing standard and does not address the need for M4(2) and M4(3) dwellings as identified in the accessible housing needs assessment.</p>	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
		Mr John Wilson and The Diocese of West Yorkshire and the Dales submitted by ID Planning			SHMA statistics fed into the accessible housing need assessment, which took into account disabled people, older people and families with young children, all of whom would benefit from the design features of an M4(2) or M4(3) home.	
		Taylor Wimpey submitted by ID Planning			Policy H10 applies to all new build dwellings across Leeds, to provide as much choice as possible and as close to an equivalent level of choice as possible for people wishing to access M4(2) or M4(3) housing compared with those who do not require accessible housing.	
		Redrow Homes submitted by ID Planning			It aims to create a mixture of tenures, sizes and locations which is reflective of housing development in Leeds, to ensure people who require accessible housing experience minimal disadvantage when accessing housing (market or social).	
		Great North Developments submitted by ID Planning			The proposed percentage requirements in H10 takes into account all groups of people who may benefit from accessible housing built to M4(2) and M4(3) standards.	
		Barnaway and Hamber submitted by ID Planning				
		The Sir Robert Ogden Partnership submitted by ID Planning				
		Thornhill Estates submitted by ID Planning				
		Linden Homes submitted by ID Planning				
		Park Lane Homes and D.G Fryer, N. Joyce, B. Timms, P. Joyce & M. Joyce submitted by ID Planning				
		Park Lane Homes and R.				

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
		Hills (East Rigton) Ltd submitted by ID Planning				
H10-18	<p>PPG is also clear that policies should also take into account site specific factors such as vulnerability to flooding, site topography and other site- specific circumstances which may make certain sites less suitable for M4(2) or M4(3) development. This is not evident within the policy as presently drafted.</p> <p>LCC should satisfy themselves of any implications for this policy for sites in flood zones where flood mitigation measures could affect ease of access e.g. raising of buildings above surrounding ground levels could result in stepped/ ramped access.</p>	Home Builders Federation Environment Agency	2	O	<p>Policy H10 needs to be specific and prescriptive to allow accessible housing requirements (whether for M4(2) or M4(3) dwellings) to be conditioned, and for building control to check resultant development against the conditions, for planning to then discharge the condition.</p> <p>The nature of individual sites e.g. topography or vulnerability to flooding will be taken into account on a case by case basis as planning officers evaluate individual planning applications. Which dwellings on a site will meet M4(2) or M4(3) standards will be informed by site specific factors.</p> <p>The optional accessible housing standards M4(2) and M4(3) require level access, but this can be provided in the form of ramped access if needed, so can adapt to different floor levels which are dictated by flood levels.</p> <p>As H10 does not require 100% of dwellings to meet M4(2) or M4(3) standards flexibility does exist within</p>	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					the policy, to ensure it can work on a variety of sites- including sites where some areas will not be suitable for accessible housing.	
H10-19	<p>PPG also states that policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. There will need to be a clear policy for how the Council will work with developers and housing associations to deliver these homes.</p> <p>It is unclear how the Council anticipates that the requirement for wheelchair accessible housing standards to be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.</p> <p>M4(3) should only apply to affordable- as drafted in contrary to national guidance and should be amended to reflect this.</p> <p>2% M4(3): local plan policies for wheelchair accessible homes should be applied only to those dwellings where the local planning authority is</p>	<p>Home Builders Federation</p> <p>Harrow Estates Plc submitted by WYG planning</p> <p>Strata Homes via WYG planning</p> <p>Gladman Developments Submitted by Mr John Fleming</p>	4	O	<p>H10 has been drafted in accordance with planning practice guidance. Policy H10 recognises that wheelchair user dwellings will be either wheelchair accessible or adaptable for wheelchair users. When planning applications are submitted, Leeds City Council planning, advised as necessary by housing officers and occupational therapists, would be involved in ensuring that residents and M4(3) wheelchair accessible dwellings are matched.</p>	<p>Insert new text, at the end of paragraph 5.2.52 “In most cases it is expected that market housing for sale and specific affordable dwellings provided through planning requirements will be wheelchair adaptable. Only where Leeds City Council is nominating a wheelchair user as an occupier will be wheelchair accessible dwellings be required.”</p>

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	responsible for allocating or nominating a person to live in that dwelling.					
H10-20	Inconsistent with national policy Not consistent with national policy or PPG	McCarthy & Stone Retirement Lifestyles Ltd. Submitted by The Planning Bureau Limited. Harrow Estates Plc submitted by WYG planning Strata Homes via WYG planning	3	O	H10 has been drafted in accordance with planning practice guidance. Policy H10 recognises that wheelchair user dwellings will be either wheelchair accessible or adaptable for wheelchair users. When planning applications are submitted, Leeds City Council planning, advised as necessary by housing officers and occupational therapists, would be involved in ensuring that residents and M4(3) wheelchair accessible dwellings are matched.	Insert new text, at the end of paragraph 5.2.52 “In most cases it is expected that market housing for sale and specific affordable dwellings provided through planning requirements will be wheelchair adaptable. Only where Leeds City Council is nominating a wheelchair user as an occupier will be wheelchair accessible dwellings be required.”
H10-21	Supporting documents do not adequately capture, describe or define the key savings and opportunities. They should take into account the costs the public purse is picking up in terms of avoidable costs due to a lack of cohesion and joint working between services and public bodies- which is further compounded through gaps in skills and knowledge.	Tim McSharry Head of disability and diversity at Access Committee for Leeds	1	O	The accessible housing needs assessment was based on the statistics available at the time of drafting. The annexes at the end of the needs assessment do highlight potential spend on adaptations which could be avoided or reduced on an M4(2) or M4(3) dwelling, however these benefits will only be realised on new build M4(2) or M4(3) dwellings, and it is likely to take a number of years for the proposed policy to have a significant impact (i.e. be a significant	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					enough proportion of the total housing stock) on adaptations spend.	
H10-22	DCLG report on housing for older people and the Women and Equalities Select Committee report ‘building for equality’: disability and the built environment’ makes clear arguments and recommendations for M4(2) to be the mandatory baseline housing standard (as opposed to M4(1)).	Rachael Docking Senior Evidence Manager- Centre for Ageing Better	1	N	Noted	None
H10-23	Vast majority of older people live in mainstream housing and most intend to stay in mainstream housing with no intention of moving into specialist housing	Rachael Docking Senior Evidence Manager- Centre for Ageing Better	1	N	Noted	None
H10-24	Questioning design standards Are design standards futureproofed? Expert disability and carer organisations were not involved in the composition of them.	Mr Colin McDonnell Individual Tim McSharry Head of disability and diversity at Access Committee for Leeds	2	O	Since the national housing standards review any accessible housing standards applied via the planning process must be either M4(2) or M4(3) as contained within Part M volume 1 of the Building Regulations. There is not an option to deviate from these, so alternative standards cannot be applied. M4(2) and M4(3) are designed to be accessible or adaptable for people with a range of disabilities and impairments.	None
H10-25	The provision of a single minimum size for access and adaptable dwellings is not enough to cover the whole range of disabilities	Mr Colin McDonnell Individual	1	O	Since the national housing standards review any accessible housing standards applied via the planning process must be either M4(2) or	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					M4(3) contained within Part M volume 1 of the Building Regulations. There is not option to deviate from these, so alternative standards cannot be applied. M4(2) and M4(3) are designed to be accessible or adaptable for people with a range of disabilities and impairments.	
H10-26	Only 7% of homes in the UK have level access, flush threshold, sufficiently wide doors and circulation space for a wheelchair and an entry level WC.	Rachael Docking Senior Evidence Manager- Centre for Ageing Better	1	N	Noted	None
H10-27	Need more flexibility Additional flexibility should be provided in the percentage requirements for accessible housing to allow developers to negotiate on a site by site basis.	Chartford Homes submitted by Barton Willmore Stonebridge Homes submitted by Barton Willmore Caddick Developments Limited Submitted by IB Planning Ltd KCS Developments Limited Submitted by IB Planning Limited Persimmon Homes (West Yorkshire)	8	O	Policy H10 needs to be specific and prescriptive to allow accessible housing requirements (whether for M4(2) or M4(3) dwellings) to be conditioned, and for building control to check resultant development against the conditions, for planning to then discharge the condition. The nature of individual sites e.g. topography will be taken into account on a case by case basis as planning officers evaluate individual planning applications. Which dwellings on a site will meet M4(2) or M4(3) standards will be informed by site specific factors. As H10 does not require 100% of dwellings to meet M4(2) or M4(3) standards, flexibility does exist within	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
		YP real estate Ltd. Submitted by Quod Inhibit submitted by Quod Vastint Leeds BV submitted by Turley			the policy, to ensure it can work on a variety of sites, including sites where some areas will not be suitable for accessible housing. As H10 does not require 100% of dwellings to meet M4(2) or M4(3) standards, flexibility does exist within the policy, to ensure it can work on a variety of sites, including sites where some areas will not be suitable for accessible housing.	
H10-28	Blanket policy for all residential development with no consideration for the type and scale of development, or the locality of sites not appropriate.	Chartford Homes submitted by Barton Willmore Stonebridge Homes submitted by Barton Willmore	2	O	Policy H10 applies to all new build dwellings across Leeds, to provide as much choice as possible and as close to an equivalent level of choice as possible for people wishing to access M4(2) or M4(3) housing compared with those who do not require accessible housing. It aims to create a mixture of tenures, sizes and locations which is reflective of housing development in Leeds, to ensure people who require accessible housing experience minimal disadvantage when accessing housing (market or social).	None
H10-29	Overly prescriptive policy	Caddick Developments Limited Submitted by IB Planning Ltd	2	O	Policy H10 needs to be specific and prescriptive to allow accessible housing requirements (whether for M4(2) or M4(3) dwellings) to be conditioned, and for building control	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
		KCS Developments Limited Submitted by IB Planning Limited			to check resultant development against the conditions, for planning to then discharge the condition.	
H10-30	The nature of sites (for example topography) and technical reasons need to be considered when looking at these requirements.	Persimmon Homes (West Yorkshire)	1	O	The nature of individual sites e.g. topography will be taken into account on a case by case basis as planning officers evaluate individual planning applications. Which dwellings on a site will meet M4(2) or M4(3) standards will be informed by site specific factors. As H10 does not require 100% of dwellings to meet M4(2) or M4(3) standards- flexibility does exist within the policy, to ensure it can work on a variety of sites- including sites where some areas will not be suitable for accessible housing.	None
H10-31	There will be a resultant adverse impact on the affordability of starter home/ first time buyer products which may translate into reduced or slower delivery rates This is an expensive option for the general purchaser, and there is no acknowledgement of this within the policy itself. Places cost burden on housing delivery	Vastint Leeds BV submitted by Turley Inhibit submitted by Quod	2	O	First time buyers should have no less choice in terms of accessible and adaptable dwellings than people who are not first time buyers- hence the supporting text wording around choice, tenure and size of dwellings which are M4(2) or M4(3). The impact on viability of Policy H10 has been tested in the Leeds EVS Update 2018. The results of this analysis are included at Section 10 and specifically outlined in Tables 27 to 30.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					There are demonstrable needs for accessible dwellings, with households willing to pay for an accessible dwelling that suits their needs. Therefore, it is unlikely that the increased affordability will translate into reduced and slower delivery rates.	
H10-32	Accessible and adaptable dwellings should be focussed primarily towards affordable housing rather than those for private sale, as they are quite poorly proportioned and designed units.	Vastint Leeds BV submitted by Turley	1	O	Accessible or adaptable housing should be available/ an option for everyone, not just limited to affordable housing. People wishing to purchase a market home should have no less choice in terms of accessible and adaptable dwellings than people who are accessing affordable housing, hence the supporting text wording around choice, tenure and size of dwellings which are M4(2) or M4(3). The requirements in M4(2) and M4(3) are minimum standards and allow for design flexibility.	None
H10-33	There will be an impact on viability/ Accessible housing needs assessment should take into account overall viability The Council should ensure that it is able to demonstrate robust evidence on viability that this is achievable across the plan period.	Persimmon Homes (West Yorkshire) Harrow Estates Plc submitted by WYG planning Strata Homes via WYG planning Gladman Developments	12	O	The impact on viability of Policy H10 has been tested in the Leeds EVS Update 2018. The results of this analysis are included at Section 10 and specifically outlined in Tables 27 to 30. The requirements of Policy H10 have been demonstrated to be achievable in association with other policy approaches without placing an undue burden on development. Higher	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	Impact upon viability has not been effectively assessed.	<p>Submitted by Mr John Fleming</p> <p>Harewood Estate submitted by Carter Jonas</p> <p>Hatfield Estate submitted by Carter Jonas</p> <p>Mr S Burnett & Lady Eliz. Hastings' Estate Charity</p> <p>Lady Elizabeth Hastings' Estate Charity submitted by Carter Jonas</p> <p>Linden Homes & Lady Eliz. Hastings' Estate Charity submitted by Carter Jonas</p> <p>AR Briggs & Co Ltd submitted by Carter Jonas</p> <p>AC Developments Yorkshire Ltd submitted by Carter Jonas</p> <p>YP real estate Ltd. Submitted by Quod</p>			requirements were identified as having a greater risk of impacting on the viability of development across the City.	
H10-34	The EVS update 2018 concludes that the review of the Core Strategy including adaptable and accessible housing policy is viable. However,	House Builders Federation	1	O	Zone 2 is sub divided (Zones 2a and 2b) to align with the CIL charging zones. The EVS 2018 update demonstrates that	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	<p>tables showing the impact of the policy options for adaptable and accessible housing identify significant issues with sites in Zone 2 for both brownfield and greenfield sites.</p>				<p>greenfield/unconstrained sites within Zone 2b are viable generating land values which are higher than the minimum benchmark land values. Only large Brownfield sites in Zone 2b generated land values that fell below the minimum benchmark land value. However, the assessment of Brownfield sites has adopted a very cautious approach assuming that all sites are contaminated and will require site preparation. Further to this it is assumed that the remediation and site preparation costs will be applied to 100% of the site area, whereas in reality there will be circumstances where only a small part of the site is contaminated. Whilst the EVS does highlight viability as an area of concern in Zone 2a this is because the viability has been exclusively modelled based on a low value beacon settlement. Naturally the impacts of suggested policies within the CSSR are more pronounced in Zone 2a than compared with the other zones which include medium and high value beacon settlements. Taking into account the results from the Leeds EVS 2018 Update and the cautious approach taken to viability the Council is satisfied that the policy is viable.</p>	

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
H10-35	Concern that this policy needs to be based on evidence/ evidence of need which may change over the plan period.	Chartford Homes submitted by Barton Willmore Stonebridge Homes submitted by Barton Willmore	2	O	The Written Ministerial Statement and national planning guidance states that a local plan is the only appropriate vehicle to introduce optional accessible housing standards in the form of M4(2) and M4(3), and that they should not be introduced via SPD. Local plan policy is therefore the only route a local authority can use to introduce planning requirements for accessible housing.	None
H10-36	Not appropriate or needed	Caddick Developments Limited Submitted by IB Planning Ltd KCS Developments Limited Submitted by IB Planning Limited House Builders Federation	3	O	The Building Regulations baseline standard of M4(1) is not an accessible housing standard and does not address the need for M4(2) and M4(3) dwellings as identified in the accessible housing needs assessment. M4(2) and M4(3) cannot be ‘switched on’ via planning without a specific policy requiring these standards to be applied, it is therefore necessary to have a specific policy in the local plan. Currently no planning policy requiring accessible housing in Leeds. The resultant need is highlighted in the accessible housing needs assessment.	None
H10-37	Due to inclusion of H9 which requires the NDSS, it is not considered appropriate or needed to introduce policy H10.	Caddick Developments Limited Submitted by IB Planning Ltd	2	O	The Nationally Described Space Standard does not provide accessible and/ or adaptable dwellings, and therefore does not address the need	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
		KCS Developments Limited Submitted by IB Planning Limited			identified by the accessible housing needs assessment.	
H10-38	The standards were introduced by national government as an optional extra and the policy should be amended to reflect this.	Persimmon Homes (West Yorkshire)	1	O	<p>The Building Regulations baseline standard of M4(1) is not an accessible housing standard and does not address the need for M4(2) and M4(3) dwellings as identified in the accessible housing needs assessment.</p> <p>M4(2) and M4(3) cannot be ‘switched on’ via planning without a specific policy requiring these standards to be applied, it is therefore necessary to have a specific policy in the local plan.</p> <p>Currently no planning policy requiring accessible housing in Leeds. The resultant need is highlighted in the accessible housing needs assessment.</p>	None
H10-39	Policy imposes an undue burden especially on BtR homes.	YP real estate Ltd. Submitted by Quod	1	O	<p>Policy H10 applies to all new build dwellings across Leeds to provide as much choice as possible and as close to an equivalent level of choice as possible for people wishing to access M4(2) or M4(3) housing compared with those who do not require accessible housing.</p> <p>It aims to create a mixture of tenures, sizes and locations which is reflective</p>	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					of housing development in Leeds- to ensure people who require accessible housing experience minimal disadvantage when accessing housing (market or social). This principle also applies to BtR homes.	
H10-40	Percentages should have due regard to practicality, feasibility and viability in terms of delivery.	YP real estate Ltd. Submitted by Quod	1	O	The percentages are in accordance with national guidance	None
H10-41	Policy does not consider the nuances of BtR BtR customers are less inclined to rent an accessible home if they do not have accessibility features to cater for their requirements.	Inhibit submitted by Quod	1	O	Policy H10 applies to all new build dwellings across Leeds to provide as much choice as possible and as close to an equivalent level of choice as possible for people wishing to access M4(2) or M4(3) housing compared with those who do not require accessible housing. It aims to create a mixture of tenures, sizes and locations which is reflective of housing development in Leeds- to ensure people who require accessible housing experience minimal disadvantage when accessing housing (market or social). This principle also applies to BtR homes. BtR dwellings would be adaptable and not wheelchair accessible (unless the local authority is responsible for allocating who lives in the M4(3) dwellings) so they do not need to	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					'look' any different from other M4(1) dwellings.	
H10-42	Adaptable may be more appropriate to BtR than accessible	Inhibit submitted by Quod	1	O	BtR dwellings would be adaptable and not wheelchair accessible (unless the local authority is responsible for allocating who lives in the M4(3) dwellings).	None
H10-43	Not justified or effective	Harrow Estates Plc submitted by WYG planning Strata Homes via WYG planning	2	O	Policy H10 is justified in that a need for accessible dwellings has been demonstrated, the percentage requirements have been viability tested and there are no better alternatives. It will be effective in applying to planning applications for new build housing developments.	None
H10-44	Accessible housing needs assessment should take into account the size, location, type and quality of dwellings required	Harrow Estates Plc submitted by WYG planning Strata Homes via WYG planning	2	O	Policy H10 applies to all new build dwellings across Leeds, to provide as much choice as possible and as close to an equivalent level of choice as possible for people wishing to access M4(2) or M4(3) housing compared with those who do not require accessible housing. The policy expects a pro-rata mix of accessible dwellings reflecting the mix of dwellings proposed on the site as a whole. This approach will enable a broad mix of size and type of accessible dwellings to be delivered across Leeds which would be less	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					onerous to developers than prescribing the particular size, location, type and quality of dwellings derived from need assessment.	
H10-45	The 2017 SHMA recommends 17.5% of dwellings be accessible. The accessible housing needs assessment suggests a need of 35%- significant discrepancy between the two. Unjustified %s and 17.5% should be used.	YP real estate Ltd. submitted by Quod Inhibit submitted by Quod	2	O	Analysis using SHMA household survey data enabled a more in depth understanding of need to be formulated which concluded that 34.5% of households need M4(2) accessible dwellings. The SHMA statistics fed into the accessible housing need assessment, which took into account disabled people, older people and families with young children, all of whom would benefit from the design features of an M4(2) or M4(3) home.	None
H10-46	Questioning veracity of policy's evidence base/ methodology applied in accessible housing needs assessment or no evidence has been produced to justify this policy It is incumbent on the Council to provide a local assessment evidencing the specific case for Leeds which justifies the inclusion of optional higher standards for accessible and adaptable homes. Evidence of an	YP real estate Ltd. Submitted by Quod Inhibit submitted by Quod Harrow Estates Plc submitted by WYG planning Strata Homes via WYG planning House Builders Federation	13	O	SHMA statistics fed into the accessible housing need assessment, which took into account disabled people, older people and families with young children, all of whom would benefit from the design features of an M4(2) or M4(3) home. Policy H10 applies to all new build dwellings across Leeds, to provide as much choice as possible and as close to an equivalent level of choice as	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	<p>ageing population or those with a disability as set out in the Accessible Housing Need Assessment 2018 document does not in itself justify the requirements of this policy, without appropriate evidence the HBF would not support the introduction of this policy.</p> <p>LCC should provide an evidence base in accordance with PPG, and appropriate viability and feasibility clauses are provided.</p> <p>No evidence which justifies this policy, no specific need can be demonstrated. If the evidence is provided this issue can be revisited.</p>	<p>Harewood Estate submitted by Carter Jonas</p> <p>Home Builders Federation</p> <p>Hatfield Estate submitted by Carter Jonas</p> <p>Mr S Burnett & Lady Eliz. Hastings' Estate Charity</p> <p>Lady Elizabeth Hastings' Estate Charity submitted by Carter Jonas</p> <p>Linden Homes & Lady Eliz. Hastings' Estate Charity submitted by Carter Jonas</p> <p>AR Briggs & Co Ltd submitted by Carter Jonas</p> <p>AC Developments Yorkshire Ltd submitted by Carter Jonas</p>			<p>possible for people wishing to access M4(2) or M4(3) housing compared with those who do not require accessible housing.</p> <p>It aims to create a mixture of tenures, sizes and locations which is reflective of housing development in Leeds- to ensure people who require accessible housing experience minimal disadvantage when accessing housing (market or social).</p> <p>The proposed percentage requirements in H10 takes into account all groups of people who may benefit from accessible housing built to M4(2) and M4(3) standards.</p> <p>Planning Practice Guidance 014 Ref ID: 2a-014020140306 asks what methodological approach should be used, and states: "no single approach will provide a definitive answer. Plan makers should avoid expending significant resources on primary research, as this will in many cases be a disproportionate way of establishing an evidence base."</p>	
H10-47	Accessible housing needs assessment should take into account the	Harrow Estates Plc submitted by WYG planning	2	O	It is not possible to accurately assess the adaptability of existing housing stock in Leeds (social and market) as	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	<p>accessibility and adaptability of existing/ current housing stock</p> <p>Accessible housing needs assessment should assess how many dwellings require adaptations or the likelihood that residents which such needs would be looking to move into newly built dwellings- without this the proposed policy stance is not justified</p>	Strata Homes via WYG planning			<p>this would require an audit of all existing dwellings in the city.</p> <p>Leeds has not had a planning policy which requires accessible housing before now, it is therefore fair to assume that very few dwellings will meet M4(2) or M4(3) standards- which were only developed and published in 2015.</p> <p>Notwithstanding the adaptability of the existing stock, it is reasonable to expect a proportion of new dwellings to be accessible and adaptable based on need and viability.</p> <p>The assessment of need for accessible housing set out in the Accessible Housing Need Assessment Background Paper calculates the proportion of existing households in need of accessible housing.</p> <p>Planning Practice Guidance 014 Ref ID: 2a-014020140306 asks what methodological approach should be used, and states: “no single approach will provide a definitive answer. Plan makers should avoid expending significant resources on primary research, as this will in</p>	

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					<p>many cases be a disproportionate way of establishing an evidence base.”</p> <p>The accessible housing which results from this policy will increase the proportion of Leeds’s housing stock which is accessible over the coming years, it is not necessarily the first occupants of the dwelling who will benefit from the enhanced accessibility/ adaptability.</p>	
H10-48	Accessible housing needs assessment should take into account how needs vary across different housing tenures	<p>Harrow Estates Plc submitted by WYG planning</p> <p>Strata Homes via WYG planning</p>	2	O	<p>Planning Practice Guidance 014 Ref ID: 2a-014020140306 asks what methodological approach should be used, and states: “no single approach will provide a definitive answer. Plan makers should avoid expending significant resources on primary research, as this will in many cases be a disproportionate way of establishing an evidence base.”</p> <p>Methodological approach adopted in the accessible housing needs assessment is in accordance with guidance.</p>	None
H10-49	Proposed policy would result in increased cost for new occupants who do not need or want adaptations	<p>Harrow Estates Plc submitted by WYG planning</p> <p>Strata Homes via WYG planning</p>	2	O	<p>The percentage requirements of Policy H10 are based on realistic need and viability assessment. For M4(3) dwellings the EVS capped the requirement at 2% of dwellings even though the SHMA recommended 5%</p>	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					<p>to meet need. The equivalent requirement figure in the London Plan is 10%. For M4(2) dwellings the EVS capped the requirement at 30% of dwellings even though the Accessible Housing Background Paper found a need for 34.5% of dwellings to be accessible to this level. The equivalent requirement figure in the London Plan is 90%. This means there should be enough households in need to take up occupation of the accessible dwellings that are built in Leeds.</p> <p>The annexes at the end of the needs assessment do highlight potential spend on adaptations which could be avoided or reduced on an M4(2) or M4(3) dwelling, however these benefits will only be realised on new build M4(2) or M4(3) dwellings, and it is likely to take a number of years for the proposed policy to have a significant impact (i.e. be a significant enough proportion of the total housing stock) on adaptations spend.</p>	
H10-50	This policy requires all development proposals to comply with part M4(2) Building Regulations requirements concerning accessible and adaptable dwellings.	Gladman Developments Submitted by Mr John Fleming	1	O	Policy H10 requires 30% of dwellings to meet the standard provided M4(2).	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
H10-51	The need for accessible housing can be met without the introduction of this policy.	<p>Redrow Homes submitted by ID Planning</p> <p>Miller Homes submitted by ID Planning</p> <p>Mr John Wilson and The Diocese of West Yorkshire and the Dales submitted by ID Planning</p> <p>Taylor Wimpey submitted by ID Planning</p> <p>Redrow Homes submitted by ID Planning</p> <p>Great North Developments submitted by ID Planning</p> <p>Barnaway and Hamber submitted by ID Planning</p> <p>The Sir Robert Ogden Partnership submitted by ID Planning</p> <p>Thornhill Estates submitted by ID Planning</p> <p>Linden Homes submitted by ID Planning</p>	13	0	Without planning policy requirements accessible housing (in accordance with M4(2) and M4(3)) will not be provided by the market- hence the introduction of the optional accessible housing standards in 2015, in addition to the mandatory baseline accessible housing standard of M4(1). The Housing Standards review identified the need for additional accessible housing and for a consistent approach in the methodology for introducing accessible housing standards requirements, as well as the design standards to which accessible housing is designed to- in order to provide certainty for developers.	None

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		<p>Park Lane Homes and D.G Fryer, N. Joyce, B. Timms, P. Joyce & M. Joyce submitted by ID Planning</p> <p>Park Lane Homes and R. Hills (East Rigton) Ltd submitted by ID Planning</p> <p>House Builders Federation</p>				
H10-52	Policy requires effective implementation	<p>Tim McSharry Head of disability and diversity at Access Committee for Leeds</p> <p>Harrow Estates Plc submitted by WYG planning</p> <p>Strata Homes via WYG planning</p> <p>House Builders Federation</p>	4	O	<p>Leeds City Council Officers within planning, housing and housing occupational therapists would be involved in ensuring that residents and M4(3) wheelchair accessible dwellings are matched.</p> <p>H10 has been drafted in accordance with current guidance in the form of planning practice guidance.</p> <p>Draft policy H10 requires 2% 'wheelchair user dwellings' in accordance with M4(3) of Part M vol 1 of the Building Regulations.</p> <p>Wheelchair user dwellings will be either wheelchair accessible or adaptable for wheelchair users.</p>	None
H10-53	why there is no minimum size of development as there is for other policy changes (i.e. developments over 10 homes in size?). No minimum number probably does work, but checking out the logic.	<p>Leeds Federated Housing Association submitted by Stephen Ellis</p>	1	O	<p>A threshold approach is not needed for this policy as the policy requirements do not apply to 100% of dwellings, the percentage requirements (of 30% M4(2) and 2% M4(3)) create a threshold in</p>	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					themselves. No need to state threshold as well as percentage requirements.	
H10-54	The council have not considered the need for a transitional period for developers to accommodate the changes	Vastint Leeds BV submitted by Turley	1	O	It is not felt that a transitional period is needed as: i) The policy does not provide a 'blanket policy' but percentage requirements for accessible housing- minimising the initial impact when compared with a blanket 100% provision approach. ii) The draft policy has been published for consultation- from the launch of the consultation to policy adoption- developers will have had the opportunity to investigate the policies implications and incorporate the requirements into proposals.	None
H10-55	Not clear how optional standards will be applied in a proportional way i.e. the proportion of accessible or wheelchair accessible in the context of local need and in respect of local developments. Need a more focussed plan to ensure housing is delivered to accommodate wheelchair user housing consistent with local need	Rothwell Neighbourhood Forum submitted by Chair Mr P.L Ellis	1	O	Policy H10 applies to all new build dwellings across Leeds, to provide as much choice as possible and as close to an equivalent level of choice as possible for people wishing to access M4(2) or M4(3) housing compared with those who do not require accessible housing. It aims to create a mixture of tenures, sizes and locations which is reflective of housing development in Leeds- to ensure people who require accessible housing experience minimal	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					<p>disadvantage when accessing housing (market or social).</p> <p>This policy can only influence proposed development, and will only apply where new build developments are proposed due to its application being bound by the limits of application of the Building Regulations (as it requires the optional Building Regulations standards M4(2) and M4(3))- it is therefore not possible for the policy to respond to and provide for exact local need.</p> <p>The needs assessment has been undertaken on a Leeds level- due to the availability of statistics it is not possible to break this figure down further geographically, so it is not possible for draft policy H10 to tailor requirements on a more local level than as drafted.</p>	
H10-56	Ability to deliver wheelchair user housing in the most effective location is unclear and the policy lacks effectiveness in this respect	Rothwell Neighbourhood Forum submitted by Chair Mr P.L Ellis	1	O	On adoption of this policy, it will be the role of planning officers and the planning process to ensure that wheelchair user dwellings are planned and provided in the most suitable locations within a site.	None
G4-1	Consider 18 sqm per student bed space is unclear and 3 students will generate a greater quantity of Green	Matthew Roe (UNITE STUDENST)	1	O	The PBSA figure is based on a per person requirement rather than a per household requirements as Census Occpancy Data is not held for PBSA.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	Space than a 3 bedroomed house. Feel there should be a clearer definition.				<p>According to the Census 2011 the average occupancy for a household in Leeds was 2.27 people per household. Assuming that the Green Space figure per dwelling is 40 sqm this translates into a figure of 17.6 sqm per person (40 / 2.27 - rounded up to 18). As an average occupancy cannot be calculated for PBSA it is considered reasonable to use a per person figure.</p> <p>In answer to the specific question regarding 3 bedroom dwellings it should be noted that the average occupancy for a 3 bedroom dwelling using the Census 2011 is 2.47 people. 2.47 as a ratio of 2.27 is 1.088 which when multiplied by 40 sqm realises a figure of 44 sqm. The calculation is more specific than the calculation for student bed spaces as the data for a specific house type can be disaggregated.</p>	
G4-2	General support for the approach	Andrew Windress (ID Planning) Rachel Flounders, [ID Planning (Miller Homes) Rachel Flounders, [ID Planning] (Linden Homes) Rachel Flounders, [ID Planning] (Thornhill Estates)	25	S	Noted	None

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		<p>Rachel Flounders, [ID Planning] (Sir Robert Ogden Partnership)</p> <p>Rachel Flounders, [ID Planning](Redrow Homes)</p> <p>Rachel Flounders, [ID Planning] (Mr John Wilson and the Diocese of West Yorkshire and the Dales)</p> <p>Rachel Flounders, [ID Planning] (Taylor Wimpey)</p> <p>Rachel Flounders, [ID Planning] (The Ogden Group)</p> <p>Rachel Flounders, [ID Planning] (Great North Developments)</p> <p>Rachel Flounders, [ID Planning] (Barnaway and Hamber)</p> <p>Tom Cook, [ID Planning] (Park Lane Homes and D.G. Fryer, N. Joyce, B. Timmes, P. Joyce & M. Joyce)</p> <p>Tom Cook, [ID Planning] (Park Lane Homes and R. Hills (East Rigton) Ltd)</p>				
G4-3	The level of financial burden placed on a PBSA scheme will be too great. For example a 1000 bed student accommodation will need to provide 1.8 Ha of land or equivalent financial contribution.	Matthew Roe [RPS] (UNITE STUDENST)	1	O	The principle of Burden on Green Space for PBSA's is accepted in both the Core Strategy and under appeal for – APP/N4720/W/16/3145119 – Victoria Road – Paragraph 65. The principle objection in this case therefore, is the amount demanded and its viability. The requirement of Policy G4 has been tested in the	None

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					Economic Viability Study 2018 Update and found to be viable in most cases. Other mechanisms in the DM process deal with this.	
G4-4	The text should reflect the nature of viability and the impact this may have on Green Space provision and development. General concerns about compounding viability considerations.	<p>Mike Ashworth [White, Young, Green] (Strata Homes).</p> <p>Simon Grundy [Carter Jonas] (Avant Homes)</p> <p>Richard Agnew (Gladman Developments)</p> <p>Emma Winter, [Carter Jonas], (Harewood Estate)</p> <p>Paul Leeming, [Carter Jonas], (Hatfield Estate)</p> <p>Paul Leeming, [Carter Jonas], (AC Developments Yorkshire Ltd)</p> <p>Paul Leeming, [Carter Jonas], (AR Briggs & Co. Ltd.)</p> <p>Paul Leeming, [Carter Jonas], (Linden Homes & Lady Elizabeth Hastings' Estate Charity)</p> <p>Paul Leeming, [Carter Jonas], (Mr S Burnett & Lady Elizabeth Hastings' Estate Charity)</p> <p>Paul Leeming, [Carter Jonas], (Lady Elizabeth Hastings' Estate Charity)</p>	10	0	Other mechanisms in the DM process deal with this.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
G4-5	<p>General concern about the reduction in quantity and quality of Green Space in the Leeds Area.</p> <p>Wishes to see a greater emphasis on providing more Green Space across Leeds.</p>	Cllr. Andrew Carter, (Leeds Conservative Group).	1	O	<p>The quantify of green space that can be sought is constrained by viability testing. The EVS identified that there were serious viability concerns with the current arrangements. There was also some evidence to show that little new Green Space was being provided. It is hoped that the greater level of flexibility in the proposed policy will allow greater levels of improvements to existing Green Space (so it is used by more people) as well as providing new space. The proposed changes will not affect the quality. Indeed existing Green Spaces quality that needs to be improved is identified as an important concern in paragraph 5.5.11. One of the factors in deciding whether an On Site Contribution in Lieu should be used is the quality of local Green Space (5.5.14). Lastly an overall requirement regarding quality is included in 5.5.17.</p>	None
G4-6	<p>‘Para 5.5.11 Will it be mandatory for greenspace to be provided either on site or off site within the distances required by policy G3 ?’</p>	Sue McQuire (Garforth Neighbourhood Forum)	1	O	<p>The inference from the question/comment is that there is a lack of clarity with reference as to how G4 interacts with G3 particularly with regard to the provision of On Site contributions in Lieu.</p>	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					It will NOT be mandatory. G3 is a standard that we can use to help define surplus and deficiencies and typologies of Green Space. It should be seen in conjunction with 5.5.9 of the Policy. Further clarification is given in 5.5.10.	
G4-7	‘Enhancing existing greenspace with commuted sums may not provide the additional typologies for the increased population needed to meet policy G3’ (5.5.11)	Sue McQuire (Garforth Neighbourhood Forum)	1	O	The Policy does not propose to totally meet the standards in G3. Has to be balanced against other planning concerns. In the current planning environment viability is an overriding factor. Further clarification is given in 5.5.10.	None
G4-8	‘There may not be additional greenspace available off site. What happens then? Improving connections to other existing greenspace involving public transport or cycle routes may not be a realistic solution . Have you any examples where this policy has been implemented and successfully used by residents’ (5.5.11).’	Sue McQuire (Garforth Neighbourhood Forum)	1	O	The off site provision will only be entertained if it can be achieved. On site is likely to be the preferred option. If it cannot be achieved off site other ways of satisfying the policy will be sought.	None
G4-9	‘What would be the criteria for any agreement that only part of the greenspace requirement is provided’ (5.5.11)	Sue McQuire (Garforth Neighbourhood Forum)	1	O	Deciding the proportion of provision on-site will be a matter of judgement on planning applications. Some steer may be provided by the criteria of paragraph 5.5.14 and by the 20% benchmark for higher density schemes (para 5.5.18)	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
G4-10	'If the commuted sum is not used for the greenspace requirements resulting from the development where would this money be spent?' (5.5.11)	Sue McQuire (Garforth Neighbourhood Forum)	1	O	If commuted sums are agreed to meet the green space requirements of Policy G4 they must be used for that purpose.	None
G4-11	'If a site is suitable for development then it should be suitable for some greenspace typologies, an odd shape with inclines could be used for several typologies' (5.5.14)	Sue McQuire (Garforth Neighbourhood Forum)	1	O	The factors in paragraph 5.5.14 allow for pragmatic choices to be made. If there is a particular need for a green space typology that will not fit on a development site, it might be better to consider off-site options.	None
G4-12	'The glossary identifies greenspace as areas to be used by the public. Combining greenspace provision with Sustainable Urban Drainage Systems is acceptable providing it is in the form of underground storage tanks and the land can be used by the public for one of the greenspace typologies. Opening up enclosed culverts returning then to open streams whilst can be landscaped they cannot be used for accessible public greenspace.' (5.5.14)	Sue McQuire (Garforth Neighbourhood Forum)	1	O	There are many forms of Sustainable Drainage systems. The practicalities of combined green space use will have to be considered on relevant planning applications.	None
G4-13	'Definitely agree that there is a role for many more smaller areas of green space, perhaps combined with children's play facilities where residents can meet and relax which all	Sue McQuire (Garforth Neighbourhood Forum)	1	S	None	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	helps with mental and physical well being’ (5.5.16)					
G4-14	‘Residents in high density developments (apartments) still require open green space for the above reasons what is the evidence that only providing 20% is sufficient for mental and physical well being? How realistic is it that commuted sums will be spent on providing additional greenspace nearby?’ (5.5.17)	Sue McQuire (Garforth Neighbourhood Forum)	1	O	<p>The 20% figure is a matter of judgement. Any density over 65 dwellings per hectare (dph) is considered high density. At this minimum density and using 40 sqm per unit, the expected level of GreenSpace will cover 26% of the site. Any increase in the density will raise this percentage figure considerably.</p> <p>It must be remembered that ultimately the Policy recognises the high priority national policy gives to the delivery of housing as well as the importance viability plays in this delivery. With this in mind more emphasis is placed in building in flexibility into the delivery of Green Space such that it can be directed to where it is needed the most to be benefit the most people.</p> <p>The 20% figure is designed to ensure that some Green Space is delivered where possible on site. However as most high density is in the inner area (not counting City Centre), it is often the case that as a matter of priority a better solution for the community will be a commuted sum in order to</p>	None

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					enhance or maintain an existing facility.	
G4-15	'It is accepted that where housing is needed, Green Space needs to be provided. The local authority requires these housing numbers so it must also provide both the greenspace and maintenance. CIL money and rates should be allocated specifically'(5.5.19)	Sue McQuire (Garforth Neighbourhood Forum)	1	N	Agreed. Paragraph 5.5.19 mentioned in the representation is concerned with ensuring that private maintenance arrangements are sustainable.	None
G4-16	If Leeds CC wish Leeds to be a child friendly city then housing developments for families should not be placed in areas that are unsecure and unsafe. There is national concern over childhood obesity levels so LCC must provide adequate and accessible safe areas for children's play facilities. (5.5.20)	Sue McQuire (Garforth Neighbourhood Forum)	1	S	None	None
G4-17	'Agree that where off- site greenspace is to be provided, it must be nearby as it is not realistic to expect people with young families to rely on public transport to access greenspace.' (5.5.22) – NOTE: BELIEVES MEANS 5.5.23	Sue McQuire (Garforth Neighbourhood Forum)	1	S	None	None
G4-18	'What is a SPONS index figure. It has not been identified in the glossary accompanying the original core	Sue McQuire (Garforth Neighbourhood Forum)	1	O	Agree. SPONS has not been defined in the CS or other places.	Define 'SPONS' in the Glossary.

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	strategy.’ (5.5.23) – NOTE: BELIEVE MEANS 5.5.24					
G4-19	‘Given that large houses (5 bedroom) are allocated 66 sq m. of greenspace presumably on the rationale that there may be more people living there , however there could be just as many people living in a 3 bed property. What is the evidence for these figures?’	Sue McQuire (Garforth Neighbourhood Forum)	1	O	Based on census data of occupancy rates.	None
G4-20	‘The rationale for revising policy G4 is based on the analysis of only 56 out of the 149 planning permissions granted between November 2014 – September 2016 and identified only two implemented policy G4. So on the basis that only 2 sites were identified as implementing policy G4 because there was a failure by planners when granting planning permission to follow their own core strategy policies, it has been proposed to drastically revise downwards the greenspace requirements’	Sue McQuire (Garforth Neighbourhood Forum)	1	O	The reduction in the green space requirement of Policy G4 is necessary to ensure viability of housing development as demonstrated by the Economic Viability Study 2018 Update	None
G4-21	‘Given that policy G3 is not part of the selective review and quantity of greenspace per 1,000 people still stands , and when the revised policy G4 is adopted there will be only a fraction of greenspace provided that	Sue McQuire (Garforth Neighbourhood Forum)	1	O	G3 is a standard that we can use to help define surplus and deficiencies and typologies of Green Space. Policy G4 seeks to optimise provision of green space through development proposals. Policy G3 helps provide justification. It should be seen in	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	will not meet the standards in G3 . How will policy G3 be implemented?’				conjunction with 5.5.9 of the Policy. Further clarification is given in 5.5.10.	
G4-22	‘Policy G3 was agreed to ensure that minimum standards of the different typologies of greenspace were required providing Leeds residents with the opportunity to partake in implementing the Leeds City Council Health and well-being Strategy produced to encourage residents to partake in more physical activities. This would reduce the incidence of many ill health issue identified in the Health & Well-being strategy which would reduce the burden on the NHS and adult social care services.’	Sue McQuire (Garforth Neighbourhood Forum)	1	N	G3 is not part of the consultation.	None
G4-23	‘The GI and ecology networks should be a key factor mentioned at 5.5.9, and 5.5.10. In addition, there does not appear to be mention at this early point of the Leeds Parks and Countrysides’ own GI strategy, this should surely be the foundation of green space provision together with Neighbourhood Plans and Local Green Space designations?’	Jennifer Kirkby (Aireborough Neighbourhood Development Forum) Mr O.L.Ellis (Rothwell Neighbourhood Forum)	1	N	The subject that is being reviewed is Green Space. Green infrastructure is covered under G1 and G2 of the Core Strategy whilst ecology is covered under G8 and G9. These policies and are not part of the review.	None
G4-24	‘There should be more mention of the use of Neighbourhood Plans – 5.5.15 being one example.’	Jennifer Kirkby (Aireborough Neighbourhood Development Forum)	1	O	Other LDF documents are mentioned where appropriate. A NP will automatically become a material part of the planning process as soon as it is	None

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					made. There is no need to mention it in these circumstances.	
G4-25	'Maintenance can be done through a growing number of vehicles including trusts, community interest companies and Friends Groups, this needs to be reflected at point 5.5.19.'	Jennifer Kirkby (Aireborough Neighbourhood Development Forum)	1	O	Whilst this is accepted, the supporting text at 5.5.19 has the specific purpose of ensuring continuing maintenance such that LCC does not 'inherit' Green Space that has not had ongoing maintenance paid for through a s106 agreement.	None
G4-26	Off-site contributions for projects at 5.5.25, should refer to Neighbourhood Plans.	Jennifer Kirkby (Aireborough Neighbourhood Development Forum)	1	O	Other LDF documents are mentioned where appropriate. A NP will automatically become a material part of the planning process as soon as it is made. There is no need to mention it in these circumstances.	None
G4-27	Should it not read, " <i>where the factors of paragraph 5.5.14</i> " rather than 5.5.4.	Jennifer Kirkby (Aireborough Neighbourhood Development Forum)	1	O	Mistake. Change text accordingly.	Change paragraph reference from "5.5.4" to "5.5.14".
G4-28	As a Neighbourhood Plan is a key planning document and looks at cumulative effects and placemaking we would like to see reference to it at the top of the list, a)i, rather than at the bottom of the list a)iv	Jennifer Kirkby (Aireborough Neighbourhood Development Forum)	1	O	The order of the list is not in priority order. All factors will be balanced appropriately when considering the individual circumstances of the proposal.	None
G4-29	Believes that G4 b should be appended with 'with the local	Jennifer Kirkby	1	O	Parish Council and communities will have the opportunity to be consulted on as normal during the Planning	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	community/Parish Council when plans are approved’.	(Aireborough Neighbourhood Development Forum)			process. It is difficult to see where this can be legitimised in the current planning process.	
G4-30	‘Statements are required along the following lines to ensure the quality of green space in both the community and across Leeds. This is essential if hard to maintain, ‘bitty’ green space provision is not to occur as has been the experience of many communities to date. <i>On site Green Space should positively contribute to the placemaking of the whole community through its design and access, this should be thought about at the pre-application stage and be part of the planning permission. Its role in strategic green infrastructure and habitat networks should also be made clear at the outset.</i> ’	Jennifer Kirkby (Aireborough Neighbourhood Development Forum)	1	O	Paragraph 5.5.17 already expects on-site green space to be appropriately planned, situated and designed to contribute positively to the development. It is standard practice for these matters to be considered at pre-application stage. Where there are green infrastructure and habitat network issues these would be considered simultaneously with green space requirements.	None.
G4-31	The provision of contributions for off-site green space is totally inadequate and will not lead to quality green space that enhances communities. Firstly, this should contain reference to Neighbourhood Plans providing a guide to what, where and how much it might cost. If there is no Neighbourhood Plan or Parish Council, then the provision should be based on a community consultation on what is	Jennifer Kirkby (Aireborough Neighbourhood Development Forum)	1	O	The costing of Off Site Green Space is based on an industry standard (SPONS). The level of contributions is based on the level of Green Space required which has been viability tested in the EVS. Other LDF documents are mentioned where appropriate. A NP will automatically become a material part of the planning process as soon as it is	None

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	required. This should be done as part of the planning applications. Part of the pre-application consultation should also be with LCC's own Parks and Countryside division who have plans for strategic green space areas such as North West Leeds Country Park – these seem to be totally ignored in the Core Strategy. Leading on from this there should be linked plans to strategic green infrastructure and habitat networks.				made. There is no need to mention it in these circumstances.	
G4-32	The new Policy is not flexible enough to recognise specific circumstances particularly with regard to high rise development. Some sites outside of the City Centre that, to all intensive purposes, could be seen as having the same circumstances as City Centre sites (e.g. on the edge of the City Centre)	James Benyon [Quod] (Inhabit)	1	O	Paragraph 5.5.18 recognises the specific circumstances of high rise development outside of the City Centre.	None.
G4-33	Commuted sums should be seen as an exception.	Mr O.L.Ellis (Rothwell Neighbourhood Forum)	1	O	An exception approach was seen as to be too inflexible in the current environment, particularly with the lack of capital available for Green Space maintenance coupled with the strong national planning agenda of delivering houses. However, where circumstances favour on-site provision, which will often be the case	None

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					for larger schemes in outer areas, the Council will pursue on-site provision.	
G4-34	Concerns expressed about the way the Sustainability Scoring methodology saw the 80 sqm as an inhibitor to high density development and thus scored it negatively when compared against the positive outcomes of Green Space.	Mr O.L.Ellis (Rothwell Neighbourhood Forum)	1	O	The sustainability appraisal by its very nature will score differently in different areas to achieve an overall sustainability score. Some aspects will always vie with each other as the Policy aims will 'pull' against each other.	None
G4-35	Believes that it is questionable whether the existing Policy is not working. States that developer attitudes coupled with acceptance of sub-standards schemes is why Green Space is not being delivered.	Mr O.L.Ellis (Rothwell Neighbourhood Forum)	1	O	Any application submitted under the existing DM process has to be balanced against other planning concerns. In the current planning environment viability is an overriding factor.	None
G4-36	'Concerns that there is little evidence as to the efficacy of the proposed Policy, particularly in light of the old one. Believe the new Policy to be too complicated and that the reduction from 80sqm to 40sqm is halving the overall provision.'	Peter Heald (Otley Town Partnership) Alastair Watson Karen Oakley, [Clerk], (Morley Town Council)	2	O	It is believed that the new approach will deliver Green Space improvements to where they are needed the most. The reduction of the requirement is based on assessment of viability.	None
G4-37	'The (incorrect) reference to the factors for expecting on-site provision seems to provide developers with many reasons for arguing against making on site provision. This when developers are unwilling to do so (as clearly evidenced by the review).'	Peter Heald (Otley Town Partnership) Alastair Watson	1	O	It is arguable whether on-site provision is always the best solution. As stated in the opening paragraph (5.5.9) the overall aim is to deliver the best that can be achieved for the area.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
G4-38	'As with the above, the 10 unit threshold is not consistent with the PPG and should be amended.'	Andrew Windress (ID Planning)	1	O	10 units is seen as the threshold for Major development (NPPF Glossary). This was the figure subsequently used for the viability testing.	None
G4-39	The Economic Viability Update 2018 Review was not assessed on the basis of the figures that have been identified in the policy but scenarios of lower blanket provision figures per residential unit (20sqm, 40sqm, 60sqm and 80sqm).	Andrew Windress (ID Planning) Rachel Flounders, [ID Planning (Miller Homes) Rachel Flounders, [ID Planning] (Linden Homes) Rachel Flounders, [ID Planning] (Thornhill Estates) Rachel Flounders, [ID Planning] (Sir Robert Ogden Partnership) Rachel Flounders, [ID Planning](Redrow Homes) Rachel Flounders, [ID Planning] (Mr John Wilson and the Diocese of West Yorkshire and the Dales) Rachel Flounders, [ID Planning] (Taylor Wimpey) Rachel Flounders, [ID Planning] (The Ogden Group) Rachel Flounders, [ID Planning] (Great North Developments) Rachel Flounders, [ID Planning] (Barnaway and Hamber) Tom Cook, [ID Planning] (Park Lane Homes and D.G. Fryer, N. Joyce, B. Timmes, P. Joyce & M. Joyce) Tom Cook, [ID Planning] (Park Lane Homes and R. Hills (East Rigton) Ltd)	22	O	Para 11.5 of the Leeds EVS update confirms that the impact of the suggested policy approach are almost identical to those which are based on a greenspace requirement of 40sq.m per dwelling (i.e. Option 3). The cumulative impact on viability of all the suggested policy changes has been tested. The results of this assessment are included within Section 13 of the EVS Update 2018. Taking into account the results from this exercise and the cautious approach taken to viability the Council are satisfied that the policies within the CCSR are viable.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
		Richard Agnew (Gladman Developments) Emma Winter, [Carter Jonas], (Harewood Estate) Joanne Harding (HBF) Paul Leeming, [Carter Jonas], (Hatfield Estate) Paul Leeming, [Carter Jonas], (AC Developments Yorkshire Ltd) Paul Leeming, [Carter Jonas], (AR Briggs & Co. Ltd.) Paul Leeming, [Carter Jonas], (Linden Homes & Lady Elizabeth Hastings' Estate Charity) Paul Leeming, [Carter Jonas], (Mr S Burnett & Lady Elizabeth Hastings' Estate Charity) Paul Leeming, [Carter Jonas], (Lady Elizabeth Hastings' Estate Charity)				
G4-40	The viability assessment also identified viability issues again in Zone 2. Whilst the reduction in greenspace provision compared to the adopted policy is welcomed, the viability assessment should be based on the proposed policy in order to be able to clearly identify whether the level of provision is viable or whether further reductions need to be made.	Andrew Windress (ID Planning) Rachel Flounders, [ID Planning (Miller Homes) Rachel Flounders, [ID Planning] (Linden Homes) Rachel Flounders, [ID Planning] (Thornhill Estates) Rachel Flounders, [ID Planning] (Sir Robert Ogden Partnership) Rachel Flounders, [ID Planning](Redrow Homes)	14	O	Zone 2 is sub divided (Zones 2a and 2b) to align with the CIL charging zones. The EVS 2018 update demonstrates that greenfield/unconstrained sites within Zone 2b are viable generating land values which are higher than the minimum benchmark land values. Whilst land values for large greenfield/unconstrained sites are shown as marginal the land value generated (£185,339 per acre) is only fractionally below the benchmark land	None

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		<p>Rachel Flounders, [ID Planning] (Mr John Wilson and the Diocese of West Yorkshire and the Dales)</p> <p>Rachel Flounders, [ID Planning] (Taylor Wimpey)</p> <p>Rachel Flounders, [ID Planning] (The Ogden Group)</p> <p>Rachel Flounders, [ID Planning] (Great North Developments)</p> <p>Rachel Flounders, [ID Planning] (Barnaway and Hamber)</p> <p>Tom Cook, [ID Planning] (Park Lane Homes and D.G. Fryer, N. Joyce, B. Timmes, P. Joyce & M. Joyce)</p> <p>Tom Cook, [ID Planning] (Park Lane Homes and R. Hills (East Rigton) Ltd)</p> <p>Joanne Harding, (HBF)</p>			<p>value of £187,500 per acre. Only large Brownfield sites in Zone 2b generated land values that fell below the minimum benchmark land value. However, the assessment of Brownfield sites has adopted a very cautious approach assuming that all sites are contaminated and will require site preparation. Further to this it is assumed that the remediation and site preparation costs will be applied to 100% of the site area, whereas in reality there will be circumstances where only a small part of the site is contaminated.</p> <p>Whilst the EVS does highlight viability as an area of concern in Zone 2a this is because the viability has been exclusively modelled based on a low value beacon settlement. Naturally the impacts of suggested policies within the CSSR are more pronounced in Zone 2a than compared with the other zones which include medium and high value beacon settlements.</p> <p>Para 11.5 of the Leeds EVS update confirms that the impact of the suggested policy approach are almost identical to those which are based on a greenspace requirement of 40sq.m per dwelling (i.e. Option 3).</p>	
G4-41	'It is not clear whether the proposed policy solely relates to land outside of the City Centre or now applies to land within the City also:	Taylor Cherret, [Turley], (Vastint Leeds BV)	1	O	This could be incorporated for clarity	Possible Changes

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	Vastint would therefore recommend that the policy title is amended to state: <i>“Policy G4: Review of Green Space in Residential Development Policy outside of the City Centre”.</i>					
G4-42	‘A city-wide spatial plan for both existing and new green space, to which new provisions and S106 contributions should be configured to implement ‘	Andrew Wood (CPRE)	1	O	This concerns the implementation of the policy. Decisions on improvements to existing green space may be informed by wider council plans and strategy, but this does not need to be part of the policy.	None
G4-43	‘A strong policy (of equivalent strength and permanence to Green Belt) to ensure that urban green spaces are not depleted by future development. ‘	Andrew Wood (CPRE)	1	O	Policy G6 fulfils this function.	None
G4-44	‘There is no evidence provided to demonstrate why such a dramatic drop is justifiable. We accept that the original policy could do with some fine-tuning, and, short of creating different policies for different areas, there must be some flexibility built in. But, in view of the shortage of open space in some areas, the base level of provision should stay the same as it is.’	(Leeds Civic Trust)	1	O	This has to be considered relatively. The EVS identified that there were serious viability concerns with the current arrangements. There was also some evidence to show that little new Green Space was being provided. It is hoped that the greater level of flexibility in the proposed policy will allow greater levels of improvements to existing Green Space (so it is used by more people) as well as providing new space.	None
G4-45	‘To address our concerns this can be resolved through the deletion of the draft Policy’	Paul Leeming, [Carter Jonas], (Hatfield Estate) Paul Leeming, [Carter Jonas], (AC Developments Yorkshire Ltd) Paul Leeming, [Carter Jonas], (AR Briggs & Co. Ltd.) Paul Leeming, [Carter Jonas], (Linden Homes &	6	O	Green space policy is necessary to address the additional need for green space generated by new residents of housing development. Deleting the policy entirely would be far too draconian.	None

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		Lady Elizabeth Hastings' Estate Charity) Paul Leeming, [Carter Jonas], (Mr S Burnett & Lady Elizabeth Hastings' Estate Charity) Paul Leeming, [Carter Jonas], (Lady Elizabeth Hastings' Estate Charity				
G4-46	Paragraph 5.5.10 tacitly defines G3 incorrectly. G3 is a minimum and the word 'surplus' is misleading.	Karen Oakley, [Clerk], (Morley Town Council)	1	O	Whilst G3 sets minimum standards, viability concerns, the national agenda to create new homes, and limited budgets means that we now need to use the planning tools we have available to achieve the best for the most people.	None
G4-47	'...it isn't clear how or why other changes should or must be looked upon as being linked to Green Space calculations so as to increase or cut amounts of Green Space required with new housing.'	Karen Oakley, [Clerk], (Morley Town Council)	1	O	The viability testing did not seek to link the factors around 'Green Space'. Instead it tested whether a range of schemes were viable given a range of factors	None
G4-48	Unclear why a one bedroomed dwelling has a requirement of 23 sqm whilst a one bedroomed flat has a requirement of 18 sqm	Karen Oakley, [Clerk], (Morley Town Council)	1	O	One bedroomed dwellings often are occupied by couples. Student PBSA's or similar usually have one person per bedroom. Therefore the requirement for students is lower based on the average for the whole City.	None
G4-49	States that maintenance is a problem for Leeds City Council. A maintenance requirement inappropriately administered runs the risk of overwhelming the capacity of Leeds Parks and Countryside.	Karen Oakley, [Clerk], (Morley Town Council)	1	O	Paragraph 5.5.19 of the proposals is fairly robust about demanding strong private maintenance arrangements. It is difficult to see how this could strengthened short of including it as part of the legal agreement.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
G5-1	The lack of Green Space in the City centre and the move away from prioritising the City Centre Park, that the phrasing ‘Open Space’ should be changed to Green Space.	(Leeds Civic Trust)	1	O	Open space has always been the term used for City Centre green space.	None
G5-2	The phrase ‘adequate open space supply’ should be deleted as there are no areas that have an adequate amount of Green Space. Makes a clear distinction between Open Space and Green Space.	Karen Oakley, [Clerk], (Morley Town Council)	1	O	Current CS Supporting text 5.5.23 and 5.5.24 (renumbered after the review) protects against inappropriate deletion of Green Space. Adequate supply means a surplus in all typologies plus 10%. Also if there is an over supply in one area then the space will be expected to be changed to another typology.	None
G5-3	Policy G5 should be changed to support creation of Green areas rather than hard surfacing.	Karen Oakley, [Clerk], (Morley Town Council)	1	O	Paragraph 5.5.20 already gives support to linked green spaces in the City Centre and a new park. Some new spaces related to commercial and mixed use developments would need to be hard surfaced because of the expected volume of footfall and need for multi-use spaces.	None
G5-4	Support to changes	Dr Deryck Piper (Little Woodhouse Community Association) Dr Deryck Piper (Little Woodhouse Neighbourhood Plan)	2	S	None	None
G5-5	The change to G5 replacing ‘City Centre Park’ with “open space and public realm improvements” should be removed as it would be contrary to the South Bank SPD. The City park is a vital component of the regeneration of the area	Taylor Cherret, [Turley], (Vastint Leeds BV)	1	O	The proposed text does not preclude any money being spent on the City Centre Park. Rather it seeks greater flexibility and also seeks to futureproof the Policy	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
G6-1	'We welcome the inclusion of pedestrian corridors in the description of protected green space in the city centre. Other public realm projects could also be included.'	(Leeds Civic Trust)	1	O	Policy G6 is only about protecting defined "space". Public realm schemes resulting in provision of space could be protected whereas schemes resulting in other improvements could not.	None
G6-2	Support to Changes	Dr Deryck Piper (Little Woodhouse Community Association) Dr Deryck Piper (Little Woodhouse Neighbourhood Plan)	2	S	None	None
G6-3	G6 (l) should be deleted as it is an invitation to build on Green Space.	Karen Oakley, [Clerk], (Morley Town Council)	1	O	This part of the policy is not proposed for review. In any case, the definition of adequate supply is a surplus in all areas plus 10%. This is quite an onerous standard to meet. Also if there is an over supply in one area then the space will be expected to be changed to another typology.	None
EN1-1	Support for the policy.	Stephen Ellis, Leeds Federated Housing Association	1	S	Support noted	None
EN1-2	This policy is contrary to the Government's intentions as set out in the Housing Standards Review. This sought to place energy requirements for housing as a matter solely for the Building Regulations, with no optional standards.	White Young Green – on behalf of Strata Homes, Harrow Estates plc. Simon Grundy, Carter Jonas LLP – on behalf of Avant Homes Emma Winter, Carter Jonas – on behalf of Harewood Estates Paul Leeming, Carter Jonas LLP – on behalf of the Hatfield Estate Paul Leeming, Carter Jonas LLP – on behalf of AC Developments Yorkshire	13	O	The Government has set out intentions for energy efficiency standards relating to housing development NOT employment. The energy efficiency part of the proposed policy relates to employment development only. The Deregulation Act relates to energy efficiency and NOT the renewable energy requirement. The renewable/ low carbon energy part of the policy is still supported in national policy and in the draft NPPF.	None

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		<p>Ltd. Paul Leeming, Carter Jonas LLP – on behalf of A.R. Briggs and Co. Ltd. Paul Leeming, Carter Jonas LLP – on behalf of Linden Homes and Lady Elizabeth Hastings. Paul Leeming, Carter Jonas LLP – on behalf of Mr S. Burnett and Lady Elizabeth Hastings.</p> <p>Paul Leeming, Carter Jonas LLP – on behalf of Lady Elizabeth Hastings. Joanne Harding, Home Builders Federation Sam Ryan, Turley – on behalf of Gallagher Estates</p>			Therefore EN1 is entirely consistent with national policy. Indeed national policy is the reason for changing the policy in the first place.	
EN1-3	Supports the 10% requirement for residential development	Iain Bath, IB Planning – on behalf of Caddick	1	S	Support noted	
EN1-4	Objects to the 20% requirement for non-residential development, as it will stifle development particularly in the central areas of Leeds	Iain Bath, IB Planning – on behalf of Caddick	1	O	LCC currently asks for 20% energy efficiency and this has not stifled development. Several major development sites are going through the system at present and achieving a 20% improvement on energy efficiency beyond building regulations.	None
EN1-5	The policy would benefit from additional wording to clarify that the 10% reduction in total predicted energy needs of the development should follow the advice set out within 'Energy Hierarchy – Be Lean, Be Clean, Be Green'	Iain Bath, IB Planning – on behalf of Caddick	1	O		
EN1-6	The revised policy is weak and does not go far enough.	<p>Pete Heald – on behalf of Otley Town Partnership</p> <p>Alastair Watson</p>	2	O	The policy is constrained by national policy. If the Council were to strengthen it the policy would then be inconsistent with national policy and	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					there would be a risk that the Council would not be successful in getting it adopted.	
EN1-7	For developments that are close to or alongside navigable waterways, as for previous CBOA responses to planning consultations in Leeds we strongly urge the use of waterways for carriage of construction materials to reduce CO2 and nitrous emissions to assist with the aims of Policy EN1.	Richard Horne- on behalf of the Commercial Boat Operators Association	1	N	The Council is supportive of this and deals with it in the Natural Resources and Waste Local Plan.	
EN1-8	Support for the policy. M and G Real Estate are actively investigating ways to incorporate the policy requirements at Parlington.	Matthew Smedley, AECOM – on behalf of M and G Real Estate	1	S	Support noted	
EN1-9	This policy, as drafted, does not recognise that some larger schemes will comprise a mix of uses, so we recommend that this policy be extended to state that “Mixed use schemes that meet both of these criteria, will be required to provide a minimum of the predicted energy demands of the development from low carbon or renewable energy on a site-wide basis”.	Taylor Cherrett, Turleys on behalf of Vastint BV	1	O	Agree, For mixed use schemes the policy applies across the whole of the development therefore it is open to the developer to choose how they meet the target and this may be easier on commercial parts of the site. LCC agrees that it would be helpful to provide more clarity on this point.	. Add new wording to the end of para 5.5.44 to state ‘For mixed use sites the developer may choose how to meet the target across the whole of the development’.
EN1-10	Suggest energy need is amended to energy demand as this is a more appropriate technical term.	Taylor Cherrett, Turleys on behalf of Vastint BV	1	O	LCC agree, we are aware that Vastint are currently applying this policy to their development in Leeds and therefore suggested word changes to clarify the policy wording based on their practical experience are very helpful.	Change energy need to energy demand. Add wording , both In the policy and, penultimate sentence of Para. 5.5.42
EN1-11	For the avoidance of doubt, EN1 should refer to the Building Regulations Target Emission Rate, Part L 2013, as without this it is not clear exactly what the 20% reduction is	Taylor Cherrett, Turleys on behalf of Vastint BV	1	O	LCC agree to amend the policy to reflect the points raised.	Add ‘Building Regulations Target Emission Rate, Part L 2013’ to the policy so as to clarify what the 20% reduction is measured

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	measured against. It should also be made clear that carbon dioxide reductions achieved through low carbon energy will contribute to meeting the 20% reduction in CO2 emissions					against. Add to text in para 5.5.43 , add before 'Building Regulations' in the first sentence the words 'Part L, 2013. Add wording to the end of the the text in para. 5.5.43 to state "Carbon dioxide reductions achieved through low carbon energy will contribute to meeting the 20% reduction in CO2 emissions".
EN1-12	This policy as drafted is therefore not effective in relation to the objectives and obligations outlined in para 5.5.38 to 5.5.41 of the CSSR. It needs to be supported by place-based carbon budget evidence so that new development can show its contribution to net carbon reduction.	Andrew Wood, CPRE	1	O	The Core Strategy includes a settlement hierarchy and the emerging Site Allocations Plan must be consistent with that and these mechanisms are part of the LCC commitment on climate change. Policy EN1 is additional to the overall intent of the Core Strategy.	
EN1-13	The ministerial statement refers only to reducing the burden on small builders and schemes less than 10 dwellings, so there is no reason to reduce the requirement for large sites. It is noted that it is a poor reflection on the commitment to carbon dioxide reduction that the date for achieving zero carbon emissions set in the original Core Strategy, 2016 is now 2 years past, but without significant progress. No doubt this is why government has abandoned any target for zero emissions – a backward step just when strides forward are required.	Leeds Civic Trust	1	O	The WMS March 2015 also states: 'From the date the Deregulation Bill 2015 is given Royal Assent, local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings'.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
EN1-14	Para.5.5.41 It would be more accurate to state: “By 2015 the City had reduced emissions by 32.4%.” rather than “In 2015 the City reduced emissions by 32.4%”.	Karen Oakley, Morley Town Council	1	O	Agree	Amend the wording in para. 5.5.41 to state: By 2015 the City had reduced emissions by 32.4%.”
EN1-15	Exemptions for fewer than 10 dwellings or less than 1,000 sq metres is not sensible, smaller schemes might rely more on energy efficient fabric and less on green energy, but the efficiency objectives should be similar even if different methods are employed.	Karen Oakley, Morley Town Council	1	O	The WMS of March 2015 states: ‘We have decided there will be an exemption for small housing sites of 10 units or fewer, which are most commonly developed by small scale home builders and can be more expensive to develop irrespective of the size of the builder, from the allowable solutions element of the zero carbon homes target. This means that all new homes will be required to meet the strengthened on-site energy performance standard but those building on small sites will not be required to support any further off-site carbon abatement measures.’ The exemption for smaller schemes recognises that it can be more difficult for smaller schemes to meet the standard.	None
EN1-16	Support for the policy	Deryck Piper, Little Woodhouse Community Association and Little Woodhouse Neighbourhood Plan.	2	S	Support noted	None
EN2-1	Support for the policy	Deryck Piper, Little Woodhouse Community Association and Little Woodhouse Neighbourhood Plan,	2	S	Support noted	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
		Stephen Ellis, Leeds Federated Housing Association				
EN2-2	The policy should not include the words 'where feasible'.	Karen Oakley, Morley Town Council	1	O	The text clarifies that this means where 'technically feasible'. It takes account of circumstances where it is not physically possible to meet the BREEAM standard.	None
EN2-3	Schemes of fewer than 10 dwellings or less than 1,000 sq metres floorspace should not be exempt from the policy requirement.	Karen Oakley, Morley Town Council	1	O	The WMS of March 2015 states: 'We have decided there will be an exemption for small housing sites of 10 units or fewer, which are most commonly developed by small scale home builders and can be more expensive to develop irrespective of the size of the builder, from the allowable solutions element of the zero carbon homes target. This means that all new homes will be required to meet the strengthened on-site energy performance standard but those building on small sites will not be required to support any further off-site carbon abatement measures.' The exemption for smaller schemes recognises that it can be more difficult for smaller schemes to meet the standard.	None
EN2-4	Objects to the introduction of the tighter optional water efficiency standard on the grounds that there is insufficient evidence.	Mike Ashworth, White Young Green – on behalf of Strata Homes Mike Ashworth, White Young Green – on behalf of Harrow Estates plc. John Fleming, Gladman Developments Joanne Harding, Home Builders Federation	4	O	The evidence is set out in the background note 'A Maximum Water Consumption Standard for Leeds'. The Humber River Basin Management Plan is a key driver for this policy. The draft NPPF includes greater emphasis on protecting water supply in the face of climate change (para 148 of draft NPPF).	None

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					<p>Yorkshire Water have been consulted on the policy but have not responded prior to submission material being prepared for Council. However the Environment Agency are supportive and have provided information to help inform the policy. The Leeds area is not classed as 'Low water stress' in the EA's categorization, this is incorrectly stated by Strata Homes and Harrow Estates plc. Furthermore the EA have encouraged Leeds to include this policy.</p> <p>Government guidance on water supply, para 3 requires us to take a catchment based approach. The Environment Agency Water Stressed Areas Classification of 2013 classifies water bodies according to their risk of environmental impacts as a result of overexploitation from abstraction and this shows the Yorkshire Water area to be classed as having a medium stress risk.</p>	
EN2-5	It is questioned why the policy is needed for water consumption and what the justification is for requiring the imposition of the optional lower figure (110 litres / person / day).	Rachel Flounders, ID Planning – on behalf of Miller Homes; Thornhill Estates; Linden Homes; the Sir Robert Ogden Partnership; Redrow Homes; Taylor Wimpey; the Ogden Group; Great North Developments; Barnaway and Hamber and Mr John Wilson and The Diocese of West Yorkshire and the Dales	12	O	The justification is explained in the EN1 and EN2 Background Paper and the background note 'A Maximum Water Consumption Standard for Leeds'.	None

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		Tom Cook, I D Planning – on behalf of Park Lane Homes and R. Hills (East Rigton) Ltd; Park Lane Homes and D. G Fryer, N. Joyce, B. Timms, P. Joyce & M. Joyce.				
EN2-6	The revised policy is weak	Pete Heald – on behalf of Otley Town Partnership Alastair Watson	2	O	The policy is constrained by national policy. If the Council were to strengthen it the policy would then be inconsistent with national policy and there would be a risk that the Council would not be successful in getting it adopted.	None
EN2-7	Support for the policy	Sally Parker, Environment Agency	1	O	Support from the Environment Agency is much appreciated.	None
EN2-8	Support for the policy. M and G Real Estate are actively investigating ways to incorporate the policy requirements at Parlington.	Matthew Smedley, AECOM – on behalf of M and G Real Estate	1	S	Support noted.	None
EN4-1	Heat networks are not viable in residential development	Sam Ryan, Turley – on behalf of Gallagher Estates	1	O	Not duly made The Council is not proposing to amend the policy intention of EN4. There is one minor factual change which is a consequence of amendments to EN2 to delete the cross-referencing but this does not have any impact on the intent of the policy.	None
EN4-2	Policy EN4 should be subjected to viability testing.	Iain Bath, IB Planning – on behalf of Caddick	1	O	Not duly made The Council is not proposing to amend the policy intention of EN4. There is one minor factual change which is a consequence of amendments to EN2 to delete the cross-referencing but this does not have any impact on the intent of the policy.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
EN8-1	LCC should take advice from electrical engineers to avoid fitting infrastructure that becomes obsolete quickly	Karen Oakley, Morley Town Council	1	O	The Council has not included technical specifications in the policy because these can go out of date very quickly.	None
EN8-2	The residential requirement seems a bit excessive.	Karen Oakley, Morley Town Council	1	O	The cost of retro-fitting is far more expensive than the cost of installing the charging points at the time of construction. Therefore it is sensible to ensure all houses that are built have the infrastructure already in place.	None
EN8-3	The value of this new policy is limited by the absence of any technical specifications (e.g. on the charging rate or the capacity of the cabling infrastructure, better to install future proof infrastructure in the first instance).	Pete Heald – on behalf of Otley Town Partnership Alastair Watson	2	O	The Council has not included technical specifications in the policy because these can go out of date very quickly.	None
EN8-4	The residential standard of one charging point per dedicated parking space can be circumvented by providing unallocated parking.	Pete Heald – on behalf of Otley Town Partnership Alastair Watson	2	O	Agree	Change policy wording to delete the word ‘dedicated’ so that the policy reads ‘Residential: 1 charging point per parking space and 1 charging point for every 10 visitor spaces’.
EN8-5	There is no complementary policy to address the need for on-street charging for existing housing areas with no off-street parking.	Pete Heald – on behalf of Otley Town Partnership Alastair Watson	2	O	The Core Strategy can only influence decisions which are subject to a planning application therefore it cannot require charging points to serve existing housing.	None
EN8-6	The policy places a significant burden on developers.	James Beynon, Quod - on behalf of Landsec James Beynon, Quod – on behalf of Inhabit Sam Ryan, Turley – on behalf of Gallagher Estates	5	O	Evidence shows that costs associated with this policy are minimal and do not affect viability. Furthermore, the costs of providing the charging points as part of the initial development are much lower than retro-fitting them afterwards. Air quality in Leeds is so serious that this type of policy intervention is necessary if Leeds is to improve air	The Air Quality Background Paper has been updated with further information on costings and comparison with cost of retro-fitting.

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		Chris Fairchild, Quod – on behalf of YP Real Estates Ltd Taylor Cherrett, Turleys on behalf of Vastint BV			quality in the face of residential and commercial growth. The evidence base for this can be found in the Air Quality Background Paper	
EN8-7	The Policy should be modified in order that electric vehicle charging can be determined on a case by case basis, depending on the viability, practicality and feasibility of provision	James Beynon, Quod - on behalf of Landsec James Beynon, Quod – on behalf of Inhabit Chris Fairchild, Quod – on behalf of YP Real Estates Ltd	3	O	This can be done through the implementation of the policy at planning application stage, but the policy should remain as a driver with clear targets to ensure that charging points are considered.	None
EN8-8	Furthermore the new policy does not appear to be supported by any specific evidence base or viability assessment to justify the significant costs associated with the introduction of EV charging points for every dedicated residential parking space. Experience of Gallagher Estates suggests that active EV charging points can incur a significant cost which should be considered in the context of overall viability. Paragraph 173 and 174 of the NPPF make clear that LPAs should ensure that their development plans do not place unrealistic burdens on development so as to compromise viability and delivery. “They should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the	Sam, Ryan, Turleys on behalf of Gallagher Estates	1	O	The cost of providing electric vehicle charging points upfront in new development are minimal, estimated at around £100 per house. These costs are not significant and do not affect viability of the development. Gallagher Estates have not included any costings in their representation.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	development plan, when added to nationally required standards”					
EN8-9	Changes should be led by national transport policy and action to reduce the price of electric cars. EN8 does not reflect the quantum of electric vehicles currently in the market. Car sales figures show that electric vehicles are only a small proportion of total car sales and this is not likely to significantly change during the plan period therefore the policy is premature until such time as the infrastructure is needed.	Sam Ryan, Turley – on behalf of Gallagher Estates	1	O	<p>The policy intends to make electric vehicles more attractive to Leeds residents by ensuring that the opportunity to home charge is not a constraint on the decision to purchase an electric vehicle. The policy is part of the Council’s wider initiative on improving air quality through the introduction of a city wide Clean Air Zone. The Air Quality BP shows that air quality is so poor in Leeds that immediate action is needed now. The National Planning Policy Framework states that: 124 Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas.</p> <p>Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.</p> <p>The draft NPPF also encourages LPAs to include policies on air quality: ‘Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.’</p> <p>Policy on local parking standards</p>	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
					expects consideration of the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. Para 106e. Also, the design of developments should enable charging points in safe, accessible and convenient locations. Para 110e	
EN8-10	Adequate car parking should be designed into all future developments. The rationale must follow the size and occupancy of each dwelling. There must surely be at least two spaces provided for the smallest of dwellings.	James Paterson	1	O	Not duly made. The CSSR does not include a review of parking standards. Existing adopted standards remain applicable.	None
EN8-11	Highways England is very supportive of policy EN8 to address air quality issues in Leeds and considers the policy to be sound.	Simon Jones, Highways England	1	S	Support noted.	None
EN8-12	There is no flexibility in the wording of this policy and therefore it is considered appropriate to add wording to the end of the residential policy which states 'where this is feasible and/or viable'.	Rachel Flounders, ID Planning – on behalf of Miller Homes; Thornhill Estates; Linden Homes; the Sir Robert Ogden Partnership; Redrow Homes; Taylor Wimpey; the Ogden Group; Great North Developments; Barnaway and Hamber and Mr John Wilson and The Diocese of West Yorkshire and the Dales Tom Cook, I D Planning – on behalf of Park Lane Homes and R. Hills (East Rigton) Ltd; Park Lane Homes and D. G Fryer, N.	12	O	The viability study shows that the policy is viable. Therefore there is no need for the suggested additional wording.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
		Joyce, B. Timms, P. Joyce & M. Joyce.				
EN8-13	Parlington will be a sustainable and socially inclusive part of Leeds, accessible by a range of transport modes, exemplifying how development can reduce carbon emissions and ease congestion. Electric vehicles charging points will form one component of the overall transport and mobility package at Parlington, setting a benchmark for the delivery of other sites, and, therefore, the introduction of new Policy EN8 is welcomed	Matthew Smedley, AECOM – on behalf of M and G Real Estate	1	S	Support noted. The fact that developers are already incorporating the requirements of the policy into development proposals before the policy is even adopted indicates that the policy is achievable.	
EN8-14	In respect to office/retail/industrial/education that it is the expectation that charging points for 10% of parking spaces, ensuring that electricity infrastructure is sufficient to enable further points to be added at a later stage. This current wording is imprecise and does not confirm what percentage of spaces would require passive provision to future proof. Without this confirmation we would suggest that reference to further points should be removed.	Taylor Cherrett, Turleys on behalf of Vastint BV	1	O	The policy was not written precisely in regard to future proofing so as to allow a degree of flexibility and negotiation. Reference needs to be made to future points because the plan needs to look ahead and this is likely to be a growing infrastructure need.	
EN8-15	Supports the policy.	Stephen Ellis, Leeds Federated Housing Association	1	S	Support noted.	None.
EN8-16	The HBF do not oppose the provision of electric charging points, the policy as worded is currently considered to be overly onerous. An element of flexibility would be beneficial and is considered to make the policy	Joanne Harding, Home Builders Federation	1	O	The term 'where practical' could lead to a lack of clarity or understanding about the meaning of the policy.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	<p>compliant with the NPPF, paragraph 35.</p> <p>HBF propose that the policy is modified as follows:</p> <ul style="list-style-type: none"> • ‘All applications for new development which include provision of parking spaces should seek to meet the minimum standard of provision of electric vehicle charging points, where practical. This requires: <ol style="list-style-type: none"> i) Residential: 1 charging point per dedicated parking space and where parking spaces are unallocated (for example visitor parking) 1 charging point per 10 spaces’. 					
EN8-17	Support	Andrew Wood, CPRE	1	S	Support noted.	None
EN8-18	<p>Charging points in motorway services should, like Office/Retail/Industrial/Education, allow for extension to a higher percentage in the future, and should include fast charging points as well. Similarly, in petrol stations. Electric car use will be encouraged where drivers can be sure there is plenty of opportunities for re-charging</p>	Leeds Civic Trust	1	S	Agree that MSAs and petrol stations need to be prepared for a higher demand of provision in the future but the policy is trying to balance between letting the industry meet demand naturally and giving a steer to encourage the industry. The policy will be monitored and reviewed and the requirement adjusted as necessary.	None
EN8-19	Support for the policy	Deryck Piper, Little Woodhouse Community Association and Little Woodhouse Neighbourhood Plan	1	S	Support noted	None
EN8-20	Clarity needed around the residential charge point – surely can't be that developers would install electric charge point at every dedicated parking space for a house? At this stage that seems excessive, brilliant	James Hulme, Sustainable Energy & Climate Change Programme Officer Programmes, Projects & Procurement Unit	1	S	The Plan is for a 15 year period so is looking ahead to meet the need that is likely to arise in the plan period.	Agree. Add “ensuring that electricity infrastructure is sufficient to enable further points to be added at a later stage.” To EN8 iii)”

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	<p>and may well be needed in 5 years, but excessive?</p> <p>Rest of it seems very good – I'd have thought may be worth replicating the 'electricity infrastructure is sufficient to enable further points to be added at a later stage to iii) Motorway Service Stations also. In time, might expect that more than 10% spaces will be required for charging on journeys as people top up?</p>	Leeds City Council				
DtC-1	<p>Duty to Cooperate</p> <p>The Council's Duty to Cooperate Statement is unclear whether it sought to identify whether neighbouring authorities can meet their own needs. Consideration should be given to completing a Statement of Common Ground as suggested in the Draft Revised NPPF.</p>	Mike Ashworth WYG (Strata,) Simon Grundy Carter Jonas (Avant Homes), Nicola Berry, Pegasus (C Makin), Paul Leeming, Carter Jonas (Hatfield Estate, AC Developments, AR Briggs, Linden Homes/Lady Hastings, S Burnett/Lady Hastings, Lady Hastings	9	O	Neighbouring local authorities are all planning to meet their own housing needs. Statements of common ground have only been suggested in the Draft Revised NPPF. Under the proposed transition arrangements this will not be a requirement for plans submitted within 6 months of the adoption of the revised NPPF.	None
DtC-2	<p>Duty to Cooperate</p> <p>The Council's Duty to Cooperate Statement is incomplete as issues are raised but the Monitoring and Action/Response columns are incomplete.</p>	Simon Grundy Carter Jonas (Avant Homes), Nicola Berry, Pegasus (C Makin),	2	O	The issues will be addressed with Monitoring and Action/Responses for Submission of the Plan.	Update the Duty to Cooperate Statement
MNG-1	<p>Monitoring Framework</p> <p>The CSSR should be accompanied by a monitoring framework to set out actions in case of changes of circumstance and failure to meet targets.</p>	John Flemming (Gladman Developments), Johnson-Mowat, Rothwell Neighbourhood Forum	3	O	Agreed	Update the monitoring framework of the adopted Core Strategy to reflect the proposed new policies

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	A commitment to a monitoring framework for delivery of housing is needed. This would accord with the direction of the NPPF consultation regarding the review of plan policies.					
SA-1	<p>Sustainability Appraisal</p> <p>The proposal to retain the 8% figure for the Outer North East HMCA is only likely to be achievable by a development which is only capable of being met through the development of a new settlement. The proposed location for this new settlement, at Parlington, would cause substantial harm to the historic environment, including harm to fabric, layout and composition of a Grade II Registered Historic Park and Garden and numerous elements which contribute to its significance. It would also harm the setting and appreciation of several designated and non-designated heritage assets around this eighteenth-Century designed landscape including one to which the Government considers to be in the category of designated heritage assets of the highest significance.</p> <p>As such, therefore, a new settlement at Parlington would not be delivering sustainable development in terms of protecting and enhancing the historic</p>	Historic England	1	O	It is not considered necessary to amend the scoring of the Sustainability Appraisal of the CSSR for the following reasons. i) Policy SP7 is too strategic to score the impact of individual sites, ii) impact on Historic Parks and Gardens is only one of many possible impacts on historic character, iii) it is arguable whether the proposed allocation at Parlington (in the submission version of the Site Allocations Plan) would be harmful once mitigation measures are taken into account. A fuller response is provided in the Sustainability Appraisal Report.	None

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	<p>environment, it would conflict with one of the Government’s Core Planning Principles (that heritage assets should be conserved in a manner appropriate to their significance), nor would it be likely to provide the positive strategy for the conservation of the historic environment that is required for Local Plans. Consequently, since the 8% figure for the Outer North East HMCA is only likely to be achievable by a development which would run wholly contrary to national Planning Policies for the historic environment, the impact of Policy 7 upon SA Objective 7 should read ‘significant adverse (- -).</p> <p>As a mitigation measure, the SA should recommend that the figure for the Outer North East HMCA is reduced to one that is capable of being met without the development of a new settlement.</p>					
IS BP 1	<p>Infrastructure Background Paper As the housing requirement is proposed to be reduced, CIL money will reduce. Therefore, an update to the Infrastructure background paper is required.</p>	Garforth Neighbourhood Forum	1	O	The CIL is supplying a small proportion of overall infrastructure. An updated Infrastructure Background Paper is available to support the Site Allocations Plan	None
HRA-1	<p>Habitats Regulations Assessment Natural England welcomes the Habitats Regulations Assessment of</p>	Merlin Ash, Natural England	1	O	Agreed	Changes have been made to the Habitats Regulations

Policy – Issue#	Representation	Who	No	O/S	Council Response	Change made
	<p>the selected review but has a number of comments to make. 1. We advise that the Conservation of Habitats and Species Regulations was updated in 2017 and reference should be made to that version of the Regulations. 2. We advise that the in-combination impact of the review should be considered to take account of any residual effects and the different local and regional policy context for the revised plan. 3. Finally we advise that the report only covers the revisions to the Core Strategy and that the original assessment is still relevant for the unchanged policies. As such we advise that this assessment should be appended to the original assessment or for it to be made clear in some other way that the original Habitats Regulations Assessment is still current for the remainder of the plan.</p>					<p>Assessment (Appropriate Assessment)</p>

What does the Local Plan include?

The Leeds Local Plan comprises:

- Core Strategy
- Saved Unitary Development Plan policies
- Natural Resources and Waste Local Plan
- Aire Valley Area Action Plan

Once Adopted, it will also include the Site Allocations Plan, which is currently at Examination.

Once Adopted, the Core Strategy Selective Review will also form part of the Local Plan.

Aire Valley Leeds Area Action Plan (AVLAAP)

The AVLAAP sets out a visionary planning framework for the regeneration of the Aire Valley inc. >6k homes on brownfield land.

An independent Inspector examined the plan in January 2017 and recommended that subject to a number of minor modifications the Plan is sound and should be adopted by the Council. The Plan was adopted by Full Council on 8th November 2017.

Site Allocations Plan (SAP)

The SAP identifies land where new homes, employment, retail centres and greenspaces are to be located.

The SAP is currently being examined by two independent Inspectors and the public hearings are in two stages. Stage 1 was held in Oct 2017 and examined retail, employment, green space, Gypsies and Travellers and Travelling Showpeople. Stage 2 is programmed to take place in Jul 2018 and will examine housing and all other matters not examined in Stage 1.

Amendments to the SAP have been made to change 43 previously released Green Belt sites, to "Broad Locations", which will remain within the Green Belt until a subsequent review of the SAP: These include: 33 previously proposed housing allocations (with potential for circa. 6,454 homes) and 10 previously proposed safeguarded land sites. These amendments are subject of consultation between 15th January until 5pm on 26th February 2018.

Drop-in sessions are on **30th Jan** and **19th Feb** at the Civic Hall.

To make a comment go to www.leeds.gov.uk/yourcity

The Inspectors' final report will be issued after all matters have been considered.

Further Information www.leeds.gov.uk/ldf - the Council's Local Plan webpage

ldf@leeds.gov.uk – email for further information

<http://www.hwa.uk.com/projects/leeds-site-allocations-plan-examination/> - the programme officer's webpages for the SAP examination



Core Strategy Selective Review (CSSR)

The Council agreed to undertake a selective review of the Core Strategy within 3 years of its adoption in 2014. A Publication Draft of the Plan will be available for consultation in February 2018.

The review covers 7 elements:

- Update the housing requirement of Core Strategy Policy SP6
- Extend the Core Strategy plan period from 2028 by 5 years to 2033
- Update sustainable construction Policies EN1 and EN2 to reflect national advice
- Update affordable housing and greenspace policies H5, G4 & G5
- Electric Vehicle Charging Policy
- Incorporate Housing Space and Access Standards
- Consequential changes and additions as a result of consultation feedback

The Review proposes that a housing requirement of 51,952 (net) dwellings be provided between 2017 and 2033.

The Core Strategy Selective Review public consultation is due to run from 9th Feb to 23rd Mar 2018. Please check here for more details: <http://www.leeds.gov.uk/council/Pages/Core-Strategy-Review.aspx>.

Drop-in sessions are due to be held for local communities on 1st March and for developers on 15th March 2018 at Leeds Civic Hall.

Evidence Base

The revised housing requirement is supported by a Strategic Housing Market Assessment (SHMA). A reference group, including local community representatives, helped steer this work. The draft final document is available here:

[http://www.leeds.gov.uk/council/Pages/Strategic-Housing-Market-Assessment-\(SHMA\).aspx](http://www.leeds.gov.uk/council/Pages/Strategic-Housing-Market-Assessment-(SHMA).aspx)

The SHMA provides evidence on three main areas:

- Objectively assessed housing need
- Affordable housing need
- The needs of different groups and different geographical areas
- Local area reports (pending)

Key Context and Further Information

The Government consultation document, 'Planning for the Right homes in the right places: consultation proposals' sets out -

1. Standard method for calculating local authorities' housing need
2. The Government's proposed method sets an **indicative annual figure of 2,649 for Leeds or 42,000 homes** for a plan period
3. It notes that this is the minimum number of homes needed in a local authority, and that Councils may decide to deliver more housing due to economic growth ambitions



Appendix 9. Notes of meeting with Local Community Groups

Local Community Briefing 19th December 2017, Leeds Civic Hall Notes of meeting

In attendance:

Name Representing

Representative from	Aberford Neighbourhood Development Plan Management Group
Representative from	Adel Neighbourhood Forum
Representative from	Aireborough Neighbourhood Development Forum
Representative from	Aireborough Neighbourhood Development Forum
Representative from	Aireborough Neighbourhood Development Forum
Cllr Jerry Pearlman	Alwoodley Parish Council
Cllr David Denby	Bardsey Parish Council
Representative from	Barwick In Elmet and Scholes Parish Council
Representative from	Barwick In Elmet and Scholes Parish Council
Representative from	Carlton Neighbourhood Forum
Mike Dando	Consultant for: Aberford, Pool and Otley Neighbourhood Groups
Representative from	Garforth Neighbourhood Forum
Representative from	Holbeck Neighbourhood Forum
Representative from	Horsforth Civic Society
Representative from	Horsforth Town Council
Representative from	Horsforth Town Council / Yorkshire Green Belt Alliance
Cllr John Illingworth	Kirkstall Neighbourhood Forum
Abbie Milanovic	Leeds City Council
Cllr Peter Gruen	Leeds City Council
Cllr Richard Lewis	Leeds City Council
Tim Hill	Leeds City Council
David Feeney	Leeds City Council
Ian Mackay	Leeds City Council
Martin Elliot	Leeds City Council
Lois Pickering	Leeds City Council
Representative from	Little Woodhouse Neighbourhood Planning Forum
Representative from	Little Woodhouse Neighbourhood Planning Forum
Representative from	Menston & Guiseley Green Belt Protection Group
Peter Baker	Peter Baker Associates
Cllr Dawn	Collins Rawdon Parish Council
Representative from	Rawdon Parish Council
Representative from	Rothwell Neighbourhood Forum
Representative from	Save Parlington Action Group
Representative from	Save Parlington Action Group
Representative from	Thorp Arch Group
Representative from	Thorp Arch Parish Council
Representative from	Weetwood Residents Association
Representative from	Weetwood Residents Association
Representative from	etherby Town Council
Representative from	Wharfedale & Airedale Review Development
Representative from	Wills Gill Action Group

Notes of meeting:

Cllr Richard Lewis introduced the meeting and acknowledged that plan-making is a long and often complicated process. He welcomed the opportunity to talk through and explain the current position with local resident's groups who had made comments on the Site Allocations Plan (SAP).

Martin Elliot, Policy and Plans Group Manager summarised the current position. It was requested at the meeting that the explanation given was put in writing as follows:

1. Good and effective planning in Leeds relies on having an up to date Plan in place. The Council is making two plans at the moment. They are the Site Allocations Plan (at an advanced stage) and the Core Strategy Selective Review (CSSR) (at an early stage).
2. They aren't being done at the same time because the Site Allocations Plan (SAP) was started immediately upon Adoption of the adopted Core Strategy (CS) and is at its penultimate stage of preparation (i.e. independent Examination)
3. To stop the SAP now, to bring it in line with the CSSR would lead to a policy vacuum in Leeds. This would put sites at risk through "planning by appeal" (i.e. developers seeking planning permission on sites that the Council does not wish to see come forward for housing). Government tell us that we need to get plans in place quickly.
4. The current consultation on the SAP is to address a potential misalignment between the CSSR and the SAP. This was signalled by the release of Government guidance on housing needs in September 2017.
5. Unfortunately this release was after the Council had submitted the SAP for independent examination so a pause in the SAP Examination has had to occur.

The Core Strategy

6. The Core Strategy (CS) was adopted in 2014 and sets the statutory strategic planning framework for the Local Plan in Leeds. It contains policies which in turn set the context for lower tier plans; including the Site Allocations Plan (SAP), Aire Valley Plan and Neighbourhood Plans. The CS identifies an overall housing requirement of 74,000 dwellings (70,000 (net)) between 2012 to 2028 and sets out that the SAP/Aire Valley Plan should plan for housing land for 66,000 dwellings.

Monitoring the Core Strategy / Review

7. After the CS was adopted the Council monitored the evidence base and committed to a review within 3 years. The CS was based on 2010 official statistics. Whilst the most up to date 2012 official statistics were discussed at the time of the CS examination it was important to see whether these would be short-lived (as thought by the CS Inspector when he considered the CS to be sound) or long-term.
8. Since then the official demographic evidence base has continued to forecast lower rates of growth.. It is important to note that this does not mean that the CS was wrong (as all the official figures at the time were tested at independent Examination) simply that the evidence has changed.
9. Clearly the level of housing development which the house building industry claimed able to deliver was far lower than they have managed as the CS target has not been met since 2012 despite a considerable number of planning permissions (particularly on brownfield sites) throughout Leeds.

The Site Allocations Plan and the fit with the Core Strategy Review

10. It is important to note that the SAP has to be in line with the Adopted CS, which means that even though the evidence base has now changed the Council cannot now simply change one housing figure for another. It has to be changed through the statutory plan making process to allow everyone to make comments on what a future housing requirement for Leeds might be..

11. The SAP inspectors have been written to by residents about their concern of Green Belt release in the context of falling population / household growth (a point made by residents groups throughout the SAP process). The SAP Inspectors were initially of the view (endorsed by the Council) that this was not a matter for them.

12. Whilst the SAP was releasing land against the Adopted CS figure, the Council considered, at the time of submission of the SAP to the Secretary of State, that any over-allocation of land could be addressed through an extended CS plan period from 2017 to 2033 i.e. the same amount of land could last the authority longer.

The DCLG consultation

13. The DCLG consultation in September included a plan-period figure of 42,000 homes for Leeds. The Council recognised that it needed to pause to consider implications for SAP and particularly for Green Belt release, even though the 42,000 figure was only for consultation. It was now questionable whether the surplus provision in the SAP could be addressed by an extension to the plan period.

14. The DCLG figure is a contextual figure to the CSSR and the Council will seek views on whether it should plan for this amount. However, because of other local factors such as the delivery of affordable housing and the need to align homes with job growth the CSSR will consult on a slightly higher figure in the region of 52,000 homes. This is supported by a local Strategic Housing Market Assessment and household survey.

The implication of the DCLG figure on the SAP

15. National guidance notes that release of Green Belt through plan-making needs exceptional circumstances and the Council had up until this point been relying on the CS housing target to justify those circumstances. The DCLG consultation affected this assumption.

16. There were 3 choices open to the Council in October. First, plough on regardless with the SAP. Second, amend the SAP to try and reflect the lower national trajectory. Third, withdraw the SAP and await the CS Review with a new housing figure to plan for.

17. The decision to carry on with some amendment to the SAP was taken for the following reasons: a) the SAP was at an advanced stage of preparation, b) the need to avoid continued uncertainty over sites for local people and investors in Leeds, c) the need to allocate those sites in the SAP which have not generated objection, d) the need for the Council to have a plan for housing supply so as to avoid speculative development.

18. The consultation therefore seeks to amend the SAP so that a) it remains in line with the CS because national guidance advises that housing requirements can be met through allocations and broad locations of growth, b) it requires that the SAP be reviewed once the CSSR has determined a new housing requirement, c) it ensures that the release of Green Belt land is limited at this stage to that which is necessary to maintain a five year housing land supply and to provide a trajectory of deliverable and identified allocations for the SAP up to 2023.

Questions from the floor were taken as follows:

What is meant by certainty of delivery?

Officers confirmed that local authorities need to have a plan for housing land supply. Ideally this should be for the plan-period but it can be for shorter periods of time. The most critical time period is the next 5 years as national guidance requires that there are identified and deliverable sites made available to meet housing requirement for the next five years. This should also include a buffer and remedy any backlog. In Leeds there is currently a 4.3 year land supply. The release of sites through the SAP will enable a 5 year supply. In turn this can be used to resist speculative development.

There will be greater certainty of delivery once the housing requirement is lowered to match up to date evidence on needs

What is the difference between “exceptional circumstances” and “very special circumstances” for Green Belt release?

Officers confirmed that in national guidance (the National Planning Policy Framework) the terms have distinct meaning. Exceptional circumstances are needed to change Green Belt boundaries through a plan-making process. These are housing needs, topography and nature of the local area. Very special circumstances are needed to grant planning permission on land in the Green Belt for non-Green Belt uses outside of the plan-making process.

Why are sites being termed Broad Locations rather than Green Belt?

Officers noted that the NPPF says that we have to show that we have a plan for housing. The Broad Locations are a signal to a future plan review that these sites are suitable for housing should they be needed. The Council has done a considerable amount of assessment and consideration of sites to reach the 66,000 target in the CS for allocations. They have already made the case that these sites are suitable. Having them as Broad Locations meets the tests of the NPPF but retains their Green Belt protection until such a time as the plan can be reviewed. If we had returned sites to the Green Belt we would not be able to take the SAP through Examination as it would not meet the NPPF.

Where do broad locations fit with other Green Belt and PAS?

Broad Locations are in the Green Belt so they retain the full weight of protection. They are at this stage a signal to the next SAP Review. Upon review they can be brought forward as housing allocations for the new CSSR plan period (2017 to 2033), designated as Safeguarded Land for beyond 2033 or returned to the Green Belt if there is no evidence that they are needed against new CSSR requirements with the Broad Location designation removed.

The Protected Areas of Search which were allocated in the UDP have either been used for housing allocations in the SAP or retained as Safeguarded Land (the name has changed but it means the same thing).

Some proposed new Safeguarded Land was proposed to be released from the Green Belt for the SAP, but this too has now been designated as Broad Locations and remains in the Green Belt until SAP Review.

Isn't the biggest problem that the volume house builders are not building on brownfield land?

Cllr Peter Gruen noted that this is a problem. He noted that there is a problem of landbanking from some developers and that the planning system doesn't allow all planning permissions to be accounted for in the five year land supply.

Cllr Richard Lewis noted that a lot of Council work goes on below the radar on brownfield land delivery. He pointed to the considerable work being done by the Council to attract and work with non-volume house builders to deliver sites on brownfield land, not least the recent Strata/Keepmoat/LCC deal or 1,000 homes in East Leeds. The Council also has a Private Sector Acceleration Programme to speed up and match builders with grants for delivery on brownfield land. In addition, the Council House Building programme has a focus on such sites. However, unless Government guidance is re-written we cannot force developers to use brownfield land first; rather local authorities must deliver a choice. In some areas where local needs are to be met there simply isn't the stock of brownfield land available.

The Government's Housing White Paper stresses that the market is broken and seeks to stimulate delivery. It will be important to see what changes are progressed through the re-written National Planning Policy Framework (NPPF) in the New Year.

What is the timetable for the CSSR?

Publication Draft Policies	Consultation Feb/Mar 2018
Submission Draft	Autumn 2018
Examination	From Winter 2018
Adoption	Early 2019

With the delay to the SAP why can't the SAP and CSSR be brought together or the SAP delayed until after the CSSR?

If the CSSR is not Adopted until 2019 there would be at least 18 months of delay to bring the SAP back to Examination. Such a change to the overall quantum of growth would necessitate starting again rather than scaling back in a pro rata manner.

There would be a need for further rounds of consultation and in the meantime speculative development would continue as the Council – because the SAP is the only means to release Green Belt – would still not have a 5 year supply. The 5 year supply is the key Government test of housing performance.

If the plan were merged there would be a longer delay as all policies and a rethink of SAP sites would be up for grabs. This would be at least 24 months delay in bringing such a plan back to Examination

The current approach maintains the SAP at Examination. If the delay were longer the Inspectors would ask the Council to withdraw the plan and re-submit it. We'd then lose the work that the Inspectors have invested in the Plan thus far.

The Chief Planning Officer noted that there is cross party agreement that we should not withdraw the SAP. He likened the approach to a chess game in 3 moves: 1. The SAP gets adopted, reserving our position on many GB sites, 2. Push ahead with CSSR to adoption. 3. Quickly revise our position on the remaining SAP sites.

He stressed that it is important that local groups understand that this is the approach and it is this way because of the legislative and national guidance background. He asked that local groups can help

with this by supporting the overall approach through response to the consultation even though they might still consider that some Green Belt sites should not come forward.

Can the CSSR deal with crematoria?

Noted. Need to make a representation to that effect.

We need smaller and cheaper housing not executive housing

Noted. The Council has housing mix policies to deliver this. The results of the Strategic Housing Market Assessment can be brought to bear on decisions. This can also be addressed locally through strong Neighbourhood Plan policies e.g. for older persons housing or starter homes.

We are in this problem because of fake numbers at the time of the Core Strategy

The numbers for the Core Strategy were not fake. They were the 2008-based household projections which fed into a SHMA at the time in accordance with national guidance and supported by a steering group comprising a range of interests. They were also scrutinised by an Independent Inspector. At the time sub-national projections were high as a result of the national demographic evidence base. The Council chose to submit the lowest of the choices it had – lower than the projections which were in the region of 90,000 homes. As an aside if the current DCLG consultation approach had been used then we would have had a target of 97,900.

It was at the Inspectors behest during the Examination that work from Edge Analytics was commissioned to look at the interim 2011 projections. These had a greater range of scenarios with the 70,000 nearer the top. The house builders and the Inspector took the view that the lower scenarios were recession induced.

What potential is there now for alternatives to Parlington?

Cllr Richard Lewis noted that in the Outer North East (ONE) there were a difficult set of choices.

Cllr Peter Gruen noted that there was consultation with local councillors who were in favour of a single strategic site in ONE, first Headley Hall and then Parlington

The site remains in the Plan albeit at a lower scale. There are other reasonable alternatives in the ONE which have been considered and discounted by the Council with the locally driven Parlington estate option being progressed.

The Council is not proposing new alternatives but if these exist and were not considered at the time they can be brought to the Inspector's attention, although strictly speaking any new site suggestions or comments on rejected sites are not considered 'duly made'

How has the Green belt review been done?

A comprehensive Green Belt Review was undertaken for the SAP. Details are in the Green Belt Background Paper on the web-site

Why have the HMCA targets not changed to reflect performance so far?

The CS does not expect HMCAs to deliver at the same rate. The figures are based on local needs and the supply of land e.g. near to major settlements and services.

If the CSSR figure goes down the proportion to be delivered in each HMCA will also go down

If the target goes down to 42,000 would this mean no need to release Green Belt at all?

There is a danger of adhering to DCLG consultation methodology which could be a hostage to fortune. It will be better to have a locally driven target.

No matter what that is there will be some parts of Leeds that need housing but have no options other than Green Belt land.

Cllr Peter Gruen thanked all for their attendance and interest in the Plan. It was agreed that another meeting would be beneficial as the process continues.