



Report of the Director of City Development

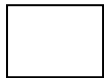
Development Plan Panel

Date: 2 February 2010

**Subject: Leeds LDF Core Strategy – ‘Preferred Approach’
(Initial Report of Consultation)**

Electoral Wards Affected:

All



Ward Members consulted
(referred to in report)

Specific Implications For:

Equality and Diversity

Community Cohesion

Narrowing the Gap

Executive Summary

1. At Development Plan Panel on 30 September 2009, Members received a report concerning the Leeds LDF Core Strategy ‘Preferred Approach’, as a basis for a period of informal public consultation (26 October – 7 December 2009).
2. The purpose of this report, is to provide an initial Report of Consultation on the consultation, highlight key issues and next steps.

1.0 Purpose of this report

- 1.1 At Development Plan Panel on 30 September 2009, Members received a report concerning the Leeds LDF Core Strategy 'Preferred Approach', as a basis for a period of informal public consultation (26 October – 7 December 2009). Following on from this activity, the purpose of this report, is to provide an *initial* 'Report of Consultation', highlight key issues and next steps. Consequently, it should be noted that at this stage, given timescales, this report does not provide an exhaustive level of analysis to the consultation responses received but aims to provide an overall commentary on the programme of consultation and the 'headline' points made in responses. Further detailed analysis is underway and will be reported to Panel in due course.

2.0 Background information

- 2.1 As noted in previous reports to Panel, the Core Strategy is the overarching and central document of the LDF process. Government Guidance (PPS12, 2008), emphasises the key role of the Core Strategy, in setting out an overall spatial vision for an area and how the places within it should develop, to provide a link to the Community Strategy (Vision for Leeds) and Local Area Agreements, and the provision of an Infrastructure Delivery Plan (IDP).
- 2.2 Following consideration of the 'Preferred Approach' document by Development Plan Panel on 30 September, informal public consultation was undertaken across the District during the period 26 October – 7 December 2009. In support of this, the following range of consultation activity took place (a detailed schedule of consultation activity has been included as Appendix 1 of this report, for information):
- Notification and dispatch of consultation material ('Preferred Approach' Main Document, Summary Document, Map Book, Response Form/Questionnaire) to Parish Councils, interest groups and statutory bodies,
 - Meetings, Discussion Groups and Workshop Sessions
 - 'Drop in' Sessions
 - Members Briefings, and,
 - Public Exhibitions.
 - Social networking internet site (facebook)
- 2.3 It can be reported that there was positive engagement and a good level of response (over 220, written responses plus feed back and comments received at the various events, exhibitions and workshops). These include a range of Statutory Bodies, Local Authorities & Parish Councils, Amenity & Interest Groups, Developers, Infrastructure providers and various under-represented groups and stakeholders (see Table 1 below and event schedule included in Appendix 1). Consequently, there was a very useful, substantive and constructive response to the consultation material, in relation to the overall Spatial Vision & Strategy and in relation to the scope and content of the 5 integrated themes (Green Infrastructure, Sustainable Communities, Managing the Needs of A Growing City, Managing Environmental Resources and a Well Connected City). The following section sets out the 'headline' responses to each of these areas in turn. It should be emphasised that this is an initial assessment of the responses received and more detailed analysis is underway, which will be reported to Panel future meetings.

Table 1: LDF Core Strategy: Approx. Breakdown of Consultation Responses Received

(Nb. This table does not include the detailed responses received from the groups & individuals who commented at the various workshops and stakeholder events detailed in Appendix 1, these are being 'written up' as consultation events and will be incorporated in the final Report of Consultation).

Category of Respondent	Responses Received
Community Groups	28
Individuals	41
Leeds City Council	7
Organisations	130
Parish & Town Councils	11
Statutory Bodies	5
Total	222

3.0 Main issues

- 3.1 As a basis to receive and focus consultation responses, the Response Form set out a number of questions, structured around the key themes of the document. Opportunity was provided also to comment on the entirety of the consultation material (including the supporting evidence base completed to date). The following summary is intended to give an initial overview of the comments received. More detailed analysis is ongoing, to consider the comments received in further detail alongside the City Council's responses.
- 3.2 A key feature of the consultation has been the wide ranging nature of respondents (i.e. from different agencies, organisations and interest groups), which is reflected in the coverage of comments across the consultation material. Overall, there is a large measure of support across the emerging Core Strategy, as well as detailed concerns in a number of areas and calls for greater clarity in terms of aspects of the document's scope and content.

Spatial Vision & Strategy

- Support for overall approach,
- Need for greater clarity and consistency between the Spatial Vision and subsequent Themes,
- Need to give greater emphasis to health issues,
- Ensure integration of Core Strategy with Community Strategy priorities and related Strategies including the emerging Agenda for Improved Economic Performance & Regeneration Strategy,
- Where possible, make individual objectives more locally specific to Leeds (especially the delivery of long term Housing requirements) & go beyond the current Vision for Leeds,
- Some concern that the Core Strategy was consulted on prior to the publication of the Strategic Housing Land Availability Assessment,
- Support for the definition of the settlement hierarchy as a basis to plan for future growth,
- Need to more explicitly take into account a range of cross boundary issues with Wakefield and Bradford and to give greater emphasis to the City Region role of Leeds.

(i) Green Infrastructure (GI)

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

Natural Environment

- The need for an area specific policy for the Aire Valley is questioned given that specific strategies/policies are not included for other key corridors,
- Contributions to the habitat network should be directly proportional to any adverse impact on identified species from new development and should not impact on viability, especially in regeneration areas. Where possible, mitigation should be through design and not via a financial contribution,
- The need to protect natural habitats must be carefully balanced against the need to make efficient use of brownfield land. Policies should be sufficiently flexible to allow solutions which reflect individual site circumstances,

- Natural England suggest illustrating the habitat network on the Proposals Map when they become available. Natural England support efforts to increase woodland cover in Leeds and the intention to develop a network of wetland nature reserves in the Lower Aire Valley (Policy G6).

(ii) Sustainable Communities

- Overall strong support for Regeneration Priority Areas, but need further justification through evidence, and identification of future areas should be undertaken now rather than leaving uncertainty. Should be more detail on the implications and action which will be taken within regeneration areas, including the Leeds-Bradford Corridor, and how the Urban Eco Settlement relates to Aire Valley Leeds (AVL),
- Support hierarchy and location of centres, although need to recognise the differences in roles between centres on the same level of the hierarchy, and need more evidence. Need more clarity on centres in rural settlements, and on how centres can move between hierarchy levels. Support restricting out of centre development including existing retail parks. A number of comments in support or against specific centres,
- Need to ensure that setting out proposed uses in Leeds' centres is locally specific and expands on higher-level guidance. Support for creating critical mass in centres, but do need a level of flexibility. Concern over the uses, which can dominate shopping centres (often hot food takeaways and charity shops) and need a balance of uses appropriate to centres' roles to provide a good range of services and choice and opportunities for residents. Should require retention of post offices and banks,
- Need more recognition of facilities which will not be able to find a suitable town centre site, and existing facilities which will therefore not be relocating and may need to expand in situ, e.g. education, hospitals, and culture/leisure in countryside locations,
- Overall support for criteria to consider new centres, although should identify where all the new centres will be needed including in the Aire Valley (AVL) where appropriate, and should be based on more evidence,
- Support for promoting health, education, cultural, and leisure facilities, but needs to be more delivery specific,
- A range of comments re. those who want stricter sustainable design measures and standards, including that they should apply to all developments, and those who thought requirements were too onerous, too inflexible, will impact on viability, and therefore should only match national standards,
- Design policies were supported, but needed more clarity and more detail on disabled access and shared space, lifetime homes, tall buildings, improvement and management of historic assets including those which do not have statutory protection, biodiversity, landscape character, and waterfronts.

(iii) Managing the Needs of A Growing City

(a) The Housing Challenge

- The absence of the Strategic Housing Land Availability Assessment (SHLAA) at this stage, makes the consultation unsound, as it was not possible to understand the housing land approach. This was the most widespread comment made.
- The “step-up” of the housing requirement will store up a massive undersupply of housing and is contrary to national and regional guidance,

- The focus on urban areas and on previously developed land (PDL) is out of step with national planning policy which no longer contains a sequential approach,
- The strategy lacks clarity in terms of locations for growth,
- The focus on urban areas will fail to deliver sufficient housing, particularly family housing with gardens. Greenfield land in a variety of sustainable locations must be released in tandem with PDL in urban areas. Strategic sites should be designated,
- A selective Green Belt review is required and the Core Strategy should provide more direction on where and how this should be conducted,
- Protected Areas of Search (PAS) land needs to be tested to sieve out the least sustainable locations,
- The PDL target of 75% over the plan period (85-95% in early years) is too high relative to the Regional Spatial Strategy (RSS) target of 65% and will unduly restrict development contrary to national guidance,
- The preference for the southern half of the district goes beyond the encouragement given in RSS. It will be difficult to define what the preference means in practice,
- The “windfall” allowance of 11% cannot be justified in terms of national planning guidance. There is no reason why Leeds cannot identify sufficient land,
- Policy H3 should not preclude windfall development on greenfield sites,
- It is wrong to say that “Quality of Place” takes priority over numerical targets. They are both necessary.

Housing Mix

- A policy requirement is too inflexible and not justified. A non-binding aspiration to improve mix would be preferred,
- The market should determine what mix of dwellings is needed. Factors such as location and site circumstances should be taken into account,
- The evidence lacks consideration of demand, points to no clear conclusions and fails to account for elderly people wishing to stay in larger houses,
- The application of control through annual monitoring should be linked to vacancy levels,
- Houseboats should be considered.

Affordable Housing

SPD/DPD – Thresholds/Targets & Tenures

- Specific requirements for affordable housing should be set out in a Development Plan Document (DPD) not a Supplementary Planning Document (SPD) as it needs to be tested through public consultation and examination. Policies on specific targets, thresholds and tenure splits should not be set in SPD as this is formulation of policy, not expansion of it.

40% Target

- Object to blanket imposition of 40% (without evidence base to support this) - the policy is too prescriptive, should be more flexible and refer to individual proposals being assessed on a site by site basis subject to viability testing,
- 40% is too onerous, makes developments unviable and will discourage housing development,
- The requirement should be lower on PDL than greenfield land and certain types of development e.g. university accommodation should be exempt from the policy.

Evidence Base

- Need to be able to justify 40% and support the policy with an economic viability study. Outcome of Wakefield case may affect the direction of such policy. As no such evidence base currently exists, this part of the plan is unsound,
- Increased targets should only be promoted where there is an up to date and robust housing needs assessment (SHMA) that demonstrates the exceptional circumstances that warrants the increase. The SHMA 2007 is out of date.

Specialist Housing

General Points:

- It is unclear in H6 how the Council will control specialist forms of accommodation and which types of accommodation come under this (only elderly housing referred to),
- Evidence base to underpin the policy is required.

Student Accommodation:

- Policy H15 of UDP (Area of Housing Mix) should be in Core Strategy,
- Contrary view is that Headingley has always been a student area and there is little growth in student numbers now,
- Non-first year students don't want purpose built accommodation. Saturation point has been reached for purpose built accommodation as student numbers not increasing.

Elderly Accommodation:

- General support for H6 with regards location of sheltered accommodation being accessible to centres,
- Need more reference/clarification on Council's stance towards Lifetime Homes,
- Cross reference to SC6 care homes needed and gypsy accommodation.

(b) The Leeds Economy

- General support for economic priorities, although whether it is necessary for these to be expressed in the form of a policy is questioned,
- General support for retaining the primacy of the City Centre as the main location for retail and leisure development but some concern from developers that the economic development potential of other town centres and existing business and office parks is not being fully considered. Support for the City Centre park proposals,
- Some support for the identified employment land requirement but also a number of concerns that the requirement is insufficient to support the growth of Leeds as the main economic driver of the City Region. Also concern that the requirement is based on an out of date evidence base, which should be updated to align with RSS figures,
- Mixed opinions regarding employment land around airport. Some concerns about extending airport related development but also views that the range of acceptable uses should be widened to include hotel development and car parking,
- Policy EC6 should adopt a positive approach to the redevelopment of existing employment land for other uses,
- Some support for rural economy policy (EC7) but also concerns that the policies does not go far enough to encourage diversification of the rural economy e.g. by being over-restrictive toward large scale leisure and tourism development and economic development in the smaller settlements.

(iv) Managing Environmental Resources

- Generally positive support for policies seeking to manage biodiversity, mitigate climate change & manage environmental resources,
- Some scope to improve the clarity and intent of policies within the theme,
- Need to clarify policy intent & delivery of Policy CC1,
- Contrary concern that some aspects of policy requirements with this section are too onerous or do not go far enough,
- Need for clarity regarding the relationship of the Core Strategy & Natural Resources & Waste Development Plan Document,
- Need for a more specific strategic policy within the Core Strategy regarding Waste Management & Minerals,
- Need to more explicitly recognise energy demands and opportunities within Aire Valley Leeds,
- General support for approach to managing flood risk and the need for cost effective and appropriate measures within the Aire Valley and River Wharfe catchments (including safeguarding key infrastructure within areas of flood risk),
- Scope to improve clarity and wording of policies for managing flood risk,
- Detailed design issues and the down stream implications of the Leeds Flood Alleviation Scheme need to be addressed.

(v) A Well Connected City

Transport Investment Priorities

- General support for Transport Investment priorities and the delivery of an Integrated Transport Strategy for Leeds but need to expand transport initiatives (such as 'Car Clubs'), link the approach to the transport strategy for Leeds and regional infrastructure decisions, more integrated and comprehensive public transport solutions (such as NGT), Park & Ride and better provision for walking and cycling and local 'shuttle' services & transport provision,
- Support for the role of canals and waterways as part of a wider integrated transport strategy,
- Some concern regarding the impact of individual proposals (Tram train),
- Need to utilise opportunities to target funding more effectively and recognise financial constraints (and capacity issues on the Strategic Highways Network),
- Need to improve public transport provision in community areas (not just focus upon the City Centre) which are currently poorly served,
- Need to more effectively integrate the location of transport infrastructure and potential housing growth areas (and the overall spatial strategy of the plan) and the more effective 'joining up' of policy approaches,
- Some concern that transport proposals and initiatives need to be more radical and make better use of technology,
- Need to make more explicit policy reference to transport links to Leeds/Bradford Airport,
- More explicit policy reference should be made to the provision of Roadside Services.

Accessibility Requirements for new development

- General support for the overall approach of the policies,
- Need for development to be in sustainable locations and greater clarity regarding the quantum of development in order to understand and manage impacts (including car parking and trip generation),

- Development should only be permitted where sufficient infrastructure is in place.

Managing the Growth of the Airport

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

Next Steps

3.2 As emphasised above (para. 2.3), the report has provided an initial assessment of the consultation responses received. More detailed analysis is underway to review the responses and the City Council's response to them, which will be reported to Panel at future meetings.

4.0 Implications for council policy and governance

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

5.0 Legal and resource implications

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

6.0 Conclusions

6.1 This report has provided an overview of the Core Strategy Preferred Approach consultation and highlights the 'headline' comments received. This is not intended to be an exhaustive level of analysis to the consultation responses received or to set out the City Council's responses to them. Further detailed analysis is therefore underway and will be reported to Panel at future meetings, as a basis to move the Core Strategy process forward to its next stages of Publication and Submission.

7.0 Recommendation

7.1 Development Plan Panel is recommended to:

- i). Note the contents of this initial Report of Consultation, with a view to receiving further detailed analysis of consultation responses.

APPENDIX 1

Leeds LDF Core Strategy Preferred Approach Consultation

Programme of Events

Date	Event	Attendees
Thurs. 15th October	Meeting: Leeds Strategic Plan Group	50
Mon. 2nd November	Exhibition: Merrion Centre (10:00-14:00)	39
Mon. 2nd November Banqueting Suite, Leeds Civic Hall	Drop in Session: Target Group: Housing/Regen/Developer/Infrastructure Bodies (15:30 – 19:00 pm)	32
Tue. 3 rd November	Exhibition: Headingley Library (10:00 -14:00)	11
Tue 3 rd November Committee Room 6 & 7, Civic Hall	Members Briefing (14:00 – 16:00)	3
Wed. 4 th November	Exhibition: Crossgates Shopping Centre (10:00-14:00)	30
Thurs. 5 th November	Briefing to Area Committee Chairs.	16
Fri. 6 th Nov Committee Room 6 & 7, Civic Hall	Members Briefing 10:00 – 12:00	4
Sat. 7 th November	Exhibition: Owlcotes – ASDA (10:00-14:00)	66
Tues. 10th November	DC City Centre Panel	14
Wed. 11th November	Drop in Session: Target Group: Parish & Town Councils & Community Groups (invitations distributed also via Leeds Voice network) as well as Area Committee Reps. 15:30 – 19:30	29
Thurs. 12 th November	Exhibition: Wetherby – Morrisons (10:00 - 14:00)	32
Sat. 14th November	Exhibition: Moor Allerton – Sainsburys (10:00 -14:00)	62
Mon. 16th November	Exhibition: Otley Library (10:00 - 14:00)	14
Tue. 17 th November	Exhibition: Merrion Centre (14:00 -16:00)	32
Wed. 18th November	DC Plans Panel East	14
Mon. 23 rd November	Exhibition: White Rose Centre (10.00 - 14.00)	45
Thurs. 26th November	Meeting/Workshop: Leeds Tenants Federation. Event Facilitated by Yorkshire Planning Aid.	17
Thurs. 26th November	DC Plans Panel West	14
Fri. 27th November	Exhibition: Morley Town Hall (10:00 - 14:00)	3
Tus.1st December	Meeting/Workshop: Leeds Disability Group (14:00 - 17:00)	7

Tue. 1st December	Meeting/Workshop: with Infrastructure Providers/Infrastructure Delivery Plan (Highways Agency, Network Rail, Environment Agency, Metro, Gas, Yorkshire Water), (10:00 - 12:00)	10
Fri. 4th December	Meeting/Discussion Group: Voluntary Action Leeds @ VAL Offices, Hunslet (13:00 - 16:00). Event Facilitated by Yorkshire Planning Aid.	6
Mon. 7th December	Meeting/Workshop: Disability & Access Groups @ Leeds Society for Deaf & Blind (12:30-16:00). Event Facilitated by Yorkshire Planning Aid.	7
Wed. 9th December	Meeting/Workshop: Leeds City College (Park Lane Campus). Event Facilitated by Yorkshire Planning Aid.	37
Mon. 14th December	Meeting/Workshop: Female Asian Elders. Apna Centre, Headingley. Event Facilitated by Yorkshire Planning Aid.	10
Tues. 15th December	Meeting/Workshop: Male Asian Elders. Apna Centre, Headingley. Event Facilitated by Yorkshire Planning Aid.	8
Thurs. 17th December	Meeting/Workshop: Leeds Lesbian Gay & Bisexual Group (9:00 - 10:00)	10
Thurs. 17th December	Meeting/Workshop: Members of Leeds Voice BME Network, Josephs Well. (16:30 - 18:30). Event Facilitated by Yorkshire Planning Aid.	12
Sat. 19th December	Meeting/Workshop: Leeds Youth Council, Leeds Civic Hall (11:30 -13:00). Event Facilitated by Yorkshire Planning Aid.	34
Whole consultation period	“Facebook” online social networking group	43 Members