



Report of the Director of City Development

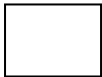
Development Plan Panel

Date: 11 May 2010

Subject: Leeds LDF Core Strategy – ‘Preferred Approach’ Analysis of Consultation Responses: A Well Connected City (Transport) Theme

Electoral Wards Affected:

All



Ward Members consulted
(referred to in report)

Specific Implications For:

Equality and Diversity

Community Cohesion

Narrowing the Gap

Executive Summary

1. At Development Plan Panel on 2 February, members received a report concerning the Leeds LDF Core Strategy ‘Preferred Approach’, setting out an initial report of consultation and a headline summary of the initial comments received.
2. Within this context, the purpose of this report, is to provide further detailed consideration of the comments received in respect of the transport theme.

1.0 Purpose of this report

- 1.1 At Development Plan Panel on 2 February, members received a report concerning the Leeds LDF Core Strategy 'Preferred Approach', setting out an initial report of consultation and a headline summary of the initial comments received. Within this context, the purpose of this report, is to provide further detailed consideration of the comments received in respect of the transport theme.

2.0 Background information

- 2.1 As noted in previous reports to Panel, the Core Strategy is the overarching and central document of the LDF process. Government Guidance (PPS12, 2008), emphasises the key role of the Core Strategy, in setting out an overall spatial vision for an area and how the places within it should develop, to provide a link to the Community Strategy (Vision for Leeds) and Local Area Agreements, and the provision of an Infrastructure Delivery Plan (IDP).
- 2.2 Following consideration of the 'Preferred Approach' document by Development Plan Panel on 30 September, a period of informal public consultation has been undertaken across the District (26 October – 7 December 2009). In support of this, a range of consultation activity has taken place. In response to this consultation activity a number of comments have been received in response to the transport theme. These are summarised in section 3 below and a more detailed summary scheduled is attached as Appendix 1 to this report.

3.0 Main issues

- 3.1 The principal theme of the transport chapter of the 'Preferred Approach' document is a 'well connected city' based on the delivery of a sustainable and integrated transport strategy to support economic growth and the RSS housing targets. At the same time the strategy seeks to address the issues of climate change; safety, security and health; equality of opportunity and quality of life. There are four policies covering: Transport Investment and Management Priorities (T1); Accessibility Requirements and New Development (T2); Freight (T3) and Managing the Growth of Leeds Bradford Airport (T4).
- 3.2 A summary of the main comments received is given below, and full details and responses are included in Appendix 1.

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;
- 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) and that the NGT proposals do not follow all the original Supertram corridors;
- 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, and to consider congestion issues outside the main urban area;
- 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, make more use of demand management 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.

Freight

- The policy makes no reference to the provision of overnight parking facilities for HGVs.

Managing the Growth of the Airport

- Mixed 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.

- 3.2 The consultation responses are on the whole supportive of the broad thrust of the transport chapter, with if anything a view that the strategy should be more ambitious. Key issues identified relate to the lack of specific interventions to meet the needs of the potential housing growth areas; the integration of the text with the map; cross referencing supporting documents; the policy relating to the growth of Leeds Bradford airport, and the need to ensure that all the proposals are fundable and deliverable.
- 3.3 Ongoing work being undertaken as part of the Leeds City Region Connectivity Study (being progressed under the Department for Transport's DaSTS programme (Delivering a Sustainable Transport System)) and the outcomes from the Transport for Leeds project will be used to refine the transport strategy. The new Leeds Transport Model (being developed under Transport for Leeds) will be used to test the impact of the land use proposals and will assist in the development of the necessary transport interventions. Further internal discussion is required to agree the appropriate policy wording for the airport.

Next Steps

3.2 The Phase 1 report under DaSTS will be completed by the end of May and reported to the DfT in June. This will identify a medium length priority list of transport schemes across the Leeds City Region, and subject to DfT commissioning, may be followed by a second phase of work to further refine the priorities. This would not be completed until the end of 2010 at the earliest.

3.3 The Leeds Transport Model is expected to be available from mid July and will enable more detailed assessment to take place of specific land use proposals and their transport implications. This is likely to require a significant level of input and analysis over a period of months through the summer and autumn.

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 further analysis of the comments received in respect of transport, as part of the Core Strategy Preferred Approach consultation. In response to comments received the schedule attached as Appendix 1 details the changes and next steps in preparing the draft Core Strategy Publication document for Panel consideration in due course.

7.0 Recommendation

7.1 Development Plan Panel is recommended to:

- i). To note and comment on the contents of the report and the course of further action (as detailed in Appendix 1) in preparing a draft Publication Core Strategy.

APPENDIX 1

**LCC RESPONSES TO REPRESENTATIONS ON THE WELL CONNECTED CITY
(TRANSPORT) THEME**

CORE STRATEGY PREFERRED APPROACH

LCC RESPONSES TO REPRESENTATIONS ON THE WELL CONNECTED CITY (TRANSPORT CHAPTER)

Representor	Those Represented	Representor Comment	LCC Initial Response	Action
Overall Strategy and Transport Investment Priorities				
J Schofield	43785	<p>The policy is not sufficiently radical.</p> <p>What is required is –Tram/trolleybus on all main radials; Extensive priority over other traffic; Car free city centre; Park and ride; Freight deliveries to out of town with shuttle service to city centre with underground service bays.</p> <p>Control speeds using technology rather than traffic calming.</p> <p>Improved highway maintenance is required.</p>	<p>The majority of responses are supportive of the general thrust of the overall strategy, although some take the view that it is not radical enough. Several responses refer to the need to ensure that it is not simply a wish list but is deliverable and fundable. Others that the land use and transport policies do not align, and also that the interventions map appears divorced from the text.</p> <p>Work on developing a transport strategy for Leeds as part of the Transport for Leeds project is ongoing. In addition the Leeds City Region Transport Strategy (Oct 2009) and the DaSTS (Delivering a Sustainable</p>	<p>Cross reference to LCRTS and DaSTS and Infrastructure Delivery Plan (IDP).</p> <p>Revise supporting text as appropriate.</p>
Inner NW Area Committee Planning Sub Group	44407	<p>Any policy that delivers an increase in private car capacity should be opposed in favour of policies that encourage edge of city park and ride, walking and cycling. Parking restrictions, speed constraint, roadspace reallocation and filtered permeability are all useful tools in curtailing unnecessary car use, improving public transport efficiency and encouraging walking and cycling.</p>	<p>Transport System) Connectivity Study (ongoing) will need to be reflected. Further work is required to establish the transport implications of the full Core Strategy land use proposals – in particular the housing growth areas, and it is accepted that this is not reflected in the current proposals map. The text in the transport chapter will be revised to better link to the transport proposals map.</p>	
Mr S Harris	43588	<p>There needs to be a more joined up and integrated approach, a bit of bus lane here, a bit of trolley bus there, is not going to meet the current or future needs, this is regardless of the failed tram scheme. The A65 Quality Bus Route is a poor version of the original proposal, the failure to acquire all the land for the scheme puts its viability into question.</p> <p>Pre-paid tickets akin to the London Oyster card is needed, and Zone for annual tickets, its cheaper to pay per journey from Kirkstall to the City Centre every working day than to purchase an annual ticket.</p>	<p>By nature of the scale of map in the document it is not possible to provide details of transport interventions.</p> <p>It is recognised that the current proposals map includes a number of transport schemes with significant cost implications. Indications are that transport spending is likely to be significantly reduced over the next 10 years, and this raises the possibility that it will be challenging for land use proposals may be supported by the necessary transport infrastructure. The role of travel planning/smarter choices is likely to have to be significant in order to accommodate the level of longer</p>	<p>Explore the potential of funding options through the preparation of the IDP.</p>

Leeds Civic Trust	43388	Generally concur with the approach - public transport improvements should also consider orbital movements. Pedestrian priority should be given far greater consideration in the design of highway schemes. Enhance railway stations. Consideration should be given for reducing traffic in the city centre,	term growth envisaged in the Core Strategy. Unfortunately, the supporters of a more radical strategy in terms of high cost interventions are likely to be disappointed, as the funding available up to 2026 will almost certainly not be sufficient to deliver the current proposals.	
Spawforths	43954 43959 43964 43969 43974	CS should encourage better utilisation of existing public transport infrastructure , including railway stations. New development should be directed firstly towards transport corridors , in accordance with a range of guidance. Only Garforth and Micklefield are mainline stations that can accommodate growth. Schemes that will create the critical mass necessary to assist with the delivery of new facilities and sustainable transport should be encouraged.	Accessibility is a key consideration when allocating new developments, so that the use of existing public transport corridors will be maximised where appropriate. The infrastructure delivery plan will provide more detail of the interventions.	
Carter Jonas	44437 44756 44757 44758 44759 44760	Measures to manage travel demand and encourage modal shift away from the private motor car are consistent with the RSS and Government guidance. We would support the generality of the priorities and measures set out in the policy TI&MP1.	See above.	Revise text to ensure development & infrastructure requirements are coordinated.
D Parker & Sons (via Lister Haigh Ltd)	43748	Links should be made to previous under utilised transport corridors.	See above.	
Aireborough Civic Society	43541	Need to focus on outer area congestion and bottlenecks. Not just inside the outer ring road residents in outer areas drive in/use rat runs because the lack of bus lanes (e.g. A65) and bottlenecks at the ring road Junction A65. NB your map emphasises the concentration of initiatives limited to within the outer ring road far too vague.		
Mrs H Longfield	43164	There is a mismatch between the location of potential transport infrastructure and potential housing growth areas. Limited transport investment is proposed for the Morley, Churwell, Lower Wortley and Middleton areas, yet three out of the eight potential long term housing growth areas are planned for these areas. The LDF should encourage coordination of infrastructure and development.	The longer term strategy of the Core Strategy,, will need to be underpinned by an Infrastructure Delivery Plan, to ensure that development & infrastructure requirements are co-ordinated.	

Government Office for Yorkshire & the Humber	44371	<p>Eco settlements – specifically Aire Valley Leeds - need to be set in a wider policy context (backed up by actions) of encouraging sustainable travel on a much broader scale.</p> <p>If housing growth is to be concentrated in the South of the district why do the transport improvements on Map 5 generally appear to be in the north?</p> <p>the transport section does not integrate with the rest of the document. There is no real sense of a transport vision how difficult it will be to achieve a growing city in a sustainable way.</p> <p>Other transport issues need considering, including :</p> <ul style="list-style-type: none"> i) how to accommodate trips generated by increased economic activity and new housing, not just trips to and from work; ii) the need to improve the public transport offer; iii) the likely need for more stringent demand management in the plan period; iv) the need to make walking and cycling more attractive options; v) capacity on the trunk road network. <p>Infrastructure delivery plan will need to deal with funding</p>	<p>Better explanation of the Urban Eco settlement to be included.</p> <p>Review of integration of transport strategy and housing growth points required.</p> <p>In the current economic situation there is considerable uncertainty over the level of future transport funding. Any proposals will need to be realistic, however, this will present significant challenges as the land use targets in the RSS were derived prior to the downturn and will potentially require significant transport infrastructure.</p> <p>The specific transport issues identified will be addressed.</p>	Revise supporting text as appropriate.
MEPC (via Savills (Northern Branch))	43982 43983	MEPC supports the notion of sustainable Transport	Support is welcomed.	None
Mr S Thomson	43001	<p>I think improving transport in Leeds is the foremost priority, schemes like the outer Ring Road improvements & NGT and Cycle routes must be driven to ensure future efficiency and prosperity of Leeds.</p>		

Natural England	44401	<p>Natural England welcomes the proposals to reduce the severance between the 'rim' and the city centre as well as the priorities to improve bus and rail networks and park and ride facilities. These will help reduce pollution levels in the urban area and the contribution of transport to climate change. Further measures could include requiring large transport intensive developments, particularly in AQMAs, to implement low emissions strategies to reduce air pollution and its effects on the wider environment.</p>	<p>To be effective low emissions strategies would need to apply generally in terms of transport not just to firms located in AQMAs. A Low Emissions Zone would be potential way forward, although this does not currently form part of the proposals.</p> <p>Cross reference to Natural Resources and Waste DPD</p>	<p>Cross reference required.</p>
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Highways Agency	43771 43663	<p>Modelling work indicates that the combination of traffic growth and the proposed development strategy would have a significant impact upon the level of service provided by the Strategic Road Network, with a marked increase in congestion, notwithstanding the implementation of the proposed managed motorway schemes on the M62 and M1.</p> <p>As the rail network is in a similar position to the SRN (in that planned future improvements are largely to address existing capacity issues rather than accommodate additional development related traffic) the focus should be on the bus network to provide additional capacity.</p> <p>There are no specific details on public transport within the document other than the schematic diagram and Map 5. It is not clear whether the proposals shown on the Map are merely aspirational or what level of commitment there is to any of the proposals. It will be vital to understand what the public transport proposals are and to be assured that they are both feasible and fundable before Core Strategy Independent Examination and before acceptance of an agreed Infrastructure Development Plan.</p> <p>We are in a position to make a substantial contribution to the evidence base needed to support the Core Strategy e.g our Network Analysis Tool (NAT), our M62/M1 and A1 Corridor Studies, the work that we will do on housing and employment accessibility, and the VSSIM models of the M621 and M1 (junctions 44-46).</p>	Engagement with the HA over the proposals in the Core Strategy will be maintained, including ongoing work on Infrastructure Delivery Plan. The development of new parking standards and the parallel utilisation of smarter choices, together with the introduction of enhanced public transport, will be used to minimise the impact of additional traffic on the SRN.	Revise supporting text as appropriate. Cross Ref Infrastructure Delivery Plan.
Scholes Community Forum	44793	The failure of the current service providers to meet the present Ltp2 objectives is cause for concern. Failure to secure funding for “Supertram” and the ambiguity surrounding funding for NGT or East Coast Main line services casts doubt for reliance on the “wish list” accompanying the overall strategy. The authority’s reliance on “hopes”, when determining policies, to be achieved during the plan period is questionable.	In the current economic situation there is considerable uncertainty over the level of future transport funding. Any proposals will need to be realistic, and will be detailed in the Infrastructure Delivery Plan. The NGT scheme achieved DfT Programme Entry status in March 2010.	Cross Ref Infrastructure Delivery Plan. Revise supporting text as appropriate.

The Oulton Society	43423	it is considered that development should only take place when infrastructure is under construction or a scheme is imminent.	Individual land use proposals will be linked to specific transport requirements, where appropriate, that would require their construction prior to any development. e.g East Leeds Orbital. Phasing will be covered within the Infrastructure Delivery Plan.	Revise supporting text as appropriate. Cross Ref Infrastructure Delivery Plan.
North Yorkshire County Council	43940	The County supports proposals to provide the necessary physical and transport infrastructure and to ensure that appropriate employment and commercial land and office development is available to meet the Core Strategy's wider objectives	Support is welcomed.	None.
Metro	43668	Metro is encouraged by the tone of the document and that public transport has been recognised as a key part of the development of the city. Enhancing, making best use of existing public transport and improving accessibility where necessary is a consistent theme running through the document. This has been embedded with a number of spatial policies as well as a key consideration in transport specific policy. Metro supports the use of the DaSTs approach as a framework to accommodate the additional growth, improve journey time, improve connectivity to other destinations outside the City Centre and to manage the demand to travel by car. Metro unequivocally support these principals.		
Weetwood Residents Association	43829	The emphasis on consolidating development in existing areas and encouraging use of public transport and non-car modes of travel should be complemented by policies which seek to minimise the need for travel such as maximising flexibility in the use of buildings through mixed-use developments and live/work arrangements.	The site allocations DPD will promote mixed use developments for certain locations, however, in general there is little guarantee that they will be effective in minimising travel. The one area where this can be more successful is in the city centre and this will continue to be a focus.	None.

Bus

Leeds Teaching Hospital	44478	The Trust remains concerned that, as most of the bus routes within the city are radial in nature, getting across the grain of the city to some of its sites by bus is still difficult.	<p>Within the current deregulated bus market this is an area than is entirely under the control of the operators.</p> <p>Unfortunately, DfT approval (programme entry) for the NGT scheme currently no longer includes the link to St James' hospital and this element of the scheme is no longer being progressed, although it is part of the longer term aspirations.</p>	Update text
Mr M England	43595	<p>I am writing in reference to the proposed East Leeds Extension between Scholes and Whinmoor. I and my family live in Scholes and we have several major concerns about the proposed development of houses that would be built between Scholes and Whinmoor [including]:</p> <ul style="list-style-type: none"> Public Transport: The village of Scholes being relatively small is consistently overlooked in terms of public transport infrastructure. For example the recent reduction of bus services by First Bus with practically no intervention by LCC makes accessing timely public transport extremely difficult. How will the enlarged areas public transport infrastructure be improved to provide the basic service required now and an enhanced service required for the additional population? 	<p>Within the current deregulated bus market LCC have no control over the provision of bus services. Metro do provide financial support for evening and Sunday services, however, budgets are limited.</p> <p>Nevertheless, the East Leeds Extension would provide an additional catchment for public transport which would potentially make services more viable, and could therefore result in enhanced services for Scholes.</p>	None.
Metro	43668	With regard to the highway proposals for the City Centre, the circulation of bus services should be a key consideration in any highway changes. This includes making provision for additional kerb space for bus services as well as ensuring suitable locations are identified for interchange between services to allow improved access to development in the Rim area.	Too detailed for Core Strategy, however, consultation with Metro will be key to developing proposals for the City Centre.	None
Rail				
Mr R. Grahame	43719	Provide a railway station to serve Rookwood/Osmondthorpe	The proposals for new rail stations are based on : Investing in Public Transport – A Framework for Leeds	Cross reference to

Highways Agency	43771	<p>The Agency welcomes proposals for new stations at Kirkstall Forge, Horsforth Woodside and Apperley Bridge (Bradford).</p> <p>The Agency is working with relevant stakeholders over the proposed East Leeds Parkway Station and the potential for this station to become a strategic park and ride facility. The results of this dialogue should be fed into the Core Strategy.</p> <p>The proposal for a new station in the Stourton area, in combination with the enhanced Knottingley-Castleford-Leeds rail service proposed in the RUS, would strengthen links between development areas in Wakefield and the Aire Valley to the benefit of the SRN. The proposed station would have a negative effect on the SRN if it had a park and ride role.</p>	<p>(LCC/Metro, March 2009) and The Leeds City Region Transport Strategy (Oct 2009). These include proposals for new stations at Apperley Bridge, Kirkstall Forge and East Leeds Parkway (and these have all received RFA support). Horsforth Woodside is a longer term aspiration, linked potentially to tram train.</p> <p>Proposals for a new station at Stourton to serve the Aire Valley are no longer being progressed.</p> <p>Consultation outcomes with the HA over East Leeds Parkway will be incorporated where relevant.</p> <p>Any consideration of new stations needs to take account of the impact on existing services/capacity, together with the potential demand arising from the station. There are few locations where line capacity can be maintained without costly additional works to provide passing loops for express services (line capacity is a particular issue for the Leeds-York/Selby line). In addition, new stations within the urban area of Leeds –such as Osmondthorpe - would not provide much journey time advantage over buses or NGT. Rail is better suited to longer distance commuting.</p>	LCRTS and Investing in PT.
Spawforths	43954 43959 43964 43969 43974	<p>Needs to take account of regional infrastructure decisions eg Electrification of the Leeds/Selby/east Coast line. This will reduce pressure on the Wakefield route to London, which would allow a reassessment and feasibility study of closed and new stations including one at East Ardsley.</p>	<p>The Yorkshire and Humber Route Utilisation Strategy (July 2009) states that: ‘The proposal put forward by the former Great North Eastern Railway (GNER) for an “electric horseshoe” providing a circuit whereby London – Leeds services could return to London without reversal via a continuous circuit of electrified lines is not currently being pursued by any party. The wider issue of electrification strategy has been addressed in the Consultation Draft of the Network RUS Electrification Strategy, published in May 2009.’ None of the outline consideration reported in the RUS has any mention of the potential for new stations.</p>	
Mr D Deebank	44630	<p>The logic regarding shops, offices etc in the central locations good but it’s success is greatly dependant upon some form of transport system from the suburbs. My own thoughts are centre on a railway system with few intermediate stops but each stop would be a local transport hub/ interchange plus plenty of car parking spaces. I’m disappointed to see no such arrangement in the NE quadrant where my wife and I now reside. Buses and trolley buses are not the answer. Too many stops with no facilities e.g. toilets for workers / passengers. No covered facilities for bicycles.</p>	<p>There are no plans for a comprehensive new system as proposed by Mr Deebank – this would be prohibitively expensive.</p>	

Mr WH Tymms (Harrogate Line Rail User)	43027	Strong objection to suggestion to run a tram train on the Harrogate line. Would involve closure of line for 2 years to create infrastructure. Would lose line as heavy rail route. Would lose National Express' contingency rights to run extra trains from London to Harrogate via Leeds using the Hambleton curve. The Yorkshire and Humberside RUS identifies a need for extra services to run to Horsforth with new signalling and a turn back facility. If insist on a route to the airport, should be a line just from Horsforth to protect the existing busy rail route.	Both the LCRTS (Oct 2009) and 'Investing in Public Transport – A Framework for Leeds' (LCC/Metro, March 2009) make reference to solutions to boost capacity on the Leeds-Harrogate line, including tram train, as well as improving access to LBIA by tram train. This project is also being considered as part of the DaSTS work. The RUS proposals for a turn back facility at Horsforth would not be incompatible with tram train and could allow tram train conversion to be progressed in phases.	
Government Office for Yorkshire & the Humber	44371	There is no mention of the problem with interchange in Leeds arising from the rail and bus stations not being co-terminus.	Proposals for a city centre transport strategy are being developed and will be incorporated within the Core Strategy.	Revise text as appropriate
Mr S Garforth	44784	No apparent thought has been given to provision on a new high speed rail infrastructure alignment - this should be far more important than encouragement of basically short term growth of LBIA since LBIA will be closed in 50yrs. Air travel will be seen as antisocial other than inter continental travel.	National consideration of high speed rail is at an early stage, and until further clarity is available it would not be appropriate to make any allowance in the Core Strategy. Recent government proposals do not envisage high speed rail to Birmingham until 2025, so any scheme to serve Leeds would be a much more long term intervention.	Refer to long term potential
Mr R. Grahame	43719	Freight and storage distribution – the European rail connection should be enhanced to come in to Leeds to the Stourton bonded warehouses and on to Leeds City Station for business and leisure in to Europe.	The main London HS1 interchange at St Pancras provides a high level of connectivity with Leeds-London rail services at Kings Cross. The Natural Resources and Waste DPD recognises the benefits of utilising non-road transport for freight movements.	Revise supporting text to refer to DPD.
New Generation Transport				
Dr P Greaves	42714	Extend the NGT network to offer circular and connecting shuttle routes, e.g. around the ring road with intersecting shuttles between the City Centre and Otley, Wetherby, Wakefield, Bradford etc. Consider the light rapid transit system for disused railways.	The NGT scheme being promoted by LCC/Metro is based on a strategic review of the potential for significant public transport enhancements within the city. (Strategic Context for Public Transport Investment in Leeds. (Arup, August 2008) and the accompanying summary document: Investing in Public Transport – A Framework for Leeds (LCC/Metro, March 2009))	Cross reference to Investing in Public Transport.
Barwick in Elmet & Scholes Parish Council	44442	The East Leeds Extension promoted on Transport Policies such as “Supertram”, which is now superseded by a NGT bus proposal which does not terminate in proximity to the site. The Current proposal questions the infrastructure requirement and may be subject by us for challenge relating to the authority of land release.	The Review considered the impact of future land use changes up to 2021 based on allocations in the UDP and the (at the time) emerging Area Action plans for EASEL, City Centre, West Leeds and the Aire Valley. Overall	Revise supporting text to refer to main schemes and commitments

Spawforths	43954 43959 43964 43969 43974	Supports Bus Rapid Transit system, but should follow entire former Supertram proposal if aspirations to grow modal; share are to be achieved. In particular, the extension of the route to Tingley would have significant benefits, and could be used as a Park and Ride.	changes were capped at the level of the RSS and the Yorkshire Forward employment forecasts. The report concluded that the strongest case for rapid transit interventions was on the A660 and M621 (E) corridors. Further work was recommended on the potential for schemes to serve the EASEL and Aire Valley areas.	.
Leeds Teaching Hospital	44478	LGI and SJUH are noted. There is regret that the east Leeds route will not extend to Seacroft in its initial phase, this is a missed opportunity.		
Highways Agency	43771	The Agency is already considering the impact of the NGT southern route and the proposed park and ride at Stourton in association with Leeds City Council. There is a need for a 'fallback' bus priority / BRT position if the business case for NGT is not accepted by DfT. The Agency has already commented on the proposal for an NGT extension into the Aire Valley Leeds AAP area – welcoming the concept as a key to influencing mode share. Two other NGT extensions are proposed on Map 5 – Boddington to Holt Park is of no concern to the Agency, but the proposed extension from St. James's Hospital to Seacroft is welcomed. We do ask why the Seacroft extension is not shown to continue to the Whinmoor bus park and ride site on the A64.	The role of P&R at Grimes Dyke (Whinmoor) and service by NGT will be reviewed as part of the Transport for Leeds and DaSTS studies. (Transport for Leeds is a 2.5 year study funded under the DfT Transport Innovation Fund. It is centred on Leeds, with the objective of developing a 20 year transport strategy for the city. The DaSTS – Developing a Sustainable Transport System – study is looking at prioritising transport intervention in Leeds City Region principally for the period 2014-2019. Both have similar objectives in terms of supporting economic growth and addressing environmental, safety and social issues.). P&R proposals at Tingley are not being considered at the current time.	
Metro	43668	T1 & MP1 - Metro also encourage the inclusion of investment in 'Rapid Transit' as a separate priority for infrastructure improvements and investments. This encompasses both New Generation Transport (NGT) and Tram Train.	Text will be reviewed.	Update as appropriate.
Park and Ride				
Mr R Tyrell	42842	Why not have a lot more park and ride centres? York does this well - Why can't Leeds do the same?	Park and ride is considered to form a key part in the future transport strategy for Leeds. Together with rail it is seen as the way forward to provide more sustainable access to Leeds city Centre from communities outside the main urban area of Leeds. (Surveys show that 75% of am peak period traffic with a CC destination starts its journey outside the ORR. Even in the inter peak this figure is still 60%). Whereas rail would normally give faster journey times, the network is limited to certain corridors and stations,	Update supporting text.
Mr M Clerk	43097	Any new transport infrastructure need to consider improved public transport not park and ride which only solves local congestion not sustainability.		Individual sites will need to be referenced in Site Allocations DPD.
Mrs J Clerk	43119	Investment is also needed to ensure adequate public transport from City Centre to towns i.e. Otley – one shouldn't need a car and bus to reach work! Park and Ride only solved city centre congestion and doesn't address the sustainability of travel.		

Spawforths	43954 43959 43964 43969 43974	Supports proposals for Park and Ride and new local railway stations.	and the costs of providing new stations are high. In addition, rail station parking is limited at many locations with little scope for this to be expanded. Park and ride is therefore seen as a way of addressing gaps in the rail network.	Implications for saved policies need addressing.
Highways Agency	43771	In some circumstances, park and ride facilities have the potential to attract commuter trips onto the SRN. Therefore the Agency will require to be consulted on park and ride strategy and the location of all proposed park and ride sites.	Future employment growth in the City Centre will depend on achieving high levels of sustainable travel as highway and parking capacity will severely limit the scope for car travel, and environmental considerations would preclude any expansion.	
University of Leeds	43886	Provide park and ride in several locations.	Where facilities are proposed adjacent to the SRN full consideration of the impacts will be undertaken in dialogue with the HA.	
Scholes Community Forum	44793	Investment in Park and Ride should be sought for both Rail and Bus facilities.		
David Lock Associates	44611	We remain committed to working with partners in south Leeds but are concerned that the Core Strategy represents a missed opportunity to plan for long term economic regeneration and growth. Designating south Leeds as a Strategic Development Location would provide for a number of benefits: [including] help transform public transport infrastructure including a potential park and ride facility , new transport interchange and guided bus corridor to reduce car usage.	Comments appear to relate to specific site(s). The role of P&R and enhanced public transport is being considered as part of the Transport for Leeds and DaSTS (Developing a Sustainable Transport System) studies.	None
Parking				
Highways Agency	43771	Effective demand management will be vital in securing solutions that enable the planning needs set out in the Preferred Approach to be satisfied whilst also allowing the SRN to perform its primary strategic function. We will expect to see policies in the final Core Strategy that require the application of parking standards that are less generous than RSS levels. This does not appear to be reflected in Policy T1 & MP1 or in Policy T2 which makes reference to 'current guidelines' for parking provision.	New parking guidelines are to be developed. These will take account of the RSS and the recently published PPS4. Workplace parking for new developments will be controlled by the use of maximum parking standards. Over time, as existing sites are redeveloped, there will be a change in the provision. There are no proposals to charge for workplace parking. Equally, the use of emissions levels to control access to city centre car	Review role of new standards in Core Strategy/SPD. Modify supporting text and

University of Leeds	43886	Parking: phase out free workplace parking; differential charges for vehicles of different emission levels in all city centre car parks.	parks would be incredibly complex and expensive. Furthermore, Council control over public parking is limited in the City Centre. A more appropriate way of reducing emissions would be by way of a Low Emissions Zone, although this does not form part of any transport proposals at this time.	policy T2.
Mr S Harris	43589	T1 - 'Managing supply and use of parking' is a double edged sword , not providing the parking just relocated the problems in to the local neighbourhoods, e.g. Immigration centre on Kirkstall Road with restricted parking for staff and no visitors has choked the local residential streets with staff who no longer drive to work, but drive to the street opposite work. Residents only schemes just move the problems along one.	Parking guidelines have to comply with relevant guidance. DCLG have recently issued PPS4 which states that parking standards should align with the relevant local transport plan and regional strategy. The role of the Core Strategy is to ensure that new development takes place in the right accessible locations so that the need to travel by car is minimised.	None
Cycling and walking				
Mr R Tyrell	42842	It is time cyclists had continuous routes away from cars.	Support for walking and cycling is welcomed.	Cross Reference to Core Cycle Network. Revise supporting text as appropriate.
Government Office for Yorkshire & the Humber	44371	The outer edge of the Rim is approximately 2km from the transport interchanges in the City Centre (Map 3), or 30 minutes walk, making it a significant challenge to provide access to development in the Rim by sustainable means.	The Rim shown in Map 3 is diagrammatic. However, 2km would normally take less than 30 mins to walk, although the main point is acknowledged. A key approach to this will be to improve the ability to interchange within the City Centre, so that these journeys can be made by bus or NGT.	
Leeds Civic Trust	43388	Pedestrian priority should be given far consideration in the design of highway schemes.	The inclusion of details of walking and cycling schemes would not be appropriate at the scale of the current map. Consideration of pedestrian requirements is, however, much more fully integrated into transport interventions than in the past.	
Horsforth Riverside LLp (via Drivers Jonas)	43760	In bringing forward residential development on the Riverside Mill site, it is expected that linkages with the adjoining public transport and pedestrian/ cycle network will be improved.	The Riverside Mill comment is beyond the scope of the strategy. Individual sites will be covered in the site allocations DPD. Consideration will be given to explicitly referring to towpaths.	
British Waterways	44418	British Waterways supports the delivery of an integrated transport strategy for Leeds and improvements to existing infrastructure, including the waterways and towing paths. Policy T2 - BW welcomes the suggestion that where appropriate new development should contribute to improving access to walking and cycling routes. We suggest that specific reference is made in the policy to waterway towing paths.		

NHS Leeds	43657	T2 Transport - This policy relates to accessibility requirements and new developments. Can we include children in here more specifically? Children's cycling needs are crucial if we are to expect future generations to cycle as adults. The development of cycling infrastructure in Leeds should consider children's safety and create environments in which they can develop their skills and where parents can feel confident to encourage their children to cycle	<p>The point about cycling infrastructure and children's safety is too detailed for inclusion in the Core Strategy. Nevertheless safety is a key issue when schemes are designed and the development of the Core Cycle Network will deliver seventeen signed routes using a combination of cycle lanes, tracks, quiet roads and junction improvements to link to housing, Leeds City Centre, schools, employment sites, parks and greenspace, and the wider bridleway and cycle route network.</p> <p>The City Council has invested significantly in the National Cycle Network and the developing Leeds Core Cycle network is designed to make the necessary links with the NCN.</p>	Revise supporting text as appropriate.
University of Leeds	43886	Improve walking routes into the city centre.		
Inner NW Area Committee Planning Sub Group	44407	Walking and cycling need to be central to the strategy. Should recognise the importance of developing high quality cycle routes, reducing CO2 from transport, reducing car dependency, and restraining traffic growth. The CS needs to help create an environment where more people are prepared to walk and cycle for short distances. The Leeds Cycle Network should be fully integrated with the National Cycle Network to secure external match funding.		
Ms Garance	43023	5 - Well connected city- "the Challenge is to encourage a greater proportion of journeys to be made by public transport, cycling and walking". To take up that challenge n look no further than the bridge linking Little woodhouse and Great George Street - the bridge is sitting on the inner-rim of the city waiting to be redeveloped into a significant new public space. Already it is linking a network of key routes for pedestrians and cyclists, but does absolutely nothing to contribute to standards of best practice in the public realm. The area should be regenerated in to a high quality Gateway appropriate for 24 hour usage. With imaginative and innovative use of infill and reclaimed space, a hospitable and green corridor could be created to form more than just a link route.	<p>Connectivity with the Rim is being considered as part of the work on a city centre transport strategy.</p> <p>Too detailed for Core Strategy.</p>	None

Highways				
Mr WH Tymms	43027	Disappointed airport road route only goes to the A65, which would not decrease the volume of traffic on the A6120/A65 roundabout. Could a way be created from the A6120 ring road using an improved road from Calverley Lane past the crematorium to the A65? Could link in with road infrastructure for plans for the Clariant works and Riverside development.	Development of the link road scheme is still ongoing, however, proposals are also being developed to signalise the Horsforth roundabout.	None
Highways Agency	43771	The Aire Valley North – South Link is essential for development of sites in the Aire Valley. It also has the potential for relieving M1 between Junctions 45-44 but it could place extra stress on these two junctions. This needs to be assessed using the VISSIM model. The potential impact of the proposed East Leeds Orbital on the A63/M1, A63/A1 and A64/A1 junctions will need to be considered in combination with possible housing growth in the Garforth and Micklefield areas. Policy T1 and MP1 also specifies a priority of orbital highway improvements . However, it does not set out which routes are being considered. Map 5 shows the M62 and M1 forming part of the outer loop. This will have implications for the SRN and any proposals must therefore be developed in close consultation with the Agency. There is an incorrect reference to the M62 Improvements on Map 5 – it should refer to Junctions 25-30.	Where facilities are proposed adjacent to the SRN full consideration of the impacts will be undertaken in dialogue with the HA. Policy T1 was written to be non scheme specific. Better coordination is required between the text and the proposals map. Map notation error noted.	Revise supporting text as appropriate.
Aire Valley Leeds				
Swayfields (Skelton) Limited (via Turley Associates)	43931	The delivery of AVL requires improved infrastructure including enhanced transport infrastructure. This should be reflected in the provision of Policies T1 and MP1.	Consider including specific reference in T1	Revise text as appropriate

Goodman International (via White Young Green Planning)	44014	We support the principle of the Council's delivery of an integrated transport strategy for Leeds. Out of centre office development has the potential to reduce the impact of traffic within the centre, but Goodman consider it important for employees of Leeds Valley Park to be able to access the city centre. More detail is required on the emerging Transport Strategy.	More detail will be provided on transport strategy. Issues over LVP access are related to provision of bus services which are commercially operated. Too detailed for Core Strategy.	None
Templegate Developments Ltd (via Barton Willmore Planning Partnership-Northern)	44477	Templegate Developments supports the extension of NGT into the AVL strategic regeneration area.	Support is welcomed.	None
Airport				
Mr M Staniforth	42822	Should be much more aggressive in restricting and reversing airport growth. Allowing continued growth is irresponsible in environmental and climate change terms. The airport is too big now and should be shrunk not developed.	The Future of Air Transport White Paper (ATWP)(2003) supports the growth of LBIA subject to improvements to both public transport and road access in the medium term.	Further internal discussion required.
Mr R Davis	42611	The planning of the transport requirements due to the imminent expansion of Leeds / Bradford airport is totally inadequate and pathetic. Problems are increasing everyday and there appears to be no answers immediately to hand. The problems, including grid lock on some roads at certain times is unacceptable and need addressing now and not put off until passenger numbers get to a specific number.	The Leeds City Region Transport Strategy (LCRTS)(2009) also identifies the need for improved access to the LBIA, particularly by public transport. The text in Policy T4 needs to be better aligned with the proposals map. More clarity is required with regards to the level of public transport interventions required to permit further growth. The highway link road is not referenced in the text, and yet is shown on the map.	Cross Ref to White paper and LCRTS.
Mr S Harris	43590	As above, the A65 can not cope with the additional traffic generation from any Airport expansion.		
Aireborough Civic Society	43543	No - Recent planning permission for the airport terminal building placed no requirements to improve road infrastructure nor any new limits on aircraft noise (no limits or restrictions at all exist for light aircraft flying over built up areas.	In the short term the A65 Quality Bus Scheme will improve bus access from the CC along the A65. Construction is due to commence in 2010 following approval by DfT.	
Mr R Hill	42654	I would prefer that the airport does not expand at all and I'm particularly opposed to the proposed new road link from the A65 through greenbelt land. If the airport is serious about growth then this should only be permitted if a light rail (or similar) connection is made from the Leeds Harrogate rail line.	Need to consider whether thresholds would be appropriate to trigger new transport interventions.	

Highways Agency	43781	Leeds Bradford International Airport (LBIA) Expansion of the airport will most certainly generate additional vehicular trips from within the region and beyond, thus increasing vehicular traffic on the SRN. The Council would therefore have to demonstrate how any additional trip generation would be reduced. It would also have to demonstrate how surface access will be substantially improved by sustainable modes of transport. There is a proposal for a tram-train link to LBIA, but it does not figure in Network Rail plans for Control Period 4 (2009-2014) set out in the Route Utilisation Strategy for Yorkshire and Humber.	Growth at Leeds Bradford airport is likely to reduce the need to travel further afield to other airports (on the SRN) and could potentially therefore have a positive impact on the SRN. Investigating the scope for tram train is included within the Leeds City Region Transport Strategy (Oct 2009). Given likely funding limitations this is likely to be a longer term intervention. (Post 2020). It is not considered that more substantial interventions would be likely within the Plan period, however, the LCRTS includes the provision of enhanced rail connectivity to Manchester (a major airport hub with a wide range of international flights).	Further internal discussion required. Cross Ref to White paper and LCRTS.
Stanks and Swarcliffe residents Association	43723	The rail connection to Leeds Bradford Airport is required and this will create jobs for our local communities.	The LCRTS / ATWP analysis indicates that both LBIA and Manchester Airports are expected to grow significantly, with Manchester Airport attracting significantly more passengers than LBIA, but for LBIA to play an increasingly complementary role to Manchester in supporting the economic competitiveness of the city region.	
Mr M Clerk	43099	Allowing the airport to grow will become unsustainable without much better transport links than you are proposing. Increased air travel will add to Leeds carbon footprint through LBA. What is needed is a fast rail link to a major hub airport - not a regional airport link LBA or Robin Hood.		
Mrs J Clerk	43121	Airport growth is not sustainable. The airport focuses on tourism but needs rail infrastructure to improve travel logistics and increase commercial use. Think other airports are in better location for expansion than Leeds / Bradford.	The Future of Air Transport White Paper (2003) supports the growth of LBIA subject to improvements to both public transport and road access in the medium term.	None

Natural England	44403	Natural England does not agree with the policy to manage the growth of Leeds Bradford International Airport. While the focus on sustainable transport and environmental assessment in the policy is important, Natural England would expect to see a far greater emphasis on ensuring that any development at the airport is not detrimental to landscape character; does not impact on designated sites for biodiversity as well as priority habitats and species; minimises noise and tranquillity impacts; has regard to public rights of way; minimises air quality impacts and considers impacts on the road network; and minimises land take. They would also expect to see sustainable design and the use of renewable technology in the policy. Further refinements to the policy may be required as a result of undertaking habitats regulations assessment on the core strategy.	Any interventions will seek to minimise the impacts.	Revise text as appropriate & address as part of Sustainability Appraisal / Appropriate Assessment requirements.
Inner NW Area Committee Planning Sub Group	44404 44411	Good intentions of the Well Connected City chapter undermined by pages about Leeds Bradford Airport, which will wipe out any potential transport emission savings gained elsewhere. The Government will support airport growth but only if the Council can show it is making compensatory bigger emission cuts elsewhere. So which Leeds residents are going to have to take a hit and why not those who fly? Policy T4 Inconsistent with the UK Climate Change Act and CO2 reduction targets unless it is amended to impose on the airport operator a further requirement to demonstrate airport growth and carbon emission reductions. It will soon be a breach of international and national law to expand airports without meeting CO2 reduction targets. Policy needs to identify where compensatory emission cuts will come from.	Climate change targets are a matter for national policy and are outside the scope of the Core Strategy.	None
Leeds Civic Trust	43390	Any spend on LBIA should be carefully balanced against other transport priorities.	The delivery of improved access to the airport has been identified as a priority in the LCRTS, but would nevertheless be subject to the normal scheme appraisal process. A significant decline in the growth of air travel would make progression of such interventions less likely in the short term.	None
University of Leeds	43888	It seems to me that the further substantial growth of the airport is unlikely, given the outlook on energy prices and carbon taxes. Improved connection to whatever size of airport would be a benefit for various reasons but funds should not be diverted to this purpose from other pressing needs.		

Mr LJ Jackson	42674	Speed up the Leeds Bradford Airport Strategy including public transport links.		
Bradford Metropolitan District Council	44425	Policy T4 on managing the growth of Leeds Bradford International Airport is welcomed and supported.	Support is welcomed.	None
Metro	43668	<p>The Leeds City Region Transport Vision identifies the connectivity of LBIA as a category A intervention priority. The development of the airport is therefore supported by Metro subject to the interventions required to meet the travel demand as identified in point A of the policy. Point B of the policy requires the transport strategy to identify funding. Whilst we understand the principal of these requirements, we are unsure who would be responsible for producing this document or who would be expected to fund any intervention identified.</p> <p>Metro supports the development of an LBIA SDP / DPD which details the infrastructure requirements for the development of the airport. Such a document would need to consider the Surface Access Strategy, Airport Master Plan, LTP2 / LTP3 and the Leeds City Region Transport Strategy.</p>	<p>Support is welcomed.</p> <p>The existing Airport Surface Access Strategy (May 2006) was produced by LBIA. It would be expected therefore that a revised airport transport strategy would also be undertaken by LBIA in consultation with LCC and Metro. Funding will be considered in the Infrastructure Plan.</p>	Revised text.
Miller Homes (via Mosaic Town Planning)	44022	Support for the improvement of surface access to Leeds Bradford Airport.	The delivery of improved access to the airport has been identified as a priority in the LCRTS. Funding constraints are however likely to affect the delivery of such schemes.	Further internal discussion required.
Learmonth Property Investment Company Ltd (via CB Richard Ellis)	44347	Supportive of airport link road and potential tram train , on the basis that improved infrastructure is merited by the proposed improvements and planning increase in passenger numbers at the airport.		
Montpellier Estates (via Aspinall Verdi)	43634	LCC should ensure that the investment is in place to enable the growth of LBIA which should not be constrained. In an ideal world this investment should take place first, however, where the private sector is willing to invest in the airport this should not be curtailed and the 'public sector' infrastructure can 'catch up'.		

LBIA (via White Young Green Planning)	43040	Given that the supporting text acknowledges the role of LBIA within the integrated transport system for Leeds, we do not understand why LBIA transport links have not been addressed in Policy TI & MP1.	Consider including specific reference in T1	Consider revising text
Learmonth Property Investment Company Ltd (via CB Richard Ellis)	44348	Fully support the principle of continued improvement and expansion of the airport. However, Policy T4 makes no reference to the potential for growth of associated infrastructure outside of the airport's operational boundary. Policy needs to give direction to the potential for the growth of ancillary developments such as airport car parking, hotels and leisure facilities , having regard to the availability and proximity of the Airport Industrial Estate and its ability to play an integral part in the future growth of the airport.	Further internal discussion required.	Further internal discussion required.
D Parker & Sons (via Lister Haigh Ltd)	43750	The site could help to provide the requirement for 185 hectares of local employment opportunities, being adjacent to the motorway network to attract distribution businesses and close to Leeds Bradford Airport (20-30 mins). Links could be made with Leeds Universities as well as York for research and innovation related business.	Appears to relate to a specific development site. These will be covered in the Site Allocations DPD.	None

<p>BIA (via White Young Green Planning)</p>	<p>44106</p>	<p>The improvement, growth and success of LBIA should be included as a key objective within the key long term ambition of going up a league and developing Leeds' role as the regional capital and support for improved surface access links to LBIA under the same sub-heading.</p> <p>The growth forecasts contained in the ATWP and the masterplan should be referenced and in accordance with these documents, the growth of the airport should be supported in principle.</p> <p>Reference should also be made in the supporting text/context to the economic benefits of LBIA, citing the GVA generated by LBIA, its importance as an employer in its own right and its potential to generate more jobs and generate further economic benefit to the City and Region in the future. Reference should also be made in the supporting text to the 'leakage' of passengers from LBIA to other airports further afield.</p> <p>increasing the patronage of the North's airports will reduce the numbers of people driving from the North further away to other airports, which would lead to direct reductions in congestion and emissions. Government's policy in the ATWP was informed by a careful consideration of climate change and now forms part of the Government's policy on that issue.</p> <p>•It is not Government policy to require every sector to follow the same path in reducing overall greenhouse gas emissions. Growing industries such as aviation are to be catered for within a reducing total.</p> <p>it would be informative to explain that a formal Sustainability Appraisal (SA) was undertaken in the preparation of the LBIA masterplan, that there is both an Airport Transport Forum and a Steering Group reviewing the impact of LBIA on the local highway network and there is funding in place from LBIA to make improvements to public transport and/or road infrastructure in the future. There is also a detailed noise monitoring system to protect the amenity of local residents.</p>	<p>The comments here are primarily connected with the emphasis in CS relating to supporting growth at the airport. Consideration will be given to the points raised.</p> <p>There is a question mark about the relevance of the 2003 ATWP and the 2005 LBIA Masterplan in today's economic climate and the validity of the growth assumptions. However, airport growth will be ultimately driven by market demand, and on this basis policies need to be in place to mitigate the impact.</p> <p>Need to consider whether thresholds would be appropriate to trigger new transport interventions.</p>	<p>Further internal discussion required.</p>
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	<p>Policy T4 indicates that supplementary guidance will be produced “to manage any local impacts and implementation issues”. This explanation for supplementary planning guidance is vague and unclear. Neither the draft Policy T4 nor the supporting text clarifies the reason for its preparation, its objectives or how it will support Policy T4 in decision making.</p> <p>The Airport Operational Land Boundary (AOLB) is defined in the current Leeds UDP, common with many local authorities approach to airport development. This is currently addressed under UDP Policy T30A. The UDP also includes Policy T30B: Airport Public Safety Zone and Policy T30C: Aerodrome Safeguarding Area.</p> <p>These policies should be included in the Core Strategy and annotated as appropriate on the new Proposals Map.</p> <p>The following replacement draft Policy T4 is proposed:</p> <ul style="list-style-type: none"> - LBIA is recognised as an asset of City and Regional significance. It is a key driver of the City and Region’s economic growth, prosperity and competitiveness and is a key element of the City and Region’s transport system. - LCC support the continued improvement and growth of LBIA in accordance with the ATWP subject to: Seeking to ensure that any new operational development minimises its impact upon the local environment including the local highway network In addition: LCC will work with LBIA and other partners to maximise accessibility to the airport by public transport and other sustainable means in preference to single occupancy car journeys. <p>LCC will work with LBIA and its partners to secure long term improvements to surface access to the airport including the development of an airport link road and tram train/rail link.</p> <p>LCC will work with LBIA and other partners, including the local community, to seek to minimise the environmental impact of operations at, and connected with, the airport.</p>	<p>It is anticipated that these will continue as ‘Saved policies’.</p>	
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Developer Contributions				
D Parker & Sons (via Lister Haigh Ltd)	43748	Developer contributions would be sought to provide on and off-site improvements to transport.	Policy on developer contributions is no different from current situation and will continue to be sought. Need to ensure that this is reflected in text.	Revised text as appropriate
Barratt Strategic (via Turley Associates)	44538	The policy should be clear that developer contributions can and will only be sought where they are required and directly related to the development giving rise to the requirement.		
Highways Agency	43771	If new capacity or some other improvement to the Strategic Road Network is required to mitigate the impact of traffic generated by development after all demand management and travel planning opportunities have been exhausted, it will need to be funded by the developer or through some other mechanism.		
Scholes Community Forum	44793	Connectivity and Accessibility made possible through developer contributions as outlined in policy T2 is key to underscoring both the housing and economic vision; for this reason the word “may” in bullet point two is thought to be less than robust.		

Metro	43668	<p>Metro also support the use of the Public Transport Improvements and Developer Contributions SPD. We are concerned that the introduction of the CIL regulations effective 6/4/2010 will mean the SPD can no longer be applied. It is our understanding that Leeds will not be in a position to implement CIL by 6/4/2010 and therefore could potentially be unable to have a policy mechanism to secure developer contributions for more strategic schemes identified as investment priorities in Policy T1 and local interventions identified in T2. Given the limited life of the Public Transport Improvements and Developer Contributions SPD, policy T2 needs to be strengthened to include a requirement to contribute towards strategic public transport schemes currently covered under the SPD. It is not clear from the current text for this policy if contribution could be sought for the more strategic schemes. This requirement should be included in the policy and be made explicit. It is our understanding that the enactment of the CIL regulation in April 2010 will include a restriction of the use of S106 Agreements to secure developer contributions. We are unclear what framework will be available to secure developer contributions for public transport improvements, particularly for bus service enhancements (which would historically be secured through S106 Agreements). The policy indicates that public transport improvements will be secured through S278 Agreements. We are not confident that the S278 process allows this.</p>	LCC are still considering the implications of CIL and will continue to seek contributions from the most appropriate mechanism.	None.
Sustainable development / accessibility requirements for new developments				
Barwick in Elmet & Scholes Parish Council	44447	<p>Support is given to: All developments must be in sustainable locations. Major developments must be subject to sustainability appraisal. Certified agreement with the Integrated Transport Authority, Bus or other service provider forming a part of the design and access statement Consistent with WCC 2</p>	Planning applications require assessment of transport impacts.	None

Horsforth Riverside LLP (via Drivers Jonas)	43761	T2 - Agree in principle with the location of new developments in proximity to existing networks. Notwithstanding this position, accessibility to and from new housing development should be addressed on a site by site basis to ensure sites with redevelopment potential are not overlooked in instances where they could reasonably deliver improved accessibility for both existing and future residents.	Windfall sites will be considered on their own merits & longer term development requirements through site allocations will need to be considered as part of the future planned Site Allocations Development Plan Document.	
Caddick (Tingley) Ltd (via White Young Green)	44631	We support Policy T2 of the Draft Core Strategy which states that new development should be located in accessible locations adequately served by existing or programmed highways by public transport. It is our view that the policy continues to advocate developing in sustainable locations in areas which have already been recognised in the UDP (Saved Policies) as transport hubs , specifically through Policy T17 of the UDP as locations for Park and Ride facilities.	Support is welcomed.	None
Carter Jonas	44438 44761 44762 44763 44764 44765	It is appropriate to set out the accessibility requirements as stipulated in Policy T2. Reference is made with regard to repetition of policy in T2 and Policy SC9 Disabled Access.	T2 relates to accessibility of getting to developments, SC9 refers to physical access into the building.	None
D Parker & Sons (via Lister Haigh Ltd)	43749	The site will help to encourage a greater proportion of journeys to be made by public transport. Cycling and walking, through improving existing and providing new links. The site could be adequately served by public transport and links to previous under utilised transport corridors. Traffic could avoid the built up area of Wetherby's Town Centre and being strategically positioned in the "Golden Triangle" has Park & Ride qualities.	Appears to relate to a specific development site. These will be covered in the Site Allocations DPD	None
Natural England	44402	Policy T2 is supported and its emphasis on securing sustainable transport provision through developer contributions	Support welcomed.	None

Highways Agency	43780	The accessibility guidelines in Appendix 8 of the Core Strategy document are broadly, though not exactly, compliant with RSS accessibility guidelines. The guidelines given in the Core Strategy Appendix for housing and employment are quite close to RSS guidelines and are therefore not a cause for concern.	Comment noted. Difference appears to relate purely to employment sites in extensions to Leeds main urban area/major settlements.	Review details of Appendix 8 and RSS
Inner NW Area Committee Planning Sub Group	44419	Policy T2 Care needs to be taken to ensure developers do not rely on reference to S106/278 highway investment in order to increase road capacity for off site vehicles. It leads to more congestion on other unexpanded parts of the road network.	TAs are used to ensure that highway improvements are undertaken where necessary, including locations further from the developments.	None
Indigo Planning	43454	Policy SC5 - Town centre uses is in the main consistent with PPS6 however it is inconsistent [with regards to public transport] :- Although development must have good pedestrian and cycle access the relevant criterion goes on to state that the site must also be within a high frequency public transport corridor. This is unnecessary and unreasonable. It is therefore recommended that the wording of the policy be amended to properly reflect government guidance.	Policy SC5 is being revised – see Sustainable Communities report.	None.
Metro	43668	With regard to travel plans, a policy basis needs to be developed to allow travel plan monitoring and penalties to be developed through a future SDP.	Policy T2 will be revised to include reference to this.	Amend text.
Health Impact Assessments				
Leeds Primary Care Trust	43361 43362 43496 43497	Health Impact Assessments should be carried out on the transport development and accessibility plans.	Health Impact Assessments although not statutory are best practice. Need to treat each site on its merits and the scale of devt. The overall strategy supports sustainable travel and the use of active modes which should generate health benefits.	None

Freight				
Metro	43668	<p>POLICY T3: FREIGHT</p> <p>The policy makes no reference to the provision of overnight parking facilities for HGVs. The policy should also include guidance on the management of local freight movements by setting out requirements for servicing vehicles.</p>	<p>The HA have recently undertaken a study into the provision of services on Motorways and the Trunk Road Network. (Review of Strategic Road Network Service Areas - Jan 2010).</p> <p>This does not identify any gaps in provision within Leeds District on the motorway network or the A1.</p> <p>The UDP 2006 Review includes policies (T29/T29A) on the provision of lorry parking and these will need to be retained as saved policies as appropriate.</p> <p>Servicing requirements for commercial vehicles is too detailed an issue for the Core Strategy.</p>	Consider as part of saved policy review.
British Waterways Board	44418	<p>Para 5.5.22 and Policy T3 - BW notes the need to balance support for economic development through facilities for distribution with environmental concerns, and is pleased to see that the proposed policy recognises the important role waterways can play in this. However several points are made in relation to this:</p> <ul style="list-style-type: none"> •BW continues to encourage greater use of inland waterways in the movement of freight where it is practical and economically viable to do so and in locations where supporting facilities are operationally and environmentally appropriate. A blanket approach to safeguarding all existing and potential wharf sites will not in itself generate freight activity. BW seeks to identify and safeguard Strategically Important Wharf Sites where redevelopment involves land within BW ownership. In such cases British Waterways would seek to identify or, in some instances, secure an alternative site. This issue may also be pertinent to sites not in BW ownership. •As set out in TCPA Policy Advice Note: Inland Waterways: Unlocking the Potential and Securing the Future of Inland Waterways through the Planning System (2009), the inland waterways represent a truly multifunctional asset for Leeds. 	<p>Support welcomed.</p> <p>The preparation of the future planned Site Allocations DPD, provides an opportunity the future potential of key sites. BWB will be consulted over strategically important wharf sites.</p>	Ensure that BWB are consulted when site allocations are being progressed.

Miscellaneous				
Mr R. Hill	42652	I support fully the growth of the City Car Club and car sharing initiatives. Can some car share only parking be created in the city centre?	Car share only parking would be expensive to manage as enforcement would require permanent staff on site. The possibility of establishing dedicated car share parking spaces will be examined as part of the future parking strategy. The provision of HOV lanes and encouragement in participation of car clubs is supported by LCC.	Consider revising text.
Zeigler Farms Limited (via DPP)	43364	A new policy should be inserted after Policy T4 that states: "The provision for new road side services will be met and planning permission will be granted for the development of roadside services and facilities provided: 1) There is a demonstrable need for such new facilities. 2) The development will not be detrimental to the visual amenity or nature conservation interest of the location, create traffic problems, or adversely affect the amenity of neighbours or the character of the existing environment. 3) The proposal will incorporate a high standard of landscaping 4) Signage, including the level and appearance of illumination, will not be in discord with the surrounding area 5) Appropriate safe access is designed in accordance with the requirements set out by the Highway Authority. There is a need for such as policy as Leeds currently has a high level of arterial routes passing through and around the city, but a limited amount of Road Side Services serving these routes.	The HA have recently undertaken a study into the provision of services on Motorways and the Trunk Road Network. (Review of Strategic Road Network Service Areas - Jan 2010). This does not identify any gaps in provision within Leeds District on the motorway network or the A1. Leeds is a predominantly urban area, and consequently existing facilities in town and district centres would be expected to serve such a role. Such a policy as proposed would not therefore be appropriate.	None
Dacre Son and Hartley	44496 44514 44527 44548 44561 44573 44585 44597 44609	While broadly supportive of the thrust of the policies in this section we object to the wording contained within para 5.5.18 insofar as it needs further qualification on meeting actual needs. Policy H4 indicates a general appreciation that more family type homes need to be built, this appears to run counter to the case put forward in this section.	Para 5.5.18 will be re-evaluated in the context of Policy H4.	Revise supporting text as appropriate.

University of Leeds	43886	Reworking the loop is a high priority , especially with a view to reducing traffic in City Square.	Proposals for a city centre transport strategy are being developed and will be incorporated within the Core Strategy where appropriate.	Revise supporting text as appropriate.
LBIA (via White Young Green Planning)	44112	In light of the information contained in the Vision for Leeds and the evidence presented in section 2 above, it is considered that the development of a modern transport system , with good connections within and between cities and internationally should be included in the Core Strategy under the sub-heading going up a league and developing Leeds role as the regional capital.	Spatial vision and flow of document to be re-examined.	Revise supporting text as appropriate.
City East Limited (Rushbond Group) (via GVA Grimley Ltd)	43822	T2 - The quantum of development considered to constitute 'significant trip generating sites' should be made explicit to enable consultees to comment on the acceptability of proposed thresholds.	National guidance covers this as stated in T2.	Cross reference to National Guidance.
Mr G Kite	43191	there is a total lack of consideration for the major reasons for the destruction of the environment so this is a pointless exercise. 1 Parking access delivery transport in planning and development 2 no co ordinated and controls in road works highways maintenance no effective enforcement of vans parking on pavements. The response of the Civil Servants police etc is a joke and a master class in passing the buck. In 30 years no mp politician or councillor has done anything to rectify thee major problems	New parking standards will be developed as part of the LDF. Coordination of roadworks and parking enforcement is outside the scope of the Core Strategy.	None.
Highways Agency	43783	In the glossary, developer contributions are defined as being required because development 'causes an increase in demand for public facilities, such as roads, traffic solutions...' The Highways Agency would suggest that 'roads, traffic solutions' is replaced with 'the transport network' .	Agree.	Modify text as appropriate

Metro	43668	<p>We have identified within a number of policies the use of vague and inconsistent wording, particularly with reference to ‘good’, ‘high frequency’ and ‘adequate’ public transport services. Use of vague and inconsistent wording without clear definitions could leave the policies open to individual interpretation and challenge. We require a better understanding of what councils assumptions are with regard to public transport levels, which policy document they are set out in, and the process available to allow the assumptions to be reviewed to reflect both the location of the development (rural / urban) and other changes in the public transport network.</p> <p>See text in policies SC5 (High frequency PT corridor) H1 (adequate level of service) H3 (‘development must not exceed the capacity of transport’ – assume this relates to highway and PT?) T2 (adequately served)</p>	Comments noted – will consider consistency and relevant definitions as appropriate.	Revise text as necessary.
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