



Agenda Item:

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Report of the Director of City Development

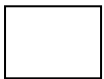
Development Plan Panel

Date: 11th May 2010

Subject: Leeds LDF Core Strategy – ‘Preferred Approach’ Analysis of Consultation Responses: Sustainable Communities 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 Sustainable Communities Chapter.
3. There was overall support for the Chapter, with comments generally requesting minor changes rather than any major overhaul. More detail is to be provided about the characters and proposals of the regeneration areas, the links between planning and health will be further highlighted, and the design criteria and sustainable construction standards are to be unchanged.
4. The key work stream underway as a result of the representations received, and also as a result of changed national policy, is the undertaking of a District wide City, Town, and Local Centres Study. This will provide quantitative data of the capacity of centres to accommodate town centre uses such as retail, offices, and leisure. It will also provide further clarity on the role and local context of the centres across Leeds, and the different roles they can play in future years including where there are deficiencies. It will be the key evidence base for the relevant policies in the draft Core Strategy Publication document.

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 Sustainable Communities 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 Sustainable Communities 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 fundamental priority of the Core Strategy is to ensure that Leeds has sustainable communities, which offer a high quality of life and strong sense of place for the people who live and work within them. The Core Strategy must direct the regeneration priorities and urban renaissance across Leeds. Also, the physical aspects of development must reflect community needs, including modern forms of retailing, services, and facilities, which are accessible to all via sustainable transport.
- 3.2 These aspects are all brought together in the Sustainable Communities Chapter. It covers Regeneration Priority Areas, the hierarchy of centres, lists all the centres by name, and sets out the types of uses, which should be directed towards each level of centre. It then sets out what criteria are to be considered when creating new centres and edge of centre development proposals. The chapter also addresses health, education, cultural, and leisure facilities, access to playing pitches, sustainable design and construction, and design policies including disabled access.

Specific representations and Leeds City Council responses

- 3.3 Regeneration Priority Areas
- Policy SC1 identifies a number of Regeneration Priority Areas, which will be given priority for regeneration funding, alongside any other areas identified by the Council through the Plan period.
 - *Responses* - Overall strong support, but needs further justification through evidence, and identification of future areas should be undertaken now rather than leaving uncertainty. There 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).

- *LCC Actions* - Detail on the different regeneration areas will be expanded, which in part will emerge from the forthcoming Regeneration Plan. Flexibility is required as neighbourhood characteristics change. The AVL is to be highlighted more throughout CS, and further input will be gained from the Leeds Bradford Corridor Project Officer.

3.4 Hierarchy of Centres

- Policy SC2 sets the centres hierarchy from the City Centre down through town and local centres, to neighbourhood shopping parades and smaller settlements with an aspiration for local facilities. The accompanying table identifies all the centres in Leeds. Out of centre development is strongly resisted.
- *Responses* – Support for the hierarchy and location of centres, although need to recognise the differences in roles between centres which are on the same level of the hierarchy. Needs 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.
- *LCC Actions* – Agree need more local context and better reflection of the different roles and characteristics of different centres, including in the rural settlements. A City, Town, and Local Centres Study has been commissioned in order to provide evidence to help direct these centres policies.

3.5 Uses in Centres, and Edge of Centre Proposals

- Policy SC3 directs particular types and sizes of uses such as shops, offices, and recreation into the different levels on the centres hierarchy. Policy SC5 sets criteria for developments proposed on the edge of centres, such as that it should not undermine the vitality and viability of existing centres, and no more central sites are available.
- *Responses* – General support but 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, places of worship, hospitals, and culture/leisure in countryside locations.
- *LCC Actions* - SC3 will be reviewed to provide more clarity and to bring in line with updated national policy (PPS4). It will also aim to be more geographically specific, which will be informed by a Housing Background paper and Town Centre Study. The policy is intended to direct uses visited by the public to centres, not to prevent the continuation of existing uses, and this will be clarified.

3.6 New Centres

- Policy SC4 sets criteria which would allow the creation of new centres, such as not undermining the vitality or viability of existing centres, and demonstrating its need for instance as a result of regeneration, or the development of large sites nearby.
- *Responses* – The policy was welcomed overall, although comments noted that 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.

- *LCC Actions* – The potential location of new centres will be defined further through the Town Centres Study, although centres associated with strategic housing development (at the Site Allocations stage) will be developed using the criteria in SC4.

3.7 Health, Learning, Cultural, and Leisure Facilities

- Policy SC6 aspires to promote and improve the provision of high quality health, education, cultural, and leisure facilities, to be accessible to all, and to work in partnership with relevant stakeholders.
- *Responses* - Support for promoting these facilities, but consider the policy needs to be more delivery specific, and potentially separated into its different themes. There needs to be more discussion of how health and planning are linked.
- *LCC Actions* - The Spatial Vision section is to be reviewed, and the need for this policy in the current form will be considered again at that time. It is likely to become more delivery specific, although there is a place for advocatory policies. Throughout the Core Strategy the constant links between planning and health will be further highlighted.

3.8 Sustainable Design and Construction

- Policy SC7 sets the sustainable construction standards required for major developments (e.g. Code for Sustainable Homes levels), which are stricter than the national standards.
- *Responses* - A range of comments ranging from 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.
- *LCC Actions* - The changing national agenda underpins this approach, and higher standards are required in order to mitigate the negative effects of growth. High standards of sustainability and design will be encouraged everywhere, however, economies of scale mean that it is likely to make smaller developments unviable. Standards need to be carefully set in order to avoid being too onerous. Viability can be assessed at application stage and considered alongside other policies. SC7 will ensure the standards are achieved for some schemes, whereas without it no schemes would achieve them. Also, the Core Strategy is a long term document and over time the costs will come down.

3.9 Design, Conservation, and Landscape, and Disabled Access

- Policy SC8 provides a range of design guidelines and geographical elements specific to Leeds' identity, which should be considered for all developments. SC9 requires all development to be accessible for all users.
- *Responses* - Design policies were supported, but considered they 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.
- *LCC Actions* – The policies will be merged so that access for all is an integral design consideration. It is considered that alongside the range of other design guidance produced by the Council, that only minor additions are needed to this policy to reflect comments made.

Next Steps

- 3.10 Changed national policy, advice from the Planning Inspectorate and representation responses, have made it clear that further work is necessary on the 'centres' across Leeds MD. The purpose of this is to provide more evidence regarding the future need for retailing and town centre uses, and the capacity of existing centres to accommodate this. Therefore, the City, Town, and Local Centres Study is to be undertaken. It is anticipated that consultants will be appointed May / June, and the Study will be completed in early October.
- 3.11 Drawing from the recommendations in the Study, plus the consultation undertaken so far, it is proposed that there will only need to be a limited redrafting of the Sustainable Communities Chapter, including giving more detail about regeneration areas (together with updates to reflect City Council's emerging Regeneration Strategy), the different centres, and making the chapter more specific to the Leeds context, as well as reflecting updated national policy. The technical policy on construction standards will move to the Environmental Resources chapter and the disabled access policy will merge with the general design policy.

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 the Sustainable Communities Chapter, 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 SUSTAINABLE COMMUNITIES
THEME**

CORE STRATEGY PREFERRED APPROACH

LCC RESPONSES TO REPRESENTATIONS ON THE SUSTAINABLE COMMUNITIES THEME

Representor	Those Represented	Representor Comment	LCC Initial Response	Action
Policy SC1 – Regeneration Priority Areas				
Government Office 95	Government Office	Regeneration should flow from the key objective of 'narrowing the gap'. Even long-term commitments need to be justified through evidence. Should be a stronger policy hook to the AAPs. Boundaries to be indicated on the key diagram. Where no AAPs are planned, need sufficient policy detail to proceed straight to masterplans to guide future planning applications. Also important to have clear delivery and infrastructure plans for regeneration areas. Remove reference to abandoned AAPs.	Will change policy to reflect withdrawal of three AAPs and scope for future guidance in regeneration areas. Delivery will be included through Infrastructure Delivery Plan. Regeneration work in former AAP areas will continue. For evidence base, now have 'Neighbourhood Index' which brings together all the elements of deprivation, and emerging Regeneration Plan.	Update text Work required – DF to discuss Regen Plan with E&N
Dacre Son & Hartley 480	Taylor Wimpey / Persimmon / Redrow	Area based regeneration should not automatically be regarded as a suitable location for additional net housing, as it may instead be about improving the environment, image and local economy in order to stimulate and sustain private sector investment in the future.	Regeneration in Leeds is holistic and includes wider aspects than new housing alone, each regeneration area has its own needs and solutions, which are a mix of uses specific to defined sites and localities.	None
Highways Agency 5604	Highways Agency	No substantial reference to the Leeds-Bradford corridor, which is described as a regeneration area "not necessarily for housing". We need more information on the proposals for this area in order to assess the likely scale and nature of impact on the strategic road network.	Agree, need to expand text.	Gain input from Leeds Bradford Corridor Project Officer, continue discussions with HA
Dacre Son & Hartley 480	Taylor Wimpey/ Persimmon/ Redrow	Is the 'Urban Eco Settlement proposal' in addition to the Aire Valley Leeds?	The UES is a new and emerging concept, agree more clarity is needed.	Reference in text

Turley Associates 5670	Swayfields (Skelton)	AVL should be identified as a strategic site (as its delivery is central to the achievement of the Vision) and addressed in a specific section; it deserves greater priority and a coherent description of the approach and amount of development in this area, to provide greater certainty. It would also set the context for the AAP and for public funding bids e.g. the ADZ and UES.	Agree AVL needs further expansion and higher profile. Infrastructure Delivery Plan will address infrastructure needs.	AVL to be highlighted more throughout CS and consider having its own chapter
Arup 397	Arup	No strategic direction yet included as to how the multiple expectations for the AVL can co-exist and which, if any are priorities. In addition, the CS does not include any evidence base or policy direction about how necessary physical infrastructure will be provided to support its growth.		
David Lock Associates 787	Millshaw Property / White Rose Shopping Centre	Support 'South Leeds' within SC1 but need more clarity on each Regeneration Priority Area in terms of geographical extent, rationale, strategic objectives and likely delivery mechanisms.	Detail on regeneration areas to be expanded, which in part will emerge from Regeneration Plan.	Expand text
Turley Associates 1743	Barratt Strategic	No explanation in evidence base for these priority regeneration areas, and what different measures will be taken within them. Implies that other areas could be identified by the Council at any time, which undermines the concept of the currently identified areas taking priority and risks undermining any measures being taken in them. Concerned that refers to additional work required to define regeneration areas as they are key to the delivery of the CS vision and objectives. Their contribution to the delivery of housing and employment must be determined and justified now so that a proper assessment of what other land might be required for housing and employment can be made and whether this will entail review of the Green Belt. Also query what alternatives have been considered and arrangements in the event they fail to deliver the anticipated level of development?	The Core Strategy Issues and Alternative Options stage consulted on criteria used to identify regeneration areas. Agree explanation could be expanded. The timescale of the CS means that flexibility is required, especially as neighbourhoods change and regeneration work needs to adapt to this. Hence feel the policy approach is justified. Not considered that would undermine current regeneration areas as there is always a range of areas and regeneration measures underway across the District. Agree, and will be considered as part of a Housing Background Paper.	Reference in text None
Leeds HMO Lobby 26	Leeds HMO Lobby	Should add 'demographic imbalance' (i.e. where the local demographic profile departs significantly from the city norm) as a reason for regeneration, and especially where this includes high population turnover. A polarised, transient population is not a secure foundation for a sustainable community.	Agree that should add to paragraph 5.2.4 that transient populations can be one characteristic of an area in need of regeneration.	Reference in text
Barton Willmore Planning 45	Barton Willmore Planning	Not clear how themes on Map 2 have been defined and how they have informed the overall spatial approach. AAPs to be removed from Map 2.	The maps were intended to represent the spatial approach of each theme as well as inform it. They will be merged into a Key Diagram at the next stage.	None

Scott Wilson 414	Parlington Estate / Revera / Individual	Housing should be referenced as it forms a key part to the creation of a sustainable community. Suggest: "The promotion of the City Centre and the distinctive Leeds main urban area (as the key component) and settlement hierarchy (including the identification of town and local centres within them) as a focus for housing, shopping, economic development and local facilities, urban renewal and renaissance, mixed and cohesive communities, which maximise opportunities for walking and cycling."	The policy is location specific and so the suggested text is more appropriate to that already in the housing chapter.	None
Teaching Hospitals Trust 2819	Teaching Hospitals Trust	Support objective to link St James' Hospital with the City Centre at Mabgate.	Support welcomed.	None
British Waterways 338	British Waterways	Fully support the creation of a new Urban Eco Settlement focussed on the river and canal corridor.	Support welcomed.	None
Policy SC2 – Hierarchy of Centres				
Carter Jonas 5681	The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate	Agree no difference between historic centres and district centres in functional terms. Broadly support the hierarchy of centres set out in the diagram. Important that the historic roles of towns such as Wetherby, Otley, Morley and Pudsey are recognised in terms of their character and amenity.	Support welcomed. Will be reflected in evidence work for the settlement hierarchy.	None
Metro 1933	Metro	Support sequential prioritisation of development. Dispersed development could reduce the need or distance to travel on a local level, but proposed concentrations in city and town centres would encourage more use of public transport.	Support welcomed.	None
Planning Potential 5680 Natural England 58	Aldi / Natural England	Welcome the hierarchy.	Support welcomed.	None

Evidence Base and Clarity:				
Government Office 95	Government Office	SC2 adds little to PPS6 and RSS.	SC2 provides a definition of the network and hierarchy of centres as required by PPS4 Policy EC3, plus provides the context for the location specific diagram of centres. SC2 also expands on PPS4 by stating that Leeds has no 'district centre' level, and also defines 'smaller settlements with an aspiration for a cluster of local facilities.' Accept that it could be more locally specific by including a list of centres as an explicit part of the policy.	Include list of centres within the policy
Barton Willmore 57	White Laith / Templegate Developments	More clarity over which centres are existing and which are the ones that could be developed in the future. Should recognise that these local centres could be delivered as part of comprehensive proposals.	SC4 recognises the potential for creation of new town or local centres. Including the list of centres within the policy will give more clarity.	Include list of centres within the policy
David Lock Associates 787	Millshaw Property / White Rose Shopping Centre	Not based on quantitative or qualitative assessment of future growth needs, require retail and leisure study to ascertain whether the proposed hierarchy of centres and the planning strategy for town centre uses is justified.	Undertaking Town Centre Study to address these issues.	TC Study
Leeds Chamber of Commerce 1736	Leeds Chamber of Commerce	Should include scope for further expansion of centres to support growth, including when defining boundaries and primary shopping areas.	Undertaking Town Centre Study to address these issues. Boundaries will be identified in Site Allocations DPD.	TC Study
Savills 467	MEPC	No evidence base to explain how the list of smaller settlements with 'aspirations' for a cluster of local shopping facilities or neighbourhood shopping has been defined. This may unreasonably restrict local opportunities from settlements not identified coming forward. Either has to be justified with evidence or a more general policy approach should apply which supports an appropriate level of facilities in smaller communities but does not identify those settlements explicitly.	Agree that further explanation is required, and ensure that policy basis would not allow unsustainable dispersal of development and redirect away from existing centres.	To be confirmed through Growth Options Paper and TC Study
Barton Willmore Planning 45	Barton Willmore Planning	The Centre Hierarchy diagram doesn't align with other parts of the CS e.g. no need to single out Micklefield as a local centre 'only where linked to the growth and settlement strategy', as the CS does identify Micklefield as a Potential Housing Growth Area.	Noted. Will be reflected in evidence base for the settlement hierarchy.	None
Roundhay Planning Forum 5057	Roundhay Planning Forum	Support the maintenance of a retail hierarchy. Centres should be listed as part of the policy. Would also like to see a list of Neighbourhood Parades.	Support welcomed. Agree could be clearer reference in the policy. Neighbourhood parades are too detailed for the CS but could be shown on future Proposals Map.	Update text

Scott Wilson 414	Parlington Estate / Revera / Individual	<p>Overall agreement, and support consistency between the Settlement Hierarchy and the Hierarchy of Centres.</p> <p>However, this should not prevent retail, leisure, and business development opportunities in more rural settlements that is vital to their sustainability, such as rural diversification, as advocated by PPS7. Suggest an additional hierarchy tier which enables development in lower order settlements, to accommodate growth should there be an identified local need identified by the applicant. For example, Aberford contains many existing businesses which contribute to vitality, viability and thus its future sustainability.</p>	<p>Support welcomed.</p> <p>Text needs to be updated with reference to PPS4 (former PPS7). Also links to LCC responses to representations in relation to CS Policy SC6.</p>	<p>None</p> <p>Reference in text</p>
Carter Jonas 5681	The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate	<p>The approach is unduly negative, as 'maintaining' a hierarchy of centres expresses a static position and will stymie innovation and change contrary to (emerging) PPS4 and PPS6.</p> <p>Should seek a more positive approach which encourages enhancement of the centres to meet the needs of their catchment and reflects their function.</p>	<p>The hierarchy itself does need to be 'maintained'; this does not preclude individual centres moving levels if this complies with other policies. The Town Centre Study will identify the potential to move through the hierarchy.</p> <p>Agree that text needs to expand discussion of enhancement and catchment needs, in particular ref to PPS4.</p>	<p>None</p> <p>Update text</p>

Turley Associates 5670, 1743	Swayfields (Skelton) / Sainsburys	<p>Approach taken to maintenance of the hierarchy of centres is unclear. The diagram on pg 31 is too complicated, not user friendly, and is different to the hierarchy set out in Policy SC2. It is difficult to understand as to the order in which these centres are to be developed, for instance, what is the status of edge of centre sites in the context of the SC2 hierarchy? Should replace with a list against each of the headings in SC2.</p> <p>Inconsistent use of terms such as principal town centres (in Policy SC3), major settlements (diagrams on pages 7 and 31), town centres (paragraph 5.2.14) and major town centres (paragraph 5.2.15). Use of the terms should be consistent and relate to the RSS designations of Principal Towns, and Local Service Centres (RSS policies YH5 and YH6).</p>	<p>Will reconsider presentation of diagram.</p> <p>The RSS terminology for centres does not relate appropriately to the network and function of centres in Leeds (e.g. only Wetherby is identified as a Principal Town), although agree this should be clarified further in the text. Para 5.2.15 reads “any major town centre proposals” and therefore the ‘major’ implies the proposals rather than the town centre description. It is agreed that there needs to be greater clarity. ‘Principal’ should not be included in SC3.</p>	<p>Update diagram</p> <p>Reference in text / correct error</p>
Out of Centre Retail Parks:				
Leeds Civic Trust 62 GVA Grimley 5661 CBRE 354 Richard Mills Counselling 2759 Metro 1933	Leeds Civic Trust / Rushbond / Hammerson / Richard Mills Counselling / Metro	<p>Support that out of town retail parks should not be considered as town centres and further out of centre developments to be resisted. Such sites should not have policy or be a regeneration priority. Need additional policy that the expansion of retail floor space at existing out of centre retail parks will be resisted.</p> <p>LCC support for large supermarkets and out of town shopping is bad for the sustainability of local community and therefore bad for the environment, so 'Vision for Leeds' is contradicted.</p> <p>Support that development of out of centre retail parks must be linked with development of public transport to encourage modal shift.</p>	<p>Support welcomed. Proposals to extend out of town centre locations would be judged against PPS4 and therefore an additional CS Policy is not required; the existing CS policies also control development in such locations.</p> <p>LCC does not support out of centre shopping. Promoting shopping choice through large supermarkets is in line with PPS4.</p> <p>Support welcomed, although it is not the intention to develop out of centre retail parks.</p>	<p>None</p> <p>None</p> <p>None</p>

<p>Indigo Planning 3010 Leeds Cycling Action Group 5644 Turley Associates 1743 David Lock Associates 787</p>	<p>Kirkstall Holdings / Leeds Cycling Action Group / Sainsburys / Millshaw Property Co.</p>	<p>Should contain a criteria based policy relating to out of town centre retail parks, recognising that they can provide employment benefits including creating sustainable communities and non-town centre uses, and will be acceptable subject to no adverse impact on any defined shopping centres.</p> <p>Neither national nor regional policy precludes out of centre development entirely, e.g. RSS E2 states expansions should be judged against PPS6 key tests. The supporting text on out of centre retail parks replicates national guidance, plus is too prescriptive as applications should be assessed on their own merits, compared against PPS4 emphasis that LPAs should plan positively and proactively to encourage economic development, in line with the principles of sustainable development.</p>	<p>Proposals to extend out of town centre locations would be judged against PPS4 and therefore an additional CS Policy is not required, although does need to be explicitly referenced for people are not aware of PPS4.</p>	<p>None</p>
<p>David Lock Associates 787</p>	<p>Millshaw Property / White Rose Shopping Centre</p>	<p>White Rose Shopping Centre and the adjoining office park and industrial estate are major attractors of people and major employers (approx 8000 jobs) and provide opportunity to take a pro-active approach in South Leeds to promote and secure further investment in deprived areas.</p> <p>Should identify WRSC, WR Office Park and Millshaw Park Industrial Estate areas as a 'Strategic Economic Sub-centre' and include a specific policy to cover the role and function of the centre in the context of the wider South Leeds regeneration area. Should include necessary physical interventions, transport and environmental improvements and regeneration requirements, along with acceptable land uses and development principles. Should specify the circumstances by which future expansion of retail and other town centre uses could occur, for instance the potential for significant enhancements to public transport.</p>	<p>PPS4 sets out the circumstances by which future expansion could occur. The role of individual out of town centre shopping locations will be considered further through the Town Centre Study, although LCC does not support expansion of out of centre shopping.</p> <p>This is not a recognised term in the settlement or town centre hierarchy.</p> <p>Regeneration priorities within the wider South Leeds area are being considered.</p>	<p>None</p>
<p>Indigo Planning 3010</p>	<p>Regent Retail Parks</p>	<p>Own Junction 1 Retail Park. Seek inclusion of J1RP in list of major out of town centre shopping centres, as no explanation is provided for its exclusion.</p>	<p>Agree that J1RP should be in the list of major out of town shopping centres (although its inclusion does not promote it for growth), and the Town Centre Study will create a comprehensive list of such centres.</p>	<p>Update text</p>
<p>Comments Regarding Specific Centres:</p>				

Mosaic Town Planning 5672 Barton Willmore Planning 45 57 Carter Jonas 5681 Walker Morris 122 Peacock and Smith 5674 GVA Grimley 2996	Miller Homes / White Laithe Developments / The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate / Various clients / Morrisons / 45 Barton Willmore Planning	<ul style="list-style-type: none"> - Support for Bramhope as a 'smaller settlement'. - Support Boston Spa as a town centre serving the needs of the village and adjoining Thorp Arch village. - Support Bramhope to be a local centre. - Support Harehills Lane elevation to town centre status - Support Whinmoor as local centre although location should be indicative to allow for ELE association. - Allerton Bywater should be a local centre within a Major Settlement. - Carlton should be identified as a local centre (smaller settlement) as part of the Leeds Centre Hierarchy. - Query inclusion of Bramhope. 	Support welcomed. Location of Whinmoor reflects current grouping of facilities. Are reviewing policy position and list of centres in relation to retailing and services in smaller settlements.	None To be informed by Housing Background Paper.
GVA Grimley 5661	Rushbond	Richmond Hill (All Saints) should be clearly referenced as 'Newly Allocated Centres' in the key.	Submission CS will identify as a town centre rather than an aspiration. Town Centre Study will also look at potential for any other new centres.	Include list of centres within the policy
Teaching Hospitals Trust 5690	Teaching Hospitals Trust	The development of Lincoln Green as a local centre should look at the opportunities of locating on Beckett Street to open up its use as an amenity for staff and visitors attending St James' Hospital.	The Hospital should encourage patronage of the existing centre in order to assist its viability. Relocating the whole centre is not realistic, would not benefit the local community as much as its present location, and could impact on centres in Harehills. Opening of the NGT could also increase the patronage and subsequent viability of Lincoln Green, including potential links with the Hospital.	None
Micklefield Parish Council 122	Micklefield Parish Council	Concerns that Micklefield is being considered for major housing growth on the basis that it has a railway station, but it does not have a central retail core or group of community facilities which it could be extended around sustainably. Highlight the findings of the UDP Review Inspector who considered that Micklefield did not justify Phase 1 housing sites.	Need to address specifically in text in relation to sustainable extensions and infrastructure requirements, linked to work on the Housing Background paper.	Reference in text

Peacock and Smith 5674	Morrisons	Object to the proposed town centre at All Saints as very little evidence has been provided to support its elevation. Furthermore, its close proximity to Richmond Hill Local Centre at Upper Accommodation Road has the potential to adversely impact upon the long term vitality of both centres.	EASEL and AVL Town and Local Centre Study provides capacity information, and regeneration benefits and supportive local consultation responses are also part of the evidence base. The CS will also consider recommendations from the District wide Town Centre Study in relation to any other new centres.	None
Workshop responses	Individuals	Concern that Gipton doesn't have many local shops.	Agree with concern, and CS promotion of current neighbourhood parades in Gipton to local centres aims to help address this. Regeneration aims will be included as an element of the Town Centre Study.	None
Miscellaneous:				
Leeds Chamber of Commerce 1736	Leeds Chamber of Commerce	Should reintroduce the District Centre designation, in accordance with the RSS hierarchy and PPS6 Annex A.	Have considered and rejected this option because there is no longer a distinction between them in relation to the Leeds context and network of centres.	None
Turley Associates 5670	Swayfields (Skelton)	Diagram on page 31 implies a tiered hierarchy which places town centres within the main urban area above the town centres of major settlements.	Noted, and will address in Submission version.	Update diagram
Turley Associates 5670	Swayfields (Skelton)	No reference to new centres in the AVL/UES in the Centres Hierarchy diagram. Strategy to address Aire Valley Leeds.	New centres are covered under SC4 and Para 5.2.20 although could be expanded, and will also be addressed through Town Centre Study.	Expand text
Roundhay Planning Forum 5057	Roundhay Planning Forum	Roundhay Neighbourhood Design Statement makes a number of recommendations for enhancement and action in relation to centres and Neighbourhood Parades.	If set out in a NDS it is too detailed for the CS.	None
Policy SC3 – Uses in Centres				
Government Office 95 Turley Associates 1743	Government Office / Sainsburys	Not locally specific and therefore does not add to national or regional guidance.	SC3 does provide more locational detail than PPS6/4 including a wider range of uses relevant to the Leeds context and LCC's commitment to clustering services. However, SC3 will be reviewed to provide more clarity and to bring in line with PPS4 rather than PPS6.	Update and clarify SC3
University of Leeds 846	University of Leeds	In relation to local centres and neighbourhood shopping parades, policy needs to be stronger than simply 'directing development to centres.'	The policy takes guidance from PPS6/4 which does require a measure of flexibility.	None

GVA Grimley 5661	Rushbond	Acceptable uses in centres should correspond to those uses described as acceptable within PPS6.	Uses do correspond, but go further to reflect the Leeds context and LCC ambition to promote sustainable centres. If there was no expansion on PPS6/4 then a CS policy would not be required. However, SC3 will be reviewed to provide more clarity and to bring in line with PPS4 rather than PPS6.	Update and clarify SC3
Walsingham Planning 5508	Whitbread Group	Agree in general, but policies should not be so prescriptive and where appropriate allow for limited expansion of existing premises outside those identified centres.	Other than where permitted under PPS4, this would not assist in sustaining vitality and viability of centres.	None
Carter Jonas 5681	The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate	Agree with approach, but the wording is too prescriptive, repetitive, and lacking flexibility. Should seek to encourage a range and scale of uses (public services, civic /administration, cultural, community, social, retail, entertainment and leisure) proportionate to the role and function of the centre, e.g. the market towns that serve catchments beyond the District.	Through setting out the range and scale of uses, the policy does seek to encourage a range appropriate to the role and function of centres. Agree that could potentially be more geographically specific, and this will be informed by the Growth Options Paper and Town Centre Study. SC3 will also be reviewed to provide more clarity and to bring in line with PPS4 rather than PPS6.	Update and clarify SC3
Clarity:				
GVA Grimley 5661	Rushbond	Reference to 'Principal Centres' is inconsistent with the hierarchy proposed in SC2.	Agree 'Principal' should not be included in SC3.	Correct error
GVA Grimley 5661	Rushbond	For town centres should use the term 'superstores' to be consistent with PPS6.	'Supermarkets' (less than 2,500 sqm) and 'superstores' (more than 2,500 sqm) are both appropriate in city and town centres subject to PPS4 tests.	Update policy text
GVA Grimley 5661	Rushbond	The policy/supporting text should emphasise that scale is implicitly linked to impact.	This will be addressed in the wider revisions needed to this Chapter to align with PPS4 rather than PPS6.	Reference in text
Planning Potential 5680	Aldi	The definition of acceptable uses within local centres should include small supermarkets as identified in Table 1 of PPS6. They provide a localised facility which can help reduce the need to travel, widen choice increase competition and assist in overcoming social exclusion.	'Supermarkets' is covered within the term 'retail' but agree can be specifically cited.	Reference in text

Teaching Hospitals Trust 5690	Teaching Hospitals Trust	No plans to relocate or build new facilities away from existing sites, so references about locating hospitals within town centres is misleading. SC3 should not be used to prevent the expansion of facilities at existing out-of-centre sites (i.e. all hospitals except the LGI) by applying any notion of disaggregation of services. The text should also be amended to healthcare facilities (which may be provided by the PCT rather than the Trust).	The policy is intended to direct uses visited by the public to centres, not to prevent the continuation of existing uses. This will be clarified through the review of SC3.	None
CBRE 354	Hammerson	Given the scale of the Eastgate and Harewood Quarter scheme and its importance to the future vitality and viability of the City Centre, it is of strategic importance and so the CS should make explicit reference to supporting its delivery, as it should not be undermined by ambiguous policies.	Agree, and will also be addressed further through the Town Centre Study.	Reference in text
Turley Associates 1743	Sainsburys	SC3 is too prescriptive, e.g. supermarket development over 2,500 sqm should only be within the Prime Shopping Quarter in City Centre. This contradicts the Council's objective of creating a walkable city. It is essential to provide easily accessible shopping to meet people's day-to-day needs which should be applied across the District.	SC3 states that for supermarket proposals within the City Centre, 2,500 sqm or above supermarkets should be within the PSQ. In town centre locations the whole centre is appropriate for locating a supermarket (although dependent on PPS4 compliance).	None
Savills 467	MEPC	Supports hierarchy as reflects Leeds' role as a regional centre. However, assumptions made in respect to the Settlement Hierarchy should be supported by evidence to this effect as it is this part of the document that influences many of the policies that follow on from it.	Settlement work addressed in other chapters and Growth Options Paper but will be underpinned by increased evidence, and as directed by PPS4.	None
Educational Facilities:				
Leeds City College 5653	Leeds City College	Should reference the acceptability of provision of Further Education uses in the City Centre, alongside universities and higher education providers. This is compatible with the future proposals of Leeds City College.	Agree.	Reference in text
J & J Design 5666	Brownberrie Education / Horsforth Gospel Hall	Strongly object that education facilities should be directed to town and local centres as they need adequate space for car parking, playing fields, and recreation. They also cannot compete with residential and town centre land values. New educational facilities should be allocated. Policy SC3 will fail to be effective in delivering the spatial requirements for education provision, contrary to the Vision for Leeds and the Leeds Strategic Plan.	It is unlikely to be possible to locate all new education facilities in town and local centres due to space constraints, and will make a stronger reference to this in the supporting text. However, centres do provide a sustainable location for educational uses and would therefore be acceptable locations in principle. Specific requirements where they are known, will be identified through the Site Allocations DPD.	Reference in text

J & J Design 5666	Brownberrie Education / Horsforth Gospel Hall	The CS should ensure adequate school provision and availability of land to cope with increases as a result of demographic changes and changes to national education policy which is likely to favour greater diversity and an increasing range of specialist schools.	Ongoing work with Education Leeds and will be addressed through Infrastructure Delivery Plan and Site Allocations DPD. Could expand text to reference this.	Reference in text
Leeds City College 5653	Leeds City College	<p>Emphasis should be on all types of education provision as this is in line with the Spatial Vision and the requirement to focus on skills and training as part of the Leeds City Region initiative. Should reference the acceptability of provision of Further Education uses in the City Centre, alongside universities and higher education providers. This is relevant also in the context of the changes in the FE sector in Leeds and the merger activity, which will require consideration of the physical estate.</p> <p>Should also referred to Leeds City College's merger and future investment plans in Para 5.2.29 to provide an inclusive approach to education provision and to recognise the important role that FE can play in the city, particularly in the current economic circumstances. Leeds City College has around 60,000 students both on campus and within the workplace, and employs 2000 staff across its diverse estate making it one of the largest FE colleges in the country. The college makes a significant contribution to the local economy, the skills and training agenda, lifelong learning and to sporting and cultural activities. The new estate strategy will aim to deliver significant investment in a new City Centre and city rim facilities alongside further estate development across the city to continue to deliver high quality FE provision.</p>	<p>Agree higher and further education, are appropriate in the City Centre and town centres.</p> <p>Agree that should make reference to this important element of education investment in Leeds. Details will be addressed through the Infrastructure Delivery Plan.</p>	<p>Reference in text</p> <p>Reference in text</p>
Miscellaneous:				
University of Leeds 846	University of Leeds	Learning, health, cultural and leisure facilities should wherever possible be co-ordinated and used as critical mass hubs to enable commercial activities to stand a better chance of survival. Wherever a civic or other public service building is due for replacement, opportunities should be taken to improve synergies between services and enhance mutual viability, support this CS aspiration.	Support welcomed, and agree that this is the approach the CS aspires to.	None

NHS 5693	NHS	Food access mapping in Leeds has identified issues with access to healthy food and prevalence of HFTAs in some areas, ongoing work by Leeds NHS to tackle obesity and directing HFTAs away from schools and parks. Must ensure there is access to healthy food within lower hierarchy centres. Policy SC3 could require and deliver a suitable balance of retail uses within local centres and ameliorate any identified deficiencies in provision and controlling proliferation of HFTAs in these areas. See example of Waltham Forest HFTA SPD.	Support the principle both in terms of reducing obesity and creating more vibrant centres. However, it is difficult to include such detailed policy in the CS. Retail mix is to some extent already dealt with through the saved shopping frontage policies of the UDP.	Review of saved policies
Workshop responses	Individuals	Great concern over the uses which can dominate shopping centres (i.e. HFTAs and charity shops) which don't provide a good range of services and choice and opportunities for residents. Lack of cash machines is also a major issue. Banks are of major importance to local communities, and especially to elder people as it increases their independence to have local facilities. Should protect them.		
University of Leeds 846	University of Leeds	Where retail units are no longer viable and are in secondary positions, should have flexible view about future change of use, e.g. to residential where there is housing need in a street with persistent retail vacancies.	Individual cases would be judged on local circumstances rather than through the CS.	None
Stanks and Swarcliffe residents Association 5052	Stanks and Swarcliffe residents Association	Regeneration funding has to stop building large supermarkets which will turn local high streets into ghost towns.	Promoting shopping choice through large supermarkets is in line with PPS4, and does take account of local impacts.	None
Individual 14	Individual	There should be a good mix of shops, offices, and leisure in urban areas so people can walk to them.	Centres provide a focus for urban areas with pedestrian visits a key element.	None
Individual 5151	Individual	Culture should also be encouraged in local centres not just City Centres.	Relates to scale and the amount of visitors that would be attracted, which is why such uses are not specifically encouraged in local centres although are encompassed within the policy wording.	None
Leeds Cycling Action Group 5644	Leeds Cycling Action Group	Disagree, directing the focus of office space into the city centre will exacerbate the rush hour transport congestion problems and create ghost towns.	Majority of consultation responses and policy approach is to direct into the City Centre and town centres. It allows the most sustainable and efficient travel choices while providing a range of locations of provision to minimise congestion.	None
BNP Paribas 56662	Telereal Trillium	Agree with proposed office locations in centres. Large scale out-of-centre office uses should be allowed to redevelop for alternative uses.	This primarily depends on landowner interests, but would generally be supported subject to the Employment Land Review.	None

Leeds and Harrogate Congregation of Jehovah's Witnesses 5657 J & J Design 5666	Leeds and Harrogate Congregation of Jehovah's Witnesses / Brownberrie Education / Horsforth Gospel Hall	Strongly object that religious facilities should be directed to centres, as their location should allow for the distinctive characteristic pattern of social grouping and access travel of the particular community, and so should be within residential areas/or urban fringe locations. Larger places of worship need adequate space for car parking and quiet contemplation. Faith facilities are also unable to compete with residential and town centre land values. Should include a 'positive' policy that supports the provision of places of worship where identified environmental constraints are not impacted upon to their detriment. There should be Class D1 allocations and/or release of employment land. A generic policy supporting community facilities is insufficient. Policy SC3 will fail to deliver the spatial requirements of the third sector generally and faith communities in particular. Up to 6 additional Gospel Halls for the Brethren's Christian fellowship will be required.	Access and travel from a local community is normally easiest and most sustainable to its town and local centres, and places of worship should aim to minimise travel by car. However, depending on the type of religious facility and its scale, alternative locations may be acceptable, and SC3 does state they will be considered on their merits and supports their provision. Will make a stronger reference to this in the supporting text. It is not appropriate to include land value issues into policy as this would be dealt with in assessing the viability of individual sites. Allocating D1 uses is not appropriate for the CS, but there may be scope to consider through the Site Allocations DPD.	Reference in text
Scott Wilson 414	Parlington Estate / Revera	Need to be careful that do not put barriers against developing strategic scale leisure offers within open settings, e.g. UDP Policy LT5B:3 (Parlington Estate), as leisure proposals can be very varied and city centre and urban locations will not always meet their needs. Leisure uses should be explicitly referred to in this policy.	Agree that need to include reference within this chapter that some facilities have specific locational requirements, however, PPS4 does only relate to intensive leisure uses.	Reference in text
Natural England 58	Natural England	Agree that directing key work and leisure resources to centres will help direct journeys to central points, allowing them to be served by public transport links.	Support welcomed	None
Workshop responses	Individuals	Providing retail space should not just be about national multiples but for independent retailers.	LCC supports independent retailers, and further aspects of this to input into the CS will arise from the Town Centre Study.	None
Workshop responses	Individuals	People like to have the choice whether to shop locally or in the city centre.	This is why a hierarchy is promoted through the CS.	None
Workshop responses	Individuals	More leisure and entertainment in town centres, particularly for children.	A broad aim of the CS is to promote such facilities in town centres.	None
Workshop responses	Individuals	If centres are promoted for activity generating uses, need to also consider safety on the streets. New development should be designed and orientated to promote natural surveillance and minimise opportunities for crime.	Minimising crime is addressed by CS Policy SC8.	None
Workshop responses	Individuals	Question locating the arena in the City Centre when it could be located in a more deprived area and create local jobs.	The City Centre is a very sustainable location and is most appropriate for this type of city-wide attraction.	None

Bury and Walker Solicitors 2527	Leeds Residential Property Forum	Important to emphasise walking cycling and public transport but essential to have proper provision for car parking as car is main form of transport. Where parking restrictions are imposed there is a loss of business and shops closing, e.g. Headingley, including from a reduction in passing trade. Declining centres impacts negatively on surrounding neighbourhoods. It gives residents less choice which means perversely they are forced to travel further to shop elsewhere.	We recognise the importance of short term parking to centres' vitality and viability, and parking will be assessed as part of the Town Centre Study. The recent LCC Parking Study identifies local issues and recommendations, as a balance needs to be sought in respect of each centre and in making decisions on new development, although the CS can only give strategic guidance.	Assess any input from Parking Study
Policy SC4 – Creation of New Centres				
Government Office 95	Government Office	Lists criteria for new centres but does not identify where they are needed.	The PPS4 Town Centre Study will define this further, although the aim of SC4 is to establish criteria. Boundaries will only be identified following more detailed work at the Site Allocations stage. Centres associated with strategic housing development will be developed using the criteria in this policy. Are likely to change the title of SC4 to incorporate 'expanded' centres as well as new, to reflect the changes proposed to SC5 and thereby make sure that all types of centre proposals will be covered by policy.	Potential location of new centres to be defined further through TC Study
Turley Associates 5670	Swayfields (Skelton)	Last bullet point is unclear, replace 'existing' with 'proposed.'	Agree the word 'existing' could be removed.	Change text
GVA Grimley 5661	Rushbond	Clarify that SC4 refers to new centres which may be identified after adoption of the CS, and not those centres indicated as aspirations within the Centre Hierarchy Diagram.	Agree that the policy refers to new centres which may be identified after the CS is adopted, although those new centres proposed in the CS are also based on these criteria.	Reference in text

ID Planning 5668 and 5671	Ben Bailey / Barwick Developments/ Persimmon / Taylor Wimpey / Edmund Thornhill / Great North Developments / Bracken Developments / Robert Ogden Partnership / Ringways Motor Group	Support the broad approach.	Support welcomed.	None
Metro 1933	Metro	Support the principal and welcome the inclusion of requirement to ensure sustainable communities are developed through good access to local facilities by public transport.	Support welcomed.	None
Planning Potential 5680	Aldi	Welcome a policy giving guidance on the creation of new centres, although the need can be not just as an increase in population, but the need for local investment, to provide consumer choice, and to address deficiencies in existing provision.	Identifying deficiencies in existing provision and the need for local investment to be addressed through Town Centre Study.	None
GVA Grimley 5661	Rushbond	Should give more weight to impact and qualitative need than quantitative need for additional floorspace (draft PPS4). Should acknowledge that quantitative need may be identified as surplus capacity as a result of growth in retail expenditure and the distribution of foodstores (PPS6).	Judgements on need will be based on PPS4 guidance, and the Town Centre Study will address capacity.	None
Pegasus Planning 4388	Individual	This is an appropriate mechanism for delivery of sustainable communities. However, the likely need to deliver new centres as part of large scale housing allocations adds strength to the argument for the identification of more, longer term strategic sites in the CS.	Addressed in housing chapter and through Infrastructure Delivery Plan.	None
Individual 4730	Individual	Need provision for corner shop and local facilities when new housing estates are built.	Where such elements are integral to sustainable new development, they will be specified through the Site Allocations DPD.	None

Policy SC5 – Edge of Centre Developments				
Government Office 95 Turley Associates 1743	Government Office / Sainsburys	Not locally specific and therefore does not add to national or regional guidance.	Substantially agree, although will be reviewing in light of PPS4 and the Town Centre Study. SC5 does go into more detail than PPS4 regarding previously developed land. The Town Centre Study will also assess any local impact criteria. The paragraph regarding offices in regeneration areas is likely to be deleted.	SC5 to be reviewed against PPS4 and TC Study
Indigo Planning 806	National Grid Property Holdings / Aviva Investors	Two points inconsistent with PPS6: A literal interpretation of the wording "no site or premises are available within the defined centre, or nearby centres within a reasonable catchments" could mean that development proposed in an edge of centre location could be opposed if there were a single vacancy unit in the centre, irrespective of whether it would be suitable or viable. Also, 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 likely that SC5 will be revised so its detailed wording is no longer relevant, although comments regarding clarity and consistency with PPS4 are noted. The Public Transport Improvements and Developer Contributions SPD sets out the City Council's accessibility standards.	SC5 to be reviewed
Carter Jonas 5681	The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate	Would be appropriate for criterion 7 to incorporate acknowledgement that a site can be made more accessible.	Agree.	Reference in text as part of review of SC5
Metro 1933	Metro	Support and are encouraged by the measures introduced to manage car parking in an attempt to encourage greater use of public transport. What level of service do the Council consider 'a high frequency public transport corridor' to be? Should enhancements to public transport be required to achieve the high frequency corridor, how long would the Council consider a reasonable time period be for such subsidy?	It is likely that SC5 will be revised so its detailed wording is no longer relevant, although comments regarding clarity are noted. The Public Transport Improvements and Developer Contributions SPD sets out the City Council's accessibility standards.	SC5 to be reviewed

Scott Wilson 414	Parlington Estate / Revera	Missing a reference to the natural environment. Suggested wording: "The conservation and enhancement of the historic and natural environment and built heritage of the District."	This point is a normal development management consideration, and is also incorporated within bullet 6 of the policy. However, it is likely that SC5 will be revised so its detailed wording is no longer relevant.	None
Policy SC6 – Health, Education, Culture, and Leisure				
Government Office 95 Carter Jonas 5681	Government Office / Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate	Not locally specific and is advocatory rather than delivery specific.	There is a place for advocatory policies in the Core Strategy and in order to be concise the different themes were merged into one policy. However, the CS Vision and overall policy suite is to be reviewed, and the need for this policy will be reviewed at that time.	Reconsider format of SC6 in wider context of revised CS
NHS 5693 Cllr Illingworth 2703	NHS / Cllr Illingworth	Refers more to physical buildings, and so also need a general policy on health (along with learning, culture, and leisure) to scope the wider health and spatial planning issues and enable future work through the LDF. The Vision for Leeds and the Leeds Strategic Plan include a number of objectives and strategic priorities for health and wellbeing which link with spatial planning and these should be more drawn out, e.g. in 'Health and Wellbeing' states "we will improve how we measure health and make sure that we take account of any effect our other policies and plans may have on health." Could integrate Health Impact Assessments and identify S106 requirements for health. More content regarding health matters and a direct approach to tackling health issues/gap.	Agree could draw more from the Vision for Leeds, and is to be discussed more in CS Vision to highlight further the link between planning and health as the two aspects are so entwined. Infrastructure Delivery Plan is to include consideration of health facilities, and Health Impact Assessments are also being considered through the work to update the LCC Sustainability Appraisal process.	None relating to this chapter but expanded reference in Vision
Scott Wilson 414	Parlington Estate / Revera	Potential that the overall hierarchy of centres approach could reduce the weight given to such supportive policy.	The hierarchy of centres is the main priority, but consider that SC6 interlinks with and supports this. The review of SC6 will ensure clarity with the balance with SC4.	Reconsider format of SC6 in wider context of revised CS
Individual 5639	Individual	Although there is reference to 'Learning facilities' this is packaged with health, cultural and leisure facilities - education deserves a section of its own.	There is a place for advocatory policies in the Core Strategy and in order to be concise the different themes were merged into one policy. However, the CS Vision and overall policy suite is to be reviewed, and the need for this policy will be reviewed at that time.	Reconsider format of SC6 in wider context of revised CS

Carter Jonas 5681	The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate	Under the fourth criterion a reference is made to student housing under Policy H6, but H6 doesn't actually directly refer to this.	Noted.	Ensure consistent policies
Savills 467	MEPC	Important is underpinned by a robust, up to date evidence base, but also with enough flexibility to ensure they can be adjusted to reflect the particular circumstances of developments and the other substantial benefits they may bring to an area.	Noted, and consider the policy meets these points.	None
Teaching Hospitals Trust 5690	Teaching Hospitals Trust	Reference to the partnership should also include the Teaching Hospitals Trust.	Noted.	Reference in text
British Waterways 338	British Waterways	Should acknowledge the role inland waterways and towing paths can play in achieving sustainable community objectives, e.g. education and training (outdoor classroom facility and volunteering opportunities); health and well-being (actively promoted by stakeholders as encouraging and supporting physical and healthy outdoor activity); and cultural as an important part of the cultural and built heritage.	To be addressed in GI Chapter.	None for this chapter
Workshop responses	Individuals	Asian and BME communities have special needs in relation to sheltered housing in terms of food, languages, distance to places of worship, and within existing communities.	Can highlight further in this chapter that sustainable communities are for all sectors of the community. Specific housing needs are addressed in the Housing chapter.	Reference in text
Harewood House Trust 5645	Harewood House Trust	Need much more reference to important heritage assets, particularly art, heritage, and cultural offerings. Indeed many such assets are owned by LCC and have benefited from significant public investment in recent years, including heritage houses (Lotherton Hall and Temple Newsam), art galleries (Leeds Art Gallery and the Henry Moor Institute) and the new Leeds City Museum. Essential to give explicit support to future development and enhancement of places such as Harewood House and other places of historical and cultural significance.	Agree could provide more recognition of cultural facilities (in broad terms) to provide more of a context for this policy. Also links to SC3 which will acknowledge the role of assets which are already located outside of centres.	Reference in text
Workshop Responses	Individuals	CS to promote more visitor attractions for the City Centre (museums etc)? Leeds Central Market is a key asset for the city and should be better promoted.		

NHS 5654	NHS	Need greater emphasis on NHS policy to transform community services by providing more services closer to home and greater connectivity between community facilities. Policy should also direct greater integration (co-location) of e.g. education, social care, and leisure to allow better service integration.	Consider this is covered through the support in SC6.	None
Access to greenspace and playing pitches				
Individual 4754	Individual	Nothing being done to alleviate the problem of increasing allotment waiting lists.	Existing allotments currently protected, and quantity to be identified further through the PPG17 Audit & Needs Assessment. Also ongoing work by Parks and Countryside (City Development). Further detail is outside scope of CS.	None
Turley Associates 5670	Swayfields (Skelton)	Too detailed.	A consideration of the saved policies is being undertaken. Policies will be informed by the conclusions of the PPG17 Audit & Needs Assessment.	PPG17 Study to influence saved policies exercise
GVA Grimley 5661	Rushbond	Need to consider the use, function and quality of existing greenspace rather than retaining existing poor quality provision.	Addressed as integral aspect of the PPG17 Audit & Needs Assessment.	None
University of Leeds 846	University of Leeds	Should be specific mention of small scale food growing, including additional allotments.	Agree, although in part depends on the conclusions of the PPG17 Audit & Needs Assessment.	Reference in text

<p>Individual 4754 Roundhay Planning Forum 5057 ID Planning 5668 and 5671 J & J Design 5666 Dacre Son & Hartley 480</p>	<p>Individual / Roundhay Planning Forum / Ben Bailey / Barwick Developments/ Persimmon / Taylor Wimpey / Edmund Thornhill / Great North Developments / Bracken Developments / Robert Ogden Partnership / Ringways Motor Group / Brownberrie Education / Horsforth Gospel Hall / Taylor Wimpey/ Persimmon/ Redrow / Individuals</p>	<p>Need PPG17 study to be completed in order to feed into CS as essential element of the evidence base as could impact on its overall delivery.</p> <p>Should be able to make further representations after publication of the PPG17 study.</p>	<p>Agree that PPG17 is important part of the evidence base and will help to update the CS greenspace policies and standards.</p> <p>At the detailed site level it will feed more into the Site Allocations DPD, where consultation will be possible.</p>	<p>PPG17 Study to influence saved policies exercise</p>
<p>Smiths Gore 5017 Drivers Jonas 5558 Carter Jonas 5681</p>	<p>Cannon Hall Estate / Horsforth Riverside / The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate</p>	<p>Greenspace policies need to be reviewed and updated to reflect more up-to-date policy advice, changes in circumstances, and evidence. Reference specific site at Fraser Avenue in Horsforth. Need flexibility to ensure balance between the protection of greenspace and that best use is made of existing derelict sites.</p> <p>Needs to be a clear link between open space policies and the proposals within the GI policies.</p>	<p>A consideration of the saved policies is being undertaken. Policies will be informed by PPG17 Audit & Needs Assessment. PPG17 and other information will also inform the Site Allocations DPD. Specific site discussions are too detailed for the CS.</p> <p>Will ensure there is clarity between these two areas and relevant saved policies.</p>	<p>PPG17 Study to influence review of saved policies</p> <p>Ensure CS signposts links between policies</p>
<p>Brownberrie Education / Horsforth Gospel Hall</p>	<p>Brownberrie Education / Horsforth Gospel Hall</p>	<p>Support, although saved Policy N11 should be more encompassing (possibly based upon N1). Object to the saved Policy N11 as protection of 'other open land' in the built up area should only be done through consultation.</p>	<p>Areas identified through PPG17 and brought forwards through the Site Allocations DPD would be granted a high level of protection after consultation. N11 will be addressed through the saved policy exercise.</p>	<p>Review of saved policies</p>
<p>Leeds Civic Trust 62 University of Leeds 846</p>	<p>Leeds Civic Trust / University of Leeds</p>	<p>Policies may need to be strengthened to ensure a more strategic approach to creation of larger areas of greenspace.</p>	<p>Noted, and will be addressed following PPG17 Audit & Needs Assessment and as part of the GI chapter.</p>	<p>None for this chapter</p>

Policy SC7 – Sustainable Design and Construction				
Representors in support		34		
Representors against		7		
Government Office 95	Government Office	SC7 would be better under the environment objective. It should be locally specific and SMART, and should not replicate regional policy without justifying that it is appropriate to Leeds.	Agree with move to environment chapter/ climate change section. SC7 is not included as a requirement in either national or regional policy and therefore does not replicate it.	Move SC7 and SC8 to Env section
General Support:				
Individual 5649 Leeds Civic Trust 62 Liberal Democrat Otley and Yeadon Councillors 4817 Individual 14, 4694, 4743, Turley Associates 5670 Sigma Planning 4110 Natural England 58	Individual / Leeds Civic Trust / Liberal Democrat Otley and Yeadon Councillors / Individuals / Swayfields (Skelton) / Hallam Land Management / The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate / Natural England	Support but with stricter standards. Same standards should be applied to all buildings and developments not just major schemes. There is no need for such a distinction. It would create an unfair market. Smaller schemes should not be exempted from any commitment to sustainable design, and a viable policy approach covering such schemes should be investigated.	Standards need to be carefully set in order to avoid being too onerous. High standards of sustainability and design will be encouraged everywhere. However, economies of scale mean that it is likely to make smaller developments unviable. Building regulations apply to all sizes of buildings.	None
English Heritage 99	English Heritage	Support that recognises that there may be circumstances where the standards cannot be met (i.e. conversions), although should explain more fully, that meeting standards has to be reconciled with the need to ensure that those elements which contribute to the special character of the city's historic buildings are not adversely affected.	Agree could reference in text.	Reference in text
Scott Wilson 414	Parlington Estate / Revera	Support but should also refer to the new BREEAM Communities Assessment Framework to assess and certify the sustainability of an entire development proposal rather than focusing on the sustainability of individual buildings (i.e. by current BREEAM and CSH). Would help in understanding the opportunities and constraints to achieving a particular sustainability standard dependent on the characteristics of a particular site/development.	Will reference the BREEAM Communities Assessment Framework in the CS, and encourage its use and consideration of its principles, although as it is only at pilot project stage it would be too onerous and premature at this stage to require it as a part of policy SC7.	Reference in text

General Objections:				
Peacock & Smith 5665 White Young Green 420 GVA Grimley 5661 Advent Development 5686 ID Planning 5668 and 5671 Drivers Jonas 5558 Carter Jonas 5681 Bury & Walker Solicitors 2527 Dacre Son & Hartley 480 Turley Associates 1743 Aspinall Verdi 5689 Bury & Walker Solicitors 2527 GVA Grimley 5661	Stockheld Estate / Individual / LBIA / Harrow Estates / Leeds Trinity University College / Goodman International / Rushbond / Advent Development / Ben Bailey / Barwick Developments/ Persimmon / Taylor Wimpey / Edmund Thornhill / Great North Developments / Bracken Developments / Robert Ogden Partnership / Ringways Motor Group / Horsforth Riverside / Bury & Walker Solicitors / Taylor Wimpey/ Persimmon/ Redrow / Individuals / Barratt Strategic / Montpellier Estates / Bury & Walker Solicitors / Rushbond	<p>Object. Welcome principle and that Leeds should strive to be a forerunner, and generally reasonable short term objectives, but unreasonable and too prescriptive in longer term. This is particularly considering the current economic impact on house building, different site circumstances, and changing policy requirements.</p> <p>It would impact on viability (particularly in regeneration areas) and therefore delay delivery and reduce housing numbers. Would be uncompetitive against neighbouring authorities for development and investment; in the current market ideological policy positions must give way to what works on the ground. Should recognise that developers will respond to environmental 'drivers' as the market requires.</p> <p>Should therefore only reflect national targets, with any subsequent changes being introduced in the light of monitoring. Needs more flexibility. It is already difficult to achieve compliance with building regulations. Without further justification fails the soundness test. Should be addressed on a site by site basis, taking into account matters relating to an individual site's characteristics, e.g. land contamination, areas of undevelopable land, and the need to contribute towards other planning obligations (e.g. education, affordable housing, etc).</p> <p>A blanket requirement to achieve BREEAM Excellent will adversely affect refurbishment and conversion projects, and it is unrealistic and impractical for such projects.</p>	The changing national agenda underpins this approach. Viability can be assessed at application stage and considered alongside other policies e.g. affordable housing and other contributions. The policy will ensure the standards are achieved for some schemes, whereas without the policy no schemes would achieve them. Also, the CS is a long term document and over time the costs will come down. Evidence from the sustainability appraisal at the issues and options stage demonstrates that higher standards are required in order to mitigate the negative effects of growth, and SC7 provides the basis for negotiations.	None
Aspinall Verdi 5689 University of Leeds 846	Montpellier Estates / University of Leeds	Only requiring larger developments to meet higher standards could lead to developers purposefully staying below the threshold in order to save costs, which is ultimately inefficient in terms of land use. Need vigilance for developments that that are purposefully just below the threshold size (including developments split into phases).	Applications are considered on a site by site basis to ensure an efficient use of land. Changing the supporting text to cover number of units and size of site means it is much less likely that developers could purposefully stay below the threshold.	None

J & J Design 5666	Brownberrie Education / Horsforth Gospel Hall	The SoS has recently struck down regional policies seeking to impose local standards which exceed Building Regulation requirements.	SC7 is not a regional policy – there is a local need due to local circumstances as shown in Sustainability Appraisal evidence.	None
GVA Grimley 5661 Advent Development 5686	Rushbond / Advent Development	Requirement for a post construction review certificate should be deleted to allow greater flexibility in delivery, otherwise it will be too onerous on developers who may fall short of BREEAM requirements due to circumstances outside their control, e.g. loss of local post office and cash machine or change in bus route, where the developer can't mitigate these lost credits at a late stage.	Disagree, post –construction review certificate is required in order to know that the policy has been complied with. Locational points are only a small part of the BREEAM scoring and therefore the closure of a post office or similar is not likely to largely impact on achieving the Policy.	None
Sigma Planning 4110 Carter Jonas 5681 J & J Design 5666	Hallam Land Management / The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate / Brownberrie Education / Horsforth Gospel Hall	Unnecessary and confusing to have parallel planning requirements (i.e. national policy through the Building Regulations and the Code for Sustainable Homes), particularly where these only apply partially. The relationship between the Building Control function and Building Regulations should be made clear. Places of worship are currently exempt from Part L of the Building Regulations and should be explicitly referenced.	Sustainability appraisal demonstrates that higher standards are required in order to mitigate the negative effects of growth. Appropriate to have a locally specific target - Leeds has its own set of circumstances. There are a range of exemptions throughout the Building Regulations which are too detailed to be included in this Policy. The CS will further clarify the relationship of SC7 with Building Control and the Building Regulations.	None Clarify the relationship with Building Regulations
Miscellaneous:				
Savills 467	MEPC	Important is underpinned by a robust, up to date evidence base, but also with enough flexibility to ensure they can be adjusted to reflect the particular circumstances of developments and the other substantial benefits they may bring to an area.	Comments noted, and consider this will be fully achieved in the Submission version of the Core Strategy.	None
Sigma Planning 4110	Hallam Land Management	Larger developments have potential for a comprehensive approach taking advantage of economies of scale to provide local energy production, Sustainable Urban Drainage (SuDS), and more sustainable transport systems. The policy emphasis should be more clearly and directly focused on these elements.	Agree there are economies of scale with regard to energy production and sustainable transport. However, SuDs is not generally more costly for small developments to provide, as they need to provide drainage anyway even if not a comprehensive system. It may therefore even be cheaper than traditional drainage systems.	None
NHS 5693	NHS	Could link to SC6 to support integrating locally relevant health based design criteria into new/existing design and construction guides, to drive the adoption of standards (Lifetime Homes), locally developed space standards, or to enhance active transport (i.e. bike storage in flats).	SC6 is specifically about facilities rather than about design. The Lifetime Neighbourhoods for Leeds project seeks to achieve, as a minimum, Code for Sustainable Homes Level 4 on all new homes provided	None

Leeds City College 5653	Leeds City College	Policy wording needs to be amended as post construction review certificates are not available; the normal approach is 'post occupation' review certificates.	Planning has to control development before occupation. Discussions with Building Research Establishment indicate that post-construction certificates are available.	None
Individual 5151	Individual	All houses should have solar panels. All houses should have a duty to plant trees.	Solar panels are encouraged but this would be too prescriptive. It is not always technically viable to introduce solar panels, and can meet the Code through a range of measures. A tree requirement is too detailed for inclusion in a Core Strategy, although it is covered and encouraged through individual landscaping schemes.	None
Policy SC8 / SC9 – Design, Conservation and Landscape, and Disabled Access				
Merging Policies SC8 and SC9:				
Government Office 95	Government Office	SC8 and SC9 would be better under the environment objective. It should be locally specific and SMART, and should not replicate regional policy without justifying that it is appropriate to Leeds.	Consider that SC8 is locally specific, and has a beneficial place in the Sustainable Communities Chapter. SC9 is to be merged into SC8.	Merge SC9 into SC8
English Heritage 99 Carter Jonas 5681	English Heritage / The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate	SC8 and SC9 could be combined to a single policy as disabled access it should be an integral part of the design process. An overarching quality/design policy could include matters such as accessibility for all members of the community and the obligations under e.g. DDA legislation.	Agree will merge policies SC8 and SC9. The obligations under the DDA legislation are included implicitly within the policy.	Merge SC9 into SC8
English Heritage 99	English Heritage	There is no need for the caveat regarding 'exceptional circumstances' in SC9 for disabled access, particularly in relation to listed buildings (not exempt from the DDA). Concern for maintaining the valued elements of buildings whilst accommodating accessibility is not exceptional, and caveat will allow an easy 'cop out'. Need to be defined further if retained.	Will remove this caveat, and SC9 will be merged into SC8.	Merge SC9 into SC8
Additions to Policy:				
Coal Authority 1922	Coal Authority	Add additional bullet: "Ground conditions and land stability' to comply with the advice in PPG14 in dealing with unstable land, given the legacy of former mining operations present within Leeds."	Include 'ground conditions and stability' in 1 st bullet of SC8.	Include in policy

British Waterways 338	British Waterways	Should amend to “the topography, landforms, river and canal corridors.....”. Recommend that design fundamentals for waterfront development are specified, and reflect some of the principles in TCPA Policy Advice Note: Inland Waterways: Unlocking the potential and securing the future of inland waterways through the planning system (2009). e.g. waterways and water spaces need to be viewed as an integral part of a wider network; as a space and leisure and commercial resource in its own right; as the starting point for consideration of the development and waterside land; encouraging and improving access; enhancing environmental quality; and improve appropriate treatment for towpaths.	Will amend policy as suggested, and incorporate discussion of waterways in the CS although may be more appropriate in the GI section.	Reference in text
English Heritage 99	English Heritage	Support but are elements of the historic environment which neither SC8 nor national policy currently address. Need to address how assets might be managed, such as historic parks and gardens (of which Leeds has the highest amount in Yorkshire) and the registered battlefield at Adwalton (one of only 7 in the Region and which the latest Heritage at Risk Register has identified as being one of the most at risk in the country), also Thorpe Arch, the best preserved example in the country of a WW2 Royal Ordnance Filling Factory. Leeds has the greatest number of Buildings at Risk in the Region, of which 8 have been on the register since its inception in 1999 including the First White Cloth Hall on Kirkgate, and 13 of its 57 Scheduled Monuments have been identified as being at risk. Historic assets (including those which are not designated but which make an important contribution to the character of an area) could be managed through; improving understanding (e.g. Conservation Area Appraisals, archaeological assessments etc); identifying those which are most at risk and how they will be addressed over the plan period; identifying what approach might be used to enhance assets; through engagement with local communities; and establishing a local list of buildings (as has been done in a number of other authorities around the Region).	Noted and will include some of these details in text, including in the Vision section. However, historic assets are all implicitly encompassed within SC8.	Reference in text
Metro 1933	Metro	Additional requirements to consider when designing development schemes: ‘desire lines to public transport access points,’ and ‘the location and specification of quality of public transport infrastructure’.	The first point is already encompassed by bullet point 4 in policy SC8. the 2 nd point is not relevant to this design policy, although is addressed through policy in other chapters.	None

GVA Grimley 5661 Leeds Civic Trust 62	Rushbond / Leeds Civic Trust	SC8 is imprecise without reference to appropriate standards or guidelines and is likely to be difficult to enforce. It does not reflect all aspects of design i.e. psychology of design. Public realm would be a positive policy to encourage community involvement.	SC8 sets out the important considerations of Leeds' geography and character, but it is not possible to have specific standards for such a policy. Public realm is included within the policy under 'all development.'	None
Miscellaneous:				
Carter Jonas 5681	The Diocese of Ripon & Leeds / Symphony Group / AR Briggs & Co / Ledston Estate / Lady Elizabeth Hastings Charity Estate / Hatfield Estate	Appropriate to have an overarching design policy such as SC8 as it provides place-making principles, although it should be placed earlier in the CS.	Support welcomed.	None
Workshop responses	Individuals	Need SPD on design guidelines to address accessibility and disability issues.	These elements are incorporated in the emerging Sustainable Design and Construction SPD and the adopted Street Design Guide as well as other SPDs.	None
Workshop responses	Individuals	Great concerns of people with disabilities with the concept and use of shared space; CS needs to be updated from Executive Board and the Scrutiny Board.	The CS doesn't go into this level of detail. Consider that this issue has been determined to the agreement of relevant parties through the emerging Sustainable Design and Construction SPD and adopted Street Design Guide consultation process.	None
Little Woodhouse Community Association 3054 Inner NW Area Committee Planning Sub Group 5696	Little Woodhouse Community Association / Inner NW Area Committee Planning Sub Group	In order to preserve and enhance Leeds' historical heritage, should be able to have more control over older larger properties which developers want to demolish when become empty rather than reuse. More consideration for buildings of architectural interest and character not listed and not in a conservation area. More attention to highway materials and building maintenance associated with developments relating to conservation areas.	It is partly because the Code for Sustainable Homes does not include protection for reuse of buildings, that this has been encouraged through the emerging Sustainable Design and Construction SPD. Conservation area policies in the UDP which provide such detail, will be retained.	None
Natural England 58	Natural England	The design of all development should take into account the character and capacity of the landscape to accommodate it, and recommend that an up-to-date landscape character assessment would inform this.	This principle is addressed in SC8, and through the Green Infrastructure chapter. Determining the evidence required for individual applications is too detailed for the CS.	None

University of Leeds 846 English Heritage 99	University of Leeds / English Heritage	Should be a policy to deal with building height, as high densities can be achieved without being excessively tall. Tall buildings have too high energy and running costs, and create problems for pedestrians and block sunlight and views. But may need to make provision in industrial areas for tall urban farming structures before the end of the plan period. In the 3 rd bullet of second part of SC8, it is not clear what 'prominence' means, should instead refer to "skylines, key views, and vistas." The justification should set out those aspects which are likely to be amplified by subsequent DPDs or SPDs. How will people be able to ascertain which key views ought to be safeguarded? What is the strategy for tall buildings?	The Council provides a range of additional guidance that builds on these principles, e.g. adopted Tall Buildings SPD, Conservation Area Appraisals, Neighbourhoods for Living. These will, however, be more clearly referenced in the supporting text to SC8.	Reference in text
Individual 4754	Individual	All new build should be sympathetic with the surrounding buildings and not allowed as at present (a mix of new and old architecture).	Such an approach would unnecessarily constrict good design principles.	None
Individual 5632	Individual	There should be a stronger drive to improve disabled access.	Agree, and this is the intention of SC9 (although it will be merged with SC8).	None
Individual 5612	Individual	New builds have cramped inconvenient living spaces, few or no storage facilities, and inadequate access or parking. Design should be developed by architects, not high volume builders. Good design does not need to be more expensive but does lead to healthier communities and more beautiful and safer urban surroundings.	Agree that design is important to safe and healthy lifestyles. Aspects mentioned are all considered during determination of planning applications.	None
Turley Associates 1743	Barratt Strategic	Covers a level a detail not appropriate for a CS.	Disagree, detailed design policies and SPDs require a parent policy on design and disabled access.	None
Miscellaneous Comments				
Leeds Civic Trust 62	Leeds Civic Trust	Moortown Corner is not noted on the Sustainable Communities map.	Noted.	Amend map
Individual 5658	Individual	Appropriate sized eating and drinking venues are also important to local centres and shopping parades, such as cafes, small restaurants, and local public houses.	Agree, and consider these are supported by the CS as ancillary uses as part of the wider mix which would support the primary retail function of such centres.	None

Dacre Son & Hartley 480	Taylor Wimpey/ Persimmon/ Redrow / Individuals	Need separate reference within Sustainable Communities text to the role of Major Growth Areas/Strategic Land Allocations. Suggest policy wording to follow paragraphs 5.23-5.28; "Major growth areas and strategic land allocations will be required to deliver housing growth and will be identified, allocated and released in a manner that helps to provide the necessary housing and employment growth in sustainable locations in accordance with all other aims of the Core Strategy. These sites should include East Leeds Extension (UDPR Allocation H3-3A.33). These sites will be further defined in the LDF Site Allocations DPD where their release, infrastructure requirements and relationship with housing need regeneration and transportation links will be fully detailed. It is expected that the release of East Leeds Extension will be required in the early part of the plan and the Council will work closely with the developers in the production of a development brief."	It is not considered necessary to repeat this explanation in the Sustainable Communities chapter as these elements are fully covered in the Housing Chapter.	None
NHS 5693	NHS	Need to be explicit about ensuring cohesion and recognising the diversity of communities / population groups within these areas i.e. BME communities, new arrivals, European migrants etc, and their corresponding cultural needs.	Noted.	Reference in text
Workshop responses	Individuals	Aligning hierarchy centres with transport policies would help to ensure access between lower and higher hierarchy areas allowing better access to all facilities. Issues of centres have links to transport issues as is often hard to get to neighbouring centres by bus unless go via the city centre.	There is a link between the planned development in the CS and investment in infrastructure including transport, and the CS transport policies do aim to maintain the best access to the hierarchy of centres. However, it is acknowledged that individual journey patterns are complex and not all journey combinations can be accommodated by public transport routes, especially where not viable such as many orbital routes.	None
Barton Willmore 57 Keyland 2064	Templegate Developments / Keyland	New town and local centres within the eastern part of Leeds should tie in more closely with the EASEL and AVL Town and Local Centres Assessment, and should be clarified in respect of such designations in the AVL.	Centre locations have been based on recommendations in the EASEL / AVL Study. Will be further evidence from the District wide Town Centre Study and as the AVL AAP is developed further.	None
University of Leeds 846	University of Leeds	Physical retailing is likely to contract rather than expand in future.	Assumptions will be set out in the Town Centre Study and physical retailing is still a vital element of planning for centres.	None
Workshop responses	Individuals	Environmental improvements in centres are also important. Should set out how quality community parks can enhance and play key role in sense of the community.	Agree, and aim to bring out more emphasis on place making and enhancing viability and vitality, and what is a sustainable community.	Reference in text

Workshop responses	Individuals	Need to build new cultural facilities for when new migrants are placed in white working class areas.	This is too detailed for the CS although support promotion and retention of community facilities generally.	None
Workshop responses	Individuals	Groups using community facilities are being pushed out as job shops take over the space.	This is too detailed for the CS although support promotion and retention of community facilities generally.	None
Individual 5612	Individual	Map 2 is not legible. CS doesn't mention classes such as arts and crafts which are essential to maintain active life of older people.	The maps are required to be diagrammatic, although aim to be more user friendly in final versions. Support for such classes is inherently encompassed in the 'extended services' text.	None
Planning Potential 5680	Aldi	Should recognise the contribution of retail jobs towards the local economy and as a facilitator of economic development.	Already referred to in Economy chapter but could expand reference in Sustainable Communities section including the link with PPS4.	Reference in text

Other points to include in revisions to Sustainable Communities Chapter

Needs to address new requirements and evidence base in PPS4; will in part be drawn out of Town Centre Study recommendations.

RSS Paragraph 11.10: The uses listed in part A of policy E2 are those defined in PPS6. Other uses that need to be accessible to a wide area by public transport, such as large hospitals, universities or colleges may also be most appropriately located in or close to the centres of Regional and Sub Regional cities and towns in order to meet the accessibility criteria set out in Table 13.8.

RSS Paragraph 11.11: Part C of the policy relates to out-of-centre regional and sub-regional shopping centres. The largest existing such centres in the region are Meadowhall and White Rose. There is no evidence to justify the large scale expansion of these, other sub regional shopping centres, or the development of new ones. What is "large scale" will need to be considered in the light of the particular circumstances, including the size and nature of the existing centre, taking account of the cumulative impact of extensions. A key determinant will be whether there would be a regionally or sub-regionally significant impact. Proposals for smaller scale extensions will be a matter for local planning authorities to determine taking account of PPS6.

Use strategic level description of EASEL in regeneration section as no longer taking forwards an EASEL-wide document.

SC3 needs more clarity on scale, and needs to separate out the 'acceptable uses' from the 'sequential approach.'

SC4 – New centres are not necessarily as a result of regeneration (i.e. regeneration doesn't automatically mean increased population) but is also a need to address areas of acknowledged current deficiency.

Need a new policy to set out the local impact considerations, as proposed under PPS4 (and identified in part through Town Centre Study).