



Report of the Director of City Development

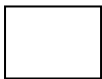
Development Plan Panel

Date: 22 June 2010

Subject: Leeds LDF Core Strategy – ‘Preferred Approach’ Analysis of Consultation Responses: Managing the Needs of a Growing City 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 theme “Managing the Needs of a Growing City”. This divides into two sections: The Housing Challenge and The Leeds Economy. The Report sets out headline comments and officers’ suggested responses. The full list of comments are addressed in the appendix tables.
3. Particular housing topics covered include housing land supply, housing mix, affordable housing and specialist housing. Particular economy topics include economic development priorities, the economic role of the city centre, provision of employment land and premises, office development, industrial and distribution development, protection of existing sites and the rural economy.

1. **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 chapter "Managing the Needs of a Growing City".

2. **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 was undertaken across the District (26 October – 7 December 2009). In support of this, a range of consultation activity took place. In response to this consultation activity a number of comments were received in response to the chapter "Managing the needs of a growing city". These are summarised in section 3 below and more detailed summary schedules are attached as Appendices 1-5 to this report.

3. **Main issues**

- 3.1. The theme "Managing the needs of a Growing City" divides into two sections: "The Housing Challenge" and "The Leeds Economy". The Housing Challenge includes policies on overall housing supply, housing mix, affordable housing and specialist housing. The section on The Leeds Economy has policies setting out economic development priorities, the economic role of the city centre, provision of employment land and premises, location of office, industrial and warehousing development, protection of existing employment land/buildings and the rural economy.
- 3.2. A summary of the main comments received is given below, and full details and responses are included in Appendices 1-5.

3.3. **The Housing Challenge.**

Housing Land Supply

- 3.3.2. The following headline issues were raised and recommended officer responses are provided:
 - i. The absence of the Strategic Housing Land Availability Assessment (SHLAA) at this stage, makes the consultation unsound, as it was not possible to understand the housing land approach. As a result of this comment, officers offered opportunity for those who made this comment to make further representations in April 2010 when the SHLAA 2009 was available.
 - ii. The "step-up" of the housing requirement will store up a massive undersupply of housing and is contrary to national and regional guidance. Officers consider that the step-up conforms with regional guidance and higher rates of delivery in

the later years (beyond 2017) will be possible with release of urban extensions and a return to buoyant economic conditions

- iii. The focus on urban areas and on previously developed land (PDL) is out of step with national planning policy which no longer contains a sequential approach. Officers consider that the “core approach” of regional policy still seeks to focus housing development on the main urban areas. It is accepted that the strict brownfield before greenfield policy of PPG3 is absent from PPS3, but PPS3 still has targets for brownfield land development and a plan-monitor-manage approach. Further research to consider strategic options (to be incorporated as part of a Housing Background Paper) will test the sustainability of the urban focus against other approaches.
- iv. The strategy lacks clarity in terms of locations for growth. Officers accept that the Publication Core Strategy will need to be clearer.
- v. The focus on urban areas will fail to deliver sufficient housing, particularly family housing with gardens. Greenfield land in a variety of sustainable locations must be released in tandem with PDL in urban areas. Strategic sites should be designated. Officers believe that the Core Strategy Preferred Approach policies on housing supply and housing mix will deliver sufficient housing including family housing with gardens.
- vi. A selective Green Belt review may be required and the Core Strategy should provide more direction on where and how this should be conducted. Officers agree that a selective Green Belt review may be required for the Site Allocations DPD but that the Core Strategy will need to give direction as appropriate. The position on this matter will however need to be reviewed in the light of the decision of the coalition government to abolish the RSS and associated housing targets.
- vii. Protected Areas of Search (PAS) land needs to be tested to sieve out the least sustainable locations. Officers agree that this will be a matter for the Site Allocations Plan (DPD).
- viii. The PDL target of 75% over the plan period (85-95% in early years) is too high relative to the Regional Spatial Strategy (RSS) target of 65% and will unduly restrict development contrary to national guidance. Officers believe that the targets conform with RSS policy.
- ix. The preference for the southern half of the district goes beyond the encouragement given in RSS. It will be difficult to define what the preference means in practice. Officers consider that this preference accords with RSS policy.
- x. The “windfall” allowance of 11% cannot be justified in terms of national planning guidance. There is no reason why Leeds cannot identify sufficient land. Also, Policy should not preclude windfall development on greenfield sites. Officers consider that Leeds has special reasons to warrant use of a windfall allowance.
- xi. It is wrong to say that “Quality of Place” takes priority over numerical targets. They are both necessary. Officers agree that we need to safeguard “Quality of Place” as far as possible.

- 3.3.3. The SHLAA released for a target period of consultation, once available, following the close of the Core Strategy Preferred Options consultation. Within this context, the following “post SHLAA” comments were received in April/May 2010:
- i. Even with the SHLAA, the CSPA lacks clarity on where housing is to be located. The plan needs to be more “place” orientated. Officers agree that the Core Strategy does need to be clearer about where new housing is to be focussed.
 - ii. The “suitability” category of developability which is defined in PPS3 and CLG’s Practice Guidance on SHLAAs has been misinterpreted and other criticisms of the SHLAA methodology are made. Officers believe the SHLAA’s use of

“suitability” accords with national definitions and that the SHLAA methodology is sound.

- iii. The Highways Agency submitted analysis of the impact of the CSPA housing growth proposals on the strategic highway network. Officers will need to maintain dialogue with the Highways Agency to explore how the negative impacts might be mitigated (for example by promoting public transport solutions) or alternative locations introduced.

3.3.4. Further research is underway to provide evidence to support the housing policy approach of the Core Strategy. Work is currently underway to consider strategic options (to be incorporated as part of a Housing Background Paper) as a basis to consider the sustainability of the distribution of new housing of the Core Strategy Preferred Approach (against distributions which were consulted upon as concepts in 2007 and as a basis to review the Preferred Approach in the light of consultation responses received) The “Strategic Housing Land Availability Assessment” 2009 is being updated to an April 2010 base date to provide up-to-date evidence of housing land supply opportunities.

Housing Mix

- 3.3.5. The following headline issues were raised and recommended officer responses are provided:
- i. A policy requirement is too inflexible and not justified. A non-binding aspiration to improve mix would be preferred. The market should determine what mix of dwellings is needed. Factors such as location and site circumstances should be taken into account. Officers consider that the policy is not prescriptive because it uses target bands rather than specific requirements, is to be judged through annual monitoring and will be applied on a “need to act” basis rather than to every scheme. The explanatory text to the policy makes clear that surrounding townscape and location specific needs will need to be taken into account.
 - ii. The evidence lacks consideration of demand, points to no clear conclusions and fails to account for elderly people wishing to stay in larger houses. Officers believe that the evidence informing Policy H4 at a strategic level is extensive, including OPCS household projections, the Council’s Strategic Housing Market Assessment (SHMA) 2007, past trends of housing delivery in Leeds going back to 1991 and data on the mix of Leeds’ existing dwelling stock. Nevertheless, the Council is updating the SHMA. Also, the Council is aware of policy and practice to help enable elderly people remain in their own homes for longer.
 - iii. The policy should also advise on housing mix for city and town centres. Officers agree that this is necessary for the city centre and expect the update of the SHMA to provide evidence.
 - iv. The split between sizes of dwelling by number of bedrooms (i.e. 1 and 2 bedroom dwellings as one category and 3+ bedroom dwellings as another) is inappropriate and should be reviewed. Officers agree and propose to use the SHMA update to inform the most appropriate split.

Affordable Housing

- 3.3.6. The following headline issues were raised and recommended officer responses are provided:
- i. The policy requirement for up to 40% affordable housing is considered too onerous and prescriptive. Officers consider that the policy is not prescriptive because it does not set 40% as a specific figure to be applied universally. However, the policy will be rewritten to set out a range of targets applicable

- under different scenarios. The detail will be set out in a Supplementary Planning Document (SPD) as this can then be responsive to up to date evidence on housing markets, need for affordable housing and the viability of delivering targets.
- ii. The policy is not based on an up to date evidence base. Officers have based the policy on RSS policy which estimates 30-40% affordable housing for Leeds. The figure is supported by the local evidence base; the Strategic Housing Market Assessment 2007 identifies a vast need for affordable housing (1889 affordable units per annum over a 15 year period) and the Economic Viability Appraisal (EVA) outlines that targets of 40% should be achievable in certain areas in certain market conditions. Both the SHMA and EVA are being updated and will be published prior to the revisions to the Core Strategy. Policy H5 will be revised as necessary to take account of up to date evidence.
 - iii. Applicants should be able to negotiate affordable provision on a site by site basis. Officer response: it is established practice that where there are viability issues an applicant may choose to submit an individual viability appraisal. Where this is verified by Leeds City Council affordable provision may be reduced accordingly. Policy H5 will be amended to incorporate wording to explain this. It should be noted that the strategic Economic Viability Assessment work involves modelling different scenarios and the effects of different levels of affordable housing upon the viability of development. This does not mean that individual viability assessments would no longer be needed or acceptable in future – each case should still be judged on its own merits, and there will always be pockets within the areas modelled in the EVA where more or less affordable housing could be achieved.
 - iv. Thresholds and tenure mix should be referred to in the policy. Officers agree that thresholds and tenure mixes should be included in the range of targets applicable under different scenarios, and that policy H5 should be amended to include reference to this.
 - v. The SPD should not be progressed in advance of the Core Strategy. The affordable housing policy should be examined by an Inspector. Officers will align the production of the SPD with the Core Strategy. A draft SPD went out for public consultation in September 2008, but, as the viability testing was carried out pre-recession, this work (the EVA) is being re-done. Once completed, the SPD will be redrafted to reflect a more up to date evidence base. The redrafting of the SPD will be tied in with or follow on from production of the Core Strategy to enable a full examination of all issues. The SPD will set out detailed policy for the current time period, and can then be revised as necessary as evidence (including need and viability) change. The Core Strategy will set out the range of targets which could be sought in different circumstances throughout the longer Core Strategy period.

Specialist Housing

- 3.3.7. The following headline issues were raised and recommended officer responses are provided:
- i. There was general criticism of the lack of evidence base to support policies of dispersal of specialist forms of housing (student, HMOs and elderly). Officers consider that Policy H6 should be re-written to separate out the different forms of specialist housing and applicable policies, for clarity. Further evidence needs to be gathered, as detailed below.
 - ii. Policy H15 of the UDP should be retained. There has been an increase in houses in multiple occupation (HMOs) in Headingley area. Need an SPD not just an overall strategy. There is also a contrary view to this, that student areas

have fewer problems than areas with a large proportion of HMOs elsewhere, and that student numbers are declining, and the massive amount of purpose built accommodation has meant less pressure on traditional areas. Officers consider that evidence needs to be gathered, including from the universities, HMO licensing authorities and the Strategic Housing Market Assessment update. In addition, officers need to assess implications of new legislation 2010 which introduced a new use class for HMOs, meaning that change of use from a dwelling house to a HMO will now need planning permission. (It should be noted that this cannot be applied retrospectively to existing HMOs). SPDs will need to be produced where further expansion of the Core Strategy policy is required. The Site Allocations DPD will identify development opportunities for specialist forms of housing, or areas where there is potential to restrict/control development.

- iii. A policy on housing for the elderly is generally welcomed, but there should also be reference to independent living and Lifetime Homes. Many elderly people do not want 1 bedroom accommodation as they need a 2nd bedroom for a carer or relative, so there should be less emphasis on 1 bedroom accommodation for the elderly. There should also be a specific definition and reference to 'disabled'. Officers will amend Policy H6 to separate out the different forms of specialist housing and the section on elderly housing will include reference to housing needs, independent living and Lifetime Homes.

3.4. The Leeds Economy

3.4.1. The following issues were raised and recommended officer responses are provided:

- i. General support for economic priorities, although whether it is necessary for these to be expressed in the form of a policy is questioned. Officers consider it important that the Core Strategy clearly expresses the economic priorities for the city. This can be achieved using a policy format like EC1 in the Preferred Approach or as part of a revised spatial vision. A final decision will need to be taken as the Draft Core Strategy document begins to take shape.
- ii. General support for retaining the primacy of the city centre as the main location for retail and leisure development but some concern from developers that the economic development potential of other town centres and existing business and office parks is not being fully considered. There is general support for the emerging city centre park proposals. Officers consider it is important that the City Centre is identified as the main location for retail, leisure and office development serving a wide catchment area. The Preferred Approach also allows for such development in town and local centre where it meets a local need. Out of centre development is not excluded entirely but options in the city centre or town centres need to be explored first. A number of planning permissions for business and office park remain in place and the potential for these sites to be developed out has been taken into account.
- iii. Some support for the identified employment land requirement but also a number of concerns that the requirement is insufficient to support the growth of Leeds as the main economic driver of the City Region. Also concern that the requirement is based on an out of date evidence base, which should be updated to align with RSS figures. Officers agree that there is a need to update the evidence which supports the identification of the employment land requirement but disagree that the RSS figures should be used as they are also based on pre-recession economic forecasts. The Employment Land Review (ELR) is being updated and a revised version will be published over the summer. The RSS does allow for

more up to date forecasts to be used. Overall, it is important that a flexible supply of employment land is identified and the ELR update is being undertaken with this in mind.

- iv. Mixed opinions regarding employment land around airport. Some concerns about extending airport related development but also views that the range of acceptable uses should be widened to include hotel development and car parking. Officers note the concerns from both sides and accept that Policy EC5 needs to be clarified and revised. There are existing employment allocations close to the airport and their retention or potential for other uses will need to be considered as part of the preparation of the Site Allocations DPD.
- v. Policy EC6 should adopt a positive approach to the redevelopment of existing employment land for other uses. Officers note that changes to national policy brought in by PPS4 (released in December 2009 after the consultation) requires a more flexible approach to be taken to other economic development uses on employment land but this does not apply to housing development. The policy will need to be revised to be consistent with PPS4 but there still needs to be protection of existing employment sites and premises where a clear strategic or local need is identified.
- vi. Some support for rural economy policy (EC7) but also concerns that the policy does not go far enough to encourage diversification of the rural economy e.g. by being overly-restrictive toward large scale leisure and tourism development and economic development in the smaller settlements. Officers consider there is a balance to be struck between allowing diversification of the economy in the countryside on the one hand and protecting it from inappropriate development and promoting a sustainable pattern of development on the other. The role of market and other towns in serving their local rural catchment, is therefore important. The policy will be reviewed to ensure it strikes the right balance. Evidence from the ELR and City, Town and Local Centre Study will assist this process.

4. **Next Steps**

- 4.1. To take the Housing Challenge forward research is underway on a number of fronts. The preparation of the Housing Background paper is underway and the “Strategic Housing Land Availability Assessment” (SHLAA) 2009 is being updated to an April 2010 base date (to provide up-to-date evidence of housing land supply opportunities). The “Strategic Housing Market Assessment” (SHMA) of 2007 is being updated to provide supporting evidence for policies on housing mix, affordable housing and specialist housing. The implications of the “Economic Viability Assessment” is being considered to help determine the affordable housing targets.
- 4.2. The Employment Land Review is being updated to provide evidence on the scale of economic growth that needs to be planned for, particularly in terms of new office floorspace and land for industry and distribution.

5. **Implications for council policy and governance**

- 5.1 None, other than to reiterate that the LDF Core Strategy needs to reflect the strategic objectives of the Council Plan and give spatial expression to the Community Strategy.

6. **Legal and resource implications**

- 6.1. 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.

7. **Conclusions**

- 7.1. This report has provided further analysis of the comments received in respect of the "Managing the Needs of a Growing City" theme, as part of the Core Strategy Preferred Approach consultation. In response to comments received the schedules attached as Appendices 1-5 detail the changes and next steps in preparing the draft Core Strategy Publication document for Panel consideration in due course.

8. **Recommendation**

- 8.1. 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 (1 – 5)

LCC RESPONSES TO REPRESENTATIONS ON THE THEME “MANAGING THE NEEDS OF A GROWING CITY”

CORE STRATEGY PREFERRED APPROACH APPENDIX 1
LCC RESPONSES TO REPRESENTATIONS ON HOUSING SUPPLY

LCC Responses to Representations on the Preferred Approach, Feb 2010

30 respondents agreed with the sequential preferences for the location of new housing (Q9) and made no comments
 99 respondents made written comments as listed in the table below
 Verbal comments recorded at consultation events are also included

Representor (include agent)	Those Repe-sented	Representor Comment	LCC Initial Response	Action
Absence of SHLAA during consultation period				
Barton Willmore Planning (57)	White Laith Dev, Templegate	Lack of evidence for the consultation makes the Core Strategy unsound. In particular, the apportionment of housing to different areas of Leeds in Table H2 and the windfall allowance of 11% cannot be justified.	Agree that without the SHLAA, it would be difficult to understand the spatial distribution of housing inherent in Policies H1 and H2 and Table H2.	Notify those consultees who raised the issue offering a 4 week opportunity for further comments to be made (this exercise has now been completed).
Bradford Council (100)		Evidence is needed to justify the proposed approach		
Carter Jonas (5681)	Diocese of Ripon & Leeds	The SHLAA should be available to help inform representations.		
DLP Planning (2657)	Ben Bailey Homes Stamford Homes	Policies H1 & H2 lack evidence for justification. Unclear whether sites have been tested for deliverability and developability.		
GMI Property (5682)		The SHLAA is needed to understand Table H2.		
Government Office for Yorkshire & the Humber (GOYH) (95)		Inability to make meaningful comment without the SHLAA.		
Highways Agency (5604)		Full details of the SHLAA are needed for the Highways Agency to properly model CS proposals		
Keyland (2064)	AVL Investors Forum	Serious weakness in the evidence base		
Mosaic TP (5672)	Miller Homes	Lack of evidence for how the housing requirements will be met		
Pegasus Planning (4388)	Mr C Makin	The lack of land supply evidence make it difficult to know whether aspects of housing policy are credible. Further opportunity to comment on Policies H1 & H2 should be given when the SHLAA is published.		

Roundhay Planning Forum (5057)		Inability to make meaningful comment without the SHLAA.		
Savills Northern (467)	Harewood Estate	The Core Strategy lacks a sound evidence base. The SHLAA is needed to understand Table H2.		
Spawforths (2663)	Mr Ramsden, Langtree Group Plc, Mr Saville, Chapman Family Discretionary Trust, Mr Lindley	Makes Table H2 unjustified. Makes approach to use of Green Belt land unjustified.		
Turley Assocs (5670)	Swayfields (Skelton) Limited	Inability to make meaningful comment without the SHLAA. Alternative approaches cannot be tested.		
Turley Assocs (5673)	The Warmfield Group	Evidence is needed to justify the focus on urban areas		
WYG (420) + (5648)	Harrow Estates, Yoo Invest, Rockspring Hanover property Unit trust	CS unsound without a SHLAA		
Civic Hall Event 2/11/09		Difficult to comment on the Core Strategy without the SHLAA		
Accuracy of Housing Number Calculation – Paragraphs 5.3.6 – 5.3.9				
Barton Willmore Planning (45,57)	Ashdale Land and Property Company LTD, White Laith Developments,	The Core Strategy should not ignore the requirement for 2008-9 which adds another 4,300 dwellings to the requirement creating a total of 77,400 dwellings to 2026.	The requirement for 2008-9 was taken into account in arriving at the total housing requirement	Clarify in draft Publication document.

ID Planning (5668 ,5671)	Ben Bailey (South Yorkshire) Ltd, Barwick Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Edmund Thornhill, Great North Developments Ltd, , Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Robert Ogden Partnership Ltd, Ringways Motor Group, Persimmon Homes and Taylor Wimpey	The carry over of oversupplied dwellings from the 2004-08 period is inappropriate in the context of the RSS expecting step-up from 2008. Delivery targets should not be viewed as ceilings.	Disagree. A residual calculation is an acceptable approach.	No change
Alternative Spatial Approaches				
Spawforths (2663)	Mr A Ramsden, Langtree Group Plc, Mr Saville, Chapman Family Discretionary Trust, Mr Lindley.	Short term focus: allocations, white land and PAS in the urban area, Leeds as well as Morley, Churwell, Guiseley & Yeadon. Renaissance of Principal Towns, to include Otley, Wetherby, Boston Spa, Garforth, Micklefield, Rothwell, East Ardsley & Drighlington. Medium term focus: Expansion of Leeds & Principal Towns and areas associated with coalfield regeneration. Villages to only accommodate local need	These alternative options needs to be examined against transport, flood risk, physical and visual criteria. Boston Spa, East Ardsley and Drighlington clearly do not have the scale to justify designation as Principal Towns. The other settlements will need further assessment.	Assess through the Housing Background Paper. Further clarity on Spawforths proposals will need to be sought.
ID Planning (5671)	Barwick Developments Ltd	Paragraphs 5.3.1 and 5.3.2 need revising to be consistent with RSS. Balanced growth is required across the settlement hierarchy of a different scale and type to reflect the scale of settlement and specific local needs.		
Clarity of Spatial Approach				
Bradford Council		Not clear how much new housing is being directed to places close to the Bradford boundary such as Otley, Yeadon, Guiseley, Pudsey and Morley	Agree. Partly a consequence of the SHLAA not being available during consultation and a lack of clarity in the CSPA.	Clarify. See also response to "Absence of SHLAA"
Barton Willmore	Ashdale Land and Property Company LTD	The red stars of Map 3 lack quantification & explanation of justification.		

GOYH		Policy H1 lacks direction in terms of locations for new housing		
GOYH		Policy H2 lacks detail of where new housing is planned. It should be broken down by places or neighbourhoods		
Pegasus Planning (4389)	Mr Makin	Policy H1 lacks direction in terms of locations for new housing. Combining Policies H1 and H2 could help clarify the overall spatial approach		
Helen Longfield (5647)		Inconsistent description of "Potential Housing Growth Area" (Map 3) and "locations for urban extensions" in main document (para 5.3.29) and Summary. Also the Summary does not mention PAS sites.	Agree to clarify description of urban extensions. It may not be possible for a summary to cover all issues. The main document must be regarded as the definitive guide to what is being advanced.	Ensure consistency in Publication Plan
Banks Developments		Policy should be more explicit as to where in the main urban area housing will be directed. In particular it should mention the city centre and regeneration areas	It is not clear what planning benefits would be achieved by sub-dividing the MUA into smaller areas. It would only add to the complexity of the plan.	No change.
Employment land and Greenspace Parameter of Policy H1				
Turley Assocs (5670)	Swayfields (Skelton) Limited	Policy H1's parameter to avoid use of employment or greenspace shown to be needed pre-empts the conclusions of the SHLAA. This is inappropriate. Alternative scenarios need to be tested.	The findings of the SHLAA, Employment Land Review and PPG17 Audit & Needs Assessment will be considered together in order to make decisions about re-allocation.	No change
WYG (5648)	Yoo Invest, Rockspring Hanover property Unit trust	An assessment should be made of the market viability of using redundant employment sites for housing	The SHLAA has already tested the market readiness of land for housing development.	No change
BNP Paribas (5662)	Telereal Trillium	More priority to use of employment land, ahead of greenfield land	The first parameter of Policy H1 prefers PDL over greenfield. In the sense that employment land is one category of PDL, more priority is given. However, it is important to safeguard employment land which is shown to be needed by the Employment Land Review (ELR). The ELR will indicate which sites are not currently suitable or viable for employment which may become available for other uses.	Release conclusions of the Employment Land Review and the PPG17 Audit & Needs Assessment.
Spatial Approach Focus on City Centre and Main Urban Areas				
DLP Planning (2657)	Ben Bailey Homes, Stamford Homes	Policy H1 unsound because the sequential approach in PPG3 has been superseded by stress on deliverability. The urban focus on PDL is failing to deliver sufficient housing.	The Core Strategy needs to plan for sufficient housing overall, but focussed in the right locations and preferably on	No change. Assess through the Housing Background Paper.

GVA Grimley (2996)		The sequential preferences in Policy H1 is out of step with PPS3 which no longer advocates a brownfield first approach. If retained, "Locations/infills within smaller settlements" should be added as the third preference after locations in major towns.	PDL This is in line with PPS3 and RSS which support Plan, Monitor and Manage, strategies to promote PDL. Land can be brought forward if there is found to be insufficient supply. PPS3 and RSS still carry PDL targets of 60% nationally and 65% for Yorkshire and Humber. The RSS also expects the more urban areas to achieve higher than 65%.
ID Planning (5668 , 5671)	Ben Bailey (South Yorkshire) Ltd, Barwick Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Edmund Thornhill, Great North Developments Ltd, Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Robert Ogden Partnership Ltd, Ringways Motor Group, Persimmon Homes and Taylor Wimpey	The parameter of preference for PDL before greenfield in paragraph 5.3.13 and Policy H1 is inconsistent with PPS3	
Peacock & Smith (5665)	The Stockeld Estate, Mr Newby	The sequential approach is too rigid. Other land needs to be allowed to come forward to meet needs. So contrary to national policy that further consultation will be needed prior to submission.	
Sigma Planning (4110)	Hallam Land Management	Policy H1 unsound because the sequential approach in PPS3 has been superseded by stress on deliverability. It is counter intuitive for greenfield urban extensions to be released at the end of the plan period as they are needed now. The SHLAA does not confidently show sufficiency of PDL. A mix of housing types & locations is required to optimise prospects of delivery. Some small urban extensions including PAS land should be released as these can be delivered early.	
Signet Planning (5039)	Kebbel Homes	Policy H1 unsound because the sequential approach in PPS3 has been superseded by stress on deliverability. The urban focus on PDL is failing to deliver sufficient housing. PAS sites should be released in the short to medim period to help meet current needs.	

Scott Wilson (414)	PPL c/o Revera, Jonathon Hague	Too much focus on the city centre. Expansion of smaller settlements should be elevated in the sequential order of preference. In terms of Table H2, Major and smaller settlements should contribute more in the medium term.		
Banks Developments (5121)		The focus on city centre and MUA will not delivery affordable and family housing	Policies H2, H4 and H5 aim to deliver a range of types and sizes of dwellings across the District	No change
Carter Jonas (5681)	The Diocese of Ripon & Leeds	This focus is likely to generate land suited to high density apartment schemes rather than family housing which is needed.		
DLP Planning (2657)	Ben Bailey Homes, Stamford Homes	Urban development tends to produce a limited mix of dwellings which will not meet the full range of housing needs		
GMI Property (5682)		Too much emphasis on the city centre which can only deliver high density housing which is only capable of meeting one category of need. There are also questions of the market appetite for more housing of this type.		
Signet Planning (5039)	Kebbel Homes	The focus on city centre and MUA will not deliver affordable and family housing with gardens that is needed. A broader range of sites – starting with UDP allocations and suitable PAS land – is needed with appropriate phasing to safeguard regeneration objectives.		
Signet Planning (5039)	Kebbel Homes	Lack of suitable sites outside of regeneration areas for family housing including executive homes could thwart efforts to expand the economic role of Leeds.		
Core Strategy Wetherby Morisons Event 12/11/09		Too many empty flats being built		
Core Strategy Merrion Centre Event 17/11/09		Schools and family housing near the City Centre		
Plans Panel East 19/11/09	Cllr Marjoram	What role for apartments? We need places that people want to live in. Better to look at PAS land and GB extensions where places can be properly planned to achieve a better quality of place, than high density apartment solutions.		
Aspinall Verdi (5689)	Montpellier Estates	The sequential approach is supported subject to gearing other housing policies to secure investment in the improvement of the older housing stock and the environment in the most deprived areas of Leeds.	The CSPA approach does focus investment in urban areas which contain most of the regeneration areas and most of the older housing stock in need of improvement	No change

GMI Property (5682)		Inappropriate for extensions to smaller settlements to be last in the sequential order. There may be occasions where extensions to smaller settlements will be more sustainable than options higher in the sequential order.	The Core Strategy needs to plan for sufficient housing overall, but focussed in the right locations and preferably on PDL, including some limited extensions to smaller settlements as is acknowledged in Table H2. Also, Policy H3 will allow for limited development of windfall sites.	No change. Assess through the Housing Background Paper.
Mosaic TP (5672)	Miller Homes	Insufficient stress given to the needs of smaller outlying settlements such as Bramhope and to help them retain some self sufficiency		
Barton Willmore Planning (45)	Ashdale Land and Property Company LTD	The sequential approach is contrary to RSS policies YH4, 5 and 6. Instead, development should be acceptable in a variety of locations in tandem.	The focus on urban areas accords with RSS policies YH1 and 4. CSPA Policy H3 distributes smaller proportions of housing to towns and villages in line with YH5 and 6.	No change
Barton Willmore Planning (45)	Ashdale Land and Property Company LTD	Policy H1 should identify land for each tier of the settlement hierarchy, rather than an order of preference. In particular, the role of Micklefield needs to be reconciled with the general focus on urban areas. Table H2 should be deleted from the Core Strategy and included in the Site Allocations DPD	Land is apportioned to different tiers of the settlement hierarchy as evident in Table H2, but according to priorities set in Policy H1. However, it is agreed that further locational clarity would be helpful.	Clarify. Assess through the Housing Background Paper
British Waterways (338)		Support for the approach could be improved by mention of the importance of inland waterways which can unlock urban potential and contribute to the principles of paragraph 5.3.2	Too much of a detailed issue for Policies H1 & H2. To be covered elsewhere in the LDF.	No change
Carter Jonas (5681)	The Diocese of Ripon & Leeds	The locational preferences of Policy H1 should not give weight to the local landscape designation as these are often arbitrary.	The areas of special landscape in Policy H1 refer to the Policy N37 designation in the UDP which was subject to examination.	Clarify. Assess through the Housing Background Paper.
DLP Planning (2657)	Ben Bailey Homes, Stamford Homes	The approach lacks flexibility to deal with unforeseen circumstances.	The quantity of land associated with the Potential Housing Growth Areas exceeds the housing requirement and could be brought forward if necessary. The LDF will continue to plan, monitor and manage delivery with trigger points to adjust release of sites according to actual performance.	No change
DLP Planning (2657)	Ben Bailey Homes, Stamford Homes	The approach expects too much housing delivery in the later years. Small urban extensions are needed in the early years which can be brought forward without extensive infrastructure.	The Core Strategy needs to plan for sufficient housing overall, but focussed in the right locations and preferably on PDL. Leeds has to plan to meet the RSS PDL target and assess the need for infrastructure	No change. Assess through the Housing Background Paper.

Drivas Jonas (5558)	Horsforth Riverside LLp	Agree that the focus on urban areas and PDL concurs with the RSS Core Approach. But given the pressure to deliver increased levels of housing, it is important for the Council to bring forward brownfield sites such as Riverside Mills, which is deliverable in the short term.	Support welcomed.	No change.
Drivas Jonas (5683)	McAleer and Rushe Group	Support for prioritising the city centre & MUA. Given proximity of local services, this is the most sustainable option	Support welcomed	No change
Environment Agency (46)		The parameter of sequential preference to avoid areas of flood risk is supported but it is not apparent whether avoidance of flood risk forms part of the locational direction set out in Table H2 and Map 3. The evidence needs to be demonstrated.	Flood risk areas have been accounted for in the land assumed in Table H2 and Map 3. The SHLAA makes this clear.	Clarify
GMI Property (5682)		The objectives of housing growth and regeneration need to be recognised as complementary to be delivered side by side. This is recognised in the Leeds City Region strategy and investment framework.	The sequential preferences for urban areas and PDL are designed to complement regeneration	A cross reference to the City Council's Regeneration Plan will be made.
GMI Property (5682)		The approach is sound, but housing supply will need to be regularly updated through the SHLAA and AMR. Otherwise, the sequential preferences may be used inappropriately to restrict supply. The policy mechanism must allow for new sites to be brought forward when supply is demonstrably low.	The LDF will continue to plan, monitor and manage delivery with trigger points to adjust release of sites according to actual performance.	The CS should set the context for a PMM mechanism in the Site Allocations DPD
GOYH (95)		Quantity of PDL in urban areas may not be sufficient to meet housing needs	The SHLAA will provide the evidence base to determine sufficiency of urban PDL supply. Whilst the focus is on urban PDL, Policy H2 can introduce further land as necessary.	No change
GVA Grimley (2996)		Allocations, PAS land and Green Belt Opportunities need to be reviewed to contribute to supply in the early years of the plan.	The Core Strategy needs to plan for sufficient housing overall, but focussed in the right locations and preferably on PDL. Greenfield sites will be needed where the supply of PDL is insufficient to meet the housing requirement	No change. Assess through the Housing Background Paper.
GVA Grimley (2996)		"Locations/infills within smaller settlements" should be added as the third preference after locations in major towns.	Infills would be dealt with as windfall proposals under Policy H3	No change. Assess through the Housing Background Paper..
Individual (5151)		No greenfield sites should be developed because there is so much PDL left in Leeds	Greenfield sites will be needed where the supply of PDL is insufficient to meet the housing requirement	No change

ID Planning (5668 , 5671)	Ben Bailey (South Yorkshire) Ltd, Barwick Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Edmund Thornhill, Great North Developments Ltd, Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Robert Ogden Partnership Ltd, Ringways Motor Group, Persimmon Homes and Taylor Wimpey	Should clarify in para 5.3.11 & Policy H1 that development in major towns does not have to wait until development in the MUA has ceased. Otherwise it will continue to contradict Table H2	It needs to be clarified that Policies H1, H2 and H3 would operate in tandem. This means that allocations would have to be found to broadly correlate with the proportions in Policy H2 & Table H2. It means that schemes on non-allocated PDL sites and exceptional greenfield sites (meeting criterion H3ii) could also be advanced within Major Settlements at any time, providing it has sufficient infrastructure.	Clarify as part of draft Publication document.
Keyland (2064)	AVL Investors Forum	The key role of AVL not recognised. In the sequential order of Policy H1, AVL should be on a par with Leeds city centre.	The housing policies need to be made more spatially specific, which should include the role of AVL, including the Urban Eco Settlement	Clarify through the text and Key Diagram that the entirety of AVL will be considered part of the Main Urban Area.
LCC Mandy Spry (5066)		Should note the biodiversity value of PDL on a case by case basis. Some PDL has a high biodiversity value.	Agree. This is noted in policies B1 and B2 of the CSPA	No change
Metro (1933)		Metro are supportive of the sequential prioritisation approach which will generally match the existing pattern of public transport services with greater concentration of service in the main centres.	Welcome support	No change
Metro (1933)		Metro are supportive of the need for any new/expanded settlement to be adequately served by public transport in Policy H1 and paragraph 5.3.17, but question how “adequate” will be defined. It needs to consider cumulative impact of different developments along routes of public transport.	Welcome support and advice. Accessibility standards are defined in the CSPA appendices. LCC will continue discussions with Metro to consider adequacy of infrastructure.	Assess through the Housing Background Paper and Infrastructure Delivery Plan
Micklefield PC (122)		Support the sequential order of Policy H1 which puts extensions of smaller settlements as lowest priority. However, the designation of Micklefield as a Potential Housing Growth Area is at odds with the sequential order	The housing policies need to be made more spatially specific, which will clarify the role of Micklefield as a housing growth area.	Clarify & Assess through the Housing Background Paper.

NHS Leeds (5654)		Insufficient capacity of healthcare facilities in the city centre	There is opportunity to provide further facilities or expand existing and the Infrastructure Delivery Plan (IDP) will be used to address shortfalls	No change. The Infrastructure Delivery Plan will be used to address shortfalls.
NHS Leeds (5693)		The choice of locations for new housing should be informed by Health Impact Assessment, which is proposed as a requirement in the Sustainable Communities section of the CS.	Agree. Health Impact Assessments will form part of the Sustainability Appraisal of the Core Strategy	Assess through the Housing Background Paper and Infrastructure Delivery Plan.
NYCC (2613)		Unlikely to provide the type of housing offer attractive to those looking to North Yorkshire as a place to live	Policies on housing mix and affordable housing will ensure delivery of family and affordable housing. Locations will need to be sustainably located. Some locations suited for lower density housing are identified in Table H2, particularly in the later years.	No change. Evidence will be provided through the update of the SHMA and dialogue with the Leeds City Region
Roundhay Planning Forum (5057)		Should give particular priority to regeneration areas.	The CSPA approach does focus investment in urban areas which contain most of the regeneration areas and most of the older housing stock in need of improvement	A cross reference to the City Council's Regeneration Strategy will be made.
Savills Northern (467)	Harewood Estate	The sequential preference of Policy H1 should include "infill locations within smaller settlements"	Development of PDL infill sites within smaller settlements would be supported by Policy H3 subject to availability of infrastructure	No change
Savills Northern (467)	Harewood Estate	Policy H2 & Table H2 cannot be properly examined without the SHLAA. 1% for smaller settlements seems too low	The Core Strategy needs to plan for sufficient housing overall, but focussed in the right locations and preferably on PDL. The RSS Core Approach expects housing to be focussed on the main urban areas. It should be noted that the 1% only covers the short term period.	Assess through the Housing Background Paper and the SHMA update.
Scholes Community Forum (20)		Support Policies H1, H2 and H3	Support welcomed	No change
Sigma Planning (4110)	Hallam Land Management	A professional assessment of the impact of releasing a limited number of urban extensions on market activity and regeneration should be undertaken.	Urban extension releases must be for housing supply reasons, not to test impact on regeneration	No change.

Sigma Planning (4110)	Hallam Land Management	Policy H2 is a phasing policy in disguise. It should not restrict housing site release in the early years of the Plan	Policy H2 is plainly a phasing policy needed to inform the Allocations Plan. Phasing is entirely appropriate as part of a plan, monitor and manage approach in accordance with paras 62-67 of PPS3.	No change.
Tenants Federation Workshops 26/11/09		All the groups supported the phased approach to housing land release.	Support noted	No change
Signet Planning (5039)		In terms of Table H2, more extensions to urban areas are needed earlier on in the plan period to compensate for deliverability issues affecting urban sites.	The Core Strategy needs to plan for sufficient housing overall, but focussed in the right locations and preferably on PDL	Assess through the Housing Background Paper and SHLAA.
Spawforths	A Ramsden., Langtree Group Plc,Mr Saville, Chapman Family Discretionary Trust, Mr Lindley	An implementation strategy with mechanisms to address over/under supply is required, as expected by PPS3 & RSS	Agree	The CS will set the context for a PMM mechanism in the Site Allocations DPD
Spawforths (2663)	A Ramsden., Langtree Group Plc,Mr Saville, Chapman Family Discretionary Trust, Mr Lindley	Table H2 is too prescriptive – could be used inflexibly in decisions on planning applications (see Wakefield CS inquiry). Too much growth in smaller settlements. Better to direct 65% growth toward the urban area and 35% toward the Principal Towns (as per Spawforths' alternative settlement hierarchy).	Core Strategies are expected to provide a locational steer on where housing growth is to be accommodated. The overwhelming drift of comment received is toward greater specificity about locations for growth. In any case, Policy H2 clarifies that Table H2 sets out an <i>indicative</i> apportionment and it is designed primarily to influence the distribution of allocations, rather than deal with planning applications	Apportionment will be considered as part of the Housing Background Paper.
The Oulton Society (42)		It is not clear whether the sequential avoidance of areas of special landscape importance would include the 5 areas of SLA to the East and South East of Leeds. These need protection.	The parameter of Policy H1 refers to all areas of special landscape importance.	No change
CB Richard Ellis (5571)	Marshalls plc	Preferences in Policy H1 ignore green belt	If selective GB boundaries need to be reviewed, to accommodate housing	Consider any changes subject to the

Smiths Gore (5017)	Cannon Hall Estate, Bramham Estate	The need to use Green Belt land for housing should be explicit in Policy H1	growth This will need to be consider in the preparation of the Publication document.	completion of the Housing Background paper & abolition of the RSS housing targets
Tenants Federation Workshop 26/11/09		<p>Group 1 agreed with policy H1, subject to greater distinction between the main urban areas and the city centre. The city centre has individual circumstances and is not suitable for families because of lack of infrastructure (medical centres and schools) and unsuitability of the dwellings. The group believed that the modern family likes to stay within the same area requiring the provision for all forms of dwellings including properties suitable for first time buyers to accommodation for the elderly. They believed that families could be encouraged to locate to the edge of centre if the right properties were developed.</p> <p>Group 2 agreed that the city centre should treated as a separate category.</p> <p>Group 3 made the following observations:</p> <p>i) a new settlement should be higher priority to deliver an 'ideal settlement' to encourage people to the area similar to the Milton Keynes effect.</p> <p>ii) brownfield sites may be more appropriate for business and enterprise rather than housing although it was recognised that there might not be demand. Locations with brownfield land tend to lack services such as schools. The Council should demonstrate if this policy model has in other cities.</p>	The Core Strategy Preferred Approach does treat the city centre as a separate part of the settlement hierarchy so that distinctive needs can be addressed	No change

<p>Leeds Youth Council Event 19/11/09 Groups 1 and 3</p>		<p>Pros:</p> <ul style="list-style-type: none"> • Efficient use of land • Concentration in the city centre will keep Leeds attractive • People generally want to live nearer to the city centre • City centre houses generally attract wealthier, more educated and highly skilled people • Good balance between the urban settlement and countryside is important • More population, means more groups that bring people together i.e. more support for people • Larger work force in the area • The architecture will keep up with modern times. • Keeps Leeds individual. • More houses means more taxes and can therefore put money back into services / hospitals • Using brownfield land is a good idea – use old buildings first and conserve land • Special projects – Leeds is up there <p>Cons:</p> <ul style="list-style-type: none"> • Agriculture – Farm land will be lost to housing development, therefore food prices will go up. • Roads will be busier, strain on bus services • Need more investment in public transport and expand road network • Review the drainage system. More houses will create more flooding issues. • The City Centre also needs good quality houses • The Council’s sequential approach by building new houses in existing settlements would segregate existing communities 	<p>Comments will be noted</p>	<p>Assess through the Housing Background Paper and SHLAA.</p>
<p>Leeds Youth Council Event 19/11/09 All Groups</p>		<p>Building in rural areas was discussed. A majority suggested that rural areas should be protected totally, but around a quarter proposed that a balance would be more appropriate. The problem of where to put houses if not in the countryside was raised by the facilitator. After more discussion, most agreed that there should be a balance rather than complete protection of rural areas.</p>		

<p>Voluntary Action Leeds Event 4/12/09</p>		<p>If the empty and disused houses are renovated and put into use the housing target could be met.</p> <p>Areas of flood risk should be avoided</p> <p>Should deprived areas be targeted to help meet the housing targets?</p> <p>Statistics should be used in the development of the strategy</p> <p>A participant wanted to know why BME settlements are not shown on the maps, and if there were plans to map out BME needs, for example - refugees require bigger houses</p>	<p>Comments will be noted</p>	<p>Assess through the Housing Background paper and SHLAA.</p>
<p>BME Apda Day Housing Workshop 17/12/09</p>		<ul style="list-style-type: none"> • What's the reason for population increase? Why Leeds? • Encroachment of Green belt. Make use of empty and derelict buildings before using green belt and country side. • Why is development focused on south of Leeds as opposed to developing the wealthy areas north of the city? • Concerns of New houses being too expensive for first time buyers, young people etc. • Concern at figures for city centre expansion of 30,000 dwellings, haven't we gone back to the 1960s, new high rises could be slums of tomorrow. • People in East Leeds (BME minorities) like multi cultural areas and are happy with it. Want to live there. Might not want to move away to predominately white working class areas with racial prejudices and lack of cultural amenities. • When new migrants are placed in white working class areas problems have arisen due to racial tension, language barriers etc. Distance from family in East Leeds, need to provide cultural amenities in new development zones. 	<p>Comments will be noted</p>	<p>Assess through the Housing Background paper and SHLAA.</p>

Leeds City College Event 9/12/09		<ul style="list-style-type: none"> Proposed homes should be built in other cities/towns and not in Leeds. They thought that the Government is not listening by dictating the amount of homes which are required Existing empty houses and other buildings should be used rather than building on green /open space. Greenspace and flood plains need to be protected to avoid problems Additional houses will mean busses become more congested. For the additional housing to be located in rural areas, roads would have to be widened resulting in loss of agricultural land No one wanted the houses built in their areas as the infrastructure was not capable of providing for the people who already lived in the area. Doubt developers will provide additional infrastructure. It would be a cost saving policy to build houses within Leeds urban area as facilities are already in place. A new town should be built in preference to building the housing elsewhere. It may be more expensive because of infrastructure requirements High rise isn't the answer as flats aren't as popular as houses. Squeezing houses into urban areas would also make the areas worse and therefore reduce the house prices. 	Comments will be noted	Assess through the Housing Background paper and SHLAA.
Green Belt				
Barton Willmore Planning (45)	Ashdale Land and Property Company LTD,	A GB review is required	It is unnecessary to review the entirety of the Green Belt. Leeds is preparing a Housing Background paper, which will assess the appropriateness of broad locations for future development and give clear direction to the Site Allocations DPD. (especially in the light of the abolition of the RSS	Prepare Housing Background paper
DLP Planning (2657)	Ben Bailey Homes, Stamford Homes	Selective GB review required. Use of discrete parts of the GB could be more sustainable than development in urban areas. They could also help facilitate urban renewal cross subsidising the regeneration programme. Possible locations include the Leeds-Bradford Corridor, New Farnley and Meanwood.		

ID Planning (5668 , 5671)	Ben Bailey (South Yorkshire) Ltd, Barwick Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Edmund Thornhill, Great North Developments Ltd, Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Robert Ogden Partnership Ltd, Ringways Motor Group, Persimmon Homes and Taylor Wimpey	A commitment to undertake a GB review is needed. As a bare minimum diagrams should identify the broad locations where GB review will be necessary.	housing targets)	
J&J Design (5666)	Horsforth Gospel Hall	The CS needs to provide a clearer lead on GB review		
Natural England (58)		The review should be selective only, retaining the general extent of the green belt. It should consider the role of the GB in contributing to landscape character and its role in delivering recreational, agricultural and biodiversity resources and opportunities.		
Pegasus Planning (4388)	Mr C Makin	Not enough detail about GB review. It should be specified how and when the GB will be reviewed. It is not clear whether the housing growth areas shown on Map 3 illustrate the locations for selective GB review.		
Scott Wilson (414)	PPL c/o Revera	Selective GB review required and can identify potential expansion of major and smaller settlements.		
Spawforths (2663)	Mr A Ramsden, Langtree Group Plc, Mr G Saville, Chapman Family Discretionary Trust, Mr Lindley	A localised review is required. Many areas of GB close to urban areas do not perform GB functions (as per PPG2) are more sustainable than locations within urban areas. Certain GB land could help unlock difficult PDL in urban areas.		
The Oulton Society (42)		GB Review should ensure that special landscape areas are protected.		

Turley Assocs (5673)	The Warmfield Group	A GB review is necessary.		
Barton Willmore Planning (45)	Ashdale Land and Property Company LTD	A GB review is required		
Signet Planning		A selective review of GB to ensure growth is in sustainable locations is required as part of the evidence for the Core Strategy. It is too late to defer this to the Allocations DPD		
Walker Morris (3042)	Various	More clarity is needed on how much GB land will be required. Table H2 suggests 48% on urban extensions; how much would be GB?	Agree. Table H2 of the CSPA will be made more spatially specific and shown in map form. This, in combination with the SHLAA will clarify the approximate quantum of Green Belt land required for housing development, if required.	Clarify. See also response to "Absence of SHLAA"
DLP Planning (2657)	Ben Bailey Homes, Stamford Homes	Selective GB review required. Use of discrete parts of the GB could be more sustainable than development in urban areas. They could also help facilitate urban renewal cross subsidising the regeneration programme. Possible locations include the Leeds-Bradford Corridor, New Farnley and Meanwood.	If required, selective Green Belt releases would need to be justified on the basis of housing supply and will need to be in sustainable locations.	No change
Leeds City College (5653)		A GB review is necessary. PDL opportunities in the GB should be identified, such as the campus of Leeds City College	Major developed sites in the GB would be identified in the Site Allocations DPD.	Consider as part of the Site Allocations DPD
GMI Property (5682)		Para 5.3.5 is confusing in conflating the purposes of GB with the function of Green Infrastructure which is potentially confusing.	The difference is explained carefully in paragraph 5.1.6 of the CSPA	No Change
Civic Hall event 2/11/09		Do the red stars on Map 3 represent comprehensive or selective green belt review?	The red stars indicate those broad locations where future long term growth may be needed. The detail of this will need to be incorporated as part of the Site Allocations DPD. The appropriateness of the red star locations will be assessed in the Housing Background paper.	Prepare Housing Background paper.
Gypsy and Traveller Accommodation				
GOYH (95)		There should be a separate policy for G&T sites reflecting circular 1/2006	The policy for Gypsy and Traveller and Travelling Showpeople accommodation is integral to Policies H1 and H3	No change.

NHS Leeds (5693)		Small sites supported. However, the proposal that transit provision is available within permanent sites could make it more difficult for the settled Gypsy & Traveller community to build positive relationships with the wider local community. There are also concerns that Transit sites will become permanent.	Agree that this needs further consideration. Early consultation suggested that dedicated transit sites were problematic because in situations of shortage, they become permanent sites. However, it is agreed that incorporation of transit provision into permanent sites brings other problems, so further solutions need to be explored	Re-consider the approach to transit provision.
GATE (2739)		The proposal to incorporate transit provision into permanent sites is a cause for concern. It will mean that police will direct Travellers “passing through” to transit provision on permanent sites. This means established families on permanent sites would have to accept total strangers and this could undermine efforts to integrate with the local community. Better alternative solutions include allocation of a site specifically for the purpose of transit accommodation or through “negotiated” stopping places where families are allowed to stay on unused ground for short periods subject to terms and conditions. The problem with a dedicated transit site is that if there is an overall shortage of permanent sites, such transit sites will soon become permanently occupied.		
Leeds Primary Care Trust (5204,3003)		Very pleased with the small sites option for Gypsies and Travellers as this provides the best likely health outcomes. Max 8 units per site would be better.	Welcome support for small sites option. No evidence is available that a maximum of 8 units per site would be better.	No change
Crossgates Shopping Centre Event 4/11/09	Justice for Travellers	There are a range of issues which can only be solved by allocating sites for Gypsy and Traveller accommodation	The Core Strategy will guide where new sites should be provided, but actual allocations will be made by the Site Allocations DPD.	No change
Planning Aid Workshop: Hunslet 4/12/09		Gypsies and travellers para.5.3.10 – include reference to facilities to be provided for each pitch	Too much detail for the Core Strategy. The level of facilities to be provided for each pitch will be a matter for the site developer in consultation with Gypsy and Travellers	No change
Infrastructure				
Bradford Council (100)		How are Leeds planning infrastructure for the scale of housing required?	Infrastructure needs will be clarified through the Leeds Infrastructure Plan and the City Centre, Town and Local Centres study	Clarify in the Infrastructure Plan and CCTLC study
GOYH (95)		Unclear what “appropriate levels” means in para 5.3.2		
Leeds Civic Trust (62)		Costs should be more onerous for greenfield development. Infrastructure is needed to support family housing on the edge of the city centre.		

Location Specific Suggestions				
Barton Willmore Planning (45)	Ashdale Land and Property Company LTD	The designation of Micklefield as a housing growth area is supported except the scale of growth should be set and the growth of this smaller settlement needs to be reconciled with the focus on urban areas. Allerton Bywater should also be promoted for housing growth.	Greater spatial clarification is required. Table H2 will be made more spatially specific and illustrated in map form.	Clarify the spatial distribution of Table H2
Barton Willmore Planning (57)	White Laith Developments	Because of its size and significance, reference to the East Leeds Extension should be made in the Core Strategy. It should be allocated as a strategic site.	LCC does not plan to allocate any strategic sites in the Core Strategy because the Site Allocations DPD will be the best means of determining all allocations in the round.	No change
Civic Hall Event 2/11/09	Persimmon Homes	Because of its size and significance, reference to the East Leeds Extension should be made in the Core Strategy. The orbital road needs to be dealt with too.		
Barton Willmore Planning (57)	Templegate Developments Ltd	Land to the south and east of the M1 at J.45 should be included with the MUA and designated as a strategic site within Aire Valley Leeds.		
Civic Hall Event 2/11/09	Persimmon Homes	The East Leeds Extension will help enhance the prospects for East Leeds by raising the profile of East Leeds. This will help not hinder efforts to regenerate EASEL	The concern about impact of East Leeds Extension on EASEL is one of timing	No change
CB Richard Ellis (5571)	Marshalls plc	Support housing development of green belt land at Dewsbury Road, Woodkirk	The choice of preferred locations to make up the strategic distribution of housing growth in the Core Strategy Preferred Approach was determined systematically with reference to all of the factors set out in Policy H1 and taking account of land availability as identified through Leeds' Strategic Housing Land Availability Assessment. Infrastructure availability and needs will need to be considered	Prepare Housing background paper. Make cross references to Leeds' Regeneration Strategy in the Publication document..
CB Richard Ellis (5571)	Marshalls plc	Support housing development of green belt land Leadwell Lane, Robin Hood		
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."		
Dacre Son & Hartley (480)	Taylor Wimpey/Persimmon/Excel	The East Leeds Extension is needed imminently and LCC should help to facilitate its early development		

Dacre Son & Hartley (480)	Persimmon Homes	Support for land at Morley including allocation H3-2A.05		
Dacre Son & Hartley (480)	Taylor Wimpey	Support for PAS land at New Lane, East Ardsley		
Dacre Son & Hartley (480)	Taylor Wimpey	Support for PAS land at Moseley Bottom, Cookridge		
Dacre Son & Hartley (480)	Taylor Wimpey	Support for GB release south of the M62 at Tingley/W. Ardsley		
Dacre Son & Hartley (480)	Taylor Wimpey	Support early release of Churchfields UDP Ph III site at Boston Spa		
Dacre Son & Hartley (480)	Taylor Wimpey	Support early release of Queen St, Woodend UDP Ph III site at Allerton Bywater		
Dacre Son & Hartley (480)	Redrow Plc	Support early release of proposed greenspace at Outwood Lane, Horsforth.		
Dacre Son & Hartley (480)	Mrs BE Henderson, Mr DA Longbottom, Mrs OM Midgley	Support for GB release to the north western edge of New Farnley		
DLP Planning (2657)	Ben Bailey Homes	Selective GB releases needed at Meanwood and New Farnley		
Drivas Jonas (5558)	Horsforth Riverside LLp	Support for Riverside Mills		
Leeds Youth Council Group 1 Workshop 19/12/09		Growth area identified in Horsforth: this will bring more resources, reduce unemployment and bring better transport links to the area. But at present there is a good balance between the countryside and urban areas. Fear that large scale development would undermine the existing quality of the area.		
Leeds Youth Council Group 2 Workshop 19/12/09		<ul style="list-style-type: none"> • Building should take place on Greenfield sites but it needs to be at the right correct balance with construction on Brownfield sites as well (80% of Group agreed) • Greenfield development needs to match the area well. • Green roofs could help. • Back to back housing was favoured as a form of dense housing. Back to backs are "efficient and attractive." 		
Mr Dunstall (4743)		Support use of PAS land at Kippax		
Tenants Federation Workshop 26/11/09		Towns such as Kippax, Garforth and Gipton would be viable options for further development		

Janet & Geoffrey Hare (5512, 5631)		Confirm inclusion of farm yard land at the southern end of Micklefield		
ID Planning (5671)	Persimmon Homes (West Yorkshire) Ltd	PAS sites at Churwell and Kippax should be allocated.		
Leeds Youth Council Group 3 Workshop 19/12/09		<ul style="list-style-type: none"> • Pudsey – Development near train station but on Greenfield site which is bad • Carlton – Development here will destroy strawberry fields and agricultural land. Small farming village and destroy the character. • Colton – Already developed Thorpe Park, too many traffic lights. The area has reached capacity. Old people live there and economic development will bring noise. 		
ID Planning (5668,5671)	Ben Bailey (S Yorks) Ltd, Barwick Developments Ltd, Persimmon Homes (W Yorks) Ltd	Support new housing around High Royds & Menston		
ID Planning (1186)	Abraham Moon & Sons Ltd	Support new housing at Netherfield Rd, Guiseley (UDP H3-3A.9)		
ID Planning (5671)	Edmund Thornhill	Support ne housing at Kirklees Knowl, Farsley		
ID Planning (5671)	Edmund Thornhill	Support new housing at Bagley Lane, Farsley		
ID Planning (5671)	Great North Developments Ltd	Support new housing at Micklefield		
Member Briefing 3/11/09	Cllr Parker	Would accept new housing in Micklefield and Scholes, but need to make sure that the new children attended the local primary school (which has capacity), and the secondary school in Garforth doesn't have capacity. Infrastructure needs to be a part of new development.		
ID Planning (5671)	Edmund Thornhill	Support new housing at Calverley. Calverley has a good range of local services & is part of the main urban core according to the RSS settlement study. It should therefore be identified as an area of housing growth.		
ID Planning (5671)	Persimmon Homes (West Yorkshire) Ltd	Support housing at East of Otley		

Core Strategy Event Otley Library 16/11/09		Concern raised in relation to the inclusion of the East of Otley phase 3 extension particularly given it has apparently previously been thrown out at appeal		
ID Planning (5671)	Robert Ogden Partnership Ltd	Support development at Tingley PAS site		
ID Planning (5671)	Ringways Motor Group	Support housing development at Whitehall Road		
ID Planning (5671)	Persimmon Homes and Taylor Wimpey	Support housing development at Grimes Dyke, Whinmoor		
Lister Haigh (2905)	D Parker & Sons	Support housing on land north of Wetherby racecourse		
Mosaic TP (5672)	Miller Homes	Support housing development at Bramhope		
Nathanial Lichfield & Partners (5677)	Steven Parker and Family	Support the release of rural land for housing land at Sandbeck Lane, Wetherby to meet the housing needs of Wetherby		
Core Strategy Event White Rose Centre 23/11/09		South Leeds suffers compared to North Leeds – Why not have more housing sites in North Leeds?		
Roundhay Planning Forum (5057)		The East Leeds Extension should be resisted as an unsustainable location which would have a detrimental impact on the setting of Roundhay Park and villages of Shadwell & Scholes		
Banks Developments	43228			
Mr England (5678)		The East Leeds Extension will harm Scholes by depressing house prices, spoiling the Green Belt and putting a burden on local schools and public transport.		
Scott Wilson (414)	PPL c/o Revera	Support housing growth at Aberford because it contains a substantial number of businesses and services and has proximity to a range of transport infrastructure. It should be elevated to status of a smaller settlement		
Scott Wilson (414)	Mr Hague	Support Barwick in Elmet for housing growth as it has suitable sites available.		
Signet Planning		Rothwell garden centre is an excellent site which would provide a well related extension to a major settlement which is well served by public transport and in flood risk zone 1.		
Smiths Gore (5017)	Bramham Estate	Support housing growth at Boston Spa, Clifford and Bardsey		

Smiths Gore (5017)	Cannon Hall Estate	Support housing growth at Horsforth		
The Oulton Society (42)		The SLA north and south of the A639 near Oulton should be protected. It is critical for the setting of Oulton.		
Turley Associates (5670)	Swayfields (Skelton) Limited	Give more prominence to use and regeneration of the Aire Valley to deliver the Growth of Leeds. Also, set out proposals for the Eco Settlement as a key aspect of the Core Strategy giving clarity on what standards are expected.		
University of Leeds (5690)		The Leeds General Infirmary would be suitable for mixed use development, although should not form part of any targets until a site development plan has been agreed		
BME Apna Day Women's Workshop		Beeston already has enough houses.		
Core Strategy Morrisons Event 12/11/09		Wetherby needs to be promoted in its own right (shouldn't have turned down 1500 houses) new housing. Employment, shops. Then can attract people who go to the White Rose as don't want to go into Leeds.		
Resident (ref: 5636)		New housing badly needed in Wetherby. It should be promoted as an area for new housing, shops and businesses with improved public transport.		
Review of Protected Area of Search Land				
Banks Developments (5121)		PAS sites which are sustainable should be brought forward. An assessment is needed alongside the GB review	Agreed that PAS land needs to be assessed to determine which land is needed to contribute to housing supply. However, it will only be the role of the Core Strategy to identify the general distribution of housing to be provided including the quantum to be delivered in different locations and at different phases. It will be the role of the Site Allocations DPD to determine which PAS land fits the distribution	The Core Strategy needs greater clarity on the preferred spatial distribution, but will not identify specific pieces of PAS land.
Barton Willmore Planning (45)	Ashdale Land and Property Company LTD	A review of PAS sites is required to assess which sites should be released early		
Barwick & Scholes PC (111)		Only PAS sites which are sustainable should be brought forward. Remainder deleted.		
Carter Jonas (5681)	The Diocese of Ripon & Leeds	Housing allocations and PAS sites should be reviewed to sieve out inappropriate sites		

ID Planning (5668,5671)	Ben Bailey (South Yorkshire) Ltd, Barwick Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Edmund Thornhill, Great North Developments Ltd, Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Robert Ogden Partnership Ltd, Ringways Motor Group, Persimmon Homes and Taylor Wimpey	A commitment to undertake a review of the sustainability credentials of PAS sites is needed. PAS land should be made available in tandem with PDL not sequentially.	expected by the Core Strategy.	
Pegasus Planning (4388)	Mr C Makin	A commitment to undertake a review of the sustainability credentials of PAS sites is needed.		
Signet Planning (5039)	Kebbel Homes	The suitability of PAS sites should be reviewed.		
Previously Developed Land Target				
Banks Developments (5121)		The CS target should not be higher than the RSS target of 65%	The RSS states “Districts with Regional Cities...are likely to be able to deliver above the regional average of 65%.” As such Leeds is justified in proposing a higher target.	Examine evidence for a higher PDL target in the Housing Background paper.
GVA Grimley (2996)		The early years target of 85-95% is unrealistic and out of step with the RSS target of 65%		

<p>ID Planning (5668,5671)</p>	<p>Ben Bailey (South Yorkshire) Ltd, Barwick Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Edmund Thornhill, Great North Developments Ltd, Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Robert Ogden Partnership Ltd, Ringways Motor Group, Persimmon Homes and Taylor Wimpey</p>	<p>The target – higher than the RSS target – lacks any evidence base or justification</p>	<p>It should be noted that the 85-95% of PDL referred to in CSPA paragraph 5.3.14 is not a target but a reflection of expected delivery</p> <p>A Housing Background paper is being prepared which will explore more recent evidence to reconfirm or modify the PDL targets.</p>	<p>Revise wording of paragraph 5.3.14 to clarify that 85-95% is a reflection of expected delivery in the 1st 5 years.</p>
<p>Peacock & Smith (5665)</p>	<p>The Stockeld Estate</p>	<p>The 75% target exceeds that of the RSS. The higher targets in the early years is vague. These targets conflict with national & regional policy as they will serve to constrain housing development from meeting housing needs.</p>		
<p>Roundhay Planning Forum (5057)</p>		<p>The CS target should be at least 90% to get developers to focus on regeneration</p>		
<p>Spawforths (2663,467)</p>	<p>Mr Ramsden, Langtree Group Plc, Mr Saville, Chapman Family DiscretionaryTrust, MEPC</p>	<p>Lacks justification. A balanced approach is suggested of dual phasing of PDL along with sustainable greenfield sites</p>		
<p>Spawforths (2663,5672)</p>	<p>Mr Ramsden, Langtree Group Plc, Mr Saville, Chapman Family DiscretionaryTrust, Miller Homes</p>	<p>Reduce to RSS 65%</p>		

Walton & Co (5510)	University of Leeds, Thorpe Park Developments Ltd	The target of 85-95% in the first 5 years is unrealistic. It will not enable a sufficient range of house types to be delivered to meet family needs.		
Leeds Youth Council Group 1 Workshop 19/12/09		<ul style="list-style-type: none"> • Agree with prioritising brownfield development over Greenfield • There may be insufficient supply of brownfield land to meet the target • New housing has to have adequate services 	Support welcome. Historic trends suggest that a 75% target should be achievable over the life of the plan	No change
Quality of Place				
GMI Property (5682)		It is wrong to say that quality of place should take priority over numerical targets. Quality of place <i>and</i> delivery of growth can be achieved together. In fact, housing development often provides opportunity to improve quality of place.	Agree that quality of place should be achieved as part of housing growth.	Reword paragraph 5.3.2, in Publication document to say that housing delivery and achievement of numerical targets should not be at the expense of quality of place.
GOYH (95)		Unsound to say Quality of Place takes priority over numerical targets		
ID Planning (5671)	Barwick Developments Ltd	Link is inappropriate		
Pegasus Planning (4388)	Mr C Makin	It is wrong to say that Quality of Place should take priority over numerical targets. Quality of Place <i>and</i> delivery of growth are required; they are not mutually exclusive. Large strategic sites will be better equipped masterplan and deliver quality of place than piecemeal scattered smaller sites.		
Turley Associates (5670)	Swayfields (Skelton) Limited	Wrong to say Quality of Place takes priority over numerical targets		
Walker Morris (3042)	Various Clients	Odd that LCC feels the need to outline this. Quality of place should be expected for any development.		
Safeguard Greenfield Land				
Barwick & Scholes PC (111)		Against use of the Green Belt. Unconvincing case of future needs	However, any potential selective review of the Green Belt would need to be carefully assessed as part of the Housing Background paper.	No change.
Individual (4754)		Against use of the Green Belt		
Core Strategy Wetherby Morrisons event 12/11/09		Housing on brownfield sites not Greenfield sites		
Individual (4754)		PDL before Greenfield at all times	Policy H1 gives preference to PDL but acknowledges that greenfield land will be required to meet the RSS housing requirement	No change

Individual (4754)		Safeguard playing pitches	Policy H1 does not expect any playing pitches to be used for housing which are concluded to be needed by the PPG17 Audit & Needs Assessment..	No change
Settlement Hierarchy				
GMI Property (5682)		Should be recognised that housing growth may lead to the status of settlements being redefined in the settlement hierarchy	Agree	Once the preferred spatial distribution of new housing is clarified, any consequences for the settlement hierarchy should be recognised
Preference for the southern half of the District				
BNP Paribas (5662)	Telereal Trillium	Should not restrict housing growth in the north of the district	This preference is derived from Policy LCR1E of the RSS which states, "Encourage growth across the south of the city region (broadly south of Bradford and Leeds city centres)....". Setting a "preference" is one means of "encouraging" growth and not necessarily stronger. The preference is justified on the basis that housing should be accessible to jobs and significant job growth is expected to the south side of Leeds city centre and in the lower Aire Valley. The Infrastructure Development Plan is assessing what additional infrastructure will be required to support housing growth across the district. The preference is not quantified in Policy H1, but the combination of the percentages in Table H2 and the "Potential Housing Growth Areas" shown on Map 3 provides a means to quantify and deliver the preference. The Publication version of the Core Strategy will need to provide greater clarity on this point.	Clarify the preferred settlement pattern spatially. Liaise with the Highways Agency
Carter Jonas (5681)	The Diocese of Ripon & Leeds	Unclear what this preference means.		
Banks Developments	43228	Support focus on the southern half of the district. Housing development in the northern half should be restricted.		
GMI Property (5682)		Where is the evidence for this? Assessments for Leeds City Region conclude that the east of the District has the greatest potential to accommodate housing growth which preserves & complements regeneration initiatives. New housing would also benefit from planned public transport improvements and proximity of areas of employment growth.		
Highways Agency (5604)		The likely traffic increase on the M621 and M1 needs to be modelled & LCC will need to work in partnership with the Highways Agency to address issues and agree appropriate mitigation.		
NYCC (2613)		Unlikely to provide the type of housing offer attractive to those looking to North Yorkshire as a place to live		
Peacock & Smith (5665, 2996)	The Stockeld Estate,	No justification. Contrary to PPS3 & RSS		
Spawforths (2663,467)	Mr Ramsden, Langtree Group Plc, Mr G Saville, Chapman Family Discretionary Trust, MEPC	No justification. Lacks a demarcation of this type across the District. "Preference" is unquantifiable therefore unimplementable.		
Turley Assocs (5670)	Swayfields (Skelton) Limited	Vague preference. Area not defined. Preference has no dwelling target nor assessment of infrastructure delivery		

Walker Morris (3042)	Various	It will be difficult to interpret what this means in practice. This type of preference should be set out in the Allocations DPD.	Since south Leeds contains considerable amounts of PDL, the preference is compatible with the preference to use PDL	
Walton & Co (5510,5660)	University of Leeds,	The wording “preference for the southern half of the district” is stronger than RSS Policy LCR1 which merely says growth should be encouraged in the south and managed in the north		
WYG (420)	Harrow Estates	Not sustainable if the priority is to make best use of PDL		
WYG (5648)	Yoo Invest	Not sustainable if the priority is to make best use of PDL		
WYG		Not sustainable if the priority is to make best use of PDL		
Mrs Longfield 5647		Not appropriate because transport improvements are programmed for the north. Growth in the southern half will exacerbate existing infrastructure inadequacies.		
Core Strategy White Rose Event		South Leeds suffers compared to North Leeds – Why not have more housing sites in North Leeds?		
Tenants Federation Workshop 26/11/09		Group 2 agreed that the city centre should be treated as a separate category. Some group members suggested that there was a bias towards development in the south of the city with limited development proposed for the more affluent north. It was accepted that there are more brownfield sites located within the south due to higher levels of industrialisation. The group believed that the core strategy should give greater consideration to development in the north.		
Stepping-up of the Housing Requirement in Table H1				
Barton Willmore Planning (57)	White Laith Developments, Templegate Developments Ltd	Does not accord with national or regional policy	The stepped requirement of Table H1 is entirely consistent with regional policy and national policy is silent on the matter. RSS Policy H1B and Table 12.2 allows Leeds’ requirement to start from below the annual average rising to above the average in later years. The actual requirement remains at 4300pa only as an annual average. It is agreed that LCC must meet the	Explore further evidence to reinforce or revise Table H1
Carter Jonas (5681)	The Diocese of Ripon & Leeds	It is not appropriate to place constraints on housing delivery in the early part of the Core Strategy period		
GVA Grimley (2996)		Inappropriate for such a slow step up storing up an undersupply.		
ID Planning (5671)	Barwick Developments Ltd	Paragraphs 5.3.1 and 5.3.2 need revising to be consistent with RSS. It needs to commit to delivering 4300 net dwellings year on year.		

ID Planning	Ben Bailey (South Yorkshire) Ltd, Barwick Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Edmund Thornhill, Great North Developments Ltd, Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Robert Ogden Partnership Ltd, Ringways Motor Group, Persimmon Homes and Taylor Wimpey	Misinterpretation of RSS Table 12.2. This only accepts under-provision where the Council is doing its best to increase supply. The stepping up in Table 12.2 has no rationale based on evidence.	requirement but taking account of other policy requirements including the “Core Approach” or RSS It is acknowledged that there is an evident need for new housing and that there is a need to significantly increase supply in Leeds (RSS 12.14). However, it will take time for housing delivery to step up to the RSS annual average, particularly given the effects of the recession. When the housing market fully recovers in later years, buoyant delivery on PDL accompanied by significant land releases will ensure that the higher than average levels of housing delivery will be achieved in later years.	
Peacock & Smith (5665,2996)	The Stockeld Estate,	The approach in Table H1 is contrary to RSS para 12.14 – it is essential to significantly increase housing supply in Leeds in order to meet needs and reduce longer distance commuting	Table H1 was based on knowledge of the housing market at the time. Further evidence will be explored – including the SHLAA and the new Local Area Agreement target – to refine the rate of step-up as appropriate.	
Pegasus Planning (4388)	Mr C Makin	Table H1 lacks evidence of justification. That the weight of housing falls in the long term means that the CS needs to provide more detail about major growth in the long term.		
Signet Planning (5039)	Kebbel Homes	There is a need for new housing now. Table H1 “backloads” housing provision		
Turley Assocs (5673)	The Warmfield Group	Approach accepted. However, figures are unsupported by evidence.		
Walker Morris (3042)	Various Clients	Table H1 is unsound and not in conformity with RSS as it could lead to a massive undersupply of housing. Similarly, Table H2 shows 54% of housing being delivered in the last 6 years of the plan. This does not reflect Leeds’ ambitions to “Go up a League” and develop as the regional capital.		
Walton & Co (5510,1933)	University of Leeds,	The actual requirement remains 4,300pa or 21,500 over the 1 st 5 years.		

WYG (420,5648)	Harrow Estates, Yoo Invest, Rockspring Hanover property Unit trust	There is a need for new housing now		
Civic Hall Event 2/11/09	Dacre Son Hartley	Do the Table H2 percentages relate to the time periods in Table H1?	Broadly yes	No change
Strategic Sites				
Barton Willmore Planning(57,5 686)	White Laith Developments,	Because size and significance, reference to the East Leeds Extension should be made in the Core Strategy. Both it and housing land in the Aire Valley should be allocated as a strategic site.	LCC does not plan to allocate any strategic sites in the Core Strategy because the Site Allocations DPD will be the best means of determining all allocations in the round. Housing growth is illustrated by CSPA Table H2 and Map 3, which need to be made more spatially specific to show the scale of growth in different locations.	Clarify spatial growth proposals, as part of Housing Background paper.
Pegasus Planning (4388)	Mr C Makin	Strategic sites should be identified for the longer term with detail of implementation. This is necessary because of the scale of growth expected (Table H2 envisages 48% of new housing) to be delivered through urban extensions.		
Dacres		Major growth areas and strategic allocations need to be identified, allocated and released in sustainable locations to meet the needs for employment and housing growth. The East Leeds Extension should be included and released in the early years. More details on release, and infrastructure should follow in the Allocations DPD.		
Support for Previously Developed Land				
WYG (420,5648)	Harrow Estates, Yoo Invest, Rockspring Hanover property Unit trust	The sequential preferences in Policy H1 should include PDL	The parameters of Policy H1 – including the preference for PDL – have to be overlaid on the sequential spatial preferences. It would be too complicated to create one sequential order of the spatial preferences and all the parameters of preference.	No change
Viability				
DTZ (5679)		House prices and land values have fallen dramatically with the effect of reducing the amount of housing development. The Core Strategy should promote engagement with residential developers to discuss the costs & challenges involved with bringing forward residential development generally & on particular sites.	Agree	No change. LCC continues to engage with house-builders in updating the SHMA and other research.

Villages and Rural Areas				
Spawforths	Mr Ramsden, Langtree Group Plc, Mr Saville, Chapman Family DiscretionaryTrust,	Clarification needed of policy for housing development in villages & rural areas. It should be limited to meeting local needs and regeneration, in accordance with RSS	In terms of distribution of allocations, the Core Strategy is clear in indicating approximately 1% of total housing supply in rural areas including villages smaller than those identified as Smaller Settlements in the Settlement Hierarchy. Policy H3 would allow any size of housing development subject to infrastructure.	Review Policy H3 in the light of comments received.
Windfall Allowance				
Barton Willmore Planning (45)	Ashdale Land and Property Company LTD	The windfall allowance should be replaced by identified deliverable sites.	The City Council is not seeking to rely upon windfall in its overall supply of housing land. Paragraph 5.3.26 of the CSPA explains that the identified housing land that makes up supply in Table H2 exceeds the 73,900 requirement for the plan period. The final sentences of paragraph 5.3.24 conclude that if windfall does come forward, less of the identified housing land in the medium and long time periods would be needed. Nevertheless, paragraph 59 of PPS3 allows Local Authorities to demonstrate exceptional local circumstances to justify a windfall allowance. Leeds only suggests 11% which is significantly lower than the 95% proportions which have been	Clarify the role of windfall
Barton Willmore Planning (57)	White Laith Developments, Templegate Developments Ltd	No allowance for windfall should be made		
DLP Planning (2657)	Ben Bailey Homes, Stamford Homes	Sites can be identified in Leeds to provide sufficiency of supply for the first 10 years of the plan.		
GMI Property (5682)		Doesn't really accord with national policy, but if retained, it is essential that housing supply is regularly updated through the SHLAA & AMR		
GOYH (95)		Questionable whether there is evidence to justify the 11% windfall allowance against PPS3 policy		
GVA Grimley (2996)		Dangerous to rely on windfalls when housing supply in Leeds is demonstrably short. The RSS requirement is at the lower end of forecast requirements. Allocations should be brought forward.		
Highways Agency (5604)		The 11% allowance is considerably lower than previous years. If actual windfall is much higher, mechanisms need to be clarified as to what would happen to allocated sites in the 1 st 5 years.		

ID Planning	Ben Bailey (South Yorkshire) Ltd, Barwick Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Edmund Thornhill, Great North Developments Ltd, Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Robert Ogden Partnership Ltd, Ringways Motor Group, Persimmon Homes and Taylor Wimpey	Leeds lacks circumstances to justify a windfall allowance in terms of PPS3 paragraph 59. The lack of a SHLAA means that the 11% allowance cannot be justified. The text of paragraph 5.3.24 obfuscates the issue & should be deleted.	generated since 2005. It is justified on the basis that this accounts for the smaller sites which Leeds' SHLAA found too small and numerous to consider for identification. In terms of mechanisms for dealing with the release of allocations depending on the rate of actual windfall development, these will be a matter for the Site Allocations DPD.	
Sigma Planning		Leeds is no different from other large cities. PPS3 still expects sites to be identified for cities		
Spawforths (2663,5668)	Mr Ramsden, Langtree Group Plc, Mr Saville, Chapman Family Discretionary Trust,	11% based on trend analysis. Contrary to PPS3. Windfall should be part of the 10% flexibility allowance applicable to SHLAAs as indicated by national best practice guidance.		
Turley Assocs(5670)	Swayfields (Skelton) Limited	The allowance is at odds with PPS3, particularly as 11% proportion gives such a scale of dwellings (over 8100)		
Turley Assocs (5673)	The Warmfield Group	Contrary to PPS3. No allowance should be made for windfall provision.		
Walker Morris (3042)	Various Clients	PPS3 says windfall should not be relied upon. Leeds is capable of identifying enough land to meet the RSS requirement.		
Windfall Criteria of Policy H3				
DLP Planning (2657)	Ben Bailey Homes, Stamford Homes	The approach is unsound because sites are not being identified when they should be. A criterion is needed to sequentially steer development away from sites at risk of flooding in line with PPS25	It is appropriate to have a policy to deal with housing development on land not identified for that purpose. PPS25 would be considered in any proposed development in areas of flood risk	No change

GVA Grimley (2996)		Development of greenfield sites should be allowed where the PDL target is exceeded and where a 5 year supply of deliverable housing land cannot be identified	In line with PPS3, Leeds is providing a 5 year supply of deliverable housing land. The consequences of not doing so are set out in paragraphs 69 and 71 of PPS3 and include the favourable consideration of greenfield site proposals. The City Council's LDF plans will be adopted on the basis that they do identify sufficient housing land, so Policy H3 should not need to deal with the eventuality that a 5 year supply of housing land cannot be identified	No change
Peacock & Smith (5665,3046)	The Stockeld Estate,	Restriction on greenfield sites is not justified. Policy H3 should acknowledge the possibility of different approaches if a 5 year supply of deliverable housing land is not available.		
Walton & Co (5510,5660)	University of Leeds,	Restriction on greenfield sites is not justified. Policy H3 should accept development of greenfield sites for housing within urban areas which are not subject to other designations.		
Roundhay Planning Forum (5057)		Define "small in size". Include a criterion for land which contributes to the setting of historic buildings.	Agree. What is meant by "small in size" needs clarification. One option is to use 0.4ha as this is the threshold for sites considered in the SHLAA. Also agree that the criteria to sanction exceptional development of greenfield land should preclude land which contributes to the setting of historic buildings.	Revise Policy H3
Scott Wilson (414)	PPL c/o Revera	Too harsh against greenfield development. Proposals submitted after the Allocations DPD has been adopted should be judged against the methodology used in the DPD to allocate greenfield sites and against offers of planning gain.	The more major greenfield sites which go beyond the scale allowable under Policy H3 should be allocated through the Site Allocations DPD. If such land is suggested after adoption of the DPD, it will have to wait until the DPD is reviewed.	No change
Turley Assocs (5670)	Swayfields (Skelton) Limited	Greenfield sites shouldn't form part of windfall, according to PPS3	Disagree. PPG3 said that there was no role for greenfield windfall development. PPS3 does not say this.	No change
University of Leeds (5690)		What does capacity of health infrastructure mean? Does it include acute hospital care? The potential to seek contributions from housing development toward healthcare facilities should be explored.	Agree. If capacity of infrastructure remains a test of acceptability of development it will need to be defined.	Re-consider whether Policy H3 should set limits for scale of development in different categories of settlement. Define capacity of infrastructure if retained as a criterion.
WYG (420)	Harrow Estates, Rockspring Hanover property Unit trust	Policy guidance is needed on how to deal with windfall development outside of settlement boundaries.	Agree. Policy H3 ignores windfall development outside of settlement boundaries	

Walker Morris (3042)	Various Clients	"Small in size" is not defined in part ii) of Policy H3	Agree. What is meant by "small in size" needs clarification. One option is to use 0.4ha as this is the threshold for sites considered in the SHLAA.	Revise Policy H3 in draft Publication document.
Miscellaneous				
Sarah McMahon (857)		Typo in second sentence of paragraph 5.3.2	Agree	Should read: "...characteristics and <i>be</i> directed and phased..."

LCC RESPONSES TO REPRESENTATIONS ON HOUSING SUPPLY

The CSPA is under providing for housing growth				
Barton Willmore	White Laith Developments	The CSPA is not planning to meet the RSS housing requirement including long term growth.	Leeds' housing supply for the short term (years 1-5) is sufficient when measured against the RSS housing requirement which follows the step-up trajectory of Table H1 of the CSPA	No change
Turley Associates	Swayfields (Skelton) Ltd (SHLAA site 1295), Taylor Wimpey UK Ltd (PAS site 23), Eshton Estates Ltd (SHLAA site 1237)	The release of the SHLAA confirms that the CSPA is planning to under-deliver against RSS housing requirements. The 14883 short term total in the SHLAA represents a shortfall of 6617 units.		
Spawforths	Langtree Group PLC, Andrew Ramsden, Geoffrey Saville, Richard Lindley	The Council lacks a 5 year supply of housing land (as confirmed by Appeal Inspectors) and should therefore release green field, Green Belt and Protected Area of Search (Safeguarded) sites.		
Government Office	Rachel Wigginton	There is a significant undersupply for years 1-5 and the SHLAA lacks a risk assessment of whether identified sites will come forward		
Clarity of Spatial Approach is still lacking even with the SHLAA				
Pegasus Planning Group	Chris Makin	There is no explanation of how the percentages in Table H2 have been arrived at. Further information is required to support and explain.	Agree. The growth proposals need to be more "place" based and give an indication of the scale of growth envisaged in different locations.	Clarify in draft Publication document.
Carter Jonas	Dartmouth Estate, Diocese of Ripon & Leeds, Hatfield Estate, Lady Elizabeth Hastings Church Charity, Ledston Estate, AR Briggs Co Ltd, Symphony Group	Lack of transparency on how the SHLAA has informed CSPA Table H2 and generated the potential housing growth areas (red asterixes on Map 3)		

Carter Jonas	Dartmouth Estate, Diocese of Ripon & Leeds, Hatfield Estate, Lady Elizabeth Hastings Church Charity, Ledston Estate, AR Briggs Co Ltd, Symphony Group	No detail on the scale of Green Belt releases in potential housing growth areas. Harrogate's urban extension study is the type of exercise that Leeds needs to undertake to justify the appropriateness of approach.		
Government Office	Rachel Wigginton	The SHLAA update should break down the distribution of sites into geographical "places" rather than according to the settlement hierarchy. Otherwise it will be difficult to assess whether there are sufficient sites where they are needed and to develop a place-based Core Strategy.		
SHLAA site "Suitability" has been misapplied				
Turley Associates	Swayfields (Skelton) Ltd (SHLAA site 1295), Taylor Wimpey UK Ltd (PAS site 23), Eshton Estates Ltd (SHLAA site 1237)	Lack of a policy neutral stance in respect of site suitability. The SHLAA applies policy variables to determine site suitability; this is wrong as the SHLAA should judge suitability according to technical evidence and statements of fact. CLG Practice Guidance for SHLAAs (para 21) regarding types of land or areas says, "...the scope of the assessment should not be narrowed by existing policies designed to constrain development..."	It should be noted that the test of site suitability is defined in the CLG practice guidance and includes planning policy as a factor to be considered. The intention of the "LDF to determine" category of site suitability was to ensure that the SHLAA exercise did not take policy decisions.	No change
Spawforths	Langtree Group PLC, Andrew Ramsden, Geoffrey Saville, Richard Lindley	The SHLAA exercise should be largely policy neutral. As part of the evidence base the SHLAA should indicate "...the unconstrained capacity for the city and to indicate where the greatest capacity exists, or where development or policy constraints might render sites unsuitable or undeliverable." In this sense, all SHLAA sites should be "LDF to determine". It is inappropriate for the SHLAA to favour certain deliverable sites over others. This is a role for the Core Strategy. The SHLAA should not be used to re-assess the appropriateness of greenfield, Green Belt, and UDP allocated sites and avoid the scrutiny of a development plan review.	At the base date of the SHLAA (1/4/09), the UDP allocated Phase II and III sites were still held back from development by the phasing of UDP Policy H3 and release tests of paragraph 7.2.10. Hence, it was appropriate to categorise all Phase II and III allocations as "LDF to determine". It was also appropriate to assign safeguarded land (UDP Policy N34) and Green Belt sites the same category.	
Carter Jonas	Dartmouth Estate, Diocese of Ripon & Leeds, Hatfield Estate, Lady Elizabeth Hastings Church Charity, Ledston Estate, AR Briggs Co Ltd, Symphony Group	Lack of a policy neutral stance towards UDP Allocations.	As the situation changes, it may be appropriate to re-assign site categories in future updates of the	

Government Office	Rachel Wigginton	Planning policy which is constraining housing development needs to be revisited to see if more sites can be brought forward. This should include UDP sites. The SHLAA needs to be reviewed to identify additional deliverable sites in years 1 to 5.	SHLAA.	
Government Office	Rachel Wigginton	The Review of the SHLAA should look at intensifying the survey by i) reducing the minimum size threshold and ii) increasing the geographical coverage.	The Leeds SHLAA Partnership agreed to apply a 0.4ha minimum size threshold (outside of the City Centre). Resource pressures & other priorities do not permit such an assessment at this time. No geographical constraint was placed on the scope of the SHLAA.	No change
SHLAA methodology or assumptions are unrealistic				
Turley Associates	Swayfields (Skelton) Ltd (SHLAA site 1295), Taylor Wimpey UK Ltd (PAS site 23), Eshton Estates Ltd (SHLAA site 1237)	The release of "City Living: Beyond the Boom" edited by Dr Rachel Unsworth suggests the SHLAA is unrealistic about delivery of schemes in the city centre and that housebuilders are now preferring to build houses rather than flats, which has consequences for density assumptions.	The conclusions about delivery dates for housing on SHLAA sites were taken by a Partnership of housing professionals and interests using best knowledge at the base-date (1/4/09).	No change. The 2009 SHLAA will be updated to 2010.
Barton Willmore	White Laith Developments	Concern that "build-out-rates" were not applied to larger sites and blocks of apartments	Whilst no standardised formula was adopted for larger sites and blocks of apartments, build-out-rates were assessed and agreed by the SHLAA Partnership on a case by case basis	No change.
Spawforths	Langtree Group PLC, Andrew Ramsden, Geoffrey Saville, Richard Lindley	Standard densities of the SHLAA are too high at a minimum of 40dph for urban areas, and over-inflate expected housing delivery. The background assumptions are ambiguous and unclear.	The standard densities were agreed by the SHLAA Partnership and were considerably lower than actually achieved densities for previous years	No change
Spawforths	Langtree Group PLC, Andrew Ramsden, Geoffrey Saville, Richard Lindley	Inappropriate to classify sites as "Dormant" when larger sites overshadow them. Such smaller sites may be developed independently, so should be recognised.	The category of "Dormant" was required to avoid double counting of dwellings. There is nothing to stop a smaller parcel of a SHLAA site being advanced for development	No change

Other comments				
Turley Associates	Swayfields (Skelton) Ltd (SHLAA site 1295), Taylor Wimpey UK Ltd (PAS site 23), Eshton Estates Ltd (SHLAA site 1237)	Table H1 of the CSPA remains unsound and should be revisited to plan positively for the RSS housing requirement	The step-up of Table H1 reflects Policy H1 of the Regional Spatial Strategy (RSS). For Leeds and other authorities named in column 1 of RSS Table 12.2, stepping-up the housing requirement is an integral part of RSS Policy.	No change
Spawforths	Langtree Group PLC, Andrew Ramsden, Geoffrey Saville, Richard Lindley	The step up of the housing requirement set out in CSPA Table H1 is unconvincing and is not supported by any evidence base, calculation or reasoning, as concluded by the Inspector to the Farsley Appeal Decision.	Evidence for the rate of step-up comes from economic and job growth forecasts (the Regional Econometric model) and from trends in levels of housing completions.	
Spawforths	Langtree Group PLC, Andrew Ramsden, Geoffrey Saville, Richard Lindley	The 11% windfall assumption of the CSPA is unjustified as Leeds has not provided robust evidence of why sites cannot be identified. The Inspector to the Farsley Appeal is not convinced of the City Council's case. Instead, the Council should re-run the SHLAA using a lower threshold than 0.4ha.	Leeds believes it can provide robust evidence of genuine local circumstances that prevent specific sites being identified. Staff/time resources did not allow a lower size threshold for the SHLAA to be used. This was agreed by the SHLAA Partnership.	No change
Government Office	Rachel Wigginton	There is not a sufficiently informed view on the need for a windfall allowance. Therefore, it is necessary for more SHLAA sites to be brought forward		
Turley Associates	Swayfields (Skelton) Ltd (SHLAA site 1295)	How can Skelton Business Park be classified as "LDF to determine" in the SHLAA when it is already an employment allocation and identified for mixed use in the Draft Aire Valley Area Action Plan? The site should be classified as "Yes", suitable. Also, the planning permission for road access etc has already been commenced, so will not lapse.	Policy GP1 of the UDPR prevents employment allocations being used for housing development. The proper place for assessing changes to existing allocations is the LDF.	No change
Turley Associates	Eshton Estates (SHLAA Ref 1237)	SHLAA site 1237 is suitable in principle for housing (potentially including some employment land.	A matter for the Site Allocations DPD to be informed by the Core Strategy preferences for housing growth and need and supply issues	No change
Pegasus Planning Group	Chris Makin	Inconsistency between CSPA Table H1 setting 17650 dwellings as the short term requirement and the SHLAA's results showing a short term capacity of 14883 (short term = 2009/10 to 2014/15).	Leeds' housing supply relies on a windfall allowance of 250 dwellings pa to bridge the gap between the SHLAA identified supply and CSPA Table H1's short term requirement	No change
Pegasus Planning Group	Chris Makin	Inconsistency in that the SHLAA says at paragraphs 4.7 – 4.8 that the UDP allocations are categorised as "LDF to determine" and assigned to the medium term; the CSPA says UDP allocations are anticipated to provide the first source of housing land supply.	The UDP housing allocations will be the first source of new land to be identified as the housing land supply.	No change

Pegasus Planning Group	Chris Makin	The totals of CSPA Table H2 do not add up.	Some of the figures are rounded up which accounts for why some totals appear not to add up.	Clarify in draft Publication document.
Government Office	Rachel Wigginton	The Council needs to use the SHLAA data to identify broad locations for growth in the Core Strategy	Broad locations are identified by the red stars on Map 3 of the CSPA	Clarify in draft Publication document.
Government Office	Rachel Wigginton	The need and extent of a Green Belt review needs to be assessed through the Core Strategy.		
Highways Agency	Louise Wright	Around 90 SHLAA sites will have major impacts on the Strategic Highway Network (SHN). The Potential Housing Growth Areas (denoted by red stars on the CSPA Map 3) will have impacts on certain stretches of the SHN.	Agree that the City Council needs to continue dialogue with the Highways Agency to properly test the Preferred Approach	Share work on the Housing Background paper with the Highways Agency

CORE STRATEGY PREFERRED APPROACH APPENDIX 2
LCC RESPONSES TO REPRESENTATIONS ON HOUSING MIX

Representor (include agent)	Those Repe-sented	Representor Comment	LCC Initial Response	Action
Requirement too prescriptive				
Ms A O'Brien (5639)		Agree that there must be some control on the mix of new dwellings e.g. excessive numbers of flats, but builders should not be forced	National Planning Policy on housing (PPS3) aims to create mixed communities expects the planning system to deliver a variety of housing, particularly in terms of price and a mix of different households (paras 9 and 10). Paragraphs 20 and 21 explain that mixed communities should include variety of housing with a mix of different households and that we should plan for a mix of housing on the basis of the different types of households needing housing over the plan period. PPS3 also states that local development documents should set out the likely profile of household types requiring market housing e.g. multi-person, including families and children (x%), single persons (y%), couples (z%). It expects developers to bring forward proposals for market housing which reflect demand and the profile of households requiring market housing in order to sustain mixed communities. Paragraph 24 of PPS3 states: In planning at site level, Local Planning Authorities	Incorporate any relevant findings of the update of the Strategic Housing Market Assessment (SHMA) into the targets and bandings of Table H4 and its supporting evidence. Results of the SHMA should also be used to provide a target mix and banding for housing mix in the city centre.
White Young Green Planning (420,5648)	Harrow Estates Goodman International Yoo Invest Rockspring Hanover property Unit trust	Target mix should not be more than aspirations in the supporting text. The market should decide mix.		
Mr M Dunstall (4743)		There should be a greater emphasis placed on market factors rather than control through the LDF.		
Peacock & Smith (5665)	The Stockeld Estate Mr Newby	The mix targets (Table H4) are considered unreasonable and difficult to apply through development control. There is clear potential [para 5.3.40] for the attempted imposition of a particular mix at the application. The mix of housing should reflect demand & the profile of households requiring market housing.		
Leeds Civic Trust (62)		Concern over the practicality of housing mix as this will be market led.		

ID Planning (5671,5632)	Barwick Developments Persimmon Homes (West Yorkshire) Ltd Edmund Thornhill x3 Great North Developments Ltd Bracken Developments Ltd Persimmon Homes (West Yorkshire) Ltd Robert Ogden Partnership Ltd Persimmon Homes and Taylor Wimpey	Policy too prescriptive to determine the mix of housing at a point in time & lacks flexibility	should ensure that the proposed mix of housing on large strategic sites reflects the proportions of households that require market or affordable housing and achieves a mix of households as well as a mix of tenure and price. For smaller sites, the mix of housing should contribute to the creation of mixed communities having regard to the proportions of households that require market or affordable housing and the existing mix of housing in the locality. Developers are expected to bring forward housing schemes with a mix which reflects demand & the profile of households requiring market housing in order to sustain mixed communities (paragraph 23). The Core Strategy needs to set policy for judging whether the housing mix of proposed schemes meets the profile of anticipated households. Otherwise there will be no proper means for assessing development schemes.	
Turley Associates (5670,1743)	Swayfields (Skelton) Limited Miller Homes Ltd Barratt Strategic	The policy is overly prescriptive. Market trends and demand will be the prime driver of housing mix. Paragraph 22 of PPS3 only requires LPA's to set out the likely proportions and profile of households likely to require market housing	Policy H4 is flexible and not too prescriptive. It only seeks to manage the <i>annual</i> dwelling mix. Also, it only seeks to influence whether mix falls within percentage <i>bands</i> . In this way, the City Council will not be applying prescriptive targets to individual sites, but taking a longer term overview of whether market choices are reflecting demand and the profile of households requiring market housing. If market choices measured on an annual basis depart from what is required, there is legitimate case for intervention. Inevitably, intervention will have to involve negotiations on planning applications. But given the non-prescriptive nature of the policy, the Council would only intervene where it had strong grounds to do so.	
Spawforths (2663)	43952 Langtree Group Plc Mr G Saville Chapman Family DiscretionaryTrust Mr Lindley	It is appropriate for the CS to set out housing mix aspirations and policy basis but it should not dictate the housing mix of all schemes. The expectation to achieve a broad mix is too prescriptive and cannot be achieved in practice. The reference to "expected to conform" should be replaced with "should reflect", Flexibility is needed for developers to respond to changing patterns of demand.	The text also states that exceptions will be accepted where exceptional local needs are evident and where the surrounding townscape dictates a particular form of housing. It is considered that this provides additional site specific flexibility.	
Drivers Jonas (5558)	Horsforth Riverside LLp	Policy should not dictate mix of dwellings, particularly in this depressed economic climate. Flexibility is required.	As a consequence of the withdrawal of the City Centre	
Barton Willmore (57,45)	White Laith Developments Templegate Developments Ltd Ashdale Land and Property Company LTD	Policy is overly restrictive. Flexibility is needed to respond to changing market forces. Ranges should be indicative only.		

SIGMA Planning Services (4110)	Hallam Land Management	The policy could undermine the viability of development. Less risk is required to boost the housing market	Area Action Plan, Table 4 of the Core Strategy will need to be extended to provide guidance on mix of dwellings needed to achieve a balanced community in the city centre.
Lister Haigh Ltd (5533)	D Parker & Sons	The planning system should encourage development to satisfy demand.	
Dacre Son & Hartley (4180)	Taylor Wimpey/Persimmon/Excel Persimmon Homes Taylor Wimpey x5 Redrow Plc Mrs BE Henderson, Mr DA Longbottom, Mrs OM Midgley	Policy H4 is overly prescriptive	
Aspinall Verdi (5689)	Montpellier Estates	Maxima and minima should not be required. The supporting text should set out evidence with a rationale for targets to provide helpful guidance to housebuilders. Market excesses should be left to correct themselves, as is happening with 1 bedroom sized flats in Leeds City Centre	
Carter Jonas (5681)	The Diocese of Ripon & Leeds The Hatfield Estate Lady Elizabeth Hastings Charity Estate The Ledston Estate AR Briggs & Co. Ltd Symphony Group Ltd	We agree that the Core Strategy should seek to avoid excesses of particular housing types (para 5.3.39); the Annual Monitoring Report provides the appropriate mechanism for this.	
Drivers Jonas LLP (5683)	McAleer and Rushe Group	Support is given to the need to provide a balance of housing types outside of the City and main urban areas. However, it is recommended that details of the required housing mix within urban areas are alluded to within this policy including the continued appropriateness of delivering apartments within the City Centre	

Dr Rachel Unsworth University of Leeds (846)		Policy H4 should be attempted but in conjunction with monitoring of take up/vacancy levels to ensure that adjustments can be made to the mix if supply and demand are getting out of kilter. Wherever possible, sites should be mixed in terms of dwelling types, sizes and tenures		
Scholes Community Forum (20)		Supports the principles and objectives of Policy H4		
University of Leeds (5676)		It is imperative for our students and other residents that future developments include a mix of dwelling types and that these are monitored and amended according to residents' housing requirements.	Agree	No Change
The Policy lacks satisfactory evidence & justification				
GVA Grimley Ltd (5661)	City East Limited (Rushbond Group)	Evidence of housing demand should inform the mix of housing types within major developments	At a strategic level, the evidence informing Policy H4 is extensive, including OPCS household projections, the Council's Strategic Housing Market Assessment (SHMA) 2007, past trends of housing delivery in Leeds going back to 1991 and data on the mix of Leeds' existing dwelling stock. The single firm overall conclusion that can be reached from varying individual conclusions is that excesses of provision of particular categories or sizes of dwelling ought to be avoided.	Update SHMA
Peacock & Smith (5665)	The Stockeld Estate Mr Newby	The policy justification (paras 5.3.35 to 5.3.40) fails to refer to housing demand and its implications for the mix and type of housing that is proposed and delivered on new housing developments. The justification highlights the fact that the prior determination of what might be an 'appropriate' mix is inherently difficult		

Turley Associates (5670,1743)	Swayfields (Skelton) Limited Miller Homes Ltd Barratt Strategic	<p>Whilst the SHMA provides a useful starting point for an estimate of future housing needs, it is by its nature a snapshot in time. It is erroneous to assume that housing requirements are determined by household size and that for e.g. single person households will only require small 1 bed units. The principal determinant of the size of residential unit is income. A single person household will, generally occupy the same amount of residential space as say a five person household at the same income level.</p> <p>There is a tension. Urban brownfield sites cannot deliver the lower density family housing that is needed.</p>	<p>Given the change to the housing market caused by the economic recession the SHMA 2007 is being updated. In particular, the SHMA update will need to bring together the different strands of evidence on housing mix & reach some overall conclusions.</p> <p>Regarding the point that the historic trend data is skewed by dominance of flat provision in the later years, it should be noted that house provision dominated in the early years, so the long term average is a reasonable reflection of need and demand.</p>	
Spawforths (2663)	Langtree Group Plc Mr G Saville Chapman Family Discretionary Trust Mr Lindley	Approach is inflexible and not based on robust evidence. No firm conclusions can be reached on housing mix. The SHMA is unclear on how its conclusions have been reached.		
Drivers Jonas (5558)	Horsforth Riverside LLP	Accept the evidence outcome from the Council's SHMA (2007) which outlines the need for a mix of size and dwelling types. Except trends indicate a mix of 65% houses and 35% flats permitted (1991 - 2007) but the latter period was dominated by flats. Therefore, to properly meet the overall need, more housing is required to compensate.		
Barton Willmore (45)	Ashdale Land and Property Company LTD	The figures are based on a Strategic Housing Market Assessment which is out of date. A more up-to-date assessment is needed.		
Drivers Jonas LLP (5683)	McAleer and Rushe Group	Acknowledgement is given to the evidence provided in Paragraphs 5.3.35 to 5.5.39 relating to housing mix requirements		

Dacre Son & Hartley (480)	Taylor Wimpey/Persimmon/Excel Persimmon Homes Taylor Wimpey x5 Redrow Plc Mrs BE Henderson, Mr DA Longbottom, Mrs OM Midgley	There is insufficient evidence base to support the approach taken and it therefore fails the tests of soundness and should be re-written		
Mix needs to take account of surrounding density & character				
GVA Grimley Ltd (5661)	City East Limited (Rushbond Group)	House types should be considered on a case by case basis and consideration given to specific circumstances and regeneration benefits. The promotion of a balanced mix of housing types is supported but needs flexibility with regard to local needs and the surrounding townscape character.	Paragraph 5.3.39 states that where the surrounding townscape requires a particular form of housing, that will be reason for accepting housing mixes outside of the bands in Table H4.	No Change
Spawforths (2663)	Langtree Group Plc Mr G Saville Chapman Family DiscretionaryTrust Mr Lindley	The policy could require developers to show how they have taken into account local housing market characteristics in their proposals for larger sites. housing	Developers will only be expected to show how they have taken into account local housing market characteristics if they believe there is a case to depart from the policy.	No Change.
Lack of advice on housing mix in city and town centres				
GVA Grimley Ltd (5661)	City East Limited (Rushbond Group)	It is unclear what the dwelling mix is expected to be within town centres.	Agree that Policy H4 leaves a vacuum of guidance for the city centre and town centres. Now that the City Centre Area Action Plan has been abandoned, the Council believes that guidance ought to be provided, at least for the city centre. Any policy will need to be influenced by further evidence of need/demand.	SHMA update to explore evidence of housing mix for city and town centres.
Leeds Civic Trust (62)		Extending the city centre to the south of the river could provide an opportunity for larger homes in hubs.		
Turley Associates (5670,1743)	Swayfields (Skelton) Limited Miller Homes Ltd Barratt Strategic	Mix should be determined according to site characteristics.		
Spawforths (2663)	Langtree Group Plc Mr G Saville Chapman Family DiscretionaryTrust Mr Lindley	The LDF should facilitate an appropriate level of new housing for each specific settlement through its distribution policies.		

Barton Willmore Planning (57)	White Laith Developments Templegate Developments Ltd	There is an unrealistically high percentage of apartments targeted in certain parts of the city.		
Dacre Son & Hartley (480)	Taylor Wimpey/Persimmon/Excel Persimmon Homes Taylor Wimpey x5 Redrow Plc Mrs BE Henderson, Mr DA Longbottom, Mrs OM Midgley	Any policy on mix should consider the role of the City and Town Centres within the wider mix		
Miscellaneous				
Stanks and Swarcliffe Residents Association (5052)		Sustainable communities need to serve community needs but building flats is not the answer. There are 20,000 empty properties. Families require houses with gardens, senior citizens require ground floor accommodation i.e. bungalows.	Policy H4 should help achieve a balanced provision of houses and flats and avoid excesses of new flats being built.	No change
Core Strategy Event Owlcotes Shopping Centre		Too many flats		
Core Strategy Wetherby Morisons Event 12/11/09		Too many empty flats being built		

<p>Planning Aid Consultation Report: Disability Group Workshop 7/12/09</p>		<ul style="list-style-type: none"> • The group looked at the targets for the proportion of flats and houses. They note that the recent trend has been to build many 1-bed flats, but they suggest that many remain empty. The group feel that houses and particularly family houses are needed, so they support a higher target for houses than flats. • The group doubt whether the minimum/maximum percentages will deliver the right housing mix. They expect that developers would rather build flats and would seek to build the minimum number of houses i.e. 50%. The group do not feel that 50% flats and 50% houses will produce the mixed neighbourhoods that are needed and that the Core Strategy says it intends to deliver. • “We want the regenerated areas to be successful, we do not want to see acres of empty 1 bed flats.” 		
<p>Leeds Youth Council Workshop 19/12/09</p>		<ul style="list-style-type: none"> • Apartments should be concentrated more in the city centre; houses should be concentrated on the edge of the city • There needs to be a mix of homes for single professionals and families. The city centre should have family homes as well as one person flats <ul style="list-style-type: none"> ○ 40% said they want to live in a flat ○ 20% said they want to live in a house <p>Houses suit ‘old people’ whereas flats suit ‘young people’, especially students..</p>		

<p>Leeds City College Event 9/12/09</p>		<ul style="list-style-type: none"> • More bungalows should be built due to the ageing population. • A variety of housing types should be built (flats/houses/bungalows), although high rise should be limited to around 4 stories. The majority preferred to live in a house rather than a flat 		
<p>Core Strategy Merrion Centre Event 17/11/09</p>		<p>Schools and family housing should be provided near the City Centre</p>		
<p>Voluntary Action Leeds Event 4/12/09</p>		<p>Flexibility is needed to implement 74,000 dwellings</p> <p>3 bedrooms houses should be viewed as standard. 2 bedroom houses are odd. There is limited demand for 1 bedroom flats.</p> <p>There are not enough small houses in the city for people to get on to the property ladder.</p> <p>Four plus bedrooms houses are needed e.g. by the BME communities and others with extended families wanting to live together.</p>		

<p>Tenants Federation Workshop 26/11/09</p>		<p>Group 1 and 2 concluded that flats outside of the city centre have a place in the mix. Low rise apartments are acceptable and can work in places such as Seacroft and where they suited the character of the locality.</p> <p>Group 1 tenants' experience is that very few people want 1 bedroom dwellings Young and elderly generally want a spare room. The group proposed a different mix:</p> <ul style="list-style-type: none"> • 1 bedroom • 2 and 3 bedrooms • 4 plus bedrooms <p>This would allow a smaller percentage to be allocated to 1 bedroom dwellings, with development concentrated on 2 and 3 bedroom dwellings.</p> <p>Group 2 felt there should not be less than 70% homes and more than 30% flats per annum but this would be too prescriptive for the market.</p> <p>1 bed dwellings shouldn't account for more than 0-5% of the total. 3 bed dwellings should be promoted as they enable families to grow without having to move.</p> <p>Group 3 proposed the following:</p> <ul style="list-style-type: none"> • 10% 1 Bedroom • 35% 2 Bedroom • 45% 3+ Bedroom <p>This mix would provide adequate stock for the market.</p>	<p>The Council will reconsider whether the policy needs to give a more detailed split of dwelling sizes including 1 bedroom units and 4 and larger units. The update of the Strategic Housing Market Assessment (SHMA) will need to provide evidence.</p>	<p>Update the SHMA to and consider recasting the split between dwelling sizes.</p>
---	--	---	---	--

<p>Planning Aid Workshop: Hunslet 4/12/09</p>		<p>Housing mix Policy H4– consider needs of individual communities. Important to make provision for 1 bedroom units for vulnerable people (preferred to 2 beds). Suggest that Policy H4 splits the bedroom numbers to individual numbers e.g. 1 bed, 2 bed, 3 bed, 4+ bed. Consider need for larger sized houses to accommodate extended families (not just for Asian families, but to reflect the ageing population, cost of social care)</p>		
<p>Plans Panel East 19/11/09</p>	<p>Cllr Marjoram</p>	<p>What role for apartments? We need places that people want to live in. Better to look at PAS land and GB extensions where places can be properly planned to achieve a better quality of place, than high density apartment solutions.</p>	<p>There will still be a role for policy intervention to promote a balanced mix of apartments and houses related to household need on all sites</p>	<p>No change</p>
<p>Miss A Balchin (5651)</p>		<p>Delighted to see elderly provision specifically addressed. As well as accessibility to services, a pleasant outlook can be important for the house-bound - this should be included in the criteria.</p> <p>There is often a preference for people to remain in the family home for as long as possible. Modern technology and current policy supports this choice. The result is a large number of small 1/ 2 persons households living in 3 or more bedroom for longer periods before the family home is 'recycled' back into the market. More family homes are needed to make up for the shortfall.</p> <p>Concern over the 40/60% split. Too many small houses could result in too many young families struggling to bring up children in cramped conditions. Need to allow more flexibility for more family homes.</p>	<p>Agree that design and outlook of residential properties is important. However other policies in the CS and supplementary policy provide relevant guidance on environment, landscaping and design. (see "Neighbourhoods for Living" and emerging Sustainable Design and Construction SPD).</p> <p>Encouragement to be given to life time homes – the ability to adapt homes to the occupiers through their life time for their changing needs.</p> <p>The 2006 household projections forecast a 43% growth (net increase) in single person households. Allied to this is that in 2008, approximately 80% of Leeds' housing stock of 320,000 comprised houses, therefore we believe that the split is appropriate</p>	

<p>British Waterways (338)</p>		<p>People living on a boat as their main place of residence are recognised by the Government as a separate household group. 'Strategic Housing Market Assessments – Practice Guidance (DCLG, March 2007) refers to barges used for residential purposes as a different type of accommodation and a minority and hard to reach household group (Ch.6 'Housing Requirements of Specific Household Groups').</p> <p>BW as the navigation authority is willing to work with LCC to ensure that people living afloat are taken into account as part of any housing needs assessment. Where the supply of moorings for residential use is identified as an issue within a particular housing needs assessment, it is important that the associated land use implications are addressed within the statutory development plan as part of the plan preparation process.</p>	<p>Agree – need to address this minority housing need in the CS.</p>	<p>Officers will explore with British Waterways to quantify the number of residential moorings in Leeds and whether more are needed.</p>
<p>North Yorkshire County Council (2613)</p>		<p>Reducing the housing pressure in N. Yorkshire generated by Leeds requires more than simply the allocation of land to meet RSS requirements. It will be necessary to ensure that new development provides choice, in terms of location, type and size of dwellings, as well as a high standard of new housing in terms of its physical and social environment. The proposals in the Core Strategy to provide higher proportions of both houses (rather than flats) and 3 or more bedroom dwellings are therefore welcomed. This needs to be supported by sufficient flexibility to meet the demand for high quality residential development which would otherwise add to the housing pressures in N Yorkshire.</p>	<p>Noted</p>	<p>No change.</p>

Woodbine Terrace Residents Assoc (5688)		The provision of special supplementary advice for Inner NW Leeds is sought with the object of arriving at a balanced housing mix.	Policy H4 is concerned about the mix of standard house types and sizes. The distribution of student and other specialist housing is addressed through Policy H6	No change
Highways Agency (5604)		The eventual mix of housing types would affect the total transport impact of the new development, for example, larger houses tend to have a greater impact than smaller houses and flats. The Core Strategy document suggests potential high level measures to mitigate this transport impact. However, when these measures are explored in more detail, they should be considered against the overall impact of the new development, and sensitivity tests should be undertaken with a lower proportion of affordable housing to assess the maximum potential impact.	<p>It is noted that different types of housing generate different demands on transport infrastructure, but the purpose of Policy H4 must remain to ensure that housing mix broadly matches up to the anticipated profile of households.</p> <p>Planning applications for new housing will continue to be assessed in terms of transport impacts and mix of dwellings may be a material factor, but it would not be appropriate to revise Policy H4 to seek to control such issues.</p> <p>However, officers will still seek to work with the Highways Agency to model the traffic impacts of proposed housing growth and distribution. The mix of dwelling sizes and types anticipated by Policy H4 will be a factor in the modelling exercises.</p> <p>The Council's Infrastructure Delivery Plan will also need to take account of housing mix in arriving at what new transport infrastructure needs to be planned in Leeds.</p>	No change
Keyland Developments Limited (2064)	AVL Investors Forum	Without the SHLAA no strategic sites have been identified / allocated (e.g. AVL) to create sustainable mixed communities. The CS should establish a new planning framework for future development establishing a long term strategy and vision on a strong evidence base.	Policy H4 does not rely on the identification of strategic sites to implement housing mix.	No change
Dr Rachel Unsworth University of Leeds(846)		Live/work space may be increasingly required in future and this should be considered at this stage.	Policy H4 does not preclude live/work units.	No change
Mr Ian Cyhanko (5151)	Individual	Having a policy stating a certain percentage of new homes must have 3 bedrooms is pointless as builders would get round this by providing a box room. There is a need to define what a bedroom is!	Agree that clarity is required on definition of "bedroom"	Need to provide glossary definition of "bedroom"

CORE STRATEGY PREFERRED APPROACH APPENDIX 3
LCC RESPONSES TO REPRESENTATIONS ON POLICY H5 AFFORDABLE HOUSING

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
40% TARGET				
Mr Robert Tyrell 05632		Affordable housing is critical. Not enough affordable housing is being built. Can the 40% quota be enforced?	40% is an appropriate target for buoyant market conditions, if the evidence base (the Strategic Housing Market Assessment (SHMA) which outlines the need for affordable housing, and the Economic Viability Assessment (EVA), which considers what can viably be provided) supports such a target.	Revise policy H5 wording to provide more clarity
Mr Alex Willis, BNP Paribas 05662	Telereal Trillium	Support subject to 40% being maxima & subject to viability.		
Mr Dave Trimmingham, Turley Associates	Swayfields (Skelton) Limited			
Mr Giles Chaplin, Lister Haigh Ltd 05533	D Parker & Sons	Agree with requirement.		
4th December 2009: Planning Aid Workshop – Voluntary Action Leeds, Hunslet		Take out reference to “up to” 40% and vary percentage across the city to reflect local circumstances		
7.12.09: Planning Aid - Disability and Access Groups		40% is required. City Centre and adjoining areas, such as Holbeck Urban Village, have a greater need for affordable housing, particularly since the construction of large numbers of expensive apartments, so a lower requirement in these areas is not supported.		
4th December 2009: Planning Aid - Voluntary Action Leeds		The Policy needs more clarity. Why does the policy state up to 40% - why not just 40%? Does 40% apply to the whole of Leeds or just some areas?		
19th December 2009: Leeds Youth Council		100% of the members were in favour of the affordable housing policy		

Mrs Mary Teal, Barwick in Elmet & Scholes Parish Council 00111		Requirements in H5 conflicts/inconsistent with SPD Sept 2008. A more defined figure is appropriate as this would provide more certainty for communities and developers.	<p>The Core Strategy is for a long time period. As such, it is impractical to set specific defined figures for affordable housing. The Core Strategy will set out a range of targets applicable under different scenarios with the evidence to support this, but the detail will be set out in a Supplementary Planning Document (SPD) as this can then be responsive to up to date evidence on housing markets, need for affordable housing and the viability of delivering the targets.</p> <p>40% is derived from RSS policy and supported by the local evidence base. The SHMA 2007 identifies a vast need for affordable housing and the EVA outlines that targets of 40% should be achievable in certain areas, in certain market conditions.</p>	<p>Revise policy H5 wording. The SHMA and EVA are being updated and will be published prior to revisions to the CS.</p>
Sam Thistlethwaite,Banks Developments 05121		An affordable housing requirement of 40% is too onerous and prescriptive and will render many currently viable sites unviable and discourage housing developers.		
Mr Tom Cook, ID Planning (X12) 05668	Ben Bailey (South Yorkshire) Ltd	Flexibility should be recognised in the policy.		
Mr Jonathan Dunbavin, ID Planning 05671	Persimmon Homes (West Yorkshire) Ltd Edmund Thornhill x3 Great North Developments Ltd Bracken Developments Ltd Persimmon Homes (West Yorkshire) Ltd Robert Ogden Partnership Ltd Persimmon Homes and Taylor Wimpey Ringways Motor Group Barwick Developments Ltd			
Mr Andrew Rose, Spawforths (x 5) 02663	Langtree Group Plc Mr G Saville Chapman Family DiscretionaryTrust Mr Lindley			
Mr John Weir, Drivers Jonas LLP 05683	McAleer and Rushe Group			
Mr Nathan Smith, Barton Willmore 00057	White Laith Developments Templegate Developments Ltd	There is no robust evidence to justify blanket 40% target. Clarification is required on anticipated affordable housing percentages across the LDF period. Suggested rewording of policy H5: "The level of affordable housing will be considered on a site by		

Mr Dan Mitchell, Barton Willmore 00045	Ashdale Land and Property Company LTD	site basis, taking into consideration the following: a) economic viability; b) potential risks to delivery c) the levels of finance available and an up to date SHMA".		
Mr Paul Leeming, Carter Jonas (x 6) 05681	The Diocese of Ripon & Leeds The Hatfield Estate Lady Elizabeth Hastings Charity Estate The Ledston Estate AR Briggs & Co.ltd Symphony Group Ltd	Flexible policy required		
Mr Andrew Smith, Savills 00467	MEPC	Unclear what evidence base has been used to justify 40% target. Although policy states it will be subject to market conditions, the starting point will be 40% which is unrealistic in current climate.		
Mr David Colley, Bury & Walker Solicitors 02527	Leeds Residential Property Forum	The continuing imposition of affordable housing obligations, especially as much as 40% makes developments non viable.		
17th December 2009: Leeds Voice BME Network Event - Housing Workshop		Concerns with targets for affordable housing, core strategies say up to 40% but in reality could this be low as 5% etc.		
M Dunstall 04743		40% is unlikely to be attained in current economic climate. In the 2007 options one option was exploring the possibility for public sector land for affordable housing. This should continue to be explored.	As above. The Council established a Strategic Affordable Housing Partnership Board to deliver affordable housing on public sector land. This is another way, in addition to delivery through the planning application process, of delivering affordable housing.	As above. Both options will be pursued and the Core Strategy amended accordingly.
Mr Alex Willis, BNP Paribas 05662	Telereal Trillium	The requirement should be lower on previously developed land than for greenfield sites because of additional site costs.	The EVA has to standardize costs to arrive at viability conclusions for broad areas and scenarios. It would be expected that proposals on PDL with exceptional site costs would have to submit individual viability appraisals.	No change.
Dr Rachel Unsworth, University of Leeds 00846		In areas of lower house prices it does not make sense to require affordable housing when all dwellings would theoretically be affordable to a wide range of households	Low cost market housing is not by definition affordable housing – see definitions in PPS3. There is still a need for a variety of tenures to enable people to have access to a variety of	Revise policy H5 wording to provide more clarity.

Mr Ian Williams, Leeds Chamber of Commerce 01736		The Council has not demonstrated the need for 40% provision in the current housing market, and further, at para 5.3.44 recognises that the district already has a good stock of modest low cost market housing in many areas. Opportunity to stimulate the housing market will be prejudiced by 40%. There should be recognition of LCCs willingness to stimulate the market through a flexible approach to delivery.	housing products (different 'rungs' on the 'housing ladder'). Low cost market housing may still not be affordable to many who still have to have large deposits to secure finance. Other products, such as intermediate tenures (shared ownership etc) help ease this problem.	
Ben Aspinall, Aspinall Verdi 05689	Montpellier Estates	Flexibility needed to waive intermediate S106 requirements to stimulate the house building industry and ensure all policies are aligned to provide investment into the existing stock of houses to deliver the low cost housing required to meet the need on a district wide basis.	The Core Strategy will set out a range of targets applicable under different scenarios with the evidence to support this, but the detail will be set out in a Supplementary Planning Document (SPD) as this can then be responsive to up to date evidence on housing markets, need for affordable housing and the viability of delivering the targets. By doing this, a flexible approach to delivery will be achieved. LCC are working to produce a standard template for 'recession proofing' S106 agreements where appropriate to help actively stimulate house building. PPS3 emphasises the need for on site affordable housing in relation to planning applications for private developments in preference to investment in existing stock.	
I Cyhanko 05151		Policies on affordable housing should not be applicable in deprived areas where private investment is required. Some areas would benefit hugely from housing – new owner occupiers rather than more social housing.	The objective in PPS3 is for sustainable mixed communities. This involves a mix of tenure types – open market, intermediate and social rented on development sites. The requirements for affordable housing are likely to vary depending on where a site is, and targets may be less in inner areas, depending on results of the updated EVA, currently awaited.	No change to policy

EVIDENCE BASE – VIABILITY TESTING (THE ECONOMIC VIABILITY APPRAISAL (EVA))

Mrs Sue Ansbro, White Young Green Planning & Design 00420	Harrow Estates	<p>There is no clarity as to the evidence base in Leeds to require up to 40%.</p> <p>The outcome of Wakefield’s high court challenge may affect the direction of such policy. PPS3 identifies need for evidence base – SHMA and economic viability (para 29).</p>	<p>The evidence is derived from the SHMA and the Economic Viability Assessment (EVA) originally published in 2007 and 2008 respectively. The EVA concludes that targets of 40% should be achievable in certain areas, in certain market conditions.</p>	<p>The EVA is being updated and will be published prior to revisions to the Core Strategy. Policy H5 will be revised as necessary to take account of up to date evidence.</p>
Mr Paul Thornton, White Young Green Planning & Design 05648	Yoo Invest Rockspring Hanover property Unit trust			
Ms Carol Stenner GOYH 00095				
Robert Halstead Chartered Surveyor 05649	Binks Executive Homes LTd			
Mr Dave Trimmington, Turley Associates 05670	Swayfields (Skelton) Limited			
Mr Dave Trimmington, Turley Associates 05670	Swayfields (Skelton) Limited			
Mr Richard Baxter, Turley Associates 01743	Swayfields (Skelton) Limited Barratt Strategic	<p>PPS3 para 29 states that targets should reflect economic viability so this should be included within H5. Each site should be assessed on its own merits with continual monitoring to establish up to date housing needs for an area. There is no viability assessment to justify 40% as SHMA is out of date.</p>	<p>The SHMA and the Economic Viability Assessment (EVA) are 2 separate pieces of evidence. The SHMA was produced in 2007 and is being updated. The EVA was published in 2008. The revised/updated EVA considers the current market scenario and others.</p>	
Mr Andrew Rose, Spawforths (x 5) 02663	Langtree Group Plc Mr G Saville Chapman Family DiscretionaryTrust Mr Lindley			
Mr Andrew Rose, Spawforths 02663	Mr G Saville Mr Lindley			

Mr Matthew Jones, Drivers Jonas 05558	Horsforth Riverside LLP	Previously submitted representations to the SPD, particularly in terms of the impact affordable housing can have on the viability of a scheme. Affordable housing should be provided on the basis that it can be demonstrated through periodic assessment that its provision does not adversely restrict development viability to the extent that the potential to deliver housing is frustrated. In current economic climate, need to adopt a flexible approach to requirements	The Core Strategy will set out a range of targets applicable under different scenarios with the evidence to support this, but the detail will be set out in SPD as this can then be responsive to up to date evidence on housing markets, need for affordable housing and the viability of delivering the targets. The evidence is derived from the SHMA and the Economic Viability Assessment. In addition, whatever the affordable housing targets, applicants may choose to submit individual viability appraisals to verify that the affordable housing target cannot be met and provision may be reduced accordingly.	
Mr Nathan Smith, Barton Willmore 00057	White Laith Developments Templegate Developments Ltd	Not clear where the evidence for this figure comes from, especially as the last assessment dates to 2007. There is no robust evidence to justify blanket 40% target. Levels of affordable housing should be assessed on a site by site basis and on the financial viability of the proposed development (PPS3 para 29). Policy H5 should be reworded to say: "The level of affordable housing will be considered on a site by site basis, taking into consideration the following: a) economic viability; b) potential risks to delivery c) the levels of finance available and d) an up to date SHMA". Such an approach will meet the requirements of PPS3 & RSS.		
Mr Dan Mitchell, Barton Willmore 00045	Ashdale Land and Property Company LTD			
Mr Paul Leeming, Carter Jonas (x 6) 05681	The Diocese of Ripon & Leeds, The Hatfield Estate, Lady Elizabeth Hastings Charity Estate The Ledston Estate AR Briggs & Co. ltd Symphony Group Ltd	A flexible approach to the provision of affordable housing is required based upon market viability & the SHMA. As per para 29 of PPS3 any targets must undergo viability testing for it to be considered deliverable and robust. No such testing of this target has been undertaken.		
Mr Tom Cook, ID Planning 05668	Ben Bailey (South Yorkshire) Ltd	Policy should recognise the effect of providing affordable housing upon the economics of		

Mr Jonathan Dunbavin, ID Planning (x11) 05671	Persimmon Homes (West Yorkshire) Ltd Edmund Thornhill x3 Great North Developments Ltd Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd Robert Ogden Partnership Ltd Persimmon Homes and Taylor Wimpey Ringways Motor Group Barwick Developments Ltd	development.		
Mr Mark Johnson, Dacre Son & Hartley (x 9) 00480	Taylor Wimpey x4 Mrs BE Henderson, Mr DA Longbottom, Mrs OM Midgley Redrow Plc Persimmon Homes Taylor Wimpey/Persimmon/Excel	Recommend H4 and supporting text be amended to say starting point for affordable housing will be in a Developer Contributions DPD supported by a fully consulted evidence base & industry agreed viability test. S106 requirements should be in a single DPD which can be viability tested through the DPD process. Object to H5 in current form.	Presume reference to H4 should be H5 in this context. Any affordable housing policies will be supported by evidence base in the form of both the SHMA and Economic Viability Assessment (EVA) in accordance with para 29 PPS3.	As above. It is not appropriate to commence a 'Contributions DPD' in advance of a decision being made on the Community Infrastructure Levy.

EVIDENCE BASE – STRATEGIC HOUSING MARKET ASSESSMENT

Suzanne Phillipson, GVA Grimley Ltd 05661	City East Limited (Rushbond Group)	Policy H5 is not precise regarding provision or how demand is to be periodically assessed	The evidence is derived from the SHMA and the Economic Viability Assessment originally published in 2007 and 2008 respectively. The SHMA 2007 identifies a vast need for affordable housing (1889 affordable dwellings per annum over a 15 year period, which amounts to way over 40%).	The SHMA is being updated and will be published prior to revisions to the Core Strategy. Policy H5 will be revised as necessary to take account of up to date evidence.
Mrs Sue Ansbro, White Young Green Planning & Design 00420	Harrow Estates	There is no clarity as to the evidence base in Leeds to require up to 40%. A fresh needs assessment should be undertaken that reflects the state of the current housing market.		
Mr Paul Thornton, White Young Green Planning & Design 05648	Yoo Invest Rockspring Hanover property Unit trust			
Mr Andrew Smith, Savills 00467	MEPC			

Mr Tom Cook, ID Planning (x12) 05668	Ben Bailey (South Yorkshire) Ltd	Increased targets should only be promoted where there is an up to date and robust housing need assessment that demonstrates the exceptional circumstances that warrant the increase.		
Mr Jonathan Dunbavin, ID Planning 05671	Barwick Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Edmund Thornhill x3 Great North Developments Ltd, Bracken Developments Ltd, Persimmon Homes (West Yorkshire) Ltd, Robert Ogden Partnership Ltd, Persimmon Homes and Taylor Wimpey Ringways Motor Group Barwick Developments Ltd			
Ben Aspinall, Aspinall Verdi 05689	Montpellier Estates	Not demonstrated current need for affordable housing of 40% since the last SHMA in 2007 which was before the credit crunch. Since 2007 house prices have fallen dramatically.		
Mr Ian Williams, Leeds Chamber of Commerce 01736				
Mr Nathan Smith, Barton Willmore 00057	White Laith Developments Templegate Developments Ltd	Not clear where the evidence for this figure comes from, especially as the last assessment dates to 2007. There is no robust evidence to justify blanket 40% target. Levels of affordable housing should be assessed on a site by site basis and on the financial viability of the proposed development (PPS3 para 29). Policy H5 should be reworded to say: "The level of affordable housing will be considered on a site by site basis, taking into consideration the following: a) economic viability; b) potential risks to delivery c) the levels of finance available and d) an up to date SHMA". Such an approach will meet the requirements of PPS3 & RSS.	The Core Strategy will set out a range of targets applicable under different scenarios with the evidence to support this, but the detail will be set out in SPD as this can then be responsive to up to date evidence on housing markets, need for affordable housing and the viability of delivering the targets. The evidence is derived from the SHMA and the Economic Viability Assessment. In addition, whatever the affordable housing targets, applicants may choose to submit individual viability appraisals to verify that the affordable housing target cannot be met and provision may be reduced accordingly.	It is not appropriate to commence a Contributions DPD in advance of a decision being made on the Community Infrastructure Levy.
Mr Dan Mitchell, Barton Willmore 00045	Ashdale Land and Property Company LTD			

Mr Mark Johnson, Dacre Son & Hartley (x 9) 00480	Taylor Wimpey/Persimmon/Excel Persimmon Homes Taylor Wimpey x5 Redrow Plc	Recommend H4 and supporting text be amended to say starting point for affordable housing will be in a Developer Contributions DPD supported by a fully consulted evidence base & industry agreed viability test. S106 requirements should be in a single DPD which can be viability tested through the DPD process. Object to H5 in current form.	Presume reference to H4 should be H5 in this context. Any affordable housing policies will be supported by evidence base in the form of both the SHMA and Economic Viability Assessment (EVA) in accordance with para 29 PPS3.	
--	---	---	--	--

INDIVIDUAL VIABILITY APPRAISALS

Suzanne Phillipson, GVA Grimley Ltd 05661	City East Limited (Rushbond Group)	Policy should recognise the effect of providing affordable housing upon the economics of development and should be framed to allow negotiation on a site by site basis in the context of site costs/individual viability testing.	Applicants may choose to submit individual viability appraisals to verify that the affordable housing target cannot be met and provision may be reduced accordingly	Policy H5 will be amended to incorporate wording to this effect.
Mr Alex Willis, BNP Paribas 05662	Telereal Trillium			
Mr Tom Cook, ID Planning (x12) 05668	Ben Bailey (South Yorkshire) Ltd			
Mr Jonathan Dunbavin, ID Planning05671	Persimmon Homes (West Yorkshire) Ltd Edmund Thornhill x3 Great North Developments Ltd Bracken Developments Ltd Persimmon Homes (West Yorkshire) Ltd Robert Ogden Partnership Ltd Persimmon Homes and Taylor Wimpey Ringways Motor Group Barwick Developments Ltd			
Mr John Weir, Drivers Jonas LLP 05683	McAleer and Rushe Group			
Barton Willmore (00045 Ashdale Land and Property Company LTD)				

Mr David Colley, Bury & Walker Solicitors 02527	Leeds Residential Property Forum			
Mr Andrew Rose, Spawforths 02663	Mr G Saville Mr Lindley	Appendix 9 – delivery – text relating to obligations is inflexible and prescriptive – every scheme should be considered on its merits, including viability.	As above. Furthermore Appendix 9 does state that ‘Planning obligations will be negotiated on a case by case basis’	Policy H5 will be amended to incorporate wording about individual viability appraisals. No change to Appendix 9.
Mr Andrew Rose, Spawforths (x 5) 02663	Langtree Group Plc Mr G Saville Chapman Family DiscretionaryTrust Mr Lindley	Each site should be assessed on its own merits with continual monitoring to establish up to date housing needs for an area.	Leeds City Council does not have resources to update housing needs information on a site by site basis. We do have the SHMA which includes housing needs information, and this is to be updated on a regular basis in accordance with CLG Good Practice Guidance. Applicants may choose to submit individual viability appraisals to verify that the affordable housing target cannot be met and provision may be reduced accordingly.	Policy H5 will be amended to incorporate wording to this effect.
THRESHOLD OF 15				
Cllr C Campbell Liberal Democrat Otley & Yeadon 04817		All developments should make a contribution (Perhaps financial) not just residential 15 +	The Affordable Housing SPD will be aligned with the production of the Core Strategy (CS) and targets and thresholds will be included in the CS policy. Proposed thresholds will have regard to the Economic Viability Assessment evidence base.	Revise policy H5 wording
Mr Paul Leeming, Carter Jonas (x 6) 05681	The Diocese of Ripon & Leeds, The Hatfield Estate, Lady Elizabeth Hastings Charity Estate The Ledston Estate, AR Briggs & Co. Ltd, Symphony Group Ltd	Object to detailed aspects such as thresholds, specific targets & viability being within SPD as such matters should be tested through public consultation & examination		
Mr Andrew Rose, Spawforths (x5) 02663	Langtree Group Plc Mr G Saville Chapman Family DiscretionaryTrust Mr Lindley			

TENURE SPLIT				
GVA Grimley Ltd (05661)	City East Limited (Rushbond Group)	Further detail should be provided on the types of housing considered eligible as affordable	Definitions of affordable housing are contained within PPS3 and explained in the CS text. Any further explanation of types of affordable housing will be detailed in the SPD	No change to CS policy. SPD to explain types of affordable housing (tenures) in more depth.
Mr Tom Cook, ID Planning (x 12?) 05668	Ben Bailey (South Yorkshire) Ltd	Should also be flexibility on tenure as social rented accommodation is more financially onerous than submarket units for sale.	The revised/updated Economic Viability Assessment (EVA) tests a range of different tenure splits across different housing areas. Affordable housing policy will have regard to this evidence base.	The EVA is being updated and will be published prior to revisions to the Core Strategy. Policy H5 will be revised as necessary.
Mr Jonathan Dunbavin, ID Planning 05671	Persimmon Homes (West Yorkshire) Ltd Edmund Thornhill x3 Great North Developments Ltd Bracken Developments Ltd Persimmon Homes (West Yorkshire) Ltd Robert Ogden Partnership Ltd Persimmon Homes and Taylor Wimpey Ringways Motor Group Barwick Developments Ltd			
Mr Leon Armstrong, Mosaic Town Planning 005672	Miller Homes			
SPD/DPD CLARITY				
Mrs Sue Ansbro, White Young Green Planning & Design 00420	Harrow Estates	The approach to determining the specific requirements for affordable housing should be set out in a DPD not SPD. There is no clarity as to the status of the current SPD.	The Core Strategy will set out a range of targets, thresholds and tenure mixes applicable under different scenarios with the evidence to support this, but the detail will be set out in SPD	Revise policy H5 wording. The Affordable Housing SPD will be aligned

Mr Paul Thornton, White Young Green Planning & Design 05648	Yoo Invest Rockspring Hanover property Unit trust		as this can then be responsive to up to date evidence on housing markets, need for affordable housing and the viability of delivering the targets.	with the production of the Core Strategy
Mr Dave Trimington, Turley Associates 05670	Swayfields (Skelton) Limited	The approach of setting a target & mix of types of affordable housing for each phase of the CS is appropriate, particularly in current economic circumstances, but should be subject to viability testing & open to public consultation and examination by an independent inspector. It is not appropriate for these matters to be dealt with through SPDs		
Mr Andrew Rose, Spawforths (x 5) 02663	Langtree Group Plc Mr G Saville Chapman Family DiscretionaryTrust Mr Lindley	Object to detailed aspects such as thresholds, specific targets & viability being within SPD as such matters should be tested through public consultation & examination.		
Mr Paul Leeming, Carter Jonas (x 6) 05681	The Diocese of Ripon & Leeds, The Hatfield Estate, Lady Elizabeth Hastings Charity Estate The Ledston Estate AR Briggs & Co. Ltd Symphony Group Ltd			
Mr George Hall, Scholes Community Forum 00020		There is inconsistency in the proportion of affordable housing under H5 (up to 40%) when cross referenced with the threshold and zoned requirements set out in the draft SPD. To satisfy soundness tests in PPS12 (para 4.25, vi and vii) consistency and coherence must prevail. This should be addressed prior to the submission stage.		
OTHER COMMENTS				
Mr Roger Davis 04754		Object – affordable housing should be made available to local people as a first priority	Leeds City Council are introducing a 'local homes for local people' policy whereby 25% of all council homes would be set aside for those with a local connection.	No change.

Ms Amanda Jackson, University of Leeds 05676		House prices have increased in last 5-10 years, impacting on the private rented sector rental rates. Affordability affects many communities and requires a city wide approach. University accommodation should be exempt from affordable housing contributions. University accommodation reduces pressure in communities with high levels of students and is in itself affordable housing	Purpose built student accommodation is currently exempt from affordable housing provisions.	The Core Strategy & SPD will further clarify what type of developments are expected to contribute towards affordable housing.
Mrs Sue Ansbro, White Young Green Planning 00420	Leeds Trinity University College	It should be confirmed within the policy that student accommodation, which responds to specialist need in the housing market should not be subject to the requirement to deliver affordable housing. This is not clear in the current drafting.		
Dr Rachel Unsworth, University of Leeds 00846		Wherever possible, affordable housing should be delivered with use of construction trainees who may be considered as occupiers of small units on some sites once they have contributed to the construction.	Paragraph 5.2.5 of the CS acknowledges that 'housing cannot be viewed separately from the necessary infrastructure requirements for mixed and sustainable communities...it is important that the planning of projects includes an assessment of links with jobs...' Leeds City Council will encourage such schemes.	No change.
Mr Matthew Jones, Drivers Jonas 05558	Horsforth Riverside LLP	Accept that arrangements such as S106 agreements must be agreed to ensure affordability is embodied for future people in housing need.	S106 legal agreements are the standard way of ensuring affordable requirements are controlled.	
Mr David Colley, Bury & Walker Solicitors 02527	Leeds Residential Property Forum	Affordable housing places huge burden on developers which has to be passed on. Impacts on specialist accommodation providers such as students, young professionals. Also impacts on private rented sector, in particular very little purpose built private housing to rent, which is bad at time when the Council recognises this is needed for homeless, vulnerable and low earners. Private rented sector is also important for those on average wages, shut out of owner occupation. Special treatment should be allowed for specialist accommodation and the private rented sector, particularly where such housing will be let to those who would otherwise be looking for accommodation in the social or intermediate sector.	The Private Rented Sector is not by definition affordable housing – see definitions in PPS3. There is still a need for a variety of tenures to enable people to have access to a variety of housing products (different 'rungs' on the 'housing ladder') and providers of specialist accommodation including private rented housing should not be exempt from the policy.	
Mr Leon Armstrong, Mosaic Town Planning	Miller Homes	Bramhope has similar issues of affordability to traditional rural locations – affluent commuters has lead to house price inflation. Also, restrictive planning	Low cost market housing is not by definition affordable housing – see definitions in PPS3. There is still a need for a variety of tenures to	The EVA is being updated and will be

005672		policies – unbalanced housing market at expense of cohesive and inclusive community. PAS sites - initial phase of dev could be to provide affordable or low cost market housing. RSS requires managed growth in the north of the City Region (policy LCR1) and a greater emphasis on delivering affordable housing. The geographic aspect to affordable and low cost market housing should be recognised in the CS. Para 5.3.44 is complacent in referring to a ‘good stock of low cost market housing in many areas without exploring how to increase supply in areas such as Bramhope.	enable people to have access to a variety of housing products (different ‘rungs’ on the ‘housing ladder’). The revised/updated EVA tests the viability of different affordable housing targets across a range of market areas. Affordable housing policy will have regard to the EVA evidence base.	published prior to revisions to the CS. Policy H5 will be revised as necessary.
Mr Mark Johnson, Dacre Son & Hartley 00480	Taylor Wimpey	Land at Churchfields Boston Spa should be released for development – it can provide much needed market housing as well as affordable housing benefits	An appeal into a planning application has been heard and the Inspector’s decision is awaited.	No change.
Mr Peter Beaumont, Keyland Developments Ltd 02064	AVL Investors Forum	Clarification is needed on affordable housing percentages linked to deliverability in the Aire Valley across the LDF period	The Core Strategy will set out a range of targets applicable under different scenarios with the evidence to support this, but the detail will be set out in a Supplementary Planning Document (SPD) as this can then be responsive to up to date evidence on housing markets, need for affordable housing and the viability of delivering the targets.	Revise policy H5 wording. The SHMA and EVA are being updated and will be published prior to revisions to the CS.
9th December Planning Aid, Leeds City College - Travel and Tourism Students		More affordable places should be built. A lot of flats are empty in Leeds - these flats are expensive and the average person can not afford them.		
7 th December: Planning Aid - Disability and Access Groups		Holbeck Urban Village – luxury flats not for local people – no affordable housing. More affordable housing needed. A proportion should be affordable and designed to look the same as the open market units.	As above, and Current policy is that the affordable units should be of the same design as the market housing, and this will be future policy.	No change.
9th December Planning Aid, Leeds City College - IT Practitioner Students		Affordable housing should be built within developments so that there are mixed communities.	This is national policy (PPS3)	

<p>26th November Tenants Federation</p> <p>Group 1</p>		<p>Make sure Tenants Federation are consulted on SPD. The group support affordable housing generally.</p> <p>How will the housing remain affordable?</p> <p>Some concerns that integrated affordable housing can reduce the value of surrounding properties.</p>	<p>The Tenants Federation will be consulted on any revisions to the SPD.</p> <p>Section 106 Agreements ensure that the dwellings remain affordable into the future</p> <p>There is no evidence to support this. Affordable units are of the same specification and design as market houses, so tenure of them is not visually apparent.</p>	
<p>4th November Crossgates Shopping Centre</p>		<p>Council housing should remain council in perpetuity – need to safe guard from right to buy. Many issues with sale to ALMO – is very arms length.</p>	<p>The Core Strategy policy is about provision of affordable housing through planning applications for private market housing.</p>	
<p>14th December 2009: Apna Day centre women's session</p>		<p>Asian community want to buy houses in same areas but difficult with house prices being high in general. All areas where people live suffer from this problem. General support for more affordable housing. One lady has a son who is unable to move at the moment because it is too expensive in Harehills.</p>		
<p>23rd November White Rose Shopping Centre</p>		<p>Private sector rented accommodation doesn't work because the landlords have no social conscience and are just trying to make a profit</p>	<p>The Private Rented Sector is not by definition affordable housing. The Council does have a Private Rented Sector Strategy and Action Plan, and landlord accreditation scheme, which aims to tackle these issues.</p>	

CORE STRATEGY PREFERRED APPROACH APPENDIX 4

LCC RESPONSES TO REPRESENTATIONS ON POLICY H6 LOCATION OF SPECIALIST HOUSING

Representor (include agent)	Those Repre- sented	Representor Comment	LCC Initial Response	Action
Student Housing				
Headingley Network 3046		Purpose built student accommodation should be dispersed. This shares out the advantages and disadvantages of large numbers of young people amongst other areas of the City.	Leeds City Council will gather further evidence to enable full consideration of all issues before rewriting policy H6. The evidence base will include information from the universities, HMO licensing authorities and others, as well as the Strategic Housing Market Assessment (SHMA) update 2010. Students not living in halls of residence form part of the overall demand for housing, as captured by the RSS figure. The RSS does not provide a separate institutional forecast for students. Therefore student accommodation will continue to count towards meeting the overall RSS housing requirement. Whilst there has been a high level of growth in student numbers over the past few years, there are no plans for major growth at Leeds Met or the University of Leeds. Coupled alongside cuts to educational funding, it is expected that the student population will remain steady over the coming years. LCC will work with the Universities to	Policy H6 to be rewritten to separate out the different forms of specialist housing and applicable policies. The Allocations DPD will identify development opportunities that exist for specialist forms of housing development, or areas where there is potential to
Ash Road Resident's Association (4698)				
14 th Dec 2009 Planning Aid – BME groups				
Far Headingley Village Society (35)		Welcome the plan to provide housing mix targets for local neighbourhoods in Inner North West Leeds		
Leeds HMO Lobby (26)		Agree broadly with paragraphs 5.3.45-5.3.48 & Policy H6 (and in particular, the reference in the Summary document to 'student accommodation') Policy SC6 confirms that this refers to student housing. Agree with the need to maintain "the balance and health of communities."		

Weetwood Residents Association (2655)		Suggest rewrite para 5.3.45: Specialist forms of accommodation such as student accommodation should be controlled & distributed around the city to avoid excessive concentrations. There has been an increase in the private rented sector, but more so in inner NW due to growth in students. This has been claimed to bring benefits, but local problems; pressure on the housing stock, reducing stock for families, visual and residential amenity issues, eg. poor external maintenance (by landlords or tenants) so the appearance of a whole street or area becomes degraded; late night street noise and disturbance; change in range of amenities eg. shops, schools, has changed in response to demographic change. Population is out of balance. Need Area of Housing Mix (UDP Policy H15) Purpose built developments - begun to shift the concentration away from Headingley but may displace problems.	ensure that student accommodation is being met. In addition, new legislation in 2010 on HMOs and a change in the Use Classes Order to make HMOs a distinct use class from residential dwellings needs to be reviewed. (NB. This cannot be applied retrospectively to existing HMOs, but will only apply to new ones. The changed legislation is on HMOs, not specifically student houses). The current CS policy refers to distributing specialist forms of accommodation around Leeds to reflect the location of needs and local characteristics. The policy was not intended to mean total dispersal. It would replace UDP policy H15 and H15A. It is recognised that a balance needs to be achieved as total dispersal would be contradictory to the aims of sustainable development in terms of transport etc. Specialist housing is to be located having regards to both the needs of those who will occupy it, and the needs of the local community.	restrict/ control development. The policy will have regard to up to date evidence. SPDs will be produced where further expansion of the CS policy is required.
Little Woodhouse Community Association (3054)		Purpose built student accommodation – ‘ghettoism’, encourages ASB among students. Dispersal good, but conflicts with transport accessibility and students wish to be with their peers. Overall increase in student numbers in Little Woodhouse - few student houses empty. Too highly priced to attract owner occupiers, so bought by larger student landlords who bring them up to a reasonable standard for letting, contrary to what CS states. Agree planning permission should be needed for change to shared houses, but too late for our area. Purpose built developments - not a complete solution to student housing problems. Saturation point reached - possible future decrease in numbers. Need to ensure mix of housing with affordable housing a high priority. Should be policies for the development of large empty buildings & former HMOs. The needs of individual areas must be considered and cannot be adequately served by an overall strategy.	SPDs can only be prepared where there is a need to expand on/provide more detail to the CS policy, for e.g. it may be that an SPD on HMOs rather than specifically on student housing in NW Leeds will be an appropriate response to the change in legislation – this will be determined once the evidence and legislation have been fully reviewed.	
Ms Garance Rawinsky (14)		Too late - Burley Triangle students flats have already tipped the balance of Little Woodhouse. Overrun by HMO'S. One school surviving, will never be attractive to families.		

Dacre Son & Hartley (480)	Taylor Wimpey Mrs BE Henderson, Mr DA Longbottom, Mrs OM Midgley Redrow Plc Persimmon Homes Taylor Wimpey/PersimmonExcel	Acknowledgment of the rise in student numbers is welcomed. It should be noted that para 5.2.29 refers to 60000 students whereas para 5.3.45 refers to 40000. Student numbers have gone beyond 80000 and while purpose built accommodation has been provided in certain areas this has not kept pace with the increase in overall numbers. The Universities and Council need to take stock, forecast and plan for future increases given recent increases are above and beyond the housing requirements of the RSS. These numbers will need to be added to the housing requirements		
Inner NW Area Committee Planning Sub Group (5696)		Plan led approach needs to be taken to purpose built student accommodation. The each case on its merits approach has led to many developments in close proximity - problems for residents. The population within Hyde Park & Woodhouse is out of balance. Policy should try to maintain balance. A strong evidence base and supporting DPD are required to reinforce this policy. Without this - ineffective and upholding appeals will be difficult, needs of individual areas must be considered and cannot be adequately served by an overall strategy for the city. Para 5.3.50 - agree with proposal to prepare supplementary guidance		
Stanks and Swarcliffe Residents Association (5052)		The new super college for 10,000 students is still to be built with five satellite colleges. Land is at a premium for this. Why is it not moving forward to create employment and training as part of a growing city vision with housing that meets the need of the city and it's families? The ALMO's have a lot to answer for here as regard to their vision.		
17.11.09 Merrion Centre		Burley Road / Kirkstall Road now student area - no longer just Headingley		
19 th December Planning Aid – Leeds Youth Council		Need to avoid excessive grouping of students, but they should be concentrated in certain areas as it is hard to balance the needs of students with those of residents. Students have different needs and lifestyles.		

Ms A O'Brien (5639)		If people decide to live near one of our two longstanding universities they must expect to find a high population of students in the vicinity. This contrasts with Leeds Trinity which is expanding far beyond its original scope so more sympathy with Horsforth residents.		
Ms Clare Marlow (3074)		Support H6 and Para 5.3.50 as anything that helps to take the pressure off LS6 is welcomed. Should be a cap on multi-letting in LS6 with immediate effect and a ban on family houses that are turned into bed-sits/ tiny flats. The visual appearance of conservation areas is paramount. Such properties and gardens aren't properly looked after, bins left out, too many cars. Most of the landlords don't care or don't have time to look after their properties properly. This ban would probably have to be tackled at Government level.		
NHPNA (3134)		Support encouragement of purpose-built accommodation in appropriate places. P 5.3.50 proposal for mixed-housing targets is welcomed and the suggestion that tight planning regulations for HMOs might be enforced is hopeful. However, ensuring that Headingley is developed to become an Area of Mixed Housing should be made explicit. The current situation where great swathes of the neighbourhood are given over to HMOs creating grotty student dives is appalling! Permanent residents demand that the Council put in place a policy that will bring back a balanced and ethnically diverse community, where young and old, professional and working class people can live together and student numbers are savagely reduced.		

<p>University of Leeds (846)</p>	<ul style="list-style-type: none"> •The rise of the Private Rented Sector is not solely linked with expansion of the student market - essential to the supply of affordable housing for many. •University numbers have stabilised. No major growth. •Decline in the number of families within Headingley can be equally attributed to changed requirements. Back to back & terraces with no gardens not desirable for families. However, need for primary school places in the area may be evidence of retention of students following their graduation. •Accreditation by LCC and Unipol - standards are greatly improved and better than the Private Rented Sector elsewhere. •The Noise Abatement Society reports – no difference between student & non student areas. •Car parking has increased due to increased car ownership and pressures caused by commuters. The University's travel surveys consistently show a decline in car use by students. In 2008 only 20% of students had a car in Leeds and of these only 5% used their car regularly. <p>It is unclear what types of, & how, specialist housing will be controlled. Existing control - Area of Housing Mix. Support this policy. Do not intend to develop any new residential sites within this area. Controls to HMO's and the PRS can only be achieved through national change in policy eg to Use Class Order. Would not support the introduction of HMO or student number quotas - this would reduce choice & drive up rental prices. Students prefer to live close to Uni. Support controls on location & amenity provisions made by purpose built student providers. Eg Burley Road - resulted in an unplanned student village, detrimental impact on community. Unlikely to be fully dispersal. Huge increase in purpose built blocks & opportunity for many students to live in City Centre apartments aimed at the general market.</p>		
----------------------------------	---	--	--

Bury & Walker Solicitors (2527)	Leeds Residential Property Forum	<p>More purpose built accommodation is inappropriate. Non-1st years prefer to live in shared houses in the community (part of life skills and education experience). Remote student blocks encourage more car usage and transport problems. HMOs make a valuable contribution to meeting some housing needs. Dispute growth in numbers over the Plan period. Student housing policies have always been dictated by pressure groups and the Council has failed to regard the interests of the wider community, including students and other residents of HMOs. Planning dept. needs much more liaison and inter-departmental working, e.g. with Housing, Environmental Health and licensing and accreditation schemes, to determine the true evidence base. The mandatory HMO licensing scheme has revealed no significant problems. Noise & disturbance insignificant compared with ASB in other areas. No evidence that HMOs offer the worst living conditions. Overcrowding is normally controlled by licensing in larger houses. Garden management & refuse disposal has been addressed. Dispute that if students were to move out then families would move in. Main property types - old, no gardens, difficult to heat, lack parking. Just part of demographic change. Policy fails to recognise valuable source of accommodation for young professionals - no longer just a student enclave. Regional centre needs rented properties close to the city centre. H6 point one is wrong - can forbid development in certain areas, but cannot force development to take place elsewhere. Affluent suburbs aren't balanced communities, so why should student areas be different.</p>		
Barton Wilmore (57)	Park Lane properties	<p>Student Housing fails to link to a suitable evidence base. Para 5.3.45 and 46 offer a simplistic view. Policy H6 should be positively worded to encourage new student housing on appropriate sites, including in inner NW Leeds to give students an alternative to traditional forms of housing. The link between purpose built student housing and the release of traditional housing from the student letting market should be recognised.</p>		

White Young Green Planning (420)	Leeds Trinity University College	Provision of student accommodation on a campus such a LTUC should be recognised & encouraged – sustainable, will reduce pressure on housing within existing community areas and, thus, the problems associated with visual and residential amenity within.	Purpose built on campus student accommodation should be encouraged.	Amend text to support on site campus developments
Saved Policy H15				
Leeds HMO Lobby (26)		The Lobby disagrees that in fact “Planning [is] managing these issues by using powers at its disposal.” At paragraph 1.6 & throughout, reference is made to ‘Saved UDP Policies’. Appendix 3 is a Schedule of Saved Policies which includes Policy H15. This was adopted in the Revised UDP in 2006, precisely in order to address the problems summarised in paragraph 5.3.45. It seeks to discourage further student housing at the expense (and to the detriment) of family occupation. Policy H15 should be cross-referenced and retained (or a new, improved version) with specific reference that an SPD will be prepared for Inner NW Leeds if the UC Order is amended.	Para 1.6 of the CS is intended to refer to a list of UDP policies saved until the CS is in place. It is intended that policies H15 and H15A will be replaced by policy H6, and should it be necessary, any SPDs will be prepared to further expand on the higher level policy at a later date.	Amend para 1.6 of the CS to make clear reference to saved policies and the intentions of the council to them. SPDs will be produced where further expansion of the CS policy is required
Ash Rd Resi Assoc 4698		UDP policy H15 (Area of housing Mix) should be carried forward. Suggest LCC impact assess the possible age related implications of omitting UDP policy H15	Once the CS policy is established/adopted, any appropriate SPD can be pursued. Consideration will need to be given to the effectiveness of previous policy H15 and H15A, an up to date evidence base and recent changes in legislation to HMOs.	
Mr Chris Webb 3099		UDP Policy H15 should be retained and/or retained in interim before DPD/SPD is produced - not as strong as it should be but is better than no restraint at all. Need restraint on loss of family homes		
Weetwood Residents Assoc 2655				
Little Woodhouse Comm Assoc 3054				
Woodbine Terr Resi Assoc 5688				
Inner NW Area Committee Planning Sub Group 5696				
Headingley Network 3046				

<p>Mr Cockerham 5637 Mrs Colley 5641 Mr Davidson 2560 Mr Joad 5647 Mrs Kirk 5650 Head Dev Trust 5652 Mr Webb 3099 Becketts Park Resi Ass 5656 S. Head Comm Ass 3369 (35)</p>				
<p>2nd Nov 2009 –Civic Hall</p>				
<p>Houses in Multiple Occupation</p>				
<p>Leeds HMO Lobby (26)</p>		<p>Agree with the account of HMOs in general, but not that “the HMO sector has been contracting” (5.3.47); numbers around Headingley have increased hugely & they outnumber all other forms of tenure – this should be recognised. Paragraph 3.2 notes “the high proportion of young people, reflecting the city’s role as a major provider for Higher and Further Education” - but not the fact that they are concentrated in Inner NW Leeds; the benefits are noted in 5.2.29, but not the costs. Agree that the population is out of balance and action is needed to ensure a sustainable community” (5.3.45). Agrees with the proposal in paragraph 5.3.50 to prepare supplementary planning advice for inner NW Leeds, to establish housing mix targets for local neighbourhoods.</p>	<p>As above, and planning applications will have to have regard to the changes in HMO legislation.</p>	<p>As above and the CS text will be expanded to reflect more accurately the evidence surrounding HMOs</p>
<p>Inner NW Area Committee Planning Sub Group (5696)</p>		<p>As above, and many of the problems experienced in Headingley with HMOs are experienced with purpose built blocks, and a large amount of family homes have been acquired by landlords for those that want to be close to friends without being in expensive blocks.</p>		
<p>Ash Road Resident’s Association (4698)</p>		<p>5.3.50 local restraint on HMOs is essential as it is key to the survival of Headingley as a viable community that there is a demographic balance. Arguments that restricting HMOs risks creating a non student ghetto miss the point entirely as the need is to have representation of all groups of people and forms of housing tenure.</p>		

Woodbine Terr Residents Assoc (5688)		Support control of further HMO development in Headingley for students in order to prevent additional distortion of social mix & community life.		
University of Leeds (846)		<ul style="list-style-type: none"> •Whilst there are issues associated with concentrations of HMO's, they are an essential component to the housing market and should be recognised as being key to the provision of affordable accommodation for many people. House prices continue to rise despite the downward economy and continue to be out of the reach of many people, in particular, single person households. •Overcrowding is not commonplace in most HMO's. Since the introduction of HMO licensing, many landlords have downsized to accommodate fewer people per household. Through licensing, basic amenities such as sound proofing and fire precautions can be enforced by local authorities. <p>It may be a feature of the next era of housing development that HMO's for younger and older people become a commoner requirement and that they will be especially designed rather than, as hitherto, being conversions of existing properties.</p>	The private rented sector, which includes HMOs is recognised as an important sector or 'rung' on the overall housing ladder. The CS recognises the importance of HMOs in accommodating households.	
Weetwood Residents Association (2655)		Rewrite the definition of House in Multiple Occupation (HMO) according to the accepted legal definition. HMOs expanded during the last two decades in specific areas in response to demand from student and young professional groups for shorter-term accommodation. Both traditional and newer HMOs frequently offer poor conditions, internally and externally: overcrowding, provision of basic amenities limited, noise, lack of fire precautions, inadequate parking, poor management of gardens and refuse disposal. Dense clusters in particular streets or areas cause particular problems. In a controlled environment, HMOs make a valuable contribution to meeting some housing needs.	The definition of HMO will be aligned with the new legislation 2010.	As above and HMOs will be clearly defined
Liberal Democrat Otley & Yeadon Cllrs (4817)	From mtg 01/12/09	Scope to identify a tolerance/threshold re HMO's/students on a street (some streets only have 1 house left). Scope to convert HMO's back to a single unit or larger flats to keep families in the city.	LCC will gather further evidence to enable full consideration of all issues before rewriting policy H6.	The policy will have regard to up to date evidence. SPDs will be

Mr Staniforth (2612)		Delivery of strategy depends on political and managerial commitment. Headingley and Hyde Park have suffered in this respect... no control over HMOs ...and a surplus of small dwellings.		produced where further expansion of the CS policy is required.
Housing for Elderly People				
Headingley Network 3046		Need more sheltered and affordable housing. Elderly peoples housing should be near local centres.	Policy H6 provides for this.	Policy H6 to be rewritten to separate out the different forms of specialist housing & applicable policies. The policy will have regard to up to date evidence. SPDs will be produced where further expansion of the CS policy is required.
Weetwood Residence Assoc 2655		Agree with criteria for sheltered housing schemes		
7 th Dec 2009: Planning Aid - Leeds Soc for Deaf & Blind		The word 'should' be located within easy walking distance of local centres ought to be replaced by 'must' because if the schemes are not built in such locations the residents will be isolated and cut off.	Will review evidence	
Ash Rd Residents Assoc 4698		Sheltered housing needs to be in a safe environment with good accessibility, close to existing community and family. If housing is not near family support this leads to more reliance on outside help – should have 'pods' for support carers etc		
7 th December Planning Aid – Disability and access groups				
Barwick in Elmet & Scholes Parish Council (3046)		Support is given to Policy H6 for the location of Specialist Housing ie. sheltered accommodation is supported (0.6 hectares adjacent to an existing facility is available for this purpose in Scholes)	Specific sites will be dealt with through the Allocations DPD.	No further action until Allocations DPD
Leeds Primary Care Trust (2504, 3003)		The focus on elderly people seems to be the provision of sheltered housing. A fitter older population may prefer the option of facilitating downsizing as an alternative or life-time homes. Need to consider increased provision of healthcare for increased population.	Lifetime Homes are included within the Code for Sustainable Homes and referred to on page 39 of the CS in a footnote. It is accepted that clearer reference to Lifetime Homes and encouraging independent living should be made within the section on elderly housing.	CS to include clearer reference to Lifetime Homes.
4 th December Planning Aid – Voluntary Action Leeds		Lifetime Homes standard should be included in policy not just a footnote - homes need to allow for adaptations for elderly. Concerns about the inability of the council to regulate	The Strategic Housing Market Assessment Update 2010 and other sources of evidence will be used to inform appropriate policies on housing mix (including the need	

26 th November 2009: Leeds Tenants Federation		the number of 'adapted homes' in the city. Whilst the number of adapted homes in the city is unknown it is believed that more are needed. Need policy to encourage this. These dwellings should be effectively integrated within other dwelling types.	for more 1 bedroom or 2 bedroom units).	
7 th Dec 2009 : Planning Aid – Disability and access groups		No mention of lifetime homes. SC9 p.41 – lifetime homes should be planned for now. SPD in London on this. Policy should be defined and embedded in the document.		
4 th Dec 2009: Planning Aid – Voluntary action group		2 or more bedrooms ideal for the elderly, so that they can have relatives to stay over. Lifetime Homes should be mentioned.		
Carter Jonas (5681)	AR Briggs & Co. Symphony Gp Ltd Lady Elizabeth Hastings Charity Estate Diocese of Ripon & Leeds Ledston Estate Hatfield Estate	Policy H6 sets out criteria for the provision of specialist housing for the elderly. The policy criteria in relation to easy walking distance to town and local centres is equally applicable to all housing developments. No clear reference to Lifetime Homes.	Accessibility is one factor considered in determining applications for housing developments, but it is a key criterion in determining the location of elderly housing schemes. See comments above re Lifetime Homes	
3 rd Nov Members Briefing Cllrs Fox, Anderson Parker.		Although new bungalows are not an efficient use of land, they would free up existing family housing currently in occupation by elderly people.	The Strategic Housing Market Assessment Update 2010 and other sources of evidence will be used to inform appropriate policies on housing (including the need for bungalows for the elderly).	Revised policy H6 will have regard to up to date evidence
14 th December 2009 – Planning Aid: BME Groups (ladies)		Need more sheltered accommodation which is suitable for Asian residents (Cultural needs - food, wardens who speak language, but mixed not solely Asian). Need to be located in areas where people already live and within easy distance of temple / mosque.	Planning policy cannot discriminate or promote different occupiers of sheltered accommodation. Inclusion of all, and encouragement of independent living are fully supported.	Amend policy and/or text to refer to independent living
15 th December – Planning Aid: BME Groups (men)		Elderly need more home help to allow them to stay in own homes for longer. Need more sheltered housing & nursing homes particularly for Asian elders.		

7 th Dec 2009 : Planning Aid – Disability and access groups		H6 should incorporate wording/definition of disabled and put in glossary – the term should be defined in a more inclusive approach – not disabled, but those affected by ill health, injury or disability.	Amend text	Amend text and clarify definition of disabled
Policy H6: General comments				
Mosaic Town Planning (5672)	Miller Homes	Provision should be made for specialist accommodation to be provided in conjunction with market and affordable housing, particularly in Bramhope. PAS, to provide more sustainable and inclusive communities.	Developers are free to provide specialist accommodation in conjunction with other housing. All development sites, not just PAS should provide for sustainable and inclusive communities.	No change to policy
Leeds Civic Trust (62)		Question the practicality of distribution but generally agree for other classes	LCC will gather further evidence to enable full consideration of all issues before rewriting policy H6. The evidence base will include information from the universities, HMO licensing authorities and others, as well as the Strategic Housing Market Assessment (SHMA) update 2010.	Policy H6 to be rewritten to separate out the different forms of specialist housing & applicable policies. The policy will have regard to up to date evidence. SPDs will be produced where further expansion of the CS policy is required.
Turley Associates (1743)	Barratt Strategic	Policy H6 fails the 'effective' test of soundness as it fails to demonstrate or identify mechanisms by which the specialist forms of accommodation will be distributed around Leeds.		
Scholes Community Forum (20)		Subject to detailed comments in regard to the housing strategy/evidence and caveat that 89% of development takes place on “allocated sites” the forum supports the principles and objectives contained within Policy H6.		
7 th December Planning Aid - Leeds Society for Deaf & Blind		Distributing specialist housing around the district in reflection of local need strongly supported. Need associated facilities. What will the council do to prevent other developments at the most accessible sites, identified in the allocations document?		

CORE STRATEGY PREFERRED APPROACH APPENDIX 5
LCC RESPONSES TO REPRESENTATIONS ON THE LEEDS ECONOMY

Responses to questions which do not include further comments.

Question	Agree	Disagree
Q13. Do you agree with the proposals to enhance the economic role of the City Centre?	38	5
Q14. Do you with the proposed location of employment land, including offices?	22	2
Q15. Do you agree with the approach to help grow and diversify the rural economy?	42	1

Additional comments

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
General comments & EC1 – Economic Development Priorities				
White Young Green	Leeds Bradford Airport	Policy EC1 contains little evidence of detailed analysis of drivers of the Leeds Economy e.g. cross references to evidence base economic papers, the RES or Leeds Agenda for Improved Economic Performance. Section should emphasise more the importance of developing a modern transport system and state that LCC will invest and work with partners and stakeholders to seek improvements to rail, road and airport infrastructure.	<p>The RES and Leeds Agenda for Improved Economic Performance have influenced the preferred approach document. Cross references would help to make these linkages more explicit.</p> <p>There is an overlap between this section and the Well Connected City policies. Clearly, a modern transport system is vital to growing the Leeds economy in a sustainable manner.</p>	Review evidence base and identify necessary cross references.
Bradford MDC		<p>More clarity required on:</p> <ul style="list-style-type: none"> • Role and function of settlements close to Bradford • How infrastructure associated with the level of economic growth is to be planned for and delivered • Evidence base needs to be made available and open to scrutiny. 	<p>Further work on the role and function of settlements in the district will be undertaken as part of the Housing Growth Options Study, which will form part of the evidence base.</p> <p>The Infrastructure Delivery Plan will identify the infrastructure requirement resulting from the level of development proposed in the plan.</p> <p>Further clarification on economic development demand and supply issues will be provided as part of the update of the Employment Land Review. This will include a</p>	Reconsider after reviewing result of evidence base updates.

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
			review of the need for employment land and premises over the plan period and assessment of existing employment sites in terms of suitability, availability and viability. This will be published well before the submission draft of the Core Strategy.	
Government Office Y&H	44618	Policy EC1 does not need to be presented as policy.	The contents of EC1 could form part of a redrafted spatial vision <u>or</u> be retained in its current form replacing UDP strategic aims SA4 and in part SA5, SA6 & SA9 and strategic principles SP6 and in part SP7 & SP8.	Review
White Young Green	Rockspring Hanover Property Unit Trust	EC1 – should support the development of existing employment sites and the provision of a range of employment sites across the district.	The first bullet point of EC1 does this to some extent but the wording suggested would be too general and not provide any further locational guidance to be applied to the identification of sites.	None
GVA Grimley	City East Limited - Rushbond Group	EC1 – Support objective 1. Important to allocate a range of sites in different locations catering for differing industries and employment needs. e.g. for start-up businesses through to SMEs.	The section would benefit by making reference to the requirements of small and medium sized business and for this to be one or the criteria to be used to identify suitable sites.	Revise policy or supporting text
ID Planning	The Castle Family Trust	EC1 – General support for the approach.	Support noted.	
ID Planning	Barwick Developments Ltd; Persimmon Homes (West Yorkshire) Ltd; Edmund Thornhill; Great North Developments Ltd; Bracken Developments Ltd; Robert Ogden Partnership Ltd; Ringways Motor Group; Persimmon Homes and Taylor Wimpey	EC1 – Support broad objectives but further objectives should be included. First objectives should be to use current allocations within the UDP in accordance with RSS Policy E3. Should recognise circumstances where greenfield development close to the motorway network will be required for industrial/distribution development. Cannot rely solely on prioritising PDL in urban areas.	Current allocations will need to be reconsidered against criteria set in PPS4 but it is expected that in the main existing employment sites will be considered suitable and retained. Out-of-centre office sites will be subject to the sequential test of PPS4 except where they already benefit from an extant planning permission as the CS Preferred Approach document makes clear (EC4). The second bullet under Policy EC1 refers to prioritising brownfield land but is not intended to mean that <u>only</u> brownfield land can be developed. It is merely an important consideration in the identification of employment land. Taking this approach is consistent with Policy EC2.1(d) of PPS4 but it would perhaps be clearer if this statement was clarified in the supporting text.	Revise supporting text.

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
White Young Green	Goodman International	<p>Lack of synergy between 'Leeds: the Agenda for Improved Economic Performance' and the Core Strategy. The former recognises that one of the most significant areas of new investment and employment opportunity is in the Aire Valley.</p> <p>EC1 – Policy should recognise the potential that continued development, and redevelopment of, existing employment sites has to offer e.g. Leeds Valley Park. Such sites represent important employers for a wide range of people.</p>	<p>The importance of employment opportunities in the Aire Valley are made clear under Policy EC5 and elsewhere in the Core Strategy.</p> <p>Policy EC4 acknowledges that existing planning permissions such as Leeds Valley Park can provide new office floorspace.</p>	None
Scott Wilson	PPL c/o Revera	<p>EC1 – Support general principles, particularly bullets 2,3,4 & 5. Considered that Parlington Estate could accommodate a major cultural, leisure, heritage and tourism facility and/or renewable energy opportunities which would contribute to the economic priorities for Leeds and deliver a facility of regional and national significance.</p> <p>Concern over promoting the city centre as a location for leisure development as it cannot provide for all types of leisure proposals. Wording of bullet 4 should be amended to also include “whilst recognising that not all leisure development can be provided appropriately within the city centre alone.</p>	<p>Promoting the city centre as a strategic location for leisure development is entirely consistent with national and regional planning policies. However, this does not mean that all leisure development will take place there and there is a role for smaller centres and for out-of-centre locations for development that cannot fit easily into existing centres. This could be explained in the supporting text but the suggested wording is not precise enough to be included in the policy wording. There also are other issues to consider including compatibility within Green Belt policies.</p>	Revise supporting text.
Natural England		<p>Welcome the economic development priorities to prioritise the use of brownfield land, to promote the low carbon economy and to support local decentralised energy solutions.</p>	<p>Comes of support welcomed.</p>	None
Metro		<p>Para 5.3.53 – Not clear how the infrastructure will be identified or what the process will be to update evolving infrastructure requirements.</p> <p>EC1 – Supports in principle the approach to focus growth on brownfield land which has good access to public transport. Greater clarity needed to establish what is meant by good access. If the required public transport interventions make the site unattractive to the market, these requirements should not be diluted to</p>	<p>The Infrastructure Delivery Plan will help to identify specific transport infrastructure requirements.</p> <p>Public transport accessibility standards are set out in RSS and Policy T2 of the CS Preferred Approach. The plan needs to have a degree of flexibility and conflicts between public transport requirements and viability may need to be considered on their merits.</p>	Reconsider with updated evidence

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
		meet market demands.		
Inner NW Area Committee Planning Sub Group		EC1 – Bullet 5 welcomed and would expect policy to acknowledge role of walking and cycling in delivering access to jobs.	Support noted. Walking and cycling accessibility is implicit in Policy T2 and is encouraged in other planning documents, for example it is a key priority in the emerging West Leeds Gateway SPD.	None
Nathanial Lichfield & Partners	Steven Parker and Family	EC1 does not acknowledge that Greenfield land will need to be brought forward for employment purposes.	The second bullet under Policy EC1 refers to prioritising brownfield land but is not intended to mean that only brownfield land can be developed. It is merely an important consideration in the identification of employment land. Taking this approach is consistent with Policy EC2.1(d) of PPS4 but it would perhaps be clearer if this statement was clarified in the supporting text.	Revise supporting text
Natural England		Welcome preference for utilising previously developed land and sites in high frequency public transport corridors. However, brownfield sites can harbour biodiversity resources so sites should be investigated prior to allocation.	These issues are addressed in detail under Policies B1-B5 and there would be little benefit to repeating them in this section.	None
EC2: Economic role of the city centre				
English Heritage		Endorse view the environmental quality is vital to the economic success of the city centre but enhancement needs to encompass the quality of buildings as well as streetscapes and open spaces.	Accept the point being made but the issue is not unique to the city centre and is picked up elsewhere under Policy SC8.	None
Government Office for Y&H		The Core Strategy should justify the city centre boundary and provide a policy hook to a possible AAP or masterplans. Should spell out that public transport links need to be improved between the city centre and the City Region. A delivery plan is required including what infrastructure is required and who is going to fund and provide it.	City centre policy issues are currently divided between a number of sections of the plan. Agree that the Core Strategy needs to be clear on the broad extent of the city centre boundary i.e. whether it should grow and if it should where that growth should be focused. The decision will need to take into account the Urban Eco Settlement proposal and evidence emerging from the City, Town and Local Centres Study and the updated Employment Land Review on the need for additional floorspace for town centre uses (retail, office, leisure development). The Infrastructure Delivery Plan will help to identify specific strategic public transport requirements resulting from proposed city centre development.	Review extent of City Centre boundary

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
GVA Grimley	City East Limited - Rushbond	CS should recognise need to focus some economic development within town centres including employment, retail, leisure, tourism, culture, health and sport.	Agree that town centres have a role to play and this role is recognised under Policy SC3.	None
Savills	MEPC	Welcome overall content which affirms the primacy of the city centre.	Comments of Support welcomed.	None.
Leeds Civic Trust		Some of the bullet points in Policy EC2 are too specific.	General content of EC2 considered appropriate and it is important that it sets out clear and specific priorities. It may need updating and clarifying where appropriate in the light of updates to the evidence base.	Review policy
Turley Associates	Warmfield Group	The evidence base is not clear in respect of the existing, committed and extant office permissions and their locations. Important to understanding the numerical analysis present in the CS including how the requirement has been derived and the basis for targets for the city centre, town centres and out of centre locations.	The Employment Land Review is to be brought up to date with an April 2010 base date. This will include evidence on the need for and supply of employment land, including existing planning permissions. Targets may be revised to take account of the updated evidence base.	Update ELR and consider implications for targets.
CB Richard Ellis	Learmonth Property Investment	Support improving public transport links to the airport and facilitating its planned expansion is key to the growth of the economy and the vitality of Leeds and the City Region.	Comments of Support welcomed	None
Leeds Chamber of Commerce		Need to address number of critical aspects listed under EC2 e.g. City Park and green space, the Arena and flood alleviation whilst maintaining benefit of river frontages.	These issues will be addressed through detailed master planning work and as part of the determination of planning applications but the comment raises a wider issue about how city centre issues which cross cut a number themes are addressed. The profile of the city centre in the document could be raised through a re-ordering of the document so that there is, for example, a specific city centre section	Review structure of draft Publication document
Carter Jonas	The Diocese of Ripon & Leeds; The Hatfield Estate; Lady Elizabeth Hastings Charity Estate; The Ledston Estate; AR	Support approach that makes the city centre the main location for larger scale retail, office and leisure development. Not clear how the city centre park will sit within the broader Green Infrastructure framework	Support noted. Green Infrastructure matters are discussed under Policy G2.	None

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
	Briggs & Co. Ltd; Symphony Group Ltd.			
GMI Property Company		New homes, jobs and leisure opportunities are needed to support the wider prosperity of the district. Important that a suitable range and choice of quality homes are available to those working in the city centre.	The Core Strategy provides for an increase in jobs and leisure opportunities over the plan period. Housing issues are addressed separately under the Housing Challenge sub-theme.	None
Drivers Jonas	McAleer & Rushe	Clarity required on status of New Lane site. It is located in a prime location to the south of the city centre close to the railway station and motorway network. Object to exclusion of education facilities from the city centre section (SC3) Highlight potential for city centre to become a destination of company HQs. Highlights linkages between site and south of the city and ability to break down barriers.	The supporting text (para 5.3.55) identifies the broad potential of sites south of the river in the city centre. Detailed work on the status of individual sites will be undertaken as part of the Site Allocations DPD. The city centre is identified as a strategic location for office development, which would include company HQs but there would be no basis for reserving land specifically for this purpose.	For Site Allocations DPD to address
North Yorkshire CC		Welcome proposals to support the role of Leeds city centre as an economic driver for the wider region.	Support noted.	None
Turley Associates	Barrett Strategic	Support the general thrust to maintain the economic importance of the city as the economic driver of the region.	Support noted.	None
Scott Wilson	PPL c/o Revera	Concern over promotion of city centre for leisure development. Should be qualified and recognised that not all economic activity can take place in the city centre.	Promoting the city centre as a strategic location for leisure development is entirely consistent with national and regional planning policies. However, this does not mean that all leisure development will take place there and there is a clear role for smaller centres and for out-of-centre locations for development that cannot fit easily into existing centres. Policies in the Sustainable Communities section address this in detail.	None
CB Richard Ellis	Hammerson Plc	Support. Eastgate and Harewood Quarter will provide a leading role in delivering primary objective of EC2.	Comments of Support welcomed	
Natural England		Support provision of new park in city centre.	Comments of support welcomed.	

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
Metro		Consistent with broad objectives and priorities for transport in the LCR Transport Strategy. Reference could be made to the development of rapid transit to boost capacity and improve connectivity. Development in Rim area will require improvements in interchange facilities for buses.	NGT scheme could be referred to as an example of public transport investment linking the city centre and other parts of the city.	Revise supporting text
University of Leeds		Welcome the new park. Likely that there will not be a need for as much additional retail space as is currently in the pipeline. Monitoring of retail trends and churn should inform the way forward on additional or replacement retail facilities. Extra cultural and leisure institutions and activities should be encouraged. City markets should be protected and encouraged.	Support for park noted. The Council are embarking on the preparation of a City Centre, Town and Local Centres Study which will identify the need for additional retail floorspace in the city over the plan period. This will include advice on how to support the independent retail and market sectors. This will inform the direction of the Core Strategy and the approach taken to retail development in the city centre.	Complete Retail & Town Centres Study and consider implications.
Location of employment land and offices – General				
Liberal Democrat Otley & Yeadon Councillors		Include reference to local centres of employment.	Analysis of existing patterns of employment could form of the update to the ELR. Data is available at the middle super output area (neighbourhood) level for employment floorspace in the B classes. The CS could cross reference this work which may also influence the criteria for the location of new employment land.	Update ELR and consider implications
Government Office for Y&H		Policy should be expanded to give more direction on where employment sites will be located. Locationally specific elements of EC4 & EC5 would be clearer if they were incorporated into EC2 & EC3. Stronger policy hooks needed to the Aire Valley AAP , the Allocations DPD and masterplans.	Agree that policies need to be more locationally specific. The update of the Leeds Employment Land Review will assist this process. Do not consider that EC2 and EC4 should be merged. EC2 deals with economic development issues in the city centre in their wider sense where as EC4 deals with office development across the city. Similarly EC3 & EC5 cover different but overlapping issues and should be retained as separate policies. EC3 sets the overall requirement for all employment land/floorspace at the district level where as EC5 details the strategy for identifying the land to meet the industrial & storage/distribution requirement. A number of references are made to the Site Allocations DPD and Area Action Plans. These will need to be brought up to date where necessary e.g. reference to the South Bank Planning Statement under	Update ELR and revise policy

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
			Policy EC2.	
DHA Planning	Munroe K Ltd	Fails to recognise contribution made by existing employment sites and the need to protect, retain and enhance these e.g. White Rose Office Park. Maximum use should be made of existing sustainable sites additional to the promote of town centres to provide a good range and variety of office accommodation.	The suitability of sites to accommodate new employment development will be a matter for the Site Allocations DPD taking into account national, regional and Core Strategy policies. The focus of the Site Allocations DPD will be to identify sites to accommodate new employment development to meet identified need assisted by the findings of the Employment Land Review.	For Site Allocations DPD.
ID Planning	Robert Ogden Partnership	Map Book – Welcome that PAS sites are retained on the Proposals Map. The Tingley site should be allocated for mixed use housing and employment development.	This will be a matter for the Site Allocations DPD taking into account the overall employment land requirement and specific locational priorities identified in the Core Strategy and national and regional planning policies.	For Site Allocations DPD.
Nathanial Lichfield & Partners	Steven Parker and Family	Land at York Road/Sandbeck Lane, Wetherby has the potential to accommodate some of the future employment requirements of Wetherby. RSS identifies Wetherby as a Principal Town and therefore it should be the main focus for employment. EC1 does not acknowledge that Greenfield land will need to be brought forward for employment purposes.	Accept that the Employment Land Review update will need to consider in more detail the specific employment requirements of Wetherby given that it is identified as a Principal Town in the RSS. However, the suitability of sites to accommodate new employment development will be a matter for the Site Allocations DPD taking into account national, regional and Core Strategy policies. Policy EC1 should be more explicit in identifying current and as yet undeveloped employment allocations as having potential to contribute to the employment land/floorspace requirements over the plan period. Many of these allocations are greenfield.	For Site Allocations DPD. Revise EC1 wording.
Carter Jonas	The Diocese of Ripon & Leeds; The Hatfield Estate; Lady Elizabeth Hastings Charity Estate; The Ledston Estate; AR Briggs & Co. Ltd; Symphony Group Ltd	Important that the Council identifies sufficient land to meets its economic growth ambitions and that these are in the right locations. Tendency for repetition in some policies (e.g. location and scale of office development: SC3, SC5 and EC1-EC4).	Agree - the employment land requirement is to be reassessed taking into account the most recent employment forecast available from the Regional Econometric Model provided by Yorkshire Forward. The wording of the mentioned policies will be reviewed and any unnecessary repetition removed but the intention was that issues relating to office development which cut across the sustainable communities and economy themes were adequately covered.	Part of ELR update. Review policies SC3, SC5 & EC1-EC4

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
White Young Green	Rockspring Hanover Property Unit Trust	No recognition of the Thorp Arch Estate - should be recognised via Map 3 "Key Economic Development Opportunities".	The suitability of sites to accommodate new employment development will be a matter for the Site Allocations DPD taking into account national, regional and Core Strategy policies. There is a need to define more clearly what a 'Key Economic Development Opportunity' represents for the publication document or whether the concept should be retained.	Update ELR and consider implications.
Policy EC3: Provision of employment land and premises				
Yorkshire Forward		The Leeds City Region Development Programme identifies a shortage of R&D incubator units. May be a need to make a specific reference in EC3 & EC5. Would be beneficial to find a means of reflecting in the job forecast the changed position of the national and regional economy since the ELR and RSS. Job growth forecasts should be based on the most recent version of the Regional Econometric Model.	Agree that a reference to the specific need for R&D incubator units would be appropriate. The employment land requirement is to be reassessed taking into account the most recent employment forecast available from the Regional Econometric Model provided by Yorkshire Forward.	Revise policy and update ELR and consider implications.
Scholes Community Forum		Concern over concentration of office development in the city centre. Brownfield site in rural areas should be considered for office and R&D facilities but not other use classes. Disturbed that R&D is grouped with industry and storage/distribution.	There is a role for small-scale brownfield development in rural areas as acknowledged by Policy EC7 and PPS4 but large scale development of offices should be directed towards locations with good accessibility particularly the city centre and other town centres. R&D facilities are grouped with industry and storage/distribution because they have the similar locational requirements according to national and regional planning policies. Office development is considered differently due to the 'town centres first' locational approach of PPS4.	None.
Helen Longfield		Does not agree with extensive out of centre office development which means future policy will have limited impact to the detriment of neighbouring districts and the city centre. RSS policy to encourage development in the Leeds-Bradford corridor is not borne out in policies.	The plan does not identify the need for further extensive out-of-centre office development but has to acknowledge the reality that a number of large sites are partially developed and/or benefit from extant planning permissions and these will inevitably take up some of the identified demand for office floorspace. The Leeds-Bradford corridor is identified as a regeneration priority area under Policy SC1.	None.

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
ID Planning; Turley Associates	The Castle Family Trust; Barwick Developments; Persimmon Homes (West Yorkshire); Edmund Thornhill; Great North Developments; Bracken Developments; Robert Ogden Partnership; Ringways Motor Group; Persimmon Homes and Taylor Wimpey Swayfields (Skelton) Limited; The Warmfield Group; Barratt Strategic	<p>EC3 - The use of employment figures from the ELR rather than the RSS is inappropriate and therefore unsound.</p> <p>Table E1 – Only 65% of job provision suggested by RSS is being planned for. ELR is out of date and precedes the RSS which states that the evidence base should be revisited once the econometric model has been updated. Use Scenario B of the model rather than Scenario C used by RSS. Methodology applied is unduly constrained by past performance.</p> <p>Provision of land for industrial and distribution is only 14% of that forecast in the RSS. Job creation potential of distribution is under-estimated which hampers the ability of the strategy to deliver enough land to accommodate future growth.</p> <p>Net effect is to significantly under provide land for job growth.</p> <p>375ha allowance for employment land is inadequate. The 2006 ELR is not an appropriate basis for assessing future employment land requirements as it is aging and focused on past take up rates. The RSS land requirement allowing for flexibility would amount to 585ha.</p> <p>Reliance on past trends is not an appropriate method for assessing the role of the Regional Capital and ignores the transformational agenda set by RSS.</p> <p>Not appropriate to release land in a piecemeal manner and this removes certainty from the market and does not address the need for a Green Belt review.</p> <p>Concerned about the lack of up to date delivery assessment with respect to consideration of whether there is a five year supply of market ready sites.</p>	<p>The employment land requirement is to be reassessed taking into account the most recent employment forecast available from the Regional Econometric Model provided by Yorkshire Forward.</p> <p>It is not appropriate to rely on the RSS employment figures alone, however. These are based on pre-recession forecasts and are unrealistic in terms of future economic growth (from a 2006 base date). Policies E1 and E3 of the RSS allows for the use of more detailed sub-regional or local forecasts or more up-to-date information in addition to Table 11.1 and 11.2. Yorkshire Forward have acknowledged that there is a need to update the forecast in their representation to the Core Strategy consultation.</p> <p>Disagree that only 14% of the land requirement derived from RSS is being catered for. This confuses the net and gross land requirement.</p> <p>However, do agree the plan does need to provide a flexible supply of land for economic development given the requirements of new national guidance set out in PPS4. This may mean there is a need to allocate more than the 375 hectares identified in the Preferred Approach document but this will depend on the detailed results of the ELR update.</p> <p>The ELR update will also provide an assessment of the suitability, availability and viability of existing sites in the employment land supply (including allocations and windfall sites).</p>	Update ELR and consider implications.

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
Scott Wilson	PPL c/o Revera	<p>EC3 – Amend 2nd bullet to acknowledge that sites will be brownfield and greenfield.</p> <p>Table 3 – Claimed oversupply of land in the east/north east of the district should not prevent suitable site along in M1 corridor in the east from coming forward. The suitability of a site for employment should be determined through Site Allocations DPD not the ELR which will become out of date.</p> <p>M1 corridor would be a suitable location for distribution and logistics businesses e.g. land to the north of J47 of the M1 and to the west of the existing employment land south of the junction.</p>	<p>Policy EC1 should be more explicit in identifying current and as yet undeveloped employment allocations as having potential to contribute to the employment land/floorspace requirements over the plan period. Many of these allocations are greenfield. Beyond this it is not necessary to refer to the status of sites under this policy.</p> <p>Policy EC3 - An assessment of the suitability of sites against a broad set of physical, sustainability and policy criteria will be published as part of the updated ELR but the respondent is correct in asserting that this is ultimately a matter for the Site Allocations DPD. Agree that the M1 corridor is generally a suitable location for distribution uses subject to other planning considerations. This is an important locational factor identified in under EC5.</p>	Reword Policy EC1, update ELR and consider implications.
White Young Green	Rockspring Hanover Property Unit Trust	EC3 – Should be redrafted to incorporate the long term protection and growth of existing employment parks.	Protection of existing employment areas is addressed under Policy EC6. Potential for growth of existing areas will need to be considered in terms of the need for employment land and the suitability of various options.	None
NHS Leeds		EC3 – Should be strengthened to specify factors to determine the suitability of employment sites such as potential for noise and air pollution affecting nearby residents.	These are important amenity considerations which need to be taken into account as part of the identification and allocation of employment land but they are too specific to be written in Policy EC3 which is of a more strategic nature..	Consider issue through ELR assessments
Policy EC4: Location of office development				
Scholes Community Forum		Conflict between EC4 bullet 3 & 4 and paras 5.3.83 & 5.3.87. Need for more clarity and evidence as basis for decisions.	Disagree that there is a conflict between these statements. Making the centres of towns and villages serving a rural catchment the first choice location for office development in rural areas is a sustainable approach to the location of office development consistent with national and regional policy. Policy EC7 allows some flexibility with regard to small-scale development.	None
Barwick in Elmet & Scholes Parish Council		General support for economic policies but reservations with regard to bullet 4 of EC4 and para 5.3.83.		

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
GVA Grimley	City East Limited (Rushbond Group)	Office policies should not be over prescriptive so as to prohibit significant office development in regeneration areas where market forces, site availability and demand allow for investment.	Disagree that policies are over prescriptive. The approach is consistent with the town centres first approach set out in PPS4. The final bullet point allows more flexibility within regeneration areas for small and medium scale development.	None
BNP Paribas	Telereal Trillium	Support locational preference for new office uses. Large scale out-of-centre office uses should be allowed to develop for other uses. Policy EC6 should allow out-of-centre office to be redeveloped for other use where more centrally located sites are available.	Applications for the redevelopment of existing employment sites would need to be considered against the criteria set out under EC6.	None
Drivers Jonas	Barwood Developments & Caleast Holdings	EC4 – Clarification needed on the approach to ancillary offices as it is sometimes required to support larger industrial/warehousing. Policy requires some flexibility in relation to smaller ancillary office development.	The supporting text to EC4 could explain that ancillary office development is acceptable in accordance with PPS4 policy.	Revise supporting text
Savills	MEPC	As a highly sustainable location, Wellington Place's allocation in the current UDP should be carried over to any site allocations document.	Agree that Wellington Place is a sustainable location in the city centre and office development is appropriate and consistent with national and regional policy. The allocation of land is a matter for the Site Allocations DPD.	For Site Allocations DPD.
Leeds Chamber of Commerce		A presumption against office proposals in edge or out of centre locations may inhibit opportunity for employment growth in locations which are accessible to main transport corridors and near to residential areas.	There is a preference for sites and premises for offices within existing centres but this does not amount to a presumption against development on the edge or out of centres if the criteria set out in PPS4 and Policy EC4 can be satisfied.	None
Barton Willmore	Templegate Developments Ltd	Further clarification needed in respect to office development.	Further clarification on supply issues will be provided as part of the update of the Employment Land Review. This will include an assessment of existing employment sites in terms of suitability, availability and viability. This will be published well before the submission draft of the Core Strategy.	Update ELR and consider implications.
Drivers Jonas	McAleer and Rushe Group	EC4 – Request clarification on bullet point 2 as unclear whether it refers to edge city centre locations within or outside the present boundary. Certain edge of centre locations may be appropriate for larger scale offices supported by small scale retail or residential uses.	All sites within the existing (or amended) city centre boundary are classified as in-centre. Sites outside but within 300m walking distance of that boundary are classified as edge-of-centre according to the PPS4 definition as well as sites within 500m of the train station. Edge of centre sites will need to be considered on their	None

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
			own merits as part of the Site Allocation DPD but first preference will be to identify sites within the city centre for large scale development.	
Scott Wilson	PPL c/o Revera	EC4 – Should have an additional bullet that allows for small scale office use through the conversion of rural buildings as this would encourage sustainable living and working patterns.	This issue is broadly covered by the last bullet of Policy EC7 and PPS4.	None
CB Richard Ellis	Marshalls plc	ELR does not include specific site assessments therefore difficult to assess whether evidence base is sound. Request Council to confirm that Lingwell Gate Lane site has been discounted from the employment land supply. Site has been marketed with no reasonable offers. Support de-allocation from employment to housing with local retail.	Further clarification on supply issues will be provided as part of the update of the Employment Land Review. This will include an assessment of existing employment sites in terms of suitability, availability and viability. This will be published before the submission draft of the Core Strategy. An assessment of the Ligwell Gate site will be included but it will be a matter for the Site Allocation DPD to determine the appropriate end use.	Update ELR / Site Allocations DPD
White Young Green	Rockspring Hanover Property Unit Trust	EC4 – Policy excludes the ability to enable small and medium scale office development on existing major employment sites outside regeneration areas. Such development should be allowed in specific circumstances – within curtilage, where sustainable transport can be delivered, where B1 offices can help existing employment provision, office element less than 20% of employment floorspace.	The policy as drafted is consistent with new national policy set out in PPS4. The need for new floorspace for office development will be reviewed as part of the ELR update but it is expected that this will show there is little need for further out of centre development.	Update ELR and consider implications.
Highways Agency		Table 2 – Not appropriate to assume B1 development under 1,500 sq m have ‘no significant travel impact’ as they may have a significant cumulative impact on the local transport network. Statement should be removed.	The table was included in the document to give a brief indication as to why the threshold was chosen. The thresholds are to be reviewed in the light of updated national policy in PPS4 and the forthcoming update of the Leeds Employment Land Review. Accept that several smaller development can have a significant cumulative impact and therefore the wording needs to be reconsidered.	Update ELR and consider implications. Revise wording.
Metro		EC4 – Support the sequential approach to office locations with focus being on the city centre and main centres.	Comments of support welcomed	None
University of Leeds		Agree with no further out of town office parks.	Comments of support welcomed.	None

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
EC5: Location of research & development, industrial and distribution/warehousing development				
Leeds Cycling Action Group		Should not be encouraging airport related development.	This reference needs to be clarified. It is not the intention of the policy to encourage out of centre office development at this location. The Key Economic Development Opportunity status reflects the planning approval for airport growth and thus potential for the increase in the number of jobs at the location.	Revise wording
Government Office for Y&H		EC5 (B) – concern that ‘non-operational’ airport related development might lead to pressure for office parks near the airport. Should not be a key economic development opportunity on Map 3 without a rider.		
ID Planning	The Castle Family Trust; Barwick Developments; Persimmon Homes (West Yorkshire); Edmund Thornhill; Great North Developments; Bracken Developments; Robert Ogden Partnership; Ringways Motor Group; Persimmon Homes and Taylor Wimpey	Table E3 – Not based on a credible evidence base as lacks clarity as to how the sub-division has been calculated. EC5 – Welcome except for overall requirement figure of 375ha.	Agree that more clarity is required. The apportionment of the overall land requirement to sub-areas and explanation of the methodology will be reviewed and published as part of the update to the ELR.	Update ELR and consider implications.
Mosaic Town Planning	Miller Homes	Support for allocation of employment land around the airport and to meeting localised employment needs through smaller scale developments.	Comments of support welcomed	None
British Waterways		EC5 – supportive of a flexible approach to allocating and safeguarding employment land within the Aire Valley. Concerned if a restriction on change of use of low grade employment uses close to waterways prevented the appropriate redevelopment of vacant and underused land along the network contrary to PPS3.	The Aire Valley AAP will address such conflicts in a detailed and integrated manner in order to promote a wider mix of development in the area. However, it is important that the undoubted locational benefits of the Aire Valley for industrial and storage/distribution uses are secured by reserving a minimum amount of land for such uses.	None

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
Lister Haigh	D Parker & Sons	The identified Wetherby site could help provide the requirement for 185 hectares of local employment opportunities.	The merits of individual sites will be considered as part of the preparation of the Site Allocations DPD.	For Site Allocations DPD
CB Richard Ellis	Learmonth Property Investment Company Ltd	EC5 – Need greater clarity on the types of use that would be defined as ‘airport related’. The availability of existing space within the LBA Industrial Estate should meet that need. The existing allocation should be retained and considered for other airport related development such as hotel and leisure proposals and parking.	Agree that greater clarity is required. EC5 refers specifically to industrial and distribution uses so the intention of the policy as written was meant to refer to airport related development in these specific sectors. The reallocation of land for other airport related uses would be a matter for the Site Allocations DPD and would need to be consistent with national, regional and local policy approaches and based on a clearly identified need.	Clarify through revision to supporting text. Any reallocation of land would be done through the Site Allocations DPD.
Highways Agency		Para 5.3.76 re accessibility of the Aire Valley requires qualification. Need conditions relating to trip generation thresholds. EC5 – Statement encourage B8 development on sites close to motorways need qualification. Only acceptable if appropriate mitigation measures are in place.	These are general statements explaining why the Aire Valley is an appropriate location for these uses. The Aire Valley AAP will take an integrated approach to ensure that new development does not result in an unacceptable impact on the highway network.	None
EC6: Existing employment sites and premises				
White Young Green	Harrow Estates; Yoo Invest	EC6 – In order to limit the loss of existing employment site there needs to be a positive approach to recognising that in order to deliver the required housing land supply there will be a need to develop some of these sites	EC6 acknowledges this but recognises that there may also be a need to protect strategic and local employment sites in certain cases to ensure there is balanced and sustainable growth. Calculations on the employment land requirement will continue to make allowance for some loss of existing employment sites. EC6 as drafted will need to be reconsidered in relation to the new approach to economic development uses set out in PPS4 but also the needs to take into account the importance of providing some local employment opportunities in the ‘B class’ sectors.	Review in terms of PPS4 compliance.
Yorkshire Water Services		EC6 – Supports policy. Yorkshire Water’s Investment Plan is based on existing allocations and committed sites of employment land is reallocated for housing there may not be sufficient water/sewerage capacity to support new development. Additional text regarding infrastructure should be added to part B.	Comments of support welcomed.	None.

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
BNP Paribas	Telereal Trillium	Policy EC6 should allow out-of-centre offices to be redeveloped for other uses where more centrally located sites are available.	EC6 will allow for decisions to be taken on their individual merits in accordance to the criteria set out in the policy.	No change
ID Planning	The Castle Family Trust	EC6 – Broadly support but clarification required as to whether it applies to buildings/land last in employment use.	The policy is intended to apply to buildings/land last in employment use. Given there may be uncertainty this needs to be clarified in the supporting text.	Revise supporting text.
Drivers Jonas	McAleer and Rushe Group	EC6 – Object. It is appropriate for some single use allocations to be brought forward for a mix of uses comprising mainly offices but supported by small scale retail and residential uses in interests of design and viability.	Core Strategy policies would allow mixed development of offices and residential to be brought forward subject to the sequential test outlined in PPS4. Any retail development would also need to be considered in terms of PPS4 and much would depend on the scale proposed in relation to the overall development.	None
Indigo	National Grid Property Holdings Ltd	EC6(B) – There will be instances where employment sites cannot be retained or brought back into use for reasons such as changing market circumstances / viability. Has the potential to sterilise sustainable brownfield sites.	Accept that this could be the case. EC6 as drafted will need to be reconsidered in relation to the new approach to economic development uses set out in PPS4 but also the need to take into account the importance of providing some local employment opportunities in the 'B class' sectors.	Review in terms of PPS4 compliance.
CB Richard Ellis	Learmonth Property Investment Company Ltd	EC6 – Imprecise and overly restrictive. A more selective approach needed to ensure non-strategic employment sites are not unduly restricted from diversifying.		
CB Richard Ellis	Marshalls plc	EC6 – Approach is wholly inflexible. Criterion should be included which considers the changing needs of business and the financial viability of the site.		
White Young Green	Rockspring Hanover Property Unit Trust	EC6 – Needs to be a positive approach to recognised that delivering 75% PDL target will require existing employment sites.	There is a potential conflict between the housing target of 75% and EC6 (b) which seeks to prevent loss of existing employment sites in certain circumstances. Hitting the 75% targets will require a certain level of windfall development. Needs to be resolved through comparison of SHLAA and ELR results. The compliance of the approach with PPS4 is also an issue.	Review against evidence base
Highways Agency		EC6 – accessibility should be included in the criteria.	Accessibility of new development will be considered as a matter of course against national, regional and local policies. It does not need to be added an additional criterion under this policy.	None.

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
EC7: The rural economy				
East Keswick Parish Council		In relation to bullet point encouraging retention and enhancement of existing visitor attractions and provision of facilities suggest Crabtree Lane car park could be improved at cost of £4-5000.	This is too detailed an issue to be considered in the Core Strategy but the policy approach of EC7 would support such improvements in principle.	None
Harewood House Trust		Scant reference to important heritage assets within the district such as Harewood House. Essential for document to give explicit support to future development and enhancement of places of historical and cultural significance.	Reference to heritage assets would be relevant to include as these are an important aspect of the rural economy.	Revise supporting text.
Government Office for Y&H		EC7 does not add significantly to guidance in PPS7 and a separate policy is probably not needed. Para 5.3.87 refers to Map 3 but this does not provide sufficient locational detail for a key diagram.	EC7 needs to be reviewed in terms of the updated guidance set out in PPS4 (EC6 & EC7). It would benefit the policy to be more spatially specific. Updates to the evidence base in terms of the ELR, City Centre, Town and Local Centre study and the Housing Growth Options Study will help to inform an updated approach which is more spatially specific.	Review against PPS4.
Steve Harris		Retention of local shops, services and visitor attractions also important to inner city suburbs such as Burley & Kirkstall.	Agree but these issues are considered in more detail in the sustainable communities section. Policy EC7 is designed to specifically address rural economic development issues.	None
British Waterways		EC7 – waterway assets are fixed so policies should acknowledge that it is not always possible to find suitable sites adjacent to the waterways for some waterway-dependent uses in or around existing settlements e.g. visitor attractions, marinas, boatyards etc. More flexible approach would be consistent with PPS7 and the Good Practice Guide.	These issues are very specific and the policy approach should allow decisions to be taken on their merits. If a proposal happens to be water-related the approach to concentrating development within around existing settlements and town and village centres may be less relevant.	None

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
Carter Jonas	The Diocese of Ripon & Leeds;The Hatfield Estate Lady Elizabeth Hastings Charity Estate; The Ledston Estate; AR Briggs & Co. Ltd; Symphony Group Ltd	EC7 does not provide a reasonable policy basis for ensuring a vibrant and diverse rural economy e.g. by failing to make reference to the role of agriculture and the “real” rural economy. Little to support the enhancement of farming activity and diversification.	EC7 needs to be reviewed in terms of the updated guidance set out in PPS4 (EC6 & EC7). Accept that the policy should make reference to the importance of the agricultural economy.	Review against PPS4.
Savilles	Harewood Estate	EC7 should recognise that the continued vitality of smaller settlements is important. Meeting economic, housing and other needs is vital to enable them to thrive. Final criterion should define that small scale development may include housing or other uses to meet local needs. Conversion of building should continue to be permitted outside of such locations. Certain parts of rural Leeds where there are clusters of economic activity should be identified as self contained priority areas for rural employment.	This needs to be considered in relation to the overall spatial vision informed by evidence base work, particularly the Settlement Study and the ELR. Housing is not an economic development which falls under the definition set out in PPS4	Update evidence base and consider implications.
Lister Haigh	D Parker & Sons	The Wetherby site could help provide the requirement for 185 hectares of local employment opportunities	The merits of individual sites will be considered as part of the preparation of the Site Allocations DPD.	For Site Allocations DPD.

Representor (include agent)	Those Represented	Representor Comment	LCC Initial Response	Action
Scott Wilson	PPL c/o Revera	<p>EC7 does not provide the necessary support to sustain, grow and diversify the rural economy in places that fall outside the identified Smaller Settlements or village boundaries.</p> <p>Suggest flowing amendments:</p> <p>Bullet 1: Delete reference to <u>major</u> settlements and <u>town centres</u> and retain remainder.</p> <p>Bullet 5: Add provision of <u>new</u> facilities.</p> <p>Bullet 6: Change smaller <u>settlements and villages</u> to say <u>rural areas</u></p> <p>New bullet: Supporting the development of large scale leisure and tourism proposals that would bring significant environmental, economic and social benefits to the district and wider region.</p>	<p>Bullet 1: Disagree, the major settlements and their town centres have an important role to play in serving their surrounding rural communities. The role should be recognised, protected and supported in the interests of promoting sustainable patterns of development. This is consistent with RSS policy. The suggested change would dilute the approach</p> <p>Bullet 5: the suggested change is appropriate</p> <p>Bullet 6: The suggested change could conflict with Green Belt objectives and is not supported.</p> <p>New bullet: This statement is too open ended and would potentially be inconsistent with the PPS4 centres first approach and /or Green Belt objectives. There may be example of leisure development over the plan period which are not appropriate for a town centres and these should be considered on their merits against national, regional and other local policies.</p>	Revise policies where appropriate.
Scott Wilson	Jonathon Hague	Support policy. Important to the smaller settlements that are to accommodate future housing growth as the retention and enhancement of supportive services are essential in the creation of sustainable communities.	Comments of support welcomed.	None

