

**Report of the Director of City Development**

**Report to: Development Plan Panel**

**Date: 2 July 2012**

**LDF Core Strategy – Publication Draft, Analysis of Consultation Responses:  
Policy SP4 – Regeneration Priority Area and  
Policy SP5 – Aire Valley Leeds Urban Eco Settlement.**

Are specific electoral Wards affected? If relevant, name(s) of Ward(s):	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

**Summary of main issues**

1. The Core Strategy Publication Draft was subject to 6 weeks public consultation during February – April 2012. Section 3 of this report summarises the issues raised about regeneration and Aire Valley and the Table in Appendix 1 suggests how the City Council should respond. Appendix 2 illustrates how the text of the Core Strategy would need to be altered.
2. Of the wide range of issues raised, none are considered to warrant any major changes to the Core Strategy, only one or two minor text changes which are set out in Appendices 1 and 2.

**Recommendations**

Development Plan Panel is requested to:

- i). Endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval.

## **1.0 Purpose of this Report**

- 1.1 Within the context of the Core Strategy Initial Report of Consultation (6<sup>th</sup> June), the purpose of this report is to review consultation responses in relation to Policy SP4 (regeneration priority areas) and Policy SP5 (the Aire Valley Leeds Urban Eco Settlement). Appendix 1 attached, summarises the representors, key issues raised, the City Council's view and proposed action. Appendix 2 illustrates how the text of the Core Strategy would need to be altered.

## **2.0 Background Information**

- 2.1 Following Consideration by the Development Plan Panel and Executive Board, a 6 week period of public consultation has been undertaken, commencing on 28<sup>th</sup> February to 12<sup>th</sup> April 2012. Consistent with the LDF regulations, this is a targeted stage of consultation, with emphasis upon requesting responses in relation to the "soundness" of the plan. Within this context, the consultation material comprised of a range of documents, which were subsequently made available on line or as paper copies, including:

- Core Strategy Publication Draft (Main Document)
- Sustainability Appraisal (& Non Technical Summary)
- Habitats Regulations Assessment Screening
- Equality Impact Assessment Screening
- Draft Infrastructure Delivery Plan
- Draft Core Strategy Monitoring Framework
- Health Topic Paper
- Report of Consultation on Preferred Approach (October – December 2009)

Links were also incorporated to the consultation web pages to the evidence based material, which has been prepared to help inform the emerging document (including the Employment Land Review, Leeds City Centre, Town and Local Centres Study, Housing Growth in Leeds, Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment and the Leeds open space, sport and recreation assessment.

## **3.0 Main Issues**

- 3.1 The key issues arising under this topic are as follows:

### **Policy SP4**

- Lack of clarity about whether regeneration priority programme areas constitute strategic sites as referred to in the National Planning Policy Framework;
- More clarity required on what public sector interventions and private sector investment exists in regeneration priority areas, the prioritisation of these measures and consideration of infrastructure needs;
- Policy SP4 should include "Growth Areas" as well as "Regeneration Priority Areas". Leeds-Bradford corridor and Aire Valley Leeds should be re-designated

- as “Growth Areas”. South East Leeds (former mining communities) should be included as an additional regeneration area (including communities of Allerton Bywater, Micklefield, Ledsham, Ledston, Mickletown/Methley and Swillington;
- The Rim of the city centre, the Kirkstall Road Renaissance Area and the whole of the south of the city centre should be identified as additional or extended regeneration priority areas;
  - No clear definition of what the urban eco settlement proposals mean or how they consider viability;
  - Failure to fully acknowledge the importance of economic investment and need for employment in South Leeds, and the opportunities presented by the diversification of the White Rose Centre, Capital Park and Elland Road sites to include additional retail, leisure, hotels, residential, restaurants supported by enhanced public transport facilities and employment/training initiatives.
  - Concerns from the Highways Agency over potential highway capacity issues on the motorway network as a result of the Leeds-Bradford corridor proposals and offer to work with Council to resolve these.

### **Policy SP5**

- There is a policy vacuum to the south of the city centre (as shown on Maps 5 and 6). The Aire Valley UES area should be extended to include Holbeck Urban Village and/or the Pottery Fields areas (around Crown Point);
- The housing and employment land targets for the area are unrealistic and not based on robust evidence on deliverability. Housing target should be 200 units a year or 3,200 in total;
- Concerns from the Highways Agency over potential highway capacity issues on the motorway network as a result of the Aire Valley Leeds proposals and offer to work with Council to resolve these;
- Not enough reference to local amenity offered by pubs in the area;
- Further reference to principles of waterside development as a basis for formulating masterplans required;
- Reference should be made to listed buildings amongst the physical constraints to benefit from measures to bring forward sites;
- Map 6 lacks clarity as to what areas identify;
- Green infrastructure should be a high priority for the Urban Eco Settlement;
- Concern over loss of Green Belt and existing green space, corridors and infrastructure as a result of the proposals. Other locations should be considered;
- No reference to timescales for development.

## **4.0 Corporate Considerations**

As noted above, the Core Strategy, forms part of the Local Development Framework and once adopted will form part of the Development Plan for Leeds.

### **4.1 Consultation and Engagement**

- 4.1.1 As outlined in this report, the Core Strategy Publication draft has been subject to a further 6 week period of consultation. This has been undertaken in accordance with

the LDF Regulations and the City Council's adopted Statement of Community Involvement (SCI).

## **4.2 Equality and Diversity / Cohesion and Integration**

4.2.1 An Equality Impact Assessment Screening was undertaken on the Core Strategy Publication draft, prior to consultation (see Core Strategy Executive Board Report, 10<sup>th</sup> February 2012). This concluded that equality, diversity, cohesion and integration issues had been embedded as part of the plan's preparation. For information and comment, the Screening assessment has also been made available as part of the supporting material for the Publication draft consultation. Within this overall context, it will be necessary to continue to have regard to equality and diversity issues, as part of the ongoing process of preparing the Core Strategy, including considering representations and next steps.

## **4.3 Council Policies and City Priorities**

4.3.1 The Core Strategy, plays a key strategic role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to the 'the best city in the UK'. Related to this overarching approach and in meeting a host of social, environmental and economic objectives, where relevant the Core Strategy also seeks to support and advance the implementation of a range of other key City Council and wider partnership documents. These include the Leeds Growth Strategy, the City Priority Plan, the Council Business Plan and the desire to be a 'child friendly city'.

## **4.4 Resources and value for money**

4.4.1 The DPD is being prepared within the context of the LDF Regulations, statutory requirements and within existing resources.

## **4.5 Legal Implications, Access to Information and Call In**

4.5.1 The DPD is being prepared within the context of the LDF Regulations and statutory requirements. The DPD is a Budgetary and Policy Framework document and as such this report is exempt from call-in by Scrutiny.

## **4.6 Risk Management**

4.6.1 The Core Strategy is being prepared within the context of the LDF Regulations and the need to reflect national planning guidance. The preparation of the plan within the context of ongoing national reform to the planning system and in responding to local issues and priorities, is a challenging process. Consequently, at the appropriate time advice is sought from a number of sources, including legal advice and advice from the Planning Advisory Service and the Planning Inspectorate, as a basis to help manage risk and to keep the process moving forward.

## **5. Conclusions**

5.1 This report provides an overview of the issues raised about Policy SP4 (regeneration priority areas) and Policy SP5 (the Aire Valley Leeds Urban Eco Settlement). It is not considered that any of the issues raised are compelling

enough to justify any major changes to the Core Strategy; two of the issues generate minor wording changes and all of the others warrant no further changes.

## **6. Recommendations**

6.1 Development Plan Panel is requested to:

i). Endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval..

## **7. Background documents<sup>1</sup>**

7.1 A substantial number of documents are available representing various stages in preparation of the DPD and the background evidence base and Equalities Impact Assessment Screening. These are all available on the City Council's web site (LDF Core Strategy Pages) web pages or by contacting David Feeney on 247 4539.

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<sup>1</sup> The background documents listed in this section are available for inspection on request for a period of four years following the date of the relevant meeting. Accordingly this list does not include documents containing exempt or confidential information, or any published works. Requests to inspect any background documents should be submitted to the report author.

**Appendix 1:**

**Core Strategy Publication Draft - Analysis of Consultation Responses**

**Policy SP4: Regeneration Priority Programmes Area**

<b>Representor/Agent</b>	<b>Representor Comments</b>	<b>LCC Initial Response</b>	<b>Action</b>
<b>Support comments</b>			
Mr C & Mr A Haigh & other clients (Agent: Directions Planning)	Welcome and support identification of Regeneration Priority Area, especially South Leeds. There is an opportunity to deliver housing growth east of Morley to delivery growth and create a more sustainable community.	Support noted.	No change.
<b>Lack of clarity about role of regeneration priority programme areas</b>			
Home Builders Federation	The role of the four regeneration areas is ambivalent as it is unclear whether the areas constitute strategic sites referred to in the NPPF. Not clear whether they are earmarked to provide the majority of housing in the Main Urban Area (SP1). Failure to identify strategic sites is contrary to the NPPF.	<p>The four regeneration priority areas do not constitute strategic sites as referred to in the NPPF. Nor are they specifically earmarked to provide majority of housing in the Main Urban Area. This is not stated nor implied in SP4 or SP6. Only Aire Valley Leeds has a specific housing delivery target set out in SP5. New housing is distributed according to the settlement hierarchy and housing market areas under SP7.</p> <p>Furthermore, Regeneration Priority Areas are not focused solely on housing delivery, they are based on the Council's investment programme which seeks to address a number of issues set out in Paragraph 4.47.</p> <p>It is not accepted that the decision to not</p>	No change.

Representor/Agent	Representor Comments	LCC Initial Response	Action
		include strategic sites in the plan is contrary to the NPPF as this type of designation is only required for sites which are fundamental to delivery of the plan.	
Muse Developments (White Young Green)	Policy generally supported but there is no clarity as to what public sector intervention measures or private sector investment exists. There is no prioritisation of measures or consideration of infrastructure needs or how to create a sense of place.	<p>General support noted.</p> <p>The level of detail provided in the supporting text to the policy is considered to be appropriate for the Core Strategy. The plan identifies the current investment programme of the Council to support regeneration. Delivery of regeneration programmes will be achieved through a variety of mechanisms overseen by Programme Boards which will require a flexible approach depending, for example, on available funding streams.</p> <p>The Infrastructure Delivery Plan (referenced under Policy ID1) sets out infrastructure needs for the district including those in the Regeneration Priority Areas. The Core Strategy includes policies to promote good design and a sense of place, for example Policy P10.</p>	No change.
<b>Policy should include “Growth Areas” as well as “Regeneration Priority Areas”. Leeds-Bradford corridor &amp; Aire Valley Leeds should be re-designated as “Growth Areas”. South East Leeds (the former mining areas) should be included as an additional regeneration area (including communities of Allerton Bywater, Micklefield, Ledsham, Ledston, Mickleton/Methley &amp; Swillington.</b>			
Redrow; Keyland; Warner; Taylor Wimpey; Ashdale; Barrett Leeds; Miller; Chatford; Mirfield;	As above	The representation makes no reference to the criteria that would be used to identify a growth area. As this approach is not part of the spatial strategy there is no clear basis for re-designating Lead-	No change.

Representor/Agent	Representor Comments	LCC Initial Response	Action
Barrett York; Kebbell (Agent: Dacre, Son & Hartley)		Bradford corridor or Aire Valley Leeds.	
T G M F Emsley (Agent: ID Planning)  Redrow Homes	<p>Specific comments: Do not support the identification of the Leeds-Bradford corridor and the Aire Valley as Regeneration Priority Areas. The Leeds-Bradford corridor as a whole is not deprived and the majority of the Aire Valley is greenfield rather than brownfield land.</p> <p>South East Leeds (former mining communities) comprises of the communities of Allerton Bywater, Micklefield, Ledsham, Ledston and Methley Junction which Map 2 identifies as being a deprived area.</p>	<p>The designation of Regeneration Priority Area is based on more than the indices of deprivation, although this is clearly an important basic consideration, it also identifies areas where there are genuine opportunities for development and investment to tackle under-performance.</p> <p>Aire Valley Leeds is located within and close to areas falling with the bottom 10% of the indices of deprivation. There is 450 hectares of development land available, brownfield and greenfield, in close proximity to these areas. Most of the area is made up of urban development and is therefore brownfield in nature. This represents a major regeneration opportunity for which the SP4 designation is fully justified.</p>	
Redrow Homes (Yorkshire)	<p>Specific comments: An additional regeneration area should be added under Policy SP4: "South East Leeds (former mining communities)". To include Allerton Bywater, Micklefield, Mickleton/Methley &amp; Swillington.</p>	<p>The Leeds-Bradford corridor is a joint initiative between the two councils recognising the need to realise the economic potential of the corridor based on the key themes of transport, housing quality, green infrastructure and business growth. Within Leeds, the inner parts of the corridor also fall with areas of high deprivation.</p>	
Banks Development	<p>The regeneration priority areas exclude the mining communities of South East Leeds. In a period of recession new housing will principally be delivered into 'safe' market areas such as Mickleton/Methley rather than the Main Urban Area.</p>	<p>There is no evidence to suggest how the South East Leeds former mining communities better meet the definition of a Regeneration Priority Area than the</p>	



Representor/Agent	Representor Comments	LCC Initial Response	Action
		<p>areas identified in the plan.</p> <p>In Policy SP7 Outer South East Leeds is identified as location for 4,600 new houses and Outer South 2,600. The Key Diagram specifically identifies Kippax, Allerton Bywater and Micklefield as potential locations for new housing.</p>	
<b>Additional Regeneration Priority Areas &amp; Extensions</b>			
English Heritage	The RIM (of the City Centre) referred to in para 4.4.10 should be referenced as a regeneration area in the policy.	The RIM area around the city centre has not been identified in itself as one of the investment programme areas to which to policy relates, although all the areas identified do include specific parts of the RIM where investment programme will be targeted.	No change.
West Properties	The Kirkstall Road Renaissance Area should be recognised in policy as a focus for new development which maximises brownfield regeneration opportunities in a highly accessible location.	<p>The Kirkstall Road Renaissance Area has not specifically been identified as one of the investment programme areas to which the policy relates.</p> <p>General policies such as SP1 prioritise development of brownfield land and highly accessible locations.</p>	No change.
Montpellier Estates	Concerned that there is a policy vacuum between the Aire Valley and Inner South regeneration areas shown on Maps 5 & 6. The East Leeds, Aire Valley & South Leeds regeneration should run into each other to facilitate: better connectivity; use of resource across regeneration areas; recognition of public-sector funding into Holbeck Urban Village and potential impact of future HS2 proposals. Such a change is important as	<p>Representations have previously been made to the informal consultation on the Aire Valley AAP boundary extension (2011) and consultation on the South Bank Planning Framework (2010) to request the extension of the boundary in other parts of the southern half of the city centre. The requested changes were not agreed.</p> <p>It is accepted that a wider UES/AAP.</p>	No change.

Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>Regeneration Areas are referenced in other policies.</p>	<p>boundary could potentially be justified but there is a need to focus resources on the more immediately deliverable development sites in the South Bank area (such as the former Tetley's brewery site) where discussions have taken place with landowners and the planning framework adopted, and in particular on the delivery of a city centre park.</p> <p>The land between the South Bank and the M621 is mainly in use as viable commercial or light industrial concerns which contribute to the employment and economy of Leeds and have less immediate redevelopment potential. Holbeck Urban Village is subject to its own development framework.</p> <p>Policy SP4 is flexible towards the identification of future regeneration areas if justified by evidence. This could take into account issues such as future HS2 proposals as and when they emerge.</p> <p>Policy CC2 sets out specific proposals for uses and connections for the south of the city centre which includes all the areas referred to in the representation and it is not therefore accepted that exclusion of the area from the Aire Valley UES area creates a policy vacuum.</p>	
<b>Comments on specific regeneration priority programme areas</b>			
<p>Templegate Developments (Agent: Barton)</p>	<p>Support 4 regeneration priority programme areas including the Aire Valley.</p>	<p>General support noted. The UES is defined in Paragraph 4.5.2</p>	<p>No change.</p>

Representor/Agent	Representor Comments	LCC Initial Response	Action
Willmore)	<p>No clear definition of what the urban eco settlement proposals mean, or what should be aimed for and when. No objection to the overall objectives but needs to consider viability and what can be realistically achieved.</p>	<p>reflecting its status at the Leeds City Region project. This level of detail is considered to be appropriate for the Core Strategy.</p> <p>Detailed proposals on Urban Eco Settlement will be set out in the Aire Valley Leeds Area Action Plan which will take into account viability considerations.</p>	
Land Securities & Evans Property Group (Agent: Quod)	<p>Paras 4.4.4 – 4.4.11 fail to fully acknowledge the importance of economic investment and opportunities to reverse socio-economic deprivation. The policy need to be broadened to encourage, promote and stimulate private sector-led investment in Priority Regeneration Areas.</p> <p>Paras 4.4.20 – 4.4.23 are too narrowly focussed on housing and do not reflect the basic need for employment and the South Leeds Investment Strategy published in June 2011.</p> <p>Suggest revised paragraphs which identify common problems in South Leeds such as low incomes, low educational attainment, high unemployment and high deprivation; the importance of housing renewal and job creation and investment; and the creation of jobs opportunities based on existing assets such as the White Rose Shopping Centre, Capitol Park and Elland Road through diversification including additional retail, leisure, hotels, residential and restaurant/catering supported by enhanced public transport facilities and employment /</p>	<p>Issues relating to socio-economic deprivation are considered to be covered adequately in the general supporting text to the policy (para 4.47) which applies to all four regeneration priority areas. Paragraph 4.4.9 makes reference to improving the employment prospects of residents in these areas.</p> <p>Para 4.4.22 makes reference to the South Leeds Investment Strategy as an important document promoting investment in the area. The word emerging should be deleted for clarity. However, the wording suggested is considered to be too detailed for the Core Strategy. The other areas are not site specific in terms of detail, other than the Aire Valley Leeds area where an AAP is being prepared and previous consultations have taken place.</p>	<p>Minor change: delete 'emerging' before South Leeds Investment Strategy in para 4.4.22 to reflect current status.</p>

Representor/Agent	Representor Comments	LCC Initial Response	Action
	training initiatives (including a potential Skills Academy).		
Highways Agency	Development in the Leeds – Bradford corridor (paras 4.4.17 – 4.4.19) could have an adverse impact on the operation of the M621 (J1). The HA’s model has identified potential additional capacity and congestion issues during peak periods on the M621 at 2018 and 2028. Will work with Leeds City Council to resolve outstanding issues.	Leeds City Council are currently working with the Highways Agency and their consultants to assess the impacts of the proposed Core Strategy on the Strategic Road Network. This work will provide a more detailed examination of the impacts than has been possible to date. The intention is to reach an agreed position on the impacts and to agree appropriate mitigation where necessary.	No change.

**Policy SP5: Aire Valley Leeds Urban Eco Settlement**

Representor/Agent	Representor Comments	LCC Initial Response	Action
<b>General support and other comments</b>			
Templegate Developments (Agent: Barton Willmore)	Support the identification of the Aire Valley as the only strategic location within the district which has been afforded significant growth. Housing growth level and employment land requirements are appropriate. The developer’s sites at Temple Green and Skelton Grange can deliver significant development supported by a masterplan.	Supports and comments noted.	No change.
Stuart Andrew MP	Support regeneration and job creation in the Aire Valley given the proximity to the motorway network.		
WARD (Wharfedale Airedale Review Development)	Proposals seem sensible and beneficial for city. South East Leeds has the best transport infrastructure because of easy links to the		

Representor/Agent	Representor Comments	LCC Initial Response	Action
	motorway and rail network.		
The Hatfield Estate; The Ledston Estate; The Bramham Park Estate; AR Briggs & Co; Meadowside Holdings; Lady Elizabeth Hastings; The Diocese of Ripon & Leeds (Agent: Carter Jonas)	No comments but reserve right to do so if matters change.		
Muse Developments (Agent: White Young Green)	Support policy.		
<b>There is a policy vacuum to the south of the city centre (as shown on Maps 5 &amp; 6). The Aire Valley Leeds UES area should be extended to include Holbeck Urban Village and/or the Pottery Fields areas (around Crown Point).</b>			
Leeds Civic Trust	Specific comments: The Aire Valley UES area should extended to include 'Leeds City Centre South' which has the potential to accommodate family housing, offices, a school, leisure and other facilities – a fully sustainable community.	Representations have previously been made to the informal consultation on the Aire Valley AAP boundary extension (2011) and consultation on the South Bank Planning Framework (2010) to request the extension of the boundary in other parts of the southern half of the city centre. The requested changes were not agreed.	No change.
Montpellier Estates	Specific comments: The Aire Valley should be extended to include Holbeck Urban Village and Pottery Fields.		
Aspinall Verdi	Specific comments: The East Leeds, Aire Valley & South Leeds regeneration areas should run into each other to facilitate: better connectivity; use of resource across regeneration areas; recognition of public-sector funding into Holbeck Urban Village and potential impact of future HS2 rail proposals. Important because Regeneration Areas are		
		It is accepted that a wider UES/AAP boundary could potentially be justified but there is a need to focus resources on the more immediately deliverable development sites in the South Bank area (such as the former Tetley's brewery site) where discussions have taken place with landowners and the planning framework	

Representor/Agent	Representor Comments	LCC Initial Response	Action
	referenced in other policies.	<p>adopted, and in particular on the delivery of a city centre park.</p> <p>The land between the South Bank and the M621 is mainly in use as viable commercial or light industrial concerns which contribute to the employment and economy of Leeds and have less immediate redevelopment potential. Holbeck Urban Village is subject to its own development framework.</p> <p>Policy SP4 is flexible towards the identification of future regeneration areas if justified by evidence. This could take into account issues such as future HS2 proposals.</p> <p>Policy CC2 sets out specific proposals for uses and connections for the south of the city centre which includes all the areas referred to in the representation and it is not therefore accepted that exclusion of the area from the Aire Valley UES area creates a policy vacuum.</p>	
<b>The housing and employment land targets for the area are unrealistic and not based on robust evidence on deliverability.</b>			
DPP	Specific comment: The area will not be able to deliver the amount of housing proposed, especially in the short to medium term , as it is a small area with poor market perception. An optimistic amount would be 200 units a year equating to a total of 3,200 units over the plan period, significantly short of the proposed number.	The Aire Valley area extends over 1,300 hectares, from the city centre to the edge of the main urban area of Leeds. It includes a range of development sites totalling 450 hectares. Three major housing developments are under construction and 303 new homes were completed in the year 2011/12. There is no evidence provided to support the representor's assertion that delivery will	No change.
Hileys Solicitor (Agent: LDP	Specific comment: Significant level of employment and housing is not fully justified		

Representor/Agent	Representor Comments	LCC Initial Response	Action
Planning)	<p>within the Core Strategy or evidence base. Need more robust evidence on deliverability in the light of the significant contribution made by the area.</p>	<p>be significantly lower than this.</p> <p>Although the economic climate for development is currently difficult, the SHLAA process has assessed the suitability, availability and deliverability of potential housing sites in the Aire Valley. This evidence is available on the Council's website. Further work has been undertaken further refine the SHLAA, taking a realistic and flexible approach to deliverability to identify the target figure of 6,500 – 9,000 homes over the long term period of the plan to 2028. Some of these sites are not immediately developable due to lack of infrastructure and other constraints but can be unlocked for development in the medium to long term. The sites will be allocated through the Aire Valley Area Action Plan which will include proposals for infrastructure delivery.</p> <p>The Aire Valley currently contains over 250 hectares of land allocated or committed for employment development. The Employment Land Review process carried out an assessment of the suitability, availability and deliverability and recommended the retention of the majority of the land in the portfolio of employment sites. Certain sites were recommended for removal based on deliverability but additional sites have been identified which were consulted on in an informal consultation 142 hectares</p>	

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		of land is part of the Aire Valley Leeds Enterprise Zone which will assist with deliverability of employment land in the area.	
<b>Other issues</b>			
Highways Agency	<p>Proposed development in the Aire Valley (up to 35,000 additional jobs) will generate substantial traffic regardless of the extent to which investment in sustainable modes is successful.</p> <p>HA modelling information shows traffic capacity and congestion issues by 2018 and 2028 on the M621, M62 and M1 (J44 to 46).</p> <p>Further work is expected to be completed shortly. The HA will work with Leeds City Council with the objective of resolving outstanding matters.</p>	Leeds City Council are currently working with the Highways Agency and their consultants to assess the impacts of the proposed Core Strategy on the Strategic Road Network. This work will provide a more detailed examination of the impacts than has been possible to date. The intention is to reach an agreed position on the impacts and to agree appropriate mitigation where necessary.	No change.
CAMRA	The Aire Valley UES does not make enough reference to the local amenity of the areas pubs. Cross Green has lost a number of pubs. Existing pubs need to be included in any plan including the Grade II* listed Garden Gate in Hunslet.	The level of detail requested for the policy is not appropriate for the Core Strategy. The emerging Aire Valley Leeds Area Action Plan will consider the need for social facilities, such as pubs, in more detail.	No change.
British Waterways	<p>The waterway needs to be the starting point for formulating a masterplan for the area to take full advantage of the waterside setting and ensure that compatible uses are located along its length.</p> <p>Development based on the waterways should be based on the following principles:</p> <ul style="list-style-type: none"> <li>• Canal should be starting point for</li> </ul>	The importance of the district's waterways are recognised in the Core Strategy (for example paragraph 2.8). However, the level of detail sought is not appropriate for the Core Strategy. Comments will be taken into account through the preparation of the Aire Valley Leeds Area Action Plan which will incorporate design principles for the area and include more	No change.



Representor/Agent	Representor Comments	LCC Initial Response	Action
	<p>consideration of development;</p> <ul style="list-style-type: none"> <li>• Should be considered as a space and leisure &amp; commercial resource forming part of public realm;</li> <li>• Siting, layout and orientation of buildings &amp; boundary treatments should optimise views of the canal and improve access;</li> </ul>	<p>detailed proposals in the form of area framework for major areas of change, which will include waterside sites.</p>	
<p>Airebank Developments (Agent: White Young Green)</p>	<p>Policy generally supported but specific reference should be made to listed buildings so those sites which accommodate listed buildings will benefit from measures put in place to address physical constraints</p>	<p>General support noted.</p> <p>Whilst the viability issues associated with bringing listed buildings back into use are recognised in general terms it is not appropriate for listed buildings to be identified specifically under physical constraints. Re-use of listed buildings can be a trigger to support high quality new development.</p> <p>There is nothing to exclude sites with listed buildings under the current policy wording.</p>	<p>No change.</p>
<p>Harrow Estates (Agent: White Young Green)</p>	<p>Policy and Map 6 lacks clarity as to what key areas identify.</p>	<p>Accept that Map 6 should be referenced more clearly in the supporting text to Policy SP5.</p>	<p>Minor change – amend supporting text paras 4.5.1 to 4.5.4 to make clearer reference to the specific areas shown on Map 6.</p>
<p>Yorkshire Wildlife Trust</p>	<p>As the Aire Valley will be an “eco settlement” green infrastructure should be a high priority within the development and included within the policy. Key areas of existing green space which link to the wider green infrastructure network or areas where new green space could be created should be identified and</p>	<p>Agree that green infrastructure in a high priority for the Aire Valley and this is recognised under para. 4.5.2 of the Core Strategy. The emerging Aire Valley Area Action Plan will identify a green infrastructure network in the area supported by policies based on the</p>	<p>No change.</p>

Representor/Agent	Representor Comments	LCC Initial Response	Action
	protected from development.	strategic network identified in Policy G1.	
CPRE Yorkshire & Humber	<p>The location of the proposed UES is a concern. The proposed location would involve the loss of Green Belt, existing green corridors and infrastructure. The loss of green space to up to 9,000 homes and 250 hectares of employment land would be detrimental to the area and inconsistent with national policy and other parts of the Core Strategy. Would prefer the Council to consider other locations.</p>	<p>The vast majority of new housing and employment development proposed for the Aire Valley will take place on land which is either brownfield or currently allocated on the proposals map for development. This is not currently green space or another green designation and includes city centre and inner city sites. The Aire Valley boundary includes only a small portion of Green Belt east of the M1 around Skelton Lake.</p> <p>Given the Core Strategy is required to set out proposals to meet overall housing and employment needs and the potential for brownfield development and other development in urban area is being prioritised through the spatial strategy, deleting Aire Valley sites and promoting alternatives would inevitably involve a far greater land take from the Green Belt.</p> <p>The emerging Aire Valley Area Action Plan will include detailed proposals for the retention and provision of green infrastructure in the area based on the strategic network identified in Policy G1. This is referenced under para 4.5.2 of the Core Strategy.</p>	No change.
Renew	<p>No reference to timescales for development. Account should be taken of changing housing market conditions and locational preferences. Successful family housing at Yarn Street is a positive to build upon.</p>	<p>The Aire Valley area has a range of development sites which can be brought forward over different time periods. Some sites are available to be developed immediately whilst others require</p>	No change.

<b>Representor/Agent</b>	<b>Representor Comments</b>	<b>LCC Initial Response</b>	<b>Action</b>
		<p>provision of new infrastructure or removal of constraints and phased for later in the plan period.</p> <p>The emerging Aire Valley Area Action Plan will provide detail on the phasing of development and provision of infrastructure.</p>	

## **Appendix 2: Proposed changes to Core Strategy**

### **4.4 Regeneration Priority Areas**

- 4.4.1 There needs to be a clear focus on parts of the district where there is a concentration of neighbourhoods performing below city and national averages across a range of indicators, but that also present opportunities for investment that will have a positive and lasting impact on those neighbourhoods and the city as a whole.
- 4.4.2 The Council, working with a number of key partners at the national and local level, seeks to address regeneration and housing needs citywide through a range of approaches and tools. These include:- joint ventures and partnerships with the private sector, improved use of public sector assets, the Homes and Communities Agency's Affordable Homes Framework, planning obligations and proposed changes to the use of business rates, new investment mechanisms and initiatives (such as the Enterprise Zone at Aire Valley Leeds, the New Homes Bonus, Private Rental Sector Initiative and the Empty Properties Fund – the latter of which will allow the Council to generate additional income for re-investment in its priorities through building more homes, improving the quality of existing ones and bringing empty ones back into use as decent affordable rented accommodation), existing Council programmes, such as the Private Sector Lettings Scheme and the Affordable Housing Programme, and continued close collaboration with local communities and their representatives. Collectively, these approaches have the potential to stimulate economic growth and create more new jobs, to increase the number of new, affordable and sustainable homes in Leeds, and to also improve the availability, accessibility and quality of the city's private rented sector to better meet the needs of its growing population.
- 4.4.3 Current and planned regeneration activity largely focuses on those Leeds neighbourhoods that feature in the country's 10% most deprived (target neighbourhoods), as measured via the Government's Indices of Multiple Deprivation (IMD), 2010. This equates to 92 of Leeds' Lower Super Output Areas covering an approximate population of 150,000. The city also has smaller and more isolated pockets of deprivation that need to be taken into account on an ongoing basis. A range of information and intelligence sources, including the IMD and the Leeds Neighbourhood Index, will be used to identify areas in need of regeneration and to inform appropriate interventions.

#### **Regeneration Priority Programmes**

- 4.4.4 The approach to district wide regeneration should remain flexible and responsive to the changing needs of localities and neighbourhoods. Given the length of the plan period, it is anticipated that new priorities will arise which the LDF will need to reflect and respond to in terms of appropriate resource allocation.
- 4.4.5 The Council's Regeneration Priority Programmes focus on four spatial areas (as set out in the Council/HCA Local Investment Plan 2011-15):
- East Leeds

- Aire Valley Leeds
- Leeds Bradford Corridor (incorporating the West Leeds Gateway)
- South Leeds

### **Map 5 Regeneration Priority Programme Areas**

- 4.4.6 The Programmes adopt an enabling and partnership approach to regeneration, through cross-sector working to realise opportunities for investment and development that will assist in tackling a range of issues that can collectively cause neighbourhoods to under-perform.
- 4.4.7 A wide range of interconnected issues contribute to such under-performance, ranging from poor quality physical environment and buildings, lack of community involvement and empowerment, poor community and retail facilities, low take-up of public sector services, long term unemployment, low skills levels, poor educational attainment and health, in addition to lack of housing choice, quality and affordability.
- 4.4.8 The Core Strategy aims to support investment priorities that can demonstrate positive and lasting improvements to the neighbourhoods within the priority programme areas.
- 4.4.9 Therefore, support will be prioritised for those development opportunities of strategic importance that have potential to:
- Improve the quality of life for residents in the target neighbourhoods and localities,
  - Improve the employment prospects of residents in the target neighbourhoods,
  - Build the capacity of local communities to improve their neighbourhoods,
  - Provide choice, quality and affordability of housing,
  - Stimulate private sector investment,
  - Significantly improve the connectivity and image of neighbourhoods,
  - Add value to existing public sector investment through both the public and private sectors.
- 4.4.10 In addition to the Regeneration Priority Programme Areas, the 'Rim' concept has been developed to help understand the complex mix of issues affecting the area immediately adjoining the City Centre, much of which overlaps the four regeneration priority programme areas. The 'Rim', stretching approximately one km from the City Centre boundary, is separated from the City Centre by the Inner Ring Road and other road, rail and waterway networks. As well as making physical access difficult, the infrastructure contributes to a generally poor environment with few linkages. As is the case with the current regeneration priority programmes, regeneration opportunities will need to focus on reconnecting the 'Rim' area to the City Centre so that it can contribute to the longer term vitality, economic growth and renewal of Leeds.
- 4.4.11 For example, Chapeltown in particular is a 'Rim' neighbourhood with much regeneration potential. This centres around a unique combination of regeneration opportunities, including - its strong track record of enterprise development and business start-up, its strategic location as a key northern gateway to the city and the number of recent and current investment schemes in the area, including the

Townscape Heritage Initiative and Sharing the Success (Local Enterprise Growth Initiative), that can be built on to deliver further lasting improvements.

#### **SPATIAL POLICY 4: REGENERATION PRIORITY PROGRAMME AREAS**

The following Regeneration Priority Programme Areas identified on the Key Diagram will be given priority for regeneration funding and resources:

- East Leeds
- Aire Valley Leeds
- Leeds Bradford Corridor (incorporating West Leeds Gateway SPD)
- South Leeds

Additional Council led regeneration initiatives outside of the Regeneration Priority Programme Areas that can demonstrate a positive impact on their neighbourhoods will be supported. Priority will be given to developments that improve housing quality, affordability and choice, improve access to employment and skills development, enhance green infrastructure and greenspace, upgrade the local business environment, and improve local facilities and services.

The Regeneration Priority Programme Areas will be kept under review through the Council's Regeneration Priority Programme (and supporting evidence base), with any revisions reflected in future LDF documents.

4.4.12 The current investment opportunities within each priority programme are identified below. It is recognised that these may change over time in light of Government policy and associated investment opportunities, the economic climate and demographic change across the city. A detailed evidence base has been compiled by the City Council, which sets out the need, in terms of neighbourhood deprivation, alongside the opportunities for sustained improvement within each of the regeneration priority programme areas. This material is updated annually to inform the targeting and monitoring of regeneration activity.

#### **East Leeds**

4.4.13 The character of East Leeds is wide-ranging. It contains one of Europe's largest concentrations of Council-owned housing, as well as a proliferation of very dense terrace housing within the inner-city. Much of the latter is back-to-back and does not comply with current housing decency standards. This extent and mix of dwellings presents a challenge and opportunity for housing-led regeneration.

4.4.14 The primary aim of the East Leeds regeneration priority programme is to assist in the development of sustainable and vibrant communities by targeting some of the city's most deprived and underperforming neighbourhoods for improvements. This is underpinned by the development of new housing and complements wide-scale improvement to existing Council stock. Where funding is available private sector housing will also be targeted for improvement. There are significant areas of land across East Leeds, both brownfield and allocated sites, including the East Leeds Extension, that offer the potential for redevelopment to meet local housing needs and create a more diverse mix of tenures. Improved green infrastructure, green space, and support for local employment, enterprise and training opportunities are

other vital elements of the programme, that combined will assist in changing negative outside perceptions of the area.

4.4.15 The regeneration priority neighbourhoods where the Council is actively seeking improvement within East Leeds are: - Harehills, Gipton, Lincoln Green, Burmantofts, Halton Moor, Osmondthorpe and Seacroft.

4.4.16 Meeting the housing and regeneration challenge in East Leeds will require significant investment. Therefore the Council will work in partnership with the private sector and other public bodies to seek and encourage innovative approaches that can realise the potential of sites in these areas to contribute to the regeneration of the area.

#### **Leeds Bradford Corridor**

4.4.17 Leeds Bradford Corridor is a strategic economic collaboration between Leeds and Bradford Councils. Its aim is to realise the economic potential of the area west of Leeds and east of Bradford city centres and achieve better transport connections between the two cities. This is being achieved by a focus on four key areas of work:- housing improvement, improved foot, cycle, rail and road access, improvements to green infrastructure, and increased business competitiveness and growth.

4.4.18 At this stage, Leeds' main contributions to the Corridor are taking place in inner West Leeds. This area is home to a substantial population of residents and businesses and over half of its neighbourhoods feature in the country's 10% most deprived. West Leeds Gateway SPD sets out the strategic direction for the area and supports the creation of more vibrant and successful neighbourhoods with improved connectivity to the rest of the city and the City Region. The SPD provides guidance on a variety of strategic development sites with potential to improve the area through the delivery of affordable housing and mixed-use development.

4.4.19 The regeneration priority neighbourhoods where the Council is actively seeking improvement within inner West Leeds area:- New Wortley, Armley and parts of Bramley.

#### **South Leeds**

4.4.20 A range of regeneration activity driven by housing development is either planned or underway across South Leeds area. Major housing development schemes in Beeston Hill and Holbeck are being delivered and activity is focussed on the refurbishment of a large number of existing Council homes, construction of new Council homes and other significant environmental improvements.

4.4.21 A major housing scheme for Beeston Hill and Holbeck will be delivered from 2012, focussing on the refurbishment of a large number of existing Council homes, construction of new Council homes and other significant environmental improvements. Parts of the back-to-back housing stock have been refurbished, though some of the oldest, least sustainable housing of this type has been cleared, in preparation for new development.

4.4.22 However, the area also has some considerable development potential due its strategic location as a key gateway to the city relationship to the Holbeck Urban Village area and direct access to the motorway network. It also contains a large

amount of land forming part of the Council's affordable housing portfolio. As reflected within Middleton's spatial master plan (a Council and Aire Valley Homes partnership document), and the emerging South Leeds Investment Strategy, this land could act as a catalyst for infrastructure improvements and additional investment across the programme area.

4.4.23 The regeneration priority neighbourhoods where the Council is actively seeking improvement within South Leeds are: - Beeston Hill, Holbeck, Middleton, Belle Isle and parts of Hunslet.

## **4.5 Aire Valley Leeds**

4.5.1 .Aire Valley Leeds (AVL) is a major economic development and regeneration within the country and city region situated to the south east of the City Centre. It extends to over 1,300 hectares and contains over 450 hectares of sites, which are available for development in the short to medium term, as well as areas of longer term potential. The area sits within the Main Urban Area of the Settlement Hierarchy extending from the M1 motorway into the City Centre along both banks of the River Aire Corridor (see Map 6) and forms a substantial and transformational development opportunity of national significance. AVL has an existing employment base of 800 businesses, employing around 30,000 people and also provides a considerable opportunity for local jobs growth with capacity to support some 35,000 new jobs. Many of the neighbourhoods within and surrounding AVL are within the country's 10% most deprived (most are located within the East Leeds and Inner South Leeds regeneration programme areas), and a key aim is to link residents to current and future economic opportunities within AVL.

4.5.2 The unique selling point for AVL remains the delivery of a sustainable new district for the city and its region, delivering new jobs and homes. AVL, which has been identified as one of Leeds City Region's Urban-Eco Settlements, will promote sustainable development by seeking the delivery of commercial and residential areas which have high quality environment, energy efficient buildings and operations, low carbon and green business, sustainable transport, community facilities and linked areas of green infrastructure including a new city park in the South Bank area of the City Centre. Delivery of these ambitions will require major improvements to the area's infrastructure such as new public transport routes, bridges, schools and health facilities. In terms of regeneration and housing growth, good initial progress is underway in the delivery of a sustainable low carbon community, commencing with the H2010 housing development at Yarn Street in Hunslet, which incorporates a combined heat and power plant. *Map 6 shows the key locations that have been identified as having potential to accommodate major housing and mixed use development within the UES; The South Bank, Hunslet Riverside and Skelton Gate.*

4.5.3 In addition, a significant part of the AVL area (142 hectares) alongside the East Leeds Link Road has recently been approved by Government as an Enterprise Zone (see Map 6). This will help stimulate economic growth by simplifying procedures for planning applications and offering business rate discounts to new business. In turn, this will help provide the catalyst for an area, which will make a significant and lasting contribution to the economic viability and the region and Leeds.



4.5.4 In reflecting the overall strategic role of AVL as part of the Core Strategy, in contributing to job and housing growth, Strategic Policy 5, sets out a series of aspirations for the area. These will be delivered through the preparation of the AVL Area Action Plan which is currently underway and is to provide a framework for site allocations and infrastructure requirements to complement the wider regeneration programme.

#### **SPATIAL POLICY 5: AIRE VALLEY LEEDS URBAN ECO-SETTLEMENT**

Aire Valley Leeds (Urban Eco–Settlement) is identified (see Key Diagram) as a strategic location, providing between 6,500 and 9,000 new homes, and at least 250 hectares of land for employment uses (including research and development, industrial, and warehouse development).

A review of existing allocations, commitments, and other opportunities in the area will be undertaken through the Aire Valley Leeds Area Action Plan. The most suitable sites for the above uses will be retained, and co-ordinated measures put in place to address any infrastructure and other physical constraints to development of the land. Sites which are less suitable may be re-allocated for other uses.

**Insert**

**Map 6 Aire Valley Leeds – *Key locations***