

**Report of the Director of City Development**

**Report to: Development Plan Panel**

**Date: 7<sup>th</sup> August 2012**

**Subject: LDF Core Strategy – Publication Draft, Analysis of Consultation**

**Responses: SP8, SP9, EC1- EC3 Employment**

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 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 and only a few minor changes. The analysis and suggested changes 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 affordable housing. Appendix 1 attached, summarises the representations, key issues raised, the City Council's view and proposed action.

## **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 A summary of the main issues which have been raised is provided below.

### **Spatial Policy 8: Economic Development Priorities**

1. General support
  - Overall support for the policy approach and identified priorities.
2. National Planning Policy Compliancy issues
  - Concerned raised that only retail and employment uses are being promoted in centres and not all main town centre uses.

3. Employment sectors
  - Some concern raised that the policy does not fully recognised the regional economic priorities sufficiently and the role that neighbouring local authorities play in contributing to the Leeds' economy.
4. Employment locations
  - Individual sites were put forward for consideration and a general comment was raised concerning the need to further protect existing local jobs.
5. Evidence base
  - A development report was offered as evidence to support the Core Strategy's approach.

**Spatial Policy 9: Provision for Offices, Industry & Warehouse Employment Land and Premises**

1. General support for the policy approach.
2. Concerned raised regarding the methodology used to calculate the employment land figures and further details on what the figures actually mean.

**EC1: General Employment Land**

1. General support for the policy approach.
2. Employment Locations
  - Request for the policy to acknowledge the 'retention' and 'expansion' of local businesses in order to protect local jobs.
3. Provision of infrastructure
  - Request broadband and communication infrastructure to be included in the policy.
4. Employment types
  - Seeking clarification on the term 'general employment land'.

**EC2: Office Development**

1. General support for the policy approach.
2. National Planning Policy Compliancy issues which include floorspace threshold limits
  - Concerned raised that the office policy does not reflect the adopted NPPF new policy direction which requires sequential and impact assessment for office development.
  - Concerned the definition of small scale office development could limit business investment.
3. Employment Location
  - Concerns raised relating to the restrictions on new out of centre office development
  - Supported given to restricting new out of centre office development

- Further details are requested on the requirements for sequential and impact assessments.

### **EC3: Safeguarded Existing Employment Land and Industrial Areas**

1. General support for the policy approach.
2. National Planning Policy Compliancy issues
  - Concerns raised this policy could conflict with the new NPPF guidance which advises against the long term protection of employment sites.
3. Seeking further information on the policy meaning and guidance on how the policy intends to be applied.

## **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 concerning policies SP8, SP9, EC1-EC3. With the exception of Policy EC2, it is not considered that any of the issues raised require the need for any major changes to the Core Strategy. Additional wording or minor changes have occurred to all other policies in order to help improve the scope of the policies except SP9 where there are no changes.

However due alteration in national planning policy there is a need to make major changes to Policy EC2:Office Development. These changes include requiring office development to understand sequential and impact assessments where appropriate. New floorspace threshold standards have been development and now included in the revised policy.

In addition to the policy amendments an Employment Background Paper is being prepared to help aid further understanding of Leeds' employment approach. This will not be new information but rather the bringing together of existing key evidence, strategies and guidance used to help formulate the Core Strategy policies.

### **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**

**Employment: SP8, SP9, EC1, EC2 & EC3**

<b>Representor /Agent</b>	<b>Representor Comments</b>	<b>LCC Initial Response</b>	<b>Action</b>
<b>Q: 11                      Spatial Policy 8 : Economic Development Priorities</b>			
<b>General support</b>			
Templegate (0057)	(Para 4.7.14) - Support the identification of Aire Valley Leeds within SP8, part iv as a location for job opportunities.	Support welcomed	No change
Highways Agency (0060)	Sustainable location principles expressed in the policy are welcomed. In particular the aims of improving access to employment activities by public transport, walking and cycling.  Supports - developing the city centre, Aire Valley and town/local centres as the main locations for office and retail development; and industrial and warehousing development in existing employment areas.	Support welcomed	No change
British Waterways (0338)	Support para (iv) which seeks to improve access to employment opportunities by walking and cycling across the District and especially in relation to the City Centre and Aire Valley Leeds.  Support para (viii) especially in relation	Support welcomed	No change

	to waterway locations which can utilise the Aire & Calder Navigation, as it is an operational commercial waterway for the transportation of waterborne freight.		
Airebank Developments (via White Young Green Planning) (0420)	Support the policy	Support welcomed	No change
British Library (via Drivers Jonas Deloitte) (5034)	Support bullet 2 in particular aspiration to continue to grow opportunities in the digital and creative sectors. The redevelopment of the British Library site at Boston Spa will enable digitisations.	Support welcomed	No change
Harrow Estates (via White Young Green) (0420)	Welcome the acknowledgement that housing and construction is a key employment sector which assists in delivering a competitive local economy.	Support welcomed	No change
Hammerson UK (via Barton Willmore) (4816)	Support the key priorities for encouraging economic development within the City.	Support welcomed	No change
The Ledston Estate , AR Briggs and Co, Meadowside Holdings Ltd(5681), The Hatfeild	Broad support for the employment priorities set out in the Core Strategy. It is important that the Core Strategy (and the planning system in general) is not seen as a barrier to economic growth and actually encourages and stimulates enterprise and innovation.	Support welcomed and comments noted	No change

Estate , The Bramham Park Estate, The Diocese of Ripon and Leeds) Lady Elizabeth Hastings, Estate Charity (via Carter Jonas)			
ASDA Stores Limited (via Osborne Clarke) (5889)	Support the City Centre and the town/local centres are identified as the core location for new retail and office employment in line with the NPPF.	Support welcomed	No change
<b>National Planning Policy Framework (NPPF) Compliancy issues</b>			
Hammerson UK (via Barton Willmore) (4816)	For clarity and consistency with the NPPF, criterion vii should be expanded to include all main town centre uses as defined in Annex 2.	Although main town uses have already been addressed in Spatial Policy 2. Agree to add 'main town centre uses' to criteria (vii) to ensure consistency with the National Planning Policy Framework.	<b>Proposed Modification - minor changes</b>  New wording added to the part (vii) of the policy:  (v) Developing the city centre and the town/local centres as the core location for new retail, <del>and</del> office employment <i>and</i> <i>other main town centre uses.</i>
ASDA Stores Limited (via Osborne Clarke) (5889)	It should be noted that retail development in other locations should be permitted subject to an assessment against the policies outlined in the National Planning Policy Framework. The Policies of the Core Strategy should be amended to reflect the content of the	Spatial Policy 8 reinforces the Core Strategy approach of a centres first approach. This approach is also consistent with the National Planning Policy Framework. This spatial policy will not remove the requirements of sequential and impact assessments	No change

	new NPPF.	where appropriate.	
<b>Employment sectors</b>			
Leeds Civic Trust (0062)	<p>The policy omits the need to maintain and provide small workshops and starting-up units for small manufacturing and engineering, particularly in low carbon industries which may be appropriate in town centre locations.</p> <p>Policy should be supporting the provision of small workshops located as part of mixed use development rather purely on employment areas. The policy could also encourage the retention/provision of workshop premises or start-up units especially where they help to retain historic buildings.</p>	Agree – small workshops and start up units have a role to play. For completeness their role will be recognised under Spatial Policy 8.	<p><b>Proposed Modification - minor changes</b></p> <p>A new criteria is added to the policy;</p> <p><i>(vi) Support the retention and provision of new business start-up units including small workshops, where appropriate.</i></p> <p>New paragraph added to the supporting text:</p> <p><i>4.7.14 Leeds and the region play an integral role in assisting emerging new businesses (business start up, investment in new projects) and encourage young entrepreneurship. These will be supported by the retention and provision of new small start up units including workshops in appropriate locations.</i></p>
PPL (via Scott Wilson) (0414)	<p>Concerns are raised regarding the lack of coverage of leisure and tourism issues.</p> <p>Paras 2.35, 2.36 (Profile Section) mentions the importance of leisure &amp; tourism. But there is no further mention of how leisure &amp; tourism are to be maintained and enhanced during the life of the Plan other than in relation to intensive facilities in the City Centre and other Town Centres.</p>	The Leisure and Tourism sectors are both important regional and local economic priorities. Agree to add both sectors to the policy and supporting text.	<p><b>Proposed Modification - minor changes</b></p> <p>“leisure and tourism” added to part (ii) of the Spatial Policy 8.</p> <p>(ii) Promoting the development of a strong local economy through enterprise and innovation, in facilitating existing strengths in financial and business services and manufacturing and to continue to grow opportunities in health and medical, low carbon manufacturing, digital and creative,</p>

	Suggest SP8 ii to include the leisure and tourism sectors.		<p>retail, housing and construction, social enterprise, <i>leisure and tourism</i> and the voluntary sector.</p> <p>New paragraph added to supporting text –</p> <p><i>4.7.5b Leisure and tourism are both employment sectors which are of significant importance to the regional economy. The Leeds City Region Employment and Skills strategy research for VisitBritain forecasts that tourism will be one of the UK's best performing sectors over the coming decade (2010 – 2020). It is also predicted that the hospitality industry is likely to follow the same growth pattern. The hospitality industry employs the highest percentage of young people (16-24 year olds).</i></p>
<p>Mr &amp; Mrs Haigh (via Directions Planning) (5121)</p> <p>Otley Town Partnership (via Directions Planning) (5121)</p>	Object to the inclusion of social initiative under criterion (vi) as it is not a planning matter and contrary to national guidance on planning gain.	Disagree – The purpose of this policy is to identify and support business innovation, entrepreneurship & economy growth across the whole of the district. Job creations in rural locations through social capital and inclusion initiatives are seen as a tool for fostering employment however they are not stand alone measures, it is therefore appropriate for this type of initiative to appear under this policy which focuses upon economic development priorities.	No change
Leeds University Union (5898)	Policy fails to make any reference to the role of the universities and students. Recommend another clause added to the policy – to assert that a competitive local economy will be supported through encouraging graduates of the city's	It is not the purpose of the policy to identify specific workforces however it is accepted that the role of all education institutions and students do have positive role to play contributing to the city's and region's economy, if	<p><b>Proposed Modification - minor changes</b></p> <p>New wording added to existing paragraph in the supporting text –</p> <p><i>4.7.8 The city's education institutions already</i></p>

	universities to remain in the city and use their skills and knowledge to benefit the area. This would require a commitment to working with local businesses to develop a greater graduate economy.	not beyond.  For completeness in reference to clause iii, additional wording will be included to the supporting text 'encouraging graduates of the city's education institutions to remain in the city and use their skills and knowledge to benefit the area.'	<i>play an important role in providing employability skills and training. Additionally they work hard to foster innovation and research outputs which contribute significantly to the local and regional economy. Graduates should be encouraged to remain in the city and use their skills and knowledge to help contribute to Leeds growing economy. Partnership working through local business mentoring and knowledge transfer should help to stimulate business innovation and creativity both locally and globally.</i>
Aberford Parish Council (0106)	Policy (section v) fails to recognise diverse rural economy.  The policy should enable a dispersed pattern of small scale, environmentally sensitive SME economic activity to be supported on appropriate sites, through the re-use of redundant buildings and on brownfield sites, in communities and to work towards continued sustainable land use through the farming and forestry and tourism sectors.	Agree – further information is required to identify how the rural economy is to be supported in development terms for example, <ul style="list-style-type: none"> <li>- conversion of existing building</li> <li>- promote the development and diversification of agricultural and other land-base rural businesses</li> <li>- support provision &amp; expansion of tourist and cultural facilities in appropriate locations</li> <li>- retention and development of local services and community facilities.</li> </ul> It is considered that these proposed changes will improve the readability of the policy and reflect the importance of rural issues which are also covered in the National Planning Policy Framework.	<b>Proposed Modification - minor changes</b>  New paragraph added to supporting text under the heading of Rural Economy;  <i>4.7.11b Outside the major settlements, small businesses and local services are a vital part of the economy and the life of the community. In order to grow and diversify the rural economy the following proposals should be supported, where appropriate;</i>  <ul style="list-style-type: none"> <li>○ <i>conversion of existing buildings</i></li> <li>○ <i>promote the development and diversification of agricultural and other land-base rural businesses</i></li> <li>○ <i>support provision &amp; expansion of tourist and cultural facilities in appropriate locations</i></li> <li>○ <i>retention and development of local services and community facilities.</i></li> </ul>
<b>Employment Locations</b>			
White Young Green	Thorp Arch Estate represents a significant facility in the North East which	It is acknowledged Thorp Arch Estate could positively contribute to the	No change

<p>Planning (0420)</p>	<p>can help to implement the Spatial Vision.  Thorp Arch Estate should be included in the supporting text and the Key Diagram.</p>	<p>housing and employment needs. Paragraph 4.6.17 of the Core Strategy supports the Thorp Arch Estate.</p>	
<p>Leeds Bradford International Airport (via White Young Green Planning) (0420)</p>	<p>Para 4.7.13 SP8 refers to locations that have been selected to take advantage of strategic infrastructure which includes the Airport.  It is therefore suggested to include Leeds Bradford International Airport as an employment location in the Policy itself, as the organisation already employ 2,500 people. In the future there is the potential to create a 1,000 new jobs.</p>	<p>It is recognised that the airport is an employment hub and there is already existing opportunities in this area which can help city and regional economic growth.</p>	<p>See forthcoming DPP report on Spatial Policy 12.</p>
<p>MUSE Development – (via White Young Green) (0420)</p>	<p>This policy only makes a passing reference to the Enterprise Development Zone. SP8 should be amended to include a specific criterion which recognises support for Enterprise Development Zone.</p>	<p>The Enterprise Zone is already addressed in Spatial Policy 5. To avoid duplication it is not considered necessary to include further details in a specific criteria in policy SP8 as the existing coverage (within SP8) is appropriate. However agree to added a policy cross reference within the supporting text.</p>	<p><b>Proposed Modification - minor changes</b></p> <p>A policy cross reference is added to the existing supporting text.</p> <p>4.7.14 East Leeds, the Leeds Bradford Corridor and South Leeds along with the City Centre and Aire Valley Leeds provide a number of other locations which will offer opportunity for the new job opportunity creations. <i>Aire Valley Leeds, the district's Enterprise Zone is an area covering 142 hectares. As detailed in Spatial Policy 5 the designation of the Zone should help attract long term investment to this area and benefits will be felt across the whole of the district.</i> Depending on the type of development, some locations are better suited than others. The Core Strategy will seek to ensure that a variety of suitable locations are available to ensure</p>

			future job growth.
<p>Otley Town Partnership (via Directions Planning) (5121)</p> <p>Mr &amp; Mrs Haigh (via Directions Planning) (5121)</p>	<p>Support the general principles of securing economic and job growth. However with reference to sections vii and viii, there are concerns that the Core Strategy will fail to protect existing employment sites or support job growth in Otley.</p> <p>Suggest amending the policy and para 4.7.3 to make wider reference to existing locations and sites being protected and job losses accounted for in the allocation land.</p>	<p>The focus of policy SP8 is to set out the overall economic strategy, integral to the Core Strategy approach is the promotion of the settlement hierarchy as the principle location for investment and housing growth. Within this context the Core Strategy and Site Allocation documents will provide a framework to support employment opportunities and job growth in settlements like Otley. The preparation of Neighbourhood Plan for Otley as one of the four pilots may provide further opportunities to identify employment sites and opportunities for local job growth.</p>	No change
Morley Town Council (4825)	<p>"Economic development opportunities and major sporting venues" is a heading on p.36 which should be re-worded along the lines of "Enabling development associated with sporting and cultural venues", to reflect the paragraph which should in turn be expressed in more general terms. Actual venues such as Headingley Carnegie Stadium and Leeds Arena should not be named; to do so makes the policy seem to favour named sites even before planning permission for enabling development has been sought.</p>	<p>The two stadia are presented as examples it is not intended to be a comprehensive list.</p>	No change
<b>Evidence base</b>			
White Young Green	A report was presented to the City Council in January 2012 which sets out	Support is welcomed.	No change

(0420)	the economic benefits of Headingley Carnegie Stadium. It is suggested that this report should form part of the formal evidence base of the CS. As it demonstrates a strong justification to support the text at para 4.7.9		
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Representor/Agent	Representor Comments	LCC Initial Response	Action
<b>Q: 12 Spatial Policy 9 : Provision for Offices, Industry &amp; Warehouse Employment Land &amp; Premises</b>			
<b>General support</b>			
Scarborough Development Group (via RED Property Services) (5719)	Support key role played by existing/extant consents for office development, such as Thorpe Park.	Supported noted	No change
<b>General objections</b>			
Morley Town Centre (4825)	On p.41 the sentence "The requirement for offices is expressed as floorspace, the margin of choice equals 8,611 square metres of floorspace per annum" does not make much sense. Does it contain an error? We noted that for industry the margin of choice was 6 hectares per annum	<p>The Core Strategy adopts a pro-growth approach which is consistent with the National Planning Policy Framework.</p> <p>A margin of choice provides an additional allowance of land supply which allows for the flexibility to offer a range and a choice of sites and premises to be available at any one time. Including a margin of choice for Leeds ensures supply is not constricted and enables options for existing businesses to expand or to relocated within the District.</p>	No change
Wakefield Metropolitan District Council (0104)	<p>Some significant concerns about the compliance with the legal requirements and its potential soundness.</p> <p>Clearer justification for the scale of development, including employment and</p>	<p>The Council considers its evidence base to be sound.</p> <p>The household projections as set out in the Leeds' Strategic Housing Market Assessment</p>	No change

	<p>housing, needs to be provided. There appears to be an imbalance between scales of employment land/jobs and scale of housing land, without sufficient explanation or justification. The proposed employment land provision in the Leeds Publication Draft document builds in an oversupply of employment land so the situation set out in Policy EC1(c) (oversupply of land) will occur and lead to a dispersal of general employment opportunities.</p>	<p>(SHMA) are based on an employment-led scenario. This scenario measures the relationship between the population and the labour force (economic activity rate) and between the labour force and number of jobs in an area (labour force and job conversion factor).</p> <p>The job forecasts in this scenario have been taken from the Yorkshire Forward Regional Econometric Model in particular the Autumn 2010 Update. This is same job forecast data also underpins the Leeds Employment Land Review.</p> <p>The methodology for the Employment Land Review complies with national policy guidance - PPG4 Employment Land Reviews. However an employment background paper is being prepared to help aid further understanding of Leeds employment approach.</p>	
<p>Templegate Developments (via Barton Willmore Planning Partnership-Northern) (0057)</p>	<p>Object to para 4.7.18 - refers to a minimum of 1,000,000 square metres of land will need to be identified for office use. It refers to 840,000 square metres which currently has planning permission and states that additional floorspace will be identified in or on the edge of the City and town centres. It also states that no new out of centre office locations will be allocated. SP9</p>	<p>Purpose of SP9 is to establish the overall quantum of development requirements for the B class uses over the plan period. Whereas the supporting text to policy EC2 provides more detail.</p>	<p><b>Proposed Modification - minor changes</b></p> <p>New wording added to the supporting text to Policy EC2: Office Development</p> <p><i>Office-based land requirement</i></p>

	<p>(i) then refers to the provision of a minimum of 706,250 square metres of office (B1a class) floorspace in the district. It goes onto state that to provide flexibility when determining renewals on existing out of centre applications a minimum of an additional 160,000 square metres will be identified in or on the edge of the City Centre and town centres. Our client considers the text appears some what muddled and requires amending.</p> <p>Suggested change to amend SP9 to reflect a clear link between the requirement, the existing supply, the requirement throughout the plan period, whilst also recognising the need for flexibility in the overall level of provision.</p>	<p>The wording to the supporting text of policy EC2 is improved to help the understanding of the policy.</p> <p>An Employment Background Paper is being prepared to help aid further understanding of Leeds employment approach.</p>	<p>5.2.34 <i>Paragraph 4.7.18 to Spatial Policy 9 identifies that a minimum of 706,250sq.m of office floorspace will be provided over the Plan period. This provision will comprise of new and existing locations. The Leeds Employment Land Review (2010 Update) identified current commitments on sites which s appropriately 840,000sqm. However over a third of the existing supply is located outside the City Centre, resulting in further floorspace being needed to help prioritise the locating of offices in centres. These permissions this includes the remaining land at partially developed sites, such as the business park at Thorpe Park and office development at Leeds Valley Park.</i></p> <p>5.2.35 It is anticipated that current commitments, in the form of planning permissions, will be used to help meet the overall requirements identified above. <del>Current commitments on sites which the Leeds Employment Land Review (2010 Update) identified as appropriate to be retained amount to approximately 840,000 sq.m.</del> In order to provide flexibility when determining renewals of existing out of centre office applications, 160,000 sq.m of floorspace will be identified in or on the edge of the City and town centres. This will therefore bring the total office</p>
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			<p>floorspace required up to 1,000,000 sq.m</p> <p>5.2.36 <i>The breakdown of the existing supply of commitments—(840,000 sq.m) includes for out of centre sites amount to 322,470 sq.m, with a further 19,290 sq.m is located in or on the edge of town centres and 498,736sq.m is located in the City Centre. Spatial Policy 9 states that an additional Therefore the remainder of the 160,000 sqm will be identified will be located in, or on the edge of City and Town centres. Policy CC1: City Centre Development proposes to accommodate at least 655,000sq.m of office-based development, equating to 98% of the total provision with a further 3,710sq.m to be identified in or on the edge of town centres (2%). The proposed total of offices in or on the edge of town centres reflects the current percentage of commitments, scaled up to the new requirements. (for example 2.3% of the current total commitments are in or on edge of town centre and this rate will be carried forward).</i></p>
Highways Agency (0060)	There is concern that so much of the land available with existing planning consent is in 'out-of-centre' locations. It is accepted that there is little that can be done about this until consents fall due for renewal or expire. Given that there are relevant conditions relating to the capacity of junctions on the Strategic Road	Comments noted	No change

	Network attached to certain of the existing consents, it becomes a matter that the Agency will consider when the Site Allocations DPD is brought forward for consultation.		
Highways Agency (0060)	The Core Strategy is unsound - there is concern that the information provided on the distribution of employment development is not at a sufficient level of detail to enable the Agency to use its traffic models to develop a realistic assessment of the traffic impact of Core Strategy development proposals.	Leeds City Council are currently working with the Highways Agency and their consultants to access the impact of the 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 agree appropriate mitigation where necessary.	Ongoing
Muse Developments (via White Young Green Planning) (0420)	This Policy should be amended to recognise that B1a office accommodation should also be supported on those sites which already benefit from consent for employment uses provided it can be demonstrated that there is no adverse impact on other relevant centres. Amending the text in this manner will ensure that B1a office accommodation can also be directed towards regeneration priority areas.	Policy EC2 already addresses office-based development which reinforces the NPPF approach.	No change
Land Securities & Evans Property Group (via Quod) (1091)	It is premature, and inconsistent with the NPPF, for the Core Strategy to remove the prospect for any out of centre office floorspace. In particular, such growth could support economic regeneration in outer areas of the District, and support existing investors who have a specific market requirement to be located beyond City or town centres.	The Core Strategy policies adopt centres first approach and a pro-growth approach which is consistent with the NPPF.	No change
Lady Elizabeth Hastings Estate Charity (via	It is appropriate for the Core Strategy to make adequate provision for the "traditional" employment land use sectors. The use of	Comments noted	No change

<p>Carter Jonas) (5681)</p> <p>Meadowside Holdings Ltd (via Carter Jonas) (5681)</p> <p>The Diocese of Ripon and Leeds (via Carter Jonas) (5681)</p> <p>The Hatfield Estate (via Carter Jonas) (5681)</p> <p>The Ledston Estate (via Carter Jonas) (5681)</p> <p>AR Briggs and Co (via Carter Jonas) (5681)</p> <p>The Bramham Park Estate (via Carter Jonas) (5681)</p>	<p>minimum targets is appropriate.</p>		
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Representor/Agent	Representor Comments	LCC Initial Response	Action
<b>Q: 30</b> <b>Q: 30a</b> <b>Supporting Employment Opportunities</b> <b>EC1 – General Employment Land</b>			
<b>General support</b>			
British Library (via Drivers Jonas Deloitte) (5034)	Support para ii), particularly in regards to the British Library site (have submitted it to the Site Allocations call for sites).	Supported welcomed	No change
<b>National Planning Policy Framework (NPPF) Compliancy issues</b>			
PPL (via Scott Wilson) (0414)	The draft Core Strategy needs to be amended to take account of the advice given in the recently published National Planning Policy Framework [quotes policies 9 and 28 of the NPPF]	<p>- Unclear which paragraph 9 is being referred to. Paragraph 9 (page 3) relates to ‘sustainable development’ whereas bullet point 9 which is a core planning principle under paragraph 17 relates to ‘mixed use development’. Either way the principles of ‘sustainable development’ and ‘mixed used development’ have already been addressed throughout the Core Strategy. For example the overall policy coverage in the Core Strategy would help to make positive Improvements to the quality of the built environment, natural and historic and the quality of life of its residents. Mixed used development opportunities are already included</p> <p>- Paragraph 28 of the NPPF refers</p>	No change

		<p>'supporting economic growth in rural area'. Supporting the growth of the rural economy is already a development priority which is identified in Spatial Policy 8: Economic Development Priorities.</p> <p>No further amendments would be needed as the policy approach complies with National Policy Planning Framework.</p>	
<b>Employment locations</b>			
<p>Lady Elizabeth Hasting Estate Charity AR Briggs, The Braham Park Estate, The Diocese of Ripon &amp; Leeds, The Ledston Estate, Meadowside Holdings Ltd , The Hatfield Estate (via Carter Jonas) (5681)</p>	<p>It is important to ensure that there is an appropriate supply of land sites and premises in accessible locations across the District.</p>	<p>Comments noted</p>	<p>No change</p>
<p>Otley Town Partnership (via Directions Planning) (5121)</p> <p>Mr &amp; Mrs Haigh (via Directions Planning) (5121)</p>	<p>Object to the Policy because it does not make reference to supporting the expansion or replacement of existing employment development and premises. The UDP (2006) included specific references to supporting existing businesses. Without such reference the Core Strategy provides no guidance as to whether the expansion of existing businesses and premises is acceptable.</p> <p>However support reference to the allocation of employment land within major</p>	<p>Although the supporting text to Spatial Policy 8 states the Core Strategy supports existing and future business activity and employment growth and existing employment areas. Neither the policy wording nor the supporting text explicitly refers to 'expansion' or 'replacement' of existing employment.</p> <p>Agree to include new wording to the supporting text to SP8 in order to strengthen the policy approach.</p>	<p><b>Proposed Modification - minor changes</b></p> <p>New wording added to supporting text in paragraph 4.7.3:</p> <p>4.7.3 This includes opportunities within existing settlements (including town and local centres), supporting <i>the expansion or replacement of existing employment premises and areas</i> land, promoting opportunities within Regeneration Priority</p>

	settlements, as securing employment land is important for the future of Otley.		Programme Areas (Spatial Policy 4) and potential locations associated with areas of longer term.
Leeds Civic Trust (0062)	<p>A policy is required on workshops and start up units which should be encouraged in local centres.</p> <p>Suggested change, Add to A): “Identifying locations for low-carbon industries which will be encouraged.” “Encouraging the provisions of small workshops and start up units in local centres where they will not impact on environmental amenity but will provide local employment opportunities.”</p>	<p>New wording relating to the provision of start-up units and workshops is now been included within Spatial Policy 8: Economic Development Priorities.</p> <p>The suitability of sites to accommodate new employment development for specific employment sectors will be matter for the Site Allocations documents, which will take into account national, regional and Core Strategy policies.</p>	<p><b>Proposed Modification - minor changes</b></p> <p>A new criteria refer to start-up units is added to Spatial Policy 8;</p> <p>(x) Support the retention and provision of new business start-up units including small workshops, where appropriate.</p> <p>New paragraph added to the supporting text:</p> <p>4.7.14 - Leeds and the region play an integral role in assisting emerging new businesses (business start up, investment in new projects) and encourage young entrepreneurship. These will be supported by the retention and provision of new small start up units including workshops in appropriate locations.</p>
PPL (via Scott Wilson) (0414)	<p>There is a lack of clarity on how the key policy objective of provision for employment will be met through the Settlement Hierarchy with particular reference to provision in “Villages and Rural Areas”.</p> <p>Policy EC1 provides no opportunity for local employment land to serve “other”</p>	<p>The Core Strategy is aiming to meet the needs for the whole of Leeds in the most sustainable way as set out Spatial Policy 1: Location of Development</p> <p>1. The Spatial Vision and Spatial Policy 1: Location of Development set out how sites in</p>	<p><b>Proposed Modification - minor changes</b></p> <p>New paragraph added to supporting text under the heading of Rural Economy to Spatial Policy 8;</p> <p>4.7.11b Outside the major settlements, small businesses and</p>

	<p>villages. It does not acknowledge the valuable contribution small scale employment opportunities can make in the rural area.</p> <p>It is not clear how the future needs of these “other” settlements are to be met over the next 15 years.</p> <p>Suggested changes,</p> <ol style="list-style-type: none"> <li>1. More clarity on how sites in “other” settlements are to be identified and brought forward.</li> <li>2. Identification of the criteria against which the suitability of such sites are to be considered.</li> <li>3. Reconsideration of the requirement that development in such settlements must functionally require a rural location.</li> <li>4. An acknowledgement that some of these “other” settlements will require further development to maintain existing social and economic fabric.</li> <li>5. Inclusion of a policy encouraging conversion and reuse of traditional rural buildings.</li> <li>6. Acknowledgement of the importance and support for small scale employment opportunities in rural areas and in the Green Belt and not only rural villages.</li> <li>7. Clarity on the process for the adoption Neighbourhood Plans and timescales for this to happen.</li> </ol>	<p>other settlements will be brought forward. Paragraph 4.1.15 also refers to “all other settlements within rural area...development will only be permitted if it functionally require in a rural location’.</p> <ol style="list-style-type: none"> <li>2. Para 5.2.32 explains how sites have been assessed as part of the Employment Land Review. Land is assessed for its suitability, availability and deliverability. Suitability refers to the physical conditions, availability relates to planning permission status &amp; marketability and deliverability refers to likely associated development costs. It will be the responsibility of the forthcoming Site Allocation documents to determine the merits of all sites in more detail in order to accommodate new employment.</li> <li>3. Exceptions to the Core Strategy Vision would need to be judged on it own merit on a case by case basis.</li> <li>4. Spatial Policy 1: Location of Development and the Spatial Vision already sets out the Core Strategy approach on how sites ‘other’ settlements are brought forward.</li> <li>5. Agree – new wording to be added to Spatial Policy 8: Economic Development</li> </ol>	<p>local services are a vital part of the economy and the life of the community. In order to grow and diversify the rural economy the following proposals should be supported, where appropriate;</p> <ul style="list-style-type: none"> <li>○ conversion of existing buildings</li> <li>○ promote the development and diversification of agricultural and other land-base rural businesses</li> <li>○ support provision &amp; expansion of tourist and cultural facilities in appropriate locations</li> <li>○ retention and development of local services and community facilities</li> </ul>
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		<p>Priorities to help clarify how the Core Strategy intends to support growth of the rural economy in development terms.</p> <p>6. Spatial Policy 1: Location of Development already addresses this approach.</p> <p>7. Process for the adoption of Neighbourhood Plans is being advised by the Council elsewhere. This is not a matter to be considered against this policy.</p>	
<b>Provision of infrastructure</b>			
<p>AR Briggs, Lady Elizabeth Hasting Estate Charity, Meadowside Holdings Ltd, The Hatfield Estate, The Ledston Estate, The Braham Park Estate, The Diocese of Ripon &amp; Leeds (via Carter Jonas) (5681)</p>	<p>As a point of principle the Core Strategy must support a dynamic economy and facilitate the creation of jobs and employment opportunities. It should support the creation of accessible flexible work space and the availability of appropriate infrastructure including high speed broadband/internet capability across the District.</p>	<p>Agree – communication infrastructure is an integral service which is needed to support economic growth. New wording will be added to the supporting text.</p>	<p><b>Proposed Modification - minor changes</b></p> <p>A new criteria is added to Spatial Policy 8;</p> <p><i>(vii) Support the advancement of high quality communications infrastructure to foster sustainable economic growth and to enhance business links.</i></p> <p>New paragraph added to the supporting text;</p> <p><i>4.7.13 Securing high quality communication infrastructure in particular initiatives to deliver super speed broadband technologies is critical to securing long term economic prosperity and improves business links both locally and</i></p>

			<i>internationally.</i>
<b>Employment types</b>			
Muse Developments (via White Young Green Planning) (0420)	<p>The current wording of this policy refers to “general employment land” but does not provide any further guidance on what is included with meaning of “general employment”. The Policy should be amended to provide use classes, rather than just descriptions of uses so that it is clear. As drafted, Policy EC1 does not make reference B1 offices and it should, as this generates employment.</p> <p>Part B of Policy EC1 refers to “other” uses with similar locational requirements to employment uses as sui generis. It is our view that this is not sufficiently encompassing and that the policy is too imprecise. The policy does not include for uses such as crèches, hotels and other uses which are common place in modern day employment parks. The policy should be amended to include for other uses that are complimentary to employment uses. Doing so would also encourage sustainable development by reducing the need to travel from employment hubs to undertake other activities. Not amending the condition could create unnecessary barriers should large employment sites come forward for renewals of planning applications. This could jeopardise major employment sites, in</p>	<ul style="list-style-type: none"> <li>- Agree – new wording to be added to the supporting text to clarify what ‘general employment land’ means.</li> <li>- Other main town centre uses for example, retail, health, education, culture, tourism and leisure are considered in more detail in the Placemaking chapter.</li> <li>- Disagree, policy EC1 is consistent with Spatial Policy 1: Location of Development, Spatial Policy 4: Regeneration Priority Programme Areas, Spatial Policy 5: Aire Valley Leeds Urban Eco Settlement.</li> </ul> <p>An Employment Background Paper is being prepared to help aid further understanding of Leeds employment approach.</p>	<p><b>Proposed Modification - minor changes</b></p> <p>New wording added to the existing paragraph 5.2.31 to the supporting text:</p> <p><i>For clarity, general employment land relates to all the B Class employment sectors except for offices. EC1 refers to research and development (B1b class), light industry (B1c), general industry (B2) and storage or distribution (B8).</i></p>

	<p>Regeneration Priority Areas coming forward and compromise the aims and objectives of Spatial Policies 1 and 4.</p> <p>Policy EC1 is not consistent with the aims of objectives of Spatial Policies 1, 4 and 5. It should be amended so that it is. Full support should be given to a range of uses to ensure that Regeneration Priority Areas are successful and the strategic aims and objectives of the Core Strategy are realised.</p>		
<p>McGregor Brothers Ltd (via West Waddy ADP)</p>	<p>Policy EC1 identifies the need for land to accommodate ....waste uses. However, policy SP9 makes no reference to waste uses. It is unclear therefore what the waste uses to which the policy refers are or what the need is for these uses.</p> <p>Para 5.2.33 also states that: in the event of an oversupply, consideration should be given as to whether the excess land is more appropriately used for other forms of development, with first priority given to other forms of economic development which accord with part A &amp; B of the Policy.’ This does not accord with the advice in para 51 of the NPPF.</p> <p>1. Either reference to waste uses should be deleted from policy EC1 or details should be provided of the type of uses referred to and how much land is needed to accommodate them.</p>	<p>1. Waste uses are set out as an example of one of the uses of General Employment land. In addition the Council has recently produced The Natural Resources and Waste Development Plan Document which already quantifies the need for waste uses. There will be no further requirement to delete ‘waste’ or quantify the need for waste uses separately as this already been done elsewhere.</p> <p>1. Disagree – the wording of the policy provides the flexibility to consider non-employment uses where an oversupply of land occurs. However for clarity the words “which accord” is to be replaced with “other than those uses”.</p>	<p><b>Proposed Modification - minor changes</b></p> <p>The new wording added to supporting text to the correct error. New wording ensures the policy and supporting text are the same.</p> <p>5.2.33 In the event of an oversupply, consideration should be given as to whether the excess land is more appropriately used for other forms of development, with first priority given to other forms of economic development <del>which accord</del> with <i>other than those set out</i> in part A &amp; B of the Policy. <i>Along with the total amount of employment land, consideration also needs to be given to the availability of employment land and premises in local areas of the district.</i></p>

	2. Para 5.2.33 should be amended to make it clear that residential use is acceptable where there is an oversupply of employment land and the reference to giving first priority to other forms of economic development should be removed.		
Renew (5105)	A gap has been identified where employment does not appear to be a recurrent theme throughout each of the policies as is the case with training and education for example. Equal weight could be given on the need to employ local people and encourage collaboration from major developers/developments enabling sustainable developments across the city.	These issues are already addressed in Spatial Policy 8: Economic Development Priorities.	No change

Representor /Agent	Representor Comments	LCC Initial Response	Action
<b>Q: 31 EC2 – Office Development</b>			
<b>General support</b>			
Scarborough Development Group (via RED Property Services) (5719)	Support the recognition that development will be focussed upon areas with existing commitments for office development.	Supported welcomed	No change
The Ledston Estate (via Carter Jonas)	It is appropriate that the Policy focuses upon a “centres first” approach consistent with NPPF and	Supported welcomed	No change

<p>(5681)</p> <p>The Hatfield Estate, The Bramham Park Estate, Lady Elizabeth Hastings Estate Charity, Meadowside Holdings Ltd, The Diocese of Ripon &amp; Leeds, AR Briggs &amp; Co (via Carter Jonas) (5681)</p>	<p>allows for the creation of office space appropriate in scale in other locations. For example NPPF considers it appropriate to allow for creation of office space in the rural areas for instance where this will bring redundant or underutilised buildings and premises back into use and generally support a diverse and vibrant rural economy.</p>		
<p>Arcadia Group (5723)</p>	<p>Agree with para 5.2.43 that states likely that non-employment uses (i.e. outside the B use classes) will be proposed on allocated employment sites or involve redevelopment of existing employment sites).</p>	<p>Supported welcomed</p>	<p>No change</p>
<p><b>National Planning Policy Framework (NPPF) Compliancy which include changes to the floorspace threshold issues</b></p>			
<p>Rockspring Hanover Property (via White Young Green</p>	<p>Support general aim of policy but need to clarify sequential and impacts tests against NPPF &amp; CS Policy P8</p>	<p>- Support the general aim of the policy.  - With reference to part (iv): At the time of writing this policy</p>	<p><b>Proposed Modification - minor changes</b></p> <p>Part (i) and (ii) has been swapped around to allowing the flow of the supporting text to reflect the flow of the policy. New wording added to exceptions part of the policy:</p>

<p>Planning) (0420)</p> <p>Templegate Development s (via Barton Willmore Planning Partnership-Northern) (0057)</p> <p>Airebank Development s (via White Young Green Planning) (0420)</p> <p>Muse Development s (via White Young Green Planning) (0420)</p>	<p>With reference to part (iv):</p> <ul style="list-style-type: none"> <li>- Support for small scale office floorspace acceptable in existing major employment areas. Limiting new office development to below 1500m2 is not reasonable when a new occupier to an existing office estate could demonstrate there will be no impact on existing centres.</li> <li>- Support the recognition within part (iv) of the policy that would allow out of centre office development in out of centre locations, including those Regeneration areas identified under SP4.</li> <li>- Concerned that part (iv) only applies to smaller scale office development (up to 1,500 square metres) would be acceptable in these locations.</li> <li>- Para 26 (NPPF) also refers to a default threshold of 2,500 square metres if there</li> </ul>	<p>the draft NPPF was in place which did not include offices as a main town centre use but this position has now changed.</p> <p>The threshold of the Core Strategy Publication Draft established a number of floorspace threshold standards which were used to help define what is meant by small, medium and large office developments. These standards were derived from the Council's Supplementary Planning Document on Travel Plans and this is where the 1,500sqm threshold came from.</p> <p>Further to the adopted NPPF setting an impact assessment threshold of 2,500sqm for large development. It was considered appropriate to review the Core Strategy definition of small office development against Council data. The review involved collating the floorspace sizes of existing offices in out of centre locations in villages and rural locations across the district. The average floorspace size equates to 250sq.m and the Council considers this new threshold would provide a generous threshold of what is regarded as small scale development.</p>	<p><b><u>POLICY EC2: OFFICE DEVELOPMENT</u></b></p> <p>Appropriate locations for allocations and windfall office development;</p> <p>(i) <del>Town Centres and edge of town centres are promoted as locations for office development. A target of 655,000sqm for the city centre and 23,000 sqm (equivalent to 2.3% of identified need over the plan period) of new office floorspace is set for locations in or on the edge of town centres to guide allocation documents.</del></p> <p>(ii) <del>The City Centre will be</del> The focus for most office development will be within and/or edge of the City Centre, <i>and designated</i> town and local centres. <del>Locations on the edge of the City Centre will also be appropriate for offices as part of mixed use development.</del></p> <p>Due to the availability of development opportunities in centre and edge of centre, out of centre proposals would normally be resisted <del>however there are with the exceptions of which are:</del></p> <p>(iii) Existing commitments for office development will be carried forward to meet the identified floorspace requirement over the plan period, unless it would be more sustainable for the land to be re-allocated to meet identified needs for other uses.</p> <p>(iv) To provide flexibility for businesses, smaller scale office development ( up to <del>1,500</del> 250 sqm) <del>will be acceptable in out of centre locations in the following locations-not be subject to sequential and impact assessments in the following locations;:</del></p> <ul style="list-style-type: none"> <li>i. Regeneration areas identified under Spatial Policy 4</li> <li>ii. <del>Other accessible locations (defined in Policy T2) within the Main Urban Area, Major Settlements and Smaller Settlements.</del> <ul style="list-style-type: none"> <li>ii <i>Settlements within the Hierarchy which do not have a designated centres as outlined in Map 4.</i></li> <li>iii <i>Villages or rural areas that are not included in the Settlements Hierarchy, which will also be subject to the accessibility standards as defined by Table 1 in Appendix 2.</i></li> </ul> </li> </ul> <p><i>Map xxx: shows which locations are subject to a sequential</i></p>
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<p>Land Securities &amp; Evans Property Group (via Quod) (1091)</p>	<p>is no locally set threshold. However, there is no justification for this lower threshold within the CSPD. Concerned that the imposition of a restricted approach to office development could undermine the delivery of sustainable economic growth, contrary to the NPPF.</p> <p>- Policy EC2 restricts office floorspace in out of centre locations to 1,500 sq m. The policy should be amended so that a larger element of B1 floorspace can be promoted in Regeneration Priority Areas in out of centre locations where it can be demonstrated that this will encourage regeneration potential. It is suggested that if the Council wish to promote Regeneration Priority Areas, consideration should be given to the implications of restricting B1 floorspace in out of centre locations to just</p>	<p>Although this new threshold which helps to define 'small' development, it does not preclude larger development opportunities. As any office development larger than 250sqm would be subject to sequential and/or impact assessments.</p> <p>Due to changes in national planning policy, new wording to be added to the policy and the supporting text to clarify the sequential and impact requirements. In additional a new map to be added to help illustrate the locations where assessments are required.</p> <p>- Part (v) of Policy EC2 refers to 'major employment areas'. Major is defined by any development above 2,500sq.m which is consistent with the National Planning Policy Framework.</p>	<p><i>assessment</i></p> <p>(v) In existing major employment areas, which are already a focus for offices, some small scale office floorspace may be acceptable where this does not compromise the centres first approach.</p> <p>New wording added to the supporting text to Policy EC2:</p> <p><b><u>Location of development</u></b></p> <p>5.2.37 <del>To encourage further office development to locate in centres, and in the context of the extensive availability of out of centre sites; Spatial Policy 2 already advises that</del> new proposals for offices will generally be encouraged to locate in or on the edge of the city and town centres. <i>However</i> the Council does recognise that in a district as large and varied as Leeds, and noting the changing emphasis of national guidance, many employment areas exist out of centre. Such locations play a valuable role in the Leeds economy in offering a choice of location for business and in providing local job opportunities. <i>Indeed</i> they can often be as accessible to a substantial local labour market as many of the smaller town centres. They can represent highly sustainable options particularly when located in the main urban area.</p> <p>5.2.38 <del>As noted above, no new out of centre office locations will be identified for allocation. National planning guidance expects out of centre or edge of centre office proposals to be subject to a sequential test to determine whether preferable sites exist either in-centre (first preference) or edge of centre (second preference).</del> To complement this, and for the avoidance of doubt, <i>sequential assessment for out-of-centre renewals and new development will be required subject to floorspace threshold requirements as set out in paragraph 5.2.41. the centres first approach will apply to the creation of new out of centre office areas even where this involves the renewal of existing planning permissions.</i></p> <p>5.2.39 <del>City Centre sites should be considered in sequential assessments for All sequential assessments for large scale proposals will be directed in the first instance to the City Centre. throughout the District, as Such</del></p>
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1,500 sq m.. This would ensure consistency with Spatial Policy 4.

- Policy EC2 identifies a series of criteria when out of centre office proposals may be considered. Criteria (iv) limits office development to that of a "small scale" and "up to 1,500sq.m", whilst criteria (v) (relating to major employment areas - the definition of which is unclear) is tested against whether the proposals compromise the town centres first approach. It is not clear what evidence base has been produced to justify the 1,500sq.m figure.

Notwithstanding this, the NPPF is clear that the appropriate tests for the consideration of office development in out of centre locations are sequential and impact assessments.

development would be expected to attract employees commuting from a wide catchment area, and below this scale of development a smaller catchment area may be identified based on likely travel to work patterns. ~~All centres within the identified catchment should be tested including the City Centre, if appropriate.~~

5.2.40 Offices can considerably enhance the vitality and viability of centres as well as provide an important source of local employment. Office development in town centres tend to be smaller in scale and located in mixed use buildings, for example above shop units. The capacity of each centre to accommodate new office floorspace will vary considerably depending on factors such as market preference, transport links and availability of land and premises.

~~5.2.41 The Policy below will be applied in accordance with the definitions for 'small', 'medium' and 'large' scale office development set out in the table below.~~

Scale	Office Floorspace (Gross Internal)	Approx no. of employees	Commentary
Small	Under 1,500 sq m	Less than 75	No significant travel impact
Medium	1,501 – 5,000 sq m	75-250	Gives rise to a 'significant travel impact'
Large	Over 5,000 sq m	More than 250	Regionally significant development

*Proposals for office development must accord with the following sequential and impact assessment requirements where appropriate,*

Scale	Office Floorspace (Gross Internal)	Sequential Assessment	Impact Assessment	Other Requirements
Small	Under 250 sq m located within rural areas or villages	No	No	Accessibility standards*
Small	Under 250 sq m	Yes	No	n/a

	<i>located within urban areas</i>			
<b>Medium</b>	251 – 2,499 sq m	Yes	No	n/a
<b>Large</b>	Over 2,500 sq m	Yes	Yes	n/a

*\* Table 1 in Appendix 2 of the Core Strategy sets out the accessibility standards and indicators for employment uses.*

*Locations which are subject to a sequential assessment are identified on Map xxxx.*

*5.2.42 It is considered appropriate for small scale offices and office extensions to be supported in regeneration areas and in accessible rural locations away from town and local centres, without the need for a sequential test. The threshold size of small scale is defined as 250sq.m. Therefore in regeneration areas and in those areas not served by a centre in rural areas or villages (as shown on Map 4) small scale office development (up to 250sq.m) will be permitted without the need to undertake a sequential test. Locations outside of the Settlement Hierarchy will need to demonstrate compliance to accessibility standards as outlined in Table 1, Appendix 2 of the Core Strategy. All office development larger than 250sq.m will need to undertake a sequential assessment.*

*5.2.43 (Formerly part of 5.2.37) Within this context, limited additional office development may be acceptable in out of centre locations where they are demonstrably sustainable, where proposals are of an appropriate scale to existing development and will not compromise the centres first approach.*

*5.2.44 National planning guidance advises when assessing applications for office development outside of town centres, an impact assessment will be required if the development is over 2,500sq.m. For the purposes of the Core Strategy it is considered appropriate to apply this threshold to large scale office development.*

**Employment locations**

<p>Rockspring Hanover Property (via White Young Green Planning) (0420)</p>	<p>The introduction of B1c uses needs to be recognised as appropriate in existing employment areas especially as this does offer the opportunity to deliver modern high tech employment such as health and medicine - one of the 7 key employment sectors identified in the Leeds Growth Strategy, which the CS seeks to facilitate.</p>	<p>Policy EC2 does not offer policy guidance for B1c uses. Please refer to EC1 or EC3. SP8 already identifies its support to key employment sectors which include the health and medicine sectors.</p>	<p>No change</p>
<p>British Library (via Drivers Jonas Deloitte) (5034)</p>	<p>Object to wholesale prohibition of new office development or the renewal of existing consents for such uses in out of centre locations.</p> <p>There may be instances where new office development or the redevelopment of existing office facilities outside of the defined city, town, or smaller settlements could be appropriate. The reprovision of existing potentially out-dated office facilities with purpose built storage and supporting office buildings on the British Library Boston Spa campus in support of the overall operational</p>	<p>This issue is already addressed. criteria (v) to Policy EC2 would support limited development in an out of centre location for existing major businesses which the British Library is an example of.</p>	<p>No change</p>

	<p>requirements of the Library would be appropriate if the office elements are of a scale that would not act to undermine the Council's centres first approach.</p> <p><b>SUGGESTED CHANGES</b> Wording amendment to show that the Council would consider proposals for out of centre office development if deemed to be of a scale appropriate to their function and one which would not act to undermine the centres first approach.</p>		
Leeds Civic Trust (0062)	<p>The policy seems to be suggesting that out of town permissions renewals will be subject to a sequential test. If so, that is to be supported, but the policy is not clear.</p> <p><b>SUGGESTED CHANGE</b> Para iii) should be re-written to be as strong as para 5.2.38 of the justification re the sequential assessment for out-of-centre renewals and new development. A policy is required on</p>	<p>Agree to improve the wording of the policy and supporting text to confirm sequential tests would be required for renewals.</p>	<p><b>Proposed Modification - minor changes</b></p> <p>New wording is added to the existing paragraph:</p> <p>5.2.38 <del>As noted above, no new out of centre office locations will be identified for allocation. National planning guidance expects out of centre or edge of centre office proposals to be subject to a sequential test to determine whether preferable sites exist either in-centre (first preference) or edge of centre (second preference).</del> To complement this, and for the avoidance of doubt, <i>sequential assessment for out-of-centre renewals and new development will be required subject to floorspace threshold requirements as set out in paragraph 5.2.41.</i> <del>the centres first approach will apply to the creation of new out of centre office areas even where this involves the renewal of existing planning permissions.</del></p>

	workshops and start up units which should be encouraged in local centres.		
PPL (via Scott Wilson) (0414)	Policy EC2 makes no provision for local office developments [quotes policy 9 and 28 of the NPPF].	<p>- Unclear which paragraph 9 is being referred to. Paragraph 9 (page 3) relates to 'sustainable development' whereas bullet point 9 which is a core planning principle under paragraph 17 relates to 'mixed use development'.</p> <p>Either way the principles of 'sustainable development' and 'mixed used development' have already been addressed throughout the</p> <p>All issues have already been covered in Spatial Policy 8: Economic Development Priorities. There no need for duplication.</p>	No change
Cllr T Ledley (2956)	Some parts of Leeds been awarded CS protection of employment land without much supporting evidence or appeal history, is unsound. CS fails to protect employment land allocation in Morley (defined as the Morley North, Morley South and Ardsley and Robin Hood wards in Shepherd Homes'	Policy EC3 is revised to safeguard existing employment land where there is a planning need for sites to be retained across Leeds. NPPF paragraph 22 gives a strong message that employment land should not be retained unnecessary. However the rewording of policy EC3 makes clear that there will be a criteria based approach to try to retain employment uses where	No change

	appeal dismissed in 2006 against refusal of application 231702/03 for 200 houses off Britannia Road).	identified by an assessment of the supply and demand of sites across both the district and the surrounding area where necessary.	
<b>General comments</b>			
St James Securities Ventures (Leeds) Ltd (via Indigo Planning) (3010)	<p>The Leeds Employment Land Review (2010) identifies a potential shortfall of available employment land in some areas of the District.</p> <p>However, there is a healthy supply in Inner East Leeds.</p> <p>Where there is an oversupply there should be de-allocation of sites for alternative uses in accordance with the recently published NPPF (reference to paragraphs 14, 21). Our Client's site at Coal Road should be allocated for a range of commercial uses including retail, hospital, and business uses within the Site Allocations DPD.</p>	The suitability and the merits of individual sites to be allocated or de-allocated will be a matter for the Site Allocations Development Plan Document (DPD) taking into account national, regional and Core Strategy policies.	No change
Otley Town Partnership (via Directions Planning)	Object to the Policy because it does not make reference to supporting the expansion or replacement of existing office	SP8 is a strategic policy which sets out the context for job growth and economic development priorities over the plan period.	<p><b>Proposed Modification - minor changes</b></p> <p>New wording added to supporting text in paragraph 4.7.3:</p> <p>This includes opportunities within existing settlements (including town and</p>

<p>(5121)</p> <p>Mr &amp; Mrs Haigh (via Directions Planning) (5121)</p>	<p>development for the same reasons as stated in our comments relating to Policy EC1.</p>	<p>The supporting text in paragraphs 4.7.2 refers to 'supporting existing and future businesses' and paragraph 4.73 state 'future job growth - includes opportunities within existing settlements (including towns and local centres), supporting existing employment areas'.</p> <p>Accept the terms "expansion" and "replacement" do not appear in section viii. How new wording is to be added to the supporting text.</p>	<p>local centres), supporting <i>the expansion or replacement of</i> existing employment <i>premises and areas land</i>, promoting opportunities within Regeneration Priority Programme Areas (Spatial Policy 4) and potential locations associated with areas of longer term</p>
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Representor/Agent	Representor Comments	LCC Initial Response	Action
<b>Q: 31a EC3 – Safeguarding Existing Employment Land &amp; Industrial Area</b>			
<b>General support</b>			
British Library (via Drivers Jonas Deloitte)  (5034)	Support EC3, and in particular support restrictions on proposals for non employment uses in existing employment locations unless it can be proven that the loss will have no detrimental impact on local requirements. The Library wish to retain their presence within the District and to raise the profile of the Boston Spa.	Support welcomed	No change
Otley Town Partnership (via Directions Planning) (5121)  Mr & Mrs Haigh (via Directions Planning) (5121)	Welcome Policy EC3, as it recognises one of our key concerns which are that local employment opportunities are being eroded and lost forever as a result of the redevelopment of employment sites for housing.  An additional criterion is suggested to be added to the Policy which refers to the need to protect a range of employment sites for different types of business and also size of business. Such matters should be considered specifically as part of the assessments referred to under criteria (i) and (ii).	Policy EC3 is revised to safeguard existing employment land where there is a planning need for sites to be retained. The new wording will help to protect a range of employment sites for different types and sizes of businesses.	<b>Proposed Modification - minor changes</b>  New wording is added and some re-ordering of existing text has occurred in the policy. These changes have not resulted in changing the meaning of the policy but instead are considered to help improve the application of the policy. These changes are:  <del>The Employment Land Review identifies the following local sub areas – Inner North East, Inner North West, Inner West, Outer North West and Outer North East where there are currently shortfalls in employment land provision.</del>  <i>A) Proposals for a change from B Use Classes on sites which were last used or allocated for employment to other economic development uses including town centre</i>

			<p><i>uses or to non-employment uses will only be permitted where:</i></p> <p><del>Development of sites for non-employment uses, which were last used or allocated for employment will only be permitted where;</del></p> <p>(i) <i>Existing buildings and land are considered to be non-viable in terms of market attractiveness, business operations, age, condition and/or compatibility with adjacent uses and</i></p> <p>(ii) <i>The proposal would not result in the loss of a deliverable employment site necessary to meet the employment needs during the plan period ('employment needs' are as identified Spatial Policies 8 &amp; 9); or</i></p> <p>(iii) <del>(iii) In areas of shortfall</del> <i>The proposal will deliver a mixed use development which continues to provide for a good range of local employment opportunities and would not undermine the viability of the remaining employment site; and</i></p> <p><i>B) Where a proposal is located in an area of shortfall as identified in the most recent Employment Land Review, non-employment uses will only be permitted where:</i></p> <p><i>The loss of the employment provision on the site can be mitigated sufficiently by the availability of identified sites existing employment land and premises in the *surrounding area which are suitable to meeting the employment needs of the area</i></p>
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			<p>(*surrounding area will be defined by drive time and public transport accessibility in Policy T2); and</p> <p>And new wording added to the supporting text to Policy EC3:</p> <p><b><u>Safeguarding existing employment land and industrial areas</u></b></p> <p>5.2.42a The Council has a commitment to deliver an appropriate local balance between potentially competing uses of land, particularly housing and employment. The market alone will not necessarily deliver that balance, especially where land value for housing are substantially higher than those achievable for (B Class) employment uses.</p> <p><i>5.2.42b Policy EC3 applies to proposals on sites currently or last in use for employment purposes within the B Class Uses (B1a – offices, B1b - Research &amp; Development, B1c - Light industry, B2 - General Industrial; and B8 - Storage or Distribution). The issue to be determined is whether there is a planning need for the site to remain in employment uses. There is a shortage of employment sites in certain locations but potential oversupply in others. The conclusions relating to land supply in the Leeds Employment Land Review (2010 Update) and subsequent updates will be a key consideration when making assessments of proposals for the development of existing employment sites.</i></p>
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			<p>5.2.43a <del>During the Plan period it is very likely that non-employment uses (i.e. outside the B use classes) will be proposed on allocated employment sites or involving redevelopment of existing employment sites.</del> Leeds as with other major cities can be characterised as a place where both 'strong' and 'weak' markets coexist. Therefore as part of an integrated approach at local level, these market conditions will require an appropriate planning response (as set out in Policy EC3) to consider necessary interventions to manage them. <i>Policy EC3 sets the criteria for the release of land from employment allocations and the release of land or buildings at present or last in employment uses, whilst maintaining safeguards for the supply of employment land and premises where the need is clear.</i></p> <p>5.2.43b <i>This is a criteria based policy which applies to the consideration of planning applications. Part A, which includes bullet points (i) to (iii), relates to sites not identified in area of shortfall and therefore assessed on a District-wide basis. Whilst Part B (iv) refers to only sites located within areas of shortfall.</i></p> <p><u>Part A: For all sites across the District</u></p> <p><i>(i) Relates to points (ii) and (iii) where existing premises/site are considered non-viable in marketability terms. Non-viable may be defined as:</i></p>
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			<ul style="list-style-type: none"><li>• <i>property or land has remained empty or vacant for a period of time despite being marketed, or</i></li><li>• <i>the employment space no longer serves the needs of businesses, and may be incompatible with neighbouring uses through noise and amenity issues.</i></li></ul> <p>(ii) <i>Relates to any proposals on employment land, sites or premises which already have an employment allocation* or identified in the Employment Land Review in place for B Use Class employment type.</i></p> <p><i>(* Current land/premises allocated for employment uses will be safeguarded until their long term future is reviewed and determined through the LDF Allocation documents.)</i></p> <p><i>Employment needs are identified in Spatial Policy 8 which defines the key job sectors whilst Spatial Policy 9 sets out the amount of land needed to deliver these employment sectors over the plan period.</i></p> <p><i>Applies to land or premises previously or currently used for employment but which are not allocated.</i></p> <p>(iii) <i>The nature of the mixed use proposal should deliver the Core Strategy employment objectives</i></p>
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as identified in Spatial Policy 8 and 9.

Part B: Proposals in Shortfall Areas

*Part B refers to sites in shortfall areas. Applications will be assessed using an appropriate definition of “surrounding area” as agreed between the Council and the applicant with reference to Table 1 – Accessibility Standards and Indicators for Employment and Social Infrastructure Uses in Appendix 2.*

*The availability of sites and past take up in the surrounding area will be assessed to determine how much supply should be maintained to achieve the economic objectives of the Core Strategy..*

5.2.43c Local need is calculated for the total amount of land that will be required in an area based on projected population change. This calculation will identify surplus and deficit of any local provision.

5.2.44 Leeds Employment Land Review (Update 2010) identified a potential shortfall of available employment land in some areas of the district, particularly in the north and west of the city. Over the last decade there has also been a significant loss of existing employment sites to other types of development, particularly new housing encouraged by the focus on Brownfield development. Whilst redevelopment is often positive, consideration also has to be given

			<p>to the retention of local employment opportunities. Therefore, in areas where there is <i>an identified</i> shortfall in the provision of employment land there will be a presumption against loss of employment sites to other uses.</p> <p><del>5.2.45 The areas to be used for this purpose are the ten sub areas referred to as Area Committees covering all of the areas in Leeds: Inner North West; Outer North West; Inner West; Outer West; Inner North East; Outer North East; Inner East; Outer South Outer East and Inner South. Each sub area includes a number of settlements which are covered by the committees.</del></p> <p><i>5.2.45 The Leeds Employment Land Review (2010 Update) identifies the following local sub areas - Inner North East, Inner North West, Inner West, Outer North West and Outer North East where there are currently shortfalls in employment land provision.</i></p> <p><i>5.2.46 Many of these areas where deficiencies exist are in locations where land is not available and accessibility is also an important issue, particularly the needs of businesses to access transportation networks. Subsequent updates of the Leeds Employment Land Review will monitor and bring up to date any changes to these areas.</i></p>
Arcadia Group (via Montagu Evans)	Support the policy and decision to not include Inner East as an area with a	Comments have been noted	No change

LLP) (5723)	shortfall in employment land provision based on the evidence base of the Employment Land Review.		
<b>National Planning Policy Framework (NPPF) Compliancy issues</b>			
<p>Otley Town Partnership (via Directions Planning) (5121)</p> <p>Mr &amp; Mrs Haigh (via Directions Planning) (5121)</p> <p>Tesco Stores Ltd (via DPP) (5543)</p> <p>Yelcon Limited (via DPP) (5543)</p> <p>Trinity College (via Bidwells) (5547)</p>	<p>This policy needs to be reviewed and updated in light of the NPPF.</p> <p>Policy EC3 does not accord with para 22 of the NPPF as such is unsound.</p> <p>Recent appeal decisions suggest that the areas of shortfall identified do not in fact have a shortage of employment land and the Policy does not, in any event, take any account of market demand. In our view the Policy should not and cannot only apply to certain areas of the City. It should be made a more general policy which is more flexible and which allows the individual circumstances of sites to be assessed, having regard to market demand and supply and also to the suitability of the site in question for continued employment use, a factor which is not covered by the Policy at all.</p> <p>Also suggest that clarity be added to the Policy as to what is meant by employment uses. There therefore needs to be recognition within the Policy, or the accompanying text, as to what constitutes employment generating development as it is no longer correct or appropriate to restrict this to the traditional B Classes as suggested in the NPPF.</p>	<p>- Paragraph 22 of the National Planning Policy Framework advises to 'avoid long term protection of sites allocated for employment where there is no reasonable prospect of the site being used.'</p> <p>Spatial Policy 9 sets out the land requirements for offices, industries and warehouse which is needed to deliver the Core Strategy vision over its 15 years plan period. The assessment of potential employment sites and locations are based on their suitability, availability and deliverability which is the same criteria applied to each site assessed in the Leeds Employment Land Review (2010 Update). Subsequent updates of this study will continue to review the suitability of existing employment site and this approach is endorsed by national planning guidance.</p> <p>- Policy EC3 already allows for a degree of flexibility to release land for non-employment use whether the site is in area of</p>	No change

	<p>Our concern is that certain policies of the plan are so prescriptive that they will actually have the opposite effect and stifle investment.</p>	<p>shortfall or not. The policy would allow for the release land for other non-employment uses where there is no planning need for the site to remind in employment uses.</p> <p>- What is meant by employment uses?</p> <p>Policies SP8 (partially), SP9, EC1 – EC3 refers to the B class employment sectors which are B1a - offices, B1b - research &amp; development, B1c - light industry, B2 General Industrial; and B8 Storage or Distribution. The need for other employment development (main town centre uses) for example retail, health, education, culture, tourism, leisure are considered in detail elsewhere in the Core Strategy.</p> <p>An Employment Background Paper is being prepared to help aid further understanding of Leeds employment approach.</p>	
<p><b>General objections</b></p>			
<p>Morley TC (4825)</p>	<p>Sub section ii) b - mentions safeguarding of employment land in a few areas of Leeds. It does not mention such safeguarding in Morley.</p> <p>Reference is given to an appeal case – Shepherd Homes (23/702/03). The</p>	<p>Policy EC3 is revised to safeguard existing employment land where there is a planning need for sites to be retained across Leeds. NPPF paragraph 22 gives a strong message that employment land should not be</p>	

	<p>appeal relates to 200 houses proposed at Britannia Road, Morley which would result in housing being oartky located on land allocated for employment via the UDP.</p> <p>The Inspector's decision and reasoning were so clear that since then there have been no applications to build houses on UDP employment allocations in Morley. From para 214 of NPPF we may take it that Local Plans adopted since the Planning and Compulsory Purchase Act of 2004, including the Leeds UDP Review of 2006, remain in force for the time being.</p> <p>it would be unreasonable not to carry employment safeguarding in Morley forward into LDF CS unless and until the merits of individuals sites have been assessed any strategic policy which failed to incorporate such safeguarding would be unsound.</p>	<p>retained unnecessary. However the rewording of policy EC3 makes clear that there will be a criteria based approach to try to retain employment uses where identified by an assessment of the supply and demand of sites across both the district and the surrounding area where necessary.</p>	
<p>McGregor Brother Ltd (via Westwaddy ADP) (5884)</p>	<p>Policy EC3 is not clear in a number of respects.</p> <p>1. it is not clear whether the policy relates to all existing employment land or only where there are currently shortfalls in employment land provision.</p> <p>The supporting text in paragraphs 5.2.44 and 5.2.45 which only lists nine sub areas omitting Outer East.</p> <p>2. , the policy states under clause (i) that</p>	<p>Agree the wording of the policy and supporting text should be revised in order to improve the understanding of the policy approach.</p> <p>An Employment Background Paper is being prepared to help aid further understanding of Leeds employment approach.</p>	<p><b>Proposed Modification - minor changes</b></p> <p>New wording is added and some re-ordering of existing text has occurred in the policy. These changes have not resulted in changing the meaning of the policy but instead are considered to help improve the application of the policy. The changes are:</p> <p><del>The Employment Land Review identifies the following local sub areas – Inner North East, Inner North West, Inner West, Outer North West and Outer North East where</del></p>

	<p>'the proposal would not result in the loss of a deliverable employment site.' This presumably means a site allocated for employment use.</p> <p>Clause (i) also refers to ' "employment needs" as identified in spatial Policies 8 &amp; 9.' However, SP8 &amp; SP9 are worded in broad terms so it is not clear how these employment needs would be defined and applied in relation to an individual site.</p> <p>3. under clause (ii) that 'The loss of the employment provision on the site can be mitigated by the availability of identified sites in the *surrounding area which are suitable to meeting the needs of employment (*surrounding area will be defined by drive time and public transport accessibility in Policy T2).'</p> <p>There are a number of uncertainties in this clause, including:</p> <ul style="list-style-type: none"> <li>- what are 'identified sites?'</li> <li>- what constitutes the 'surrounding area'</li> </ul> <p>Policy T2 does not refer to 'surrounding areas,' nor does it define 'drive time and public transport accessibility. Appendix 2 relates to proposals for new employment - it does not provide any indication as to how conversion of employment land to other uses will be judged acceptable 'by the availability of identified sites in the surrounding area which are suitable to meeting the needs of employment.'</p>		<p><del>there are currently shortfalls in employment land provision.</del></p> <p><i>A) Proposals for a change from B Use Classes on sites which were last used or allocated for employment to other economic development uses including town centre uses or to non-employment uses will only be permitted where:</i></p> <p><del>Development of sites for non-employment uses, which were last used or allocated for employment will only be permitted where;</del></p> <p>(i) <i>Existing buildings and land are considered to be non-viable in terms of market attractiveness, business operations, age, condition and/or compatibility with adjacent uses and</i></p> <p>(iv) The proposal would not result in the loss of a deliverable employment site necessary to meet the employment needs during the plan period ('employment needs' are as identified Spatial Policies 8 &amp; 9); or</p> <p>(v) <del>(iii) In areas of shortfall</del> The proposal will deliver a mixed use development which continues to provide for a good range of local employment opportunities and would not undermine the viability of the remaining employment site; and</p> <p><i>B) Where a proposal is located in an area of shortfall as identified in the most recent Employment Land Review, non-employment uses will only be permitted</i></p>
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	<p>This policy has the potential to conflict with Spatial Policy 6, which states that for new housing development there will be a preference for brownfield land, which in most cases will be land that has formerly been in employment use.</p>		<p><i>where:</i></p> <p>The loss of the employment provision on the site can be mitigated <i>sufficiently</i> by the availability of <del>identified sites</del> <i>existing employment land and premises</i> in the <i>*surrounding area</i> which are suitable to meeting the employment needs of <i>the area</i> (<del>*surrounding area will be defined by drive time and public transport accessibility in Policy T2</del>); and</p> <p>And new wording added to the supporting text to Policy EC3:</p> <p><b><u>Safeguarding existing employment land and industrial areas</u></b></p> <p>5.2.42a The Council has a commitment to deliver an appropriate local balance between potentially competing uses of land, particularly housing and employment. The market alone will not necessarily deliver that balance, especially where land value for housing are substantially higher than those achievable for (B Class) employment uses.</p> <p>5.2.42b <i>Policy EC3 applies to proposals on sites currently or last in use for employment purposes within the B Class Uses (B1a – offices, B1b - Research &amp; Development, B1c - Light industry, B2 - General Industrial; and B8 - Storage or Distribution). The issue to be determined is whether there is a planning need for the site to remain in employment uses. There is</i></p>
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		<p><i>a shortage of employment sites in certain locations but potential oversupply in others. The conclusions relating to land supply in the Leeds Employment Land Review (2010 Update) and subsequent updates will be a key consideration when making assessments of proposals for the development of existing employment sites.</i></p> <p><i>5.2.43a During the Plan period it is very likely that non-employment uses (i.e. outside the B use classes) will be proposed on allocated employment sites or involving redevelopment of existing employment sites. Leeds as with other major cities can be characterised as a place where both 'strong' and 'weak' markets coexist. Therefore as part of an integrated approach at local level, these market conditions will require an appropriate planning response (as set out in Policy EC3) to consider necessary interventions to manage them. Policy EC3 sets the criteria for the release of land from employment allocations and the release of land or buildings at present or last in employment uses, whilst maintaining safeguards for the supply of employment land and premises where the need is clear.</i></p> <p><i>5.2.43b This is a criteria based policy which applies to the consideration of planning applications. Part A, which includes bullet points (i) to (iii), relates to sites not identified in area of shortfall and therefore assessed on a District-wide basis. Whilst Part B (iv) refers to only sites located</i></p>
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			<p><i>within areas of shortfall.</i></p> <p><b><u>Part A: For all sites across the District</u></b></p> <p><i>(i) Relates to points (ii) and (iii) where existing premises/site are considered non-viable in marketability terms. Non-viable may be defined as:</i></p> <ul style="list-style-type: none"><li><i>a) property or land has remained empty or vacant for a period of time despite being marketed, or</i></li><li><i>b) the employment space no longer serves the needs of businesses, and may be incompatible with neighbouring uses through noise and amenity issues.</i></li></ul> <p><i>(ii) Relates to any proposals on employment land, sites or premises which already have an employment allocation* or identified in the Employment Land Review in place for B Use Class employment type.</i></p> <p><i>(* Current land/premises allocated for employment uses will be safeguarded until their long term future is reviewed and determined through the LDF Allocation documents.)</i></p> <p><i>Employment needs are identified in Spatial Policy 8 which defines the key job sectors whilst Spatial Policy 9 sets out the amount of land needed to deliver these employment sectors over the plan period.</i></p>
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			<p><i>Applies to land or premises previously or currently used for employment but which are not allocated.</i></p> <p><i>(iii) The nature of the mixed use proposal should deliver the Core Strategy employment objectives as identified in Spatial Policy 8 and 9.</i></p> <p><b><u>Part B: Proposals in Shortfall Areas</u></b></p> <p><i>Part B refers to sites in shortfall areas. Applications will be assessed using an appropriate definition of “surrounding area” as agreed between the Council and the applicant with reference to Table 1 – Accessibility Standards and Indicators for Employment and Social Infrastructure Uses in Appendix 2.</i></p> <p><i>The availability of sites and past take up in the surrounding area will be assessed to determine how much supply should be maintained to achieve the economic objectives of the Core Strategy plan.</i></p> <p>5.2.43c Local need is calculated for the total amount of land that will be required in an area based on projected population change. This calculation will identify surplus and deficit of any local provision.</p> <p>5.2.44 Leeds Employment Land Review (Update 2010) identified a potential <i>deficiency</i> of available employment land in</p>
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			<p>some areas of the district, particularly in the north and west of the city. Over the last decade there has also been a significant loss of existing employment sites to other types of development, particularly new housing encouraged by the focus on Brownfield development. Whilst redevelopment is often positive, consideration also has to be given to the retention of local employment opportunities. Therefore, in areas where there is an <i>identified</i> shortfall in the provision of employment land there will be a presumption against loss of employment sites to other uses.</p> <p><del>5.2.45 The areas to be used for this purpose are the ten sub areas referred to as Area Committees covering all of the areas in Leeds: Inner North West; Outer North West; Inner West; Outer West; Inner North East; Outer North East; Inner East; Outer South Outer East and Inner South. Each sub area includes a number of settlements which are covered by the committees.</del></p> <p><i>5.2.45 The Leeds Employment Land Review (2010 Update) identifies the following local sub areas - Inner North East, Inner North West, Inner West, Outer North West and Outer North East where there are currently shortfalls in employment land provision.</i></p> <p><i>5.2.46 Many of these areas where deficiencies exist are in locations where</i></p>
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			<i>land is not available and accessibility is also an important issue, particularly the needs of businesses to access transportation networks. Subsequent updates of the Leeds Employment Land Review will monitor and bring up to date any changes to these areas.</i>
Telereal Trillium (0345)	<p>Notwithstanding the need to safeguard some employment land, Policy EC3 or its supporting text should recognise the need for a degree of flexibility in certain circumstances in development of sites for non-employment uses, whether in recognised shortfall areas or not.</p> <p>The agent makes reference to a specific site which has already been put forward as part of the SHLAA process. The site is Government buildings, Otley Road. The site is not allocated for employment use.</p>	<p>Policy EC3 already allows for a degree of flexibility to release land for non-employment use whether the site is in area of shortfall or not.</p> <p>The suitability of sites to accommodate new employment development for specific employment sectors will be matter for the Site Allocations documents, which will take into account national, regional and Core Strategy policies.</p>	No change
Meadowside Holdings Ltd, The Braham Park Estate, The Diocese of Ripon & Leeds, The Ledston Estate, AR Briggs & Co, The Hatfield Estate Lady Elizabeth Hastings Estate Charity(via Carter Jonas) (5681)	<p>The Core Strategy should not include targets for brownfield land. Symptomatic of this is the statement at Para 5.2.44 which has resulted in the “significant loss of existing employment sites to other types of development”. It is appropriate for the Core Strategy to safeguard existing employment sites and to support the release of greenfield locations for the provision of housing.</p>	<p>The National Planning Policy Framework permits brownfield targets. While Policy EC3 of the Core Strategy allows for the release land for other non-employment uses where there is no planning need for the site to remind in employment uses.</p> <p>In addition, the aim of Spatial Policy 7: Distribution of Housing Land and Allocations and Spatial Policy 10: Greenbelt will seek to identify sites for housing.</p>	No change

Non- duly made comments			
<p>Otley and Yeadon Liberal Democrats</p>	<p>The strategy does not do enough to promote local working and would prefer to see more positive policies with regard to this including land allocation for local jobs.</p>	<p>The focus of policy SP8 is to set out the overall economic strategy, integral to the Core Strategy approach is the promotion of the settlement hierarchy as the principle location for investment and housing growth. Within this context the Core Strategy and Site Allocation documents will provide a framework to support employment opportunities and job growth in settlements like Otley. The preparation of Neighbourhood Plan for Otley as one of the four pilots may provide further opportunities to identify employment sites and opportunities for local job growth.</p>	<p>No change</p>

## Appendix 2. Proposed changes to Core Strategy.

### 4.7 Economic Development Priorities

4.7.1 The aim in Leeds is to secure long term economic growth and stimulate jobs that are associated with a successful economy. In doing so, it seeks to spread the benefits of that growth to all residents across the whole of the district.

#### **Provision and safeguarding supply of land and buildings for offices, industrial and warehousing sectors**

4.7.2 The Core Strategy supports existing business and future business activity and employment growth in identifying how much land will be needed to provide new employment in the period up to 2028 in the office, warehousing and industrial sectors (the traditional 'B' use classes).

4.7.3 To ensure the potential for future job growth, the Leeds Employment Land Review (2010 Update) has identified a requirement for 706,250 sq. m of office space and 493 hectares of industrial and warehousing land to be provided to 2028. The portfolio of sites and premises to accommodate the forecasted job growth and development will be identified through LDF Allocation documents and the Proposals Map. The approach of the Core Strategy is to support economic growth and development in key locations (including the City Centre and the Aire Valley – Urban Eco Settlement), as well as supporting a broad portfolio of opportunities. This includes opportunities within existing settlements (including town and local centres), supporting *the expansion or replacement of existing employment premises and areas land*, promoting opportunities within Regeneration Priority Programme Areas (Spatial Policy 4) and potential locations associated with areas of longer term housing growth.

#### **Promoting a strong local economy**

4.7.4 The Core Strategy prioritises a number of employment sectors identified in the Leeds Growth Strategy and Employment Land Review. The Leeds Growth Strategy focuses on seven employment sectors which are,

- § Health and Medical;
- § Financial and Business Services;
- § Low Carbon Manufacturing;
- § Retail
- § Digital and Creative Industries;
- § Housing and Construction; and
- § Social Enterprise and the voluntary sector

4.7.5a Whilst the above represent the prioritised employment sectors, the Yorkshire Futures Regional Econometric Model (REM) (which provides employment forecasting data for the Leeds Employment Land Review) predicts that between the period of 2010 to 2028, the five fastest growing sectors of the economy in Leeds (in terms of Full Time Equivalent employment) are likely to be,

- § Business Services,
- § Retailing,
- § Banking and Insurance,
- § Construction and

## § Hotel and Catering

4.7.5b *Leisure and tourism are both employment sectors which are of significant importance to the regional economy. The Leeds City Region Employment and Skills strategy research for VisitBritain forecasts that tourism will be one of the UK's best performing sectors over the coming decade (2010 – 2020). It is also predicted that the hospitality industry is likely to follow the same growth pattern. The hospitality industry employs the highest percentage of young people (16-24 year olds).*

4.7.6 The employment sectors are considered to be the key local economic drivers needed to support the retention of existing businesses and drive future economic prosperity. It is the role of the Core Strategy to formulate the policies and allocate land for office use and for general industrial use (B1b, B1c, B2, B8) which will result in accommodating these employment sectors. The sectors that are prioritised in the Leeds Growth Strategy will also be accommodated through these allocations.

### **Job retention and creation reducing barriers to employment opportunities**

4.7.7 There is a strong correlation between unemployment/economic inactivity and skills levels. Leeds is the main employment centre in the City Region, accounting for just under a third of all jobs. However the Leeds City Region Initial Labour Market Evidence Base (published in 2010) states the region suffers from the dual challenge of low workforce skills levels and significant concentrations of worklessness. Although the recession has significantly reduced the demand for jobs in the short term, in order to be prepared for the medium to long demand for skilled labour there are potential challenges at both ends of the age spectrum. Demand side analysis suggests future growth in the City Region will occur in occupations and sectors which will require higher levels of skills. Many of the jobs lost in the recession have been in lower skilled occupations which are not expected to return. Potentially the flow of entrants into the workforce may not have the skills required to compete in a labour market where the job market will demand higher skills levels.

4.7.8 *The city's education institutions already play an important role in providing employability skills and training. Additionally they work hard to foster innovation and research outputs which contribute significantly to the local and regional economy. Graduates should be encouraged to remain in the city and use their skills and knowledge to help contribute to Leeds growing economy. Partnership working through local business mentoring and knowledge transfer should help to stimulate business innovation and creativity both locally and globally.* It is therefore essential that training and skills development, sites and premises, transport infrastructure, enterprise and innovation are promoted and linked as part of the overall spatial planning framework.

### **Economic development opportunities & Major Sporting venues**

4.7.9 Leeds has a number of high profile sports venues that attract major events. In principle, the Council supports improvement at its major sporting venues, such as Headingley Carnegie Stadium and Elland Road. It also recognises that such developments may not always be financially viable and may therefore require some form of enabling development to retain valuable sporting resources and realise the wider economic and social benefits for the City. The Council is in principle willing to consider such enabling development providing that it is demonstrated to be necessary and that the scale of enabling development is no more than is required to bridge any funding gap. Any proposals for enabling development will need to be

clearly tied to the associated development by legal agreement. Similar considerations may apply to the City's major leisure and cultural attractions such as the Arena, City Museum and Royal Armouries.

### **Improve accessibility to employment opportunities**

4.7.10 Leeds along with Bradford and York has more people travelling in to the City Region to work rather than out. Commuting flows into Leeds are particularly significant, with over 100,000 people travelling work in the city. Although Leeds acts as a focal point within the City Region, there are individuals who face significant barriers to participating in the labour market and are much less likely to commute to access employment. It is the aim of the Core Strategy to improve transport links and ensure that a sufficient supply of appropriate range and mix of employment land and premises are available across a broad range of job sectors.

### **Rural economy**

4.7.11a Overall a balance needs to be struck between providing local employment opportunities, promoting sustainable patterns of development and protecting the character of the countryside and Green Belt designations. The District's Major Settlements have a vital role in serving surrounding rural areas and in providing local job opportunities. In preparing the LDF Allocations documents, sufficient land needs to be made available for economic development purposes (for example rural social enterprises) in these locations taking into account the needs of the wider rural catchment area.

4.7.11b *Outside the major settlements, small businesses and local services are a vital part of the economy and the life of the community. In order to grow and diversify the rural economy the following proposals should be supported, where appropriate;*

- *conversion of existing buildings*
- *promote the development and diversification of agricultural and other land-base rural businesses*
- *support provision & expansion of tourist and cultural facilities in appropriate locations*
- *retention and development of local services and community facilities.*

### **Supporting training / skills and job creation initiatives**

4.7.12 In order to ensure residents are able to access local job opportunities, employers and developers will be required through planning obligations to enter into local labour and training agreements, appropriate to the individual development.

### **Supporting most new employment development within urban and rural areas**

4.7.13 New employment locations are identified to relate to the Settlement Hierarchy and will provide a link between housing and jobs. The identified locations (as shown in the Key Diagram) have been selected to take advantage of the District's strategic infrastructure which includes the highway and rail network, the Airport, flood defence and major utilities. The Infrastructure Delivery Plan will provide a co-ordinated framework for longer term investment and delivery.

4.7.14 East Leeds, the Leeds Bradford Corridor and South Leeds along with the City Centre and Aire Valley Leeds provide a number of other locations which will offer opportunity for the new job opportunity creations. *Aire Valley Leeds, the district's*

*Enterprise Zone is an area covering 142 hectares. As detailed in Spatial Policy 5 the designation of the Zone should help attract long term investment to this area and benefits will be felt across the whole of the district.* Depending on the type of development, some locations are better suited than others. The Core Strategy will seek to ensure that a variety of suitable locations are available to ensure future job growth.

*4.7.13 Securing high quality communication infrastructure in particular initiatives to deliver super speed broadband technologies is critical to securing long term economic prosperity and improves business links both locally and internationally.*

*4.7.14 Leeds and the region play an integral role in assisting emerging new businesses (business start up, investment in new projects) and encourage young entrepreneurship. These will be supported by the retention and provision of new small start up units including workshops in appropriate locations.*

## **SPATIAL POLICY 8: ECONOMIC DEVELOPMENT PRIORITIES**

A competitive local economy will be supported through:

- (i) The provision and safeguarding of a sufficient supply of land and buildings, as part of a wide portfolio of sites to match employment needs and opportunities for B class uses.
- (ii) Promoting the development of a strong local economy through enterprise and innovation, in facilitating existing strengths in financial and business services and manufacturing and to continue to grow opportunities in health and medical, low carbon manufacturing, digital and creative, retail, housing and construction, social enterprise, **leisure and tourism** and the voluntary sector.
- (iii) Job retention and creation, promoting the need for a skilled workforce, educational attainment and reducing barriers to employment opportunities.
- (iv) Seeking to improve accessibility to employment opportunities by public transport, walking and cycling across the district and especially in relation to job opportunities in the City Centre and Aire Valley Leeds (Urban Eco Settlement and Enterprise Zone).
- (v) Supporting the rural economy, consistent with the Settlement Hierarchy and the protection and enhancement of a high quality rural environment.
- (vi) Supporting training / skills and job creation initiatives via planning agreements linked to the implementation of appropriate developments given planning permission.
- (vii) Developing the city centre and the town/local centres as the core location for new retail, ~~and~~ office employment **and other main town centre uses**.
- (viii) Supporting development in existing locations/sites for general industrial and warehouse, particularly in locations which take full advantage of existing services, high levels of accessibility and infrastructure (including locations and sites accessible by rail and/or waterway).
- (ix) Support the advancement of high quality communications infrastructure to foster sustainable economic growth and to enhance business links.*
- (x) Support the retention and provision of new business start-up units including small workshops, where appropriate.*

### **REVISED WORDING TO POLICY EC1**

#### **b) Supporting Employment Opportunities**

5.2.31 The Leeds Employment Land Review (2010 Update) identifies that there are 85 sites in the existing portfolio for general employment use, amounting to 400 hectares. Almost 50% of this land area is comprised of UDP allocated employment land. The LDF Allocations documents will seek to identify the additional 143 hectares of land for general employment uses.

For clarity, *general employment land relates to all the B Class employment sectors except for offices. EC1 refers to research and development (B1b class), light industry (B1c), general industry (B2) and storage or distribution (B8).*

5.2.32 The assessment of potential employment sites and locations will be based on their suitability, availability and deliverability, which is the same criteria applied to each site assessed in the Leeds Employment Land Review. Suitability refers to the physical conditions of the site for example the topography and general sustainable development factors for example access to public transport or freight provision. Availability considers whether planning permission is in place for employment or alternative uses and whether the site has been actively marketed in the past for employment uses. Deliverability refers to the likely associated costs of developing the sites in order to be able to bring the site/location forward during the plan period. This approach reflects the suggested criteria in the Office of Deputy Prime Minister guidance on Employment Land Reviews published (2004).

5.2.33 An oversupply position will have been reached if more land is allocated and/or has planning permission in the district than is needed to meet the outstanding requirement until the end of the Plan period and this also represents more than ten years worth of supply. ~~Consideration needs to be given to the availability of employment land and premises in local areas of the district.~~ In the event of an oversupply, consideration should be given as to whether the excess land is more appropriately used for other forms of development, with first priority given to other forms of economic development ~~which accord with~~ *other than those set out* in part A & B of the Policy. *Along with the total amount of employment land, consideration also needs to be given to the availability of employment land and premises in local areas of the district.*

## **POLICY EC1: GENERAL EMPLOYMENT LAND**

- (A) General employment land will be identified, in the first instance, to meet the identified need for land to accommodate research and development, industry, warehousing and waste uses over the plan period (as identified in Spatial Policy 9) including a margin of choice for the market by:
- i) Carrying forward existing allocations and other commitments that have been assessed to be suitable, available and deliverable for general employment use or,
  - ii) Identifying new allocations of general employment land to address deficiencies in the existing supply over the district and within local areas in the following locations, subject to the suitability, availability and deliverability of that land:
    - In accessible locations within the Main Urban Area, Major Settlements and Smaller Settlements; including sites with good access to the motorway, rail and waterways networks;
    - Within regeneration areas identified in Spatial Policy 4.
    - Within established industrial areas;
    - Within urban extensions linked to new housing proposals to help deliver sustainable mixed use communities.
  - iii) Phasing the release of the land consistent with the overall strategy for major regeneration and housing growth.
  - iv) Identifying freight storage / distribution opportunities as part of the overall employment land requirement set out in Spatial Policy 9. The site search will be focused in the following locations:
    - Along rail corridors, particularly in the Aire Valley
    - Along the Aire and Calder Navigation
- (B) Other uses (*i.e.* sui generis) with similar locational requirements to the employment uses set out under (A) which are generally less well suited to locating in centres, residential areas or other environmentally sensitive areas are acceptable on general employment sites.
- (C) In the event of an oversupply position being reached during the plan period, general employment land allocations will be acceptable for uses other than those set out in parts (A) and (B) of this policy providing the proposal accords with overall strategy and other plan policies.

## **REVISED WORDING TO POLICY EC2**

### **Office Development**

#### **Office-based land requirement**

5.2.34 *Paragraph 4.7.18* to Spatial Policy 9 identifies *that a minimum of 706,250sq.m* of office floorspace will be provided over the Plan period. This provision will comprise of new and existing locations. *The Leeds Employment Land Review (2010 Update) identified current commitments on sites which amount appropriately to 840,000sqm.* However over a third of the existing supply is located outside the City Centre, *resulting in further floorspace being needed to help prioritise the locating of offices in centres. These permissions* this includes the remaining land at partially developed sites, such as the business park at Thorpe Park and office development at Leeds Valley Park.

5.2.35 It is anticipated that current commitments, in the form of planning permissions, will be used to help meet the overall requirements identified above. ~~Current commitments on sites which the Leeds Employment Land Review (2010 Update) identified as appropriate to be retained amount to approximately 840,000 sq.m.~~ In order to provide flexibility when determining renewals of existing out of centre office applications, 160,000 sq.m of floorspace will be identified in or on the edge of the City and town centres. This will therefore bring the total office floorspace required up to 1,000,000 sq.m

5.2.36 *The breakdown of the existing supply of commitments (840,000 sq.m) includes* for out of centre sites amount to 322,470 sq.m, with a further 19,290 sq.m is located in or on the edge of town centres and 498,736sq.m is located in the City Centre. *Spatial Policy 9 states that an additional* ~~Therefore the remainder of the 160,000 sqm will be identified will be located in, or on the edge of City and Town centres.~~ *Policy CC1: City Centre Development proposes to accommodate at least 655,000sq.m of office-based development, equating to 98% of the total provision with a further 3,710sq.m to be identified in or on the edge of town centres (2%).* The proposed total of offices in or on the edge of town centres reflects the current percentage of commitments, scaled up to the new requirements. ~~(for example 2.3% of the current total commitments are in or on edge of town centre and this rate will be carried forward).~~

**The proposed distribution of office allocations will be:**

Location	Gross Total Floorspace		Net total Floorspace*
	Existing planning permissions	Proposed new locations	
Out of Centre	322,470sq.m	-	322,000sq.m
In or On Edge of Town Centres	19,290sq.m	3,710sq.m	23,000sq m
City Centre	498,736sq.m	156,264sq.m	655,000sq m
<b>Total proposed allocations</b>	<b>approx. 840,000sq.m</b>	<b>approx. 160,000sq.m</b>	<b>approx. 1,000,000sq.m</b>

\*All figures are rounded to the nearest 1,000sq.m

## **Location of development**

5.2.37 To encourage further office development to locate in centres, and in the context of the extensive availability of out of centre sites; *Spatial Policy 2 already advises that new proposals for offices will generally be encouraged to locate in or on the edge of the city and town centres. However* the Council does recognise that in a district as large and varied as Leeds, and noting the changing emphasis of national guidance, many employment areas exist out of centre. Such locations play a valuable role in the Leeds economy in offering a choice of location for business and in providing local job opportunities. *Indeed* they can often be as accessible to a substantial local labour market as many of the smaller town centres. They can represent highly sustainable options particularly when located in the main urban area.

5.2.38 As noted above, no new out of centre office locations will be identified for allocation. *National planning guidance expects out of centre or edge of centre office proposals to be subject to a sequential test to determine whether preferable sites exist either in-centre (first preference) or edge of centre (second preference). To complement this, and for the avoidance of doubt, sequential assessment for out-of-centre renewals and new development will be required subject to floorspace threshold requirements as set out in paragraph 5.2.41.* the centres first approach will apply to the creation of new out of centre office areas even where this involves the renewal of existing planning permissions.

5.2.39 City Centre sites should be considered in sequential assessments for *All sequential assessments for large scale proposals will be directed in the first instance to the City Centre.* throughout the District, as Such development would be expected to attract employees commuting from a wide catchment area, and below this scale of development a smaller catchment area may be identified based on likely travel to work patterns. All centres within the identified catchment should be tested including the City Centre, if appropriate.

5.2.40 Offices can considerably enhance the vitality and viability of centres as well as provide an important source of local employment. Office development in town centres tend to be smaller in scale and located in mixed use buildings, for example above shop units. The capacity of each centre to accommodate new office floorspace will vary considerably depending on factors such as market preference, transport links and availability of land and premises.

5.2.41 The Policy below will be applied in accordance with the definitions for 'small', 'medium' and 'large' scale office development set out in the table below.

<b>Scale</b>	<b>Office Floorspace (Gross Internal)</b>	<b>Approx no. of employees</b>	<b>Commentary</b>
<b>Small</b>	Under 1,500 sq m	Less than 75	No significant travel impact
<b>Medium</b>	1,501 – 5,000 sq m	75-250	Gives rise to a 'significant travel impact'
<b>Large</b>	Over 5,000 sq m	More than 250	Regionally significant development

Proposals for office development must accord with the following sequential and impact assessment requirements where appropriate,

<b>Scale</b>	<b>Office Floorspace (Gross Internal)</b>	<b>Sequential Assessment</b>	<b>Impact Assessment</b>	<b>Other Requirements</b>
<b>Small</b>	Under 250 sq m located within rural areas or villages	No	No	Accessibility standards*
<b>Small</b>	Under 250 sq m located within urban areas	Yes	No	n/a
<b>Medium</b>	251 – 2,499 sq m	Yes	No	n/a
<b>Large</b>	Over 2,500 sq m	Yes	Yes	n/a

\* Table 1 in Appendix 2 of the Core Strategy sets out the accessibility standards and indicators for employment uses.

Locations which are subject to a sequential assessment are identified on Map xxx:

5.2.42 It is considered appropriate for small scale offices and office extensions to be supported in regeneration areas and in accessible rural locations away from town and local centres, without the need for a sequential test. The threshold size of small scale is defined as 250sq.m. Therefore in regeneration areas and in those areas not served by a centre in rural areas or villages (as shown on Map 4) small scale office development (up to 250sq.m) will be permitted without the need to undertake a sequential test. Locations outside of the Settlement Hierarchy will need to demonstrate compliance to accessibility standards as outlined in Table 1, Appendix 2 of the Core Strategy. All office development larger than 250sq.m will need to undertake a sequential assessment.

5.2.43 (Formerly part of 5.2.37) Within this context, limited additional office development may be acceptable in out of centre locations where they are demonstrably sustainable, where proposals are of an appropriate scale to existing development and will not compromise the centres first approach.

5.2.44 National planning guidance advises when assessing applications for office development outside of town centres, an impact assessment will be required if the development is over 2,500sq.m. For the purposes of the Core Strategy it is considered appropriate to apply this threshold to large scale office development.

## POLICY EC2: OFFICE DEVELOPMENT

Appropriate locations for allocations and windfall office development;

- (i) ~~Town Centres and edge of town centres are promoted as locations for office development. A target of 655,000sqm for the city centre and 23,000 sqm (equivalent to 2.3% of identified need over the plan period) of new office floorspace is set for locations in or on the edge of town centres to guide allocation documents.~~
- (ii) ~~The City Centre will be~~ The focus for most office development will be within and/or edge of the City Centre, *and designated* town and local centres. ~~Locations on the edge of the City Centre will also be appropriate for offices as part of mixed use development.~~

Due to the availability of development opportunities in centre and edge of centre, out of centre proposals would normally be resisted ~~however there are~~ *with the* exceptions ~~of which are:~~

- (iii) Existing commitments for office development will be carried forward to meet the identified floorspace requirement over the plan period, unless it would be more sustainable for the land to be re-allocated to meet identified needs for other uses.
- (iv) To provide flexibility for businesses, smaller scale office development ( up to 1,500 250 sqm) will be acceptable in out of centre locations in the following locations not be subject to sequential ~~and impact~~ assessments in the following locations;:
- i. Regeneration areas identified under Spatial Policy 4
  - ii. ~~Other accessible locations (defined in Policy T2) within the Main Urban Area, Major Settlements and Smaller Settlements.~~
    - ii *Settlements within the Hierarchy which do not have a designated centres as outlined in Map 4.*
    - iii *Villages or rural areas that are not included in the Settlements Hierarchy, which will also be subject to the accessibility standards as defined by Table 1 in Appendix 2.*

*Map xxx: shows which locations are subject to a sequential assessment*

- (v) In existing major employment areas, which are already a focus for offices, some small scale office floorspace may be acceptable where this does not compromise the centres first approach.

## **REVISED WORDING TO POLICY EC3**

### **Safeguarding existing employment land and industrial areas**

5.2.42a The Council has a commitment to deliver an appropriate local balance between potentially competing uses of land, particularly housing and employment. The market alone will not necessarily deliver that balance, especially where land value for housing are substantially higher than those achievable for (B Class) employment uses.

5.2.42b *Policy EC3 applies to proposals on sites currently or last in use for employment purposes within the B Class Uses (B1a – offices, B1b - Research & Development, B1c - Light industry, B2 - General Industrial; and B8 - Storage or Distribution). The issue to be determined is whether there is a planning need for the site to remain in employment uses. There is a shortage of employment sites in certain locations but potential oversupply in others. The conclusions relating to land supply in the Leeds Employment Land Review (2010 Update) and subsequent updates will be a key consideration when making assessments of proposals for the development of existing employment sites.*

5.2.43a ~~During the Plan period it is very likely that non-employment uses (i.e. outside the B use classes) will be proposed on allocated employment sites or involving redevelopment of existing employment sites.~~ Leeds as with other major cities can be characterised as a place where both 'strong' and 'weak' markets coexist. Therefore as part of an integrated approach at local level, these market conditions will require an appropriate planning response (as set out in Policy EC3) to consider necessary interventions to manage them. *Policy EC3 sets the criteria for the release of land from employment allocations and the release of land or buildings at present or last in employment uses, whilst maintaining safeguards for the supply of employment land and premises where the need is clear.*

5.2.43b *This is a criteria based policy which applies to the consideration of planning applications. Part A, which includes bullet points (i) to (iii), relates to sites not identified in area of shortfall and therefore assessed on a District-wide basis. Whilst Part B (iv) refers to only sites located within areas of shortfall.*

#### **Part A: For all sites across the District**

(i) *Relates to points (ii) and (iii) where existing premises/site are considered non-viable in marketability terms. Non-viable may be defined as:*

- *property or land has remained empty or vacant for a period of time despite being marketed, or*
- *the employment space no longer serves the needs of businesses, and may be incompatible with neighbouring uses through noise and amenity issues.*

(ii) *Relates to any proposals on employment land, sites or premises which already have an employment allocation\* or identified in the Employment Land Review in place for B Use Class employment type.*

*(\* Current land/premises allocated for employment uses will be safeguarded until their long term future is reviewed and determined through the LDF Allocation documents.)*

*Employment needs are identified in Spatial Policy 8 which defines the key job sectors whilst Spatial Policy 9 sets out the amount of land needed to deliver these employment sectors over the plan period.*

*Applies to land or premises previously or currently used for employment but which are not allocated.*

(iii) *The nature of the mixed use proposal should deliver the Core Strategy employment objectives as identified in Spatial Policy 8 and 9.*

### Part B: Proposals in Shortfall Areas

*Part B refers to sites in shortfall areas. Applications will be assessed using an appropriate definition of “surrounding area” as agreed between the Council and the applicant with reference to Table 1 – Accessibility Standards and Indicators for Employment and Social Infrastructure Uses in Appendix 2.*

*The availability of sites and past take up in the surrounding area will be assessed to determine how much supply should be maintained to achieve the economic objectives of the Core Strategy.*

5.2.43c Local need is calculated for the total amount of land that will be required in an area based on projected population change. This calculation will identify surplus and deficit of any local provision.

5.2.44 Leeds Employment Land Review (Update 2010) identified a potential shortfall of available employment land in some areas of the district, particularly in the north and west of the city. Over the last decade there has also been a significant loss of existing employment sites to other types of development, particularly new housing encouraged by the focus on Brownfield development. Whilst redevelopment is often positive, consideration also has to be given to the retention of local employment opportunities. Therefore, in areas where there is **an identified** shortfall in the provision of employment land there will be a presumption against loss of employment sites to other uses.

~~5.2.45 The areas to be used for this purpose are the ten sub-areas referred to as Area Committees covering all of the areas in Leeds: Inner North West; Outer North West; Inner West; Outer West; Inner North East; Outer North East; Inner East; Outer South **Outer East** and Inner South. Each sub-area includes a number of settlements which are covered by the committees.~~

5.2.45 The Leeds Employment Land Review (2010 Update) identifies the following local sub areas - Inner North East, Inner North West, Inner West, Outer North West and Outer North East where there are currently shortfalls in employment land provision.

5.2.46 Many of these areas where deficiencies exist are in locations where land is not available and accessibility is also an important issue, particularly the needs of businesses to access transportation networks. Subsequent updates of the Leeds Employment Land Review will monitor and bring up to date any changes to these areas.

Insert

Map 12 City of Leeds Management Areas

### **POLICY EC3: SAFEGUARDING EXISTING EMPLOYMENT LAND AND INDUSTRIAL AREAS**

The Employment Land Review identifies the following local sub areas—Inner North East, Inner North West, Inner West, Outer North West and Outer North East where there are currently shortfalls in employment land provision:

A) Proposals for a change from B Use Classes on sites which were last used or allocated for employment to other economic development uses including town centre uses or to non-employment uses will only be permitted where:

~~Development of sites for non-employment uses, which were last used or allocated for employment will only be permitted where;~~

- (i) Existing buildings and land are considered to be non-viable in terms of market attractiveness, business operations, age, condition and/or compatibility with adjacent uses and
- (ii) The proposal would not result in the loss of a deliverable employment site necessary to meet the employment needs during the plan period ('employment needs' are as identified Spatial Policies 8 & 9); or
- (iii) ~~(iii) In areas of shortfall~~ The proposal will deliver a mixed use development which continues to provide for a good range of local employment opportunities and would not undermine the viability of the remaining employment site; and

B) Where a proposal is located in an area of shortfall as identified in the most recent Employment Land Review, non-employment uses will only be permitted where:

The loss of the employment provision on the site can be mitigated sufficiently by the availability of ~~identified sites~~ existing employment land and premises in the \*surrounding area which are suitable to meeting the employment needs of the area (\*surrounding area will be defined by drive time and public transport accessibility in Policy T2); and

