

**Report of the Director of City Development**

**Report to: Development Plan Panel**

**Date: 11 September 2012**

**Subject: LDF Core Strategy – Publication Draft, Analysis of Consultation Responses: Section 1 - 4: Introduction, Profile of Leeds Metropolitan District, Spatial Vision & Objectives, Spatial Development Strategy (Overview) & Key Diagram**

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**

- The key issues which have arisen in response to this part of the Core Strategy include comments on the plan period and the relationship to the Vision for Leeds, the need to reflect new arrangements regarding the Duty to Cooperate (following the introduction of the Localism Act), the need to use Office of National Statistics (ONS) population projections, a series of suggested wording changes to improve the clarity of the wording and a series of recommended changes to the Key Diagram to improve clarity and presentation.

**Recommendations**

Development Plan Panel is requested to:

- note and comment on the contents of the report and the course of further action (as detailed in Appendix 1 to the report).

## **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 Section 1 - 4: Introduction, Profile of Leeds Metropolitan District, Spatial Vision & Objectives, Spatial Development Strategy (Overview) & Key Diagram. Appendix 1 attached, summarises the representors, key issues raised, the City Council's view and proposed action. The suggested changes to the Core Strategy text arising from this analysis has been included in Appendix 2.

## **2.0 Background Information**

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

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

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

## **3.0 Main Issues**

- 3.1 The main issues on these topics relate to comments on the plan period and the relationship to the Vision for Leeds, the need to reflect new arrangements regarding the Duty to Cooperate (following the introduction of the Localism Act), the need to use ONS population projections, a series of suggested wording changes to improve the clarity of the wording and a series of recommended changes to the Key Diagram to improve clarity and presentation

## **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 in relation to Section 1 - 4: Introduction, Profile of Leeds Metropolitan District, Spatial Vision & Objectives, Spatial Development Strategy (Overview) & Key Diagram. Following consideration of representations received, recommendations for a number of minor changes have been made and have been consolidated in Appendix 2, to this report.

## **6. Recommendations**

- 6.1 Development Plan Panel is requested to:

i). note and comment on the contents of the report and the course of further action (as detailed in Appendix 1 to the report).

## **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**

**Section 1: Introduction, Section 2: Profile of Leeds Metropolitan District, Section 3 Spatial Vision & Objectives, Section 4. Spatial Development Strategy (Overview) & Key Diagram**

<b>Representor/Agent</b>	<b>Representor Comments</b>	<b>LCC Initial Response</b>	<b>Action</b>
	<b>1. Introduction</b>		
Templegate Developments, Hallum Land Mangement Ltd, Ashdale Land & Property Company Ltd, (via Barton Willmore Planning Partnership – Northern) (0057) Home Builders Federation (0092) Taylor Wimpy and Ashdale, Chatford, Keyland, Kebbell, Mirfield, Miller, Barratt Leeds, Barratt York, Warner, Redrow (via Dacre Son & Hartley) (0480) Redrow Homes (Yorkshire) Ltd (1938) Pegasus Planning Group (4388) Redrow Homes (Yorkshire) Ltd, Barratt David Wilson Homes Great Northern Development, Edmund Thornhill Thornhill	The Core Strategy Plan Period should be extended (to 2030 for consistency with the Vision for Leeds, or to 2031).	The plan period of 2012 – 2028, is consistent with NPPF advice, which states that plans should be drawn up over an appropriate time scale, ‘preferably a 15 year time horizon’. The 15 plan period specified in the Core Strategy is therefore sound in relation to this advice. Whilst the desire for alignment with the time scale of the Vision for Leeds is noted, the Core Strategy is consistent with the strategic objectives of the Vision for Leeds in aiming for Leeds to be the ‘Best City in the UK’. A change to the Core Strategy’s plan period at this stage in the process, would have major implications for the plan and spatial strategy as a whole, for example the overall scale of housing growth. As emphasised above, the plan is sound in relation to the plan period advocated by the NPPF and the supporting evidence base.	No Change

<p>Estates, House Builder Consortium, ELE Northern Quadrant Consortium, Wortlea Estates, Great North Developments c/o Evans Property, Robert Ogden Partnership Ltd (Via ID Planning) Barratt David Wilson Homes Yorkshire Homes (5895)</p> <p>The Ledston Estate, AR Briggs and Co, The Hatfield Estate, The Diocese of Ripon and Leeds, Lady Elizabeth Hastings Estate Charity, The Bramham Park Estate, Meadowside Holdings Ltd (via Carter Jonas) (5681)</p>			
<p>Highways Agency (0060)</p>	<p>Concern regarding the scale of Growth and associated traffic impacts arising from the scale of housing and employment development proposals, when assessed using the Network Analysis Tool (NAT)</p>	<p>Through the preparation of the Core Strategy (and supporting material, including the draft Infrastructure Plan), the City Council recognises that planning for the scale of regeneration and growth envisaged in the plan, presents major opportunities and challenges. Within this context (and the objectives of the Local Transport Plan), the City Council is working actively with the Highways Agency and other City Region Partners, including neighbouring local authorities, to manage growth and to seek to mitigate against, any adverse impacts.</p>	<p>No change</p>
<p>English Heritage (0099)</p>	<p>Welcome consideration of environmental; quality in assessing development issues and the goal of respecting local character and distinctiveness.</p>	<p>Support welcomed.</p>	<p>No change.</p>
<p>Leeds Civic Trust (0062)</p>	<p>Need to provide a schedule of UDP Saved Policies</p>	<p>A schedule of UDP saved policies will be provided, together with a schedule of UDP policies which will be superseded as a</p>	<p>No change to Core Strategy text or specific policies</p>

Leeds Local Access Forum (4572)		consequence of the Core Strategy.	regarding this matter but inclusion of information regarding superseded and retained saved policies at Submission.
Metro (1933)	Need to cross reference Local Transport Plan	As noted above, the Core Strategy has been developed, within the context of a range of strategic documents, including the Local Transport Plan. For clarity more explicit reference will be made, together with the role of Leeds within the City Region and 'duty to cooperate' arrangements.	<p>Minor change:</p> <p>Add the following text at the end of para. 1.15: <i>"Within this context also, the City Council has worked closely with Metro, through the West Yorkshire Local Transport Plan Partnership, in the preparation of the West Yorkshire Local Transport Plan (My Journey – Connecting people and Places) 2011 – 2026"</i>.</p> <p>Add the following text to para. 1.17 after 'interim Strategy Statement' <i>"(approved by the Leaders Board in April 2011)"</i>.</p> <p>Add a new para 1.19 as follows, <i>"Since the Localism Act received Royal Assent, the NPPF has been finalised and includes further policy in regard of strategic planning. In light of this the city region partnership has further developed its role in support of the Local Planning Authorities in exercising the Duty. This ranges from developing common approaches to documentation through to</i></p>

			<p><i>the commitment to develop a spatial investment plan in the City Deal. These actions will help local planning authorities to better understand and respond to activities that take place beyond their plan area and impact on their plan”.</i></p> <p>It is also proposed to prepare a Background paper detailing cross boundary working arrangements and issues.</p>
<p>Pegasus Planning Group, (4388) Morley Town Council (4825)</p>	<p>Need to clarify relationship to the Regional Spatial Strategy and what aspects of the RSS evidence base have been reflected.</p>	<p>Through changes to legislation, the RSS is in the process of being abolished. However, at the time of preparing the Publication draft Core Strategy, the RSS is still operational and the City Council is legally obliged to take this into account. This may change prior to submission. The Core Strategy has been developed within the context of the RSS but is supplemented by new evidence, prepared by and on behalf of the City Council (such as the Employment Land Review and Strategic Housing Market Assessment). This is in recognition of the major changes in economic circumstances and the housing market, post RSS adoption in 2008.</p>	<p>No change.</p>
<p>Redrow Homes (Yorkshire) Ltd, Barratt David Wilson Homes Great Northern Development, Edmund Thornhill Thornhill Estates, House Builder Consortium, ELE Northern Quadrant Consortium, Wortlea Estates, Great North Developments c/o Evans Property, Robert Ogden Partnership Ltd (Via ID Planning)</p>	<p>Consistency of Core Strategy to NPPF</p>	<p>In reviewing the compliance of the Core Strategy against the NPPF, the City Council has assessed the document using a PAS (Planning Advisory Service) check list. From this assessment, the City Council has concluded that the Core Strategy is broadly consistent with the NPPF. Where further clarification or minor amendments are required for consistency with the NPPF, the necessary changes have been made, in respect of particular policy topics.</p>	<p>No change.</p>



<p>Barratt David Wilson Homes Yorkshire Homes (5895)</p>			
<p>Directions Planning (on Behalf of Otley Town Partnership &amp; Mr &amp; Mrs Haigh).(5121)</p>	<p>Need to recognise wider role of Leeds in Leeds City Region, to reflect new arrangements under the 'Duty to Co-operate'.</p>	<p>Paragraphs 1.16 – 1.18 of the Core Strategy Publication document, describe the Leeds City Region context. It is accepted that further to the Publication of the Core Strategy new City Region arrangements have been and are being introduced. Consequently, it is proposed that this section should be updated accordingly and further information on detailed arrangements and consideration of specific issues, detailed in a background paper.</p>	<p>Minor change:</p> <p>Add the following text to para. 1.17 after 'interim Strategy Statement' "<i>(approved by the Leaders Board in April 2011)</i>".</p> <p>Add a new para 1.19 as follows, "<i>Since the Localism Act received Royal Assent, the NPPF has been finalised and includes further policy in regard of strategic planning. In light of this the city region partnership has further developed its role in support of the Local Planning Authorities in exercising the Duty. This ranges from developing common approaches to documentation through to the commitment to develop a spatial investment plan in the City Deal. These actions will help local planning authorities to better understand and respond to activities that take place beyond their plan area and impact on their plan</i>".</p> <p>It is also proposed to prepare a Background paper detailing cross boundary working arrangements and issues.</p>

	<b>2. Profile of Leeds Metropolitan District</b>		
	<b>i) Our City</b>		
Home Builders Federation (0092) Bradford Metropolitan District Council (0100) Directions Planning (5121) Bradford Council Highways (5941)	The plan is unsound as it does not reflect the provisions in legislation and national policy with regard to cooperating with other local authorities to plan strategically and to meet objectively assessed housing need. Need to fully reflect the role of Leeds within the City Region in Section 2. Need to recognise wide strategic priorities under the Duty to cooperate.	Paragraphs 1.16 – 1.18 of the Core Strategy Publication document, describe the Leeds City Region context. It is accepted that further to the Publication of the Core Strategy new City Region arrangements have been and are being introduced. Consequently, it is proposed that this section should be updated accordingly and further information on detailed arrangements and consideration of specific issues, detailed in a background paper.	Minor change: Add the following text to para. 1.17 after 'interim Strategy Statement' " <i>(approved by the Leaders Board in April 2011)</i> ".  Add a new para 1.19 as follows, " <i>Since the Localism Act received Royal Assent, the NPPF has been finalised and includes further policy in regard of strategic planning. In light of this the city region partnership has further developed its role in support of the Local Planning Authorities in exercising the Duty. This ranges from developing common approaches to documentation through to the commitment to develop a spatial investment plan in the City Deal. These actions will help local planning authorities to better understand and respond to activities that take place beyond their plan area and impact on their plan</i> ".  It is also proposed to prepare a Background paper detailing cross boundary working arrangements and issues.
Directions Planning	Specific employment policies are	The approach of the Core Strategy is to set out an overarching	No change

<p>(on behalf of Otley Town Council Partnership and Mr &amp; Mrs Haigh) (5121)</p>	<p>needed for Otley</p>	<p>spatial approach for development in the District to 2028. Within this context, Otley covered as part of settlement hierarchy and through related policies. The representation relates specifically to employment land allocation. Current employment allocations have been retained through saved UDP policies and will be subsequently reviewed as part of the Site Allocations DPD. It should be noted also that Otley has been selected as one of the 4 Neighbourhood planning pilot areas. Consequently, there will be an opportunity to consider local development issues, as part of this process.</p>	
<p>A R Briggs &amp; Co, Lady Elizabeth Hastings Estate Charity, Bramham Park Estate, the Diocese of Ripon and Leeds, Meadowside Holdings Ltd (via Carter Jonas) (5681)</p>	<p>Broad Agreement with the key challenges.</p> <p>Where will the Economic Growth come from, to support the plan.</p>	<p>Support welcomed.</p> <p>It is acknowledge that within the UK and internationally, the economy is experiencing fundamental changes. Within this context, the future is uncertain. However, following previous economic downturns and restructuring, Leeds has demonstrated its resilience and propensity to foster a diverse and dynamic economy to support growth. The Leeds Growth Strategy (referenced in paras. 1.14 – 1.15 of the Publication draft Core Strategy), sets out longer term ambitions for the District’s economy. The rate at which these ambitions can be realised, will to some extent be linked to wider economic conditions and interventions. Within this context, the Core Strategy is supported with an Employment Land Review (prepared within the context of the Regional Econometric Model – REM), which helps to identify requirements for Leeds. The Core Strategy is planning for a 15 year time frame, with regeneration and economic growth, as integral elements as part of a broader strategy. The plan will need to be monitored against its objectives (including economic) and reviewed as necessary.</p>	<p>No change.</p> <p>No change</p>
<p>AR Briggs &amp; Co, Lady Elizabeth Hastings Estate Charity, Bramham Park Estate, the Diocese of Ripon and Leeds, Meadowside Holdings Ltd (via Carter Jonas) (5681)</p>	<p>Need to Recognise the Needs of the Rural Population</p>	<p>A key theme of the Core Strategy is to plan for regeneration and growth, whilst maintaining local character and distinctiveness. Leeds MD is a large and diverse area and home to a diverse range of communities and settlement types and it is agreed that the text can be strengthened to reflect this. The importance of the rural economy is also acknowledged through strengthening the references within the ‘Rural economy’ section (Economic Development Priorities).</p>	<p>This point has been addressed through changes presented to Development Plan Panel on 7<sup>th</sup> August 2012.</p>
	<p><b>The Growth of Leeds</b></p>		

English Heritage (0099)	General support for this section but suggested minor change to clarify the historical origins of the City.	<p>General support welcomed.</p> <p>Agreed to amend para. 2.6 to add, “<i>Leeds has a rich and diverse history. Within the City there are stone hut circles dating from the Bronze Age. The majority of the City Centre dates from 1207...</i>”.</p>	<p>Minor change Add the following to para. 2.6: “<del>Parts of Leeds have a long history dating</del> <i>Leeds has a rich and diverse history. Within the District there are stone hut circles dating from the Bronze Age. The majority of the City Centre dates from 1207...</i>”.</p>
West Yorkshire Archaeology Advisory Service (5051)	No enough attention given to the importance of the historic environment as expected by the NPPF.	A key theme of the Core Strategy is to plan for regeneration and growth, whilst maintaining local character and distinctiveness. Within this context, the historic environment has a key role to play in helping to maintain local identity, supporting regeneration and helping to shape future growth. This is subsequently reflected in detailed policies relating to Design and Conservation (P10 and P11).	No further changes, Policies P10 and P11 have been strengthened following consideration changes reported to the Development Plan Panel on 7 <sup>th</sup> August 2012.
<b>Housing</b>			
Templegate Developments, Hallam Land Management, Ashdale Land & Property Company Ltd (via Barton Willmore Planning Partnership–Northern) (0057)	Need to use ONS population forecasts	<p>As part of the Core Strategy evidence base, the Leeds Strategic Housing Market Assessment (SHMA), addresses the issue of population growth in the District and concerns regarding the reliability of ONS forecasting. Consequently, based upon local evidence, a methodology for the Core Strategy for the Core Strategy has been developed which is considered to be more realistic at a local level than ONS projections.</p> <p>ONS has now published the first results from the 2011 Census. The Census data shows the population for Leeds is 751,500, which is considerably lower than previous mid-year estimates. The population estimate is significantly lower than the indicative population estimate of 780,925 published by ONS in November 2011. As a planning authority, Leeds had concerns that the mid-year estimates may have been an over estimate of the population figures for Leeds therefore an important part of the Leeds Strategic Housing Market Assessment (SHMA) was the detailed scrutiny of official statistics to ensure that the demographic evidence on which the study is based was robust and reliable. To provide a revised population for Leeds, the SHMA rescaled the trajectory of change in</p>	No change.

		<p>the mid-year population estimates to be consistent with complementary evidence from on local housing and GP registrations data. The SHMA employment-led forecast identified a growth in Leeds population of approximately 93,000 people between 2011 and 2026. The population of Leeds in 2011 was estimated at 756,060 people with a forecast for it to reach 860,618 by 2028. The changes to official statistics were deemed necessary to ensure that a robust demographic evidence base underpins the development of the SHMA. This approach has been justified by the subsequent release of the 2011 Census which shows a difference of just +0.6% between the SHMA estimate and official Census population published on 16 July 2012.</p>	
Pegasus Planning Group (4388)	<p>Paras. 2-13 – 2.16 need to acknowledge that a further factor contributing to the drop in completions has been the restriction on the type and location of sites available – given that greenfield sites have been held back until recently.</p>	<p>A key focus of the existing UDP and emerging Core Strategy, is to focus upon urban regeneration, whilst planning for longer term growth. Prior to the economic downturn, Leeds had been delivering unprecedented levels housing development on windfall sites within the urban area. As a consequence, the release of phase 2 and 3 sites was not warranted. In seeking to maintain housing land supply, phase 2 and 3 greenfield housing sites were released in June 2011. It is not accepted that the drop in completions is as a consequence of greenfield sites being 'held back'. The reduction in completions is as a consequence of a host of factors including mortgage availability, and the reduction in public sector finance to support housing development, rather than exclusively housing land supply.</p>	No change.
Morley Town Council (4825)	<p>Concerns regarding the scale of proposed housing growth and implications for Green Belt release. View that the main constraints on house building are related to housing finance rather than a lack of land availability or planning permissions.</p>	<p>These comments reflect comments raised in response to the housing policies SP6 and SP7, which are addressed in more detail as part as a separate topic paper. With regard to the points about the scope of a selective Green Belt review, this is allowed for within the context of the NPPF. Within the context of the Core Strategy, Spatial Policy 10, proposes a selective Green Belt review. However, consistent with a key theme of the plan to safeguard local character and distinctiveness, it should be emphasised that the majority of designated green belt is to be retained in tact, with the selective review, targeted to locations associated with the settlement hierarchy, through the Site Allocations DPD process (and informed through Neighbourhood planning). In order to clarify the approach, the longer term role of green belt – in maintaining the character and distinctiveness of Leeds should be reaffirmed as part of the long term vision for the district (para. 3.2), with further explanation to the overall policy approach in section 4.8.</p>	No change

NHS Leeds (5693)	Need to give greater prominence to the need for affordable housing and affordable warmth	The topic of Affordable Housing is covered in paras 5.2.11 – 5.3.17 and Policy H5 and affordable warmth is an aspect of Sustainable Design and Construction covered in paras. 5.5.35 – 5.5.37. However, it is agreed that reference to these topics within para 2.13, would help to acknowledge the importance of these issues in setting the strategic context.	Minor change, add the following sentence to para. 2.13, "...whilst protecting the quality of the environment and respecting community identity. <i>Within this overall context the need for affordable housing and affordable warmth are key issues.</i> It is clear that that house building....".
	<b>Employment</b>		
NHS Leeds (5693)	Need to reflect the desire of communities for accessibility of job opportunities close to where people live and the need to promote a range of employment opportunities for all groups.	An integral aspect of the Core Strategy is to deliver the principles of sustainable development, linked to strategic objectives and a range of policies. Access to employment opportunities is integral to this approach. The ability to live and work in the same place is inherently sustainable and the Core Strategy allows for this through the promotion of housing and employment growth within the context of the Settlement Hierarchy. However, it does need to be recognised that given the dynamics of a modern economy (at a City Region, national and international level), this is not always possible, nor are jobs for local people necessarily guaranteed, where they do exist – close to where people live. However, in reflecting the overall commitment to sustainability, Policies SP8 and EC3 seek to promote job retention and creation, training & skills and the desire to safeguard existing employment land and industrial areas.	No change.
NHS Leeds (5693)	Need to include programmes to tackle child poverty	The Core Strategy recognised that Deprivation and Health Inequalities are major challenges facing the City (paras. 2.30 – 2.32 and Map 2). In seeking to address these issues, the plan seeks to deliver the principles of sustainable development and to prioritise regeneration areas (Policy SP4). It need to be recognised also that the LDF is one of a series of strategic initiatives to tackle a range of social, economic and environmental opportunities and challenges across Leeds. It is important therefore that such initiatives in the round are complementary and through effective partnership working positive progress is made.	No change.
	<b>ii) Our People</b>		
Leeds Trinity University College (via White Young Green	<b>Support for the identification of LTUC as one of the three universities in the City (para. 2.33)</b>	Support welcomed.	No change.

Planning) (0420)			
<p>Hallam Land Management Ltd, Ashdale Land and Property Company Ltd, Templegate Developments (via Barton Willmore Planning Partnership-Northern) (0057) DPP (5543)</p> <p>Morley Town Council (4825)</p>	<p>In para. 2.28 need to replace figures with ONS derived projections. Use of GP registration data understates the real need. Figures for population growth are unrealistic.</p>	<p>The population figures used in this section are taken from the Strategic Housing Market Assessment, as part of the Core Strategy evidence base. As a planning authority, Leeds had concerns that the mid-year estimates may have been an over estimate of the population figures for Leeds therefore an important part of the Leeds Strategic Housing Market Assessment (SHMA) was the detailed scrutiny of official statistics to ensure that the demographic evidence on which the study is based was robust and reliable. To provide a revised population for Leeds, the SHMA rescaled the trajectory of change in the mid-year population estimates to be consistent with complementary evidence from on local housing and GP registrations data. The SHMA employment-led forecast identified a growth in Leeds population of approximately 93,000 people between 2011 and 2026. The population of Leeds in 2011 was estimated at 756,060 people with a forecast for it to reach 860,618 by 2028. The changes to official statistics were deemed necessary to ensure that a robust demographic evidence base underpins the development of the SHMA. This approach has been justified by the subsequent release of the 2011 Census which shows a difference of just +0.6% between the SHMA estimate and official Census population published on 16 July 2012.</p>	<p>No change</p>
<p>Mr Stuart Andrew MP (0165)</p>	<p>Need to have regard to 2011 Census results.</p>	<p>The population figures used in this section are taken from the Strategic Housing Market Assessment, as part of the Core Strategy evidence base. As a planning authority, Leeds had concerns that the mid-year estimates may have been an over estimate of the population figures for Leeds therefore an important part of the Leeds Strategic Housing Market Assessment (SHMA) was the detailed scrutiny of official statistics to ensure that the demographic evidence on which the study is based was robust and reliable. To provide a revised population for Leeds, the SHMA rescaled the trajectory of change in the mid-year population estimates to be consistent with complementary evidence from on local housing and GP registrations data. The SHMA employment-led forecast identified a growth in Leeds population of approximately 93,000 people between 2011 and 2026. The population of Leeds in 2011 was estimated at 756,060 people with a forecast for it to reach 860,618 by 2028. The changes to official statistics were deemed necessary to ensure that a robust demographic evidence base underpins the development of the SHMA. This approach has been justified by the subsequent release of the 2011 Census which</p>	<p>No change</p>

		shows a difference of just +0.6% between the SHMA estimate and official Census population published on 16 July 2012.	
Cllr John Illingworth (2703)	Like to see an overarching policy that commits the Council to 'narrow the gap', between the most favoured and least favoured communities in Leeds. Like to see the Council formally incorporate the most relevant guidance from the National Institute for Health & Clinical Excellence (NICE) into the Core Strategy.	The commitment to 'narrow the gap', was a strategic initiative incorporated as part of the Community Strategy – Vision for Leeds 2. This strategic initiative has now been reviewed and superseded by Vision for Leeds 3. As described in para. 1.2 of the Core Strategy, the key aim of the Vision for Leeds (2011 – 2030), is for Leeds to be the 'Best City in the UK', through being fair, sustainable and inclusive. In taking forward these strategic aims, the Core Strategy provides a strategic planning framework for the Vision. Issues of deprivation and the need for regeneration are therefore integral to the overall strategic objectives and policy approach of the plan. Map 2 illustrates the indices of multiple deprivation across Leeds and a number of policies including SP4 and SP8 and seeking to embed the policy interventions to tackle deprivation issues, where they can be addressed through the planning process. Because of this it is not felt that the introduction of an additional policy is necessary, as this would duplicate the policy approaches currently incorporates across the plan. In terms of health issues, a Health Impact Assessment has been undertaken as part of the Core Strategy evidence base, and the necessary adjustments made to the document. The significance of the NICE guidance is acknowledged but with regard to government advice on the preparation of Development Plan Documents, it is not the role of such documents to repeat national guidance	No change
	<b>iii) Our Green Environment</b>		
Sport England (1982)	Welcome references to the quality of the environment in providing opportunities for leisure.	Support welcomed.	No change.
Templegate Developments (via Barton Willmore Planning Partnership-Northern) (0057)	Opportunities to enhance the environment of the Aire Valley.	Comments in respect of the desire to enhance the environment of the Aire Valley (para. 2.40) are noted. This is a key objective of the Core Strategy, linked to a number of key Policies including SP5 (Aire Valley Urban Eco-Settlement) and SP13 (Strategic Green Infrastructure). More detailed aspects of this approach are also being progressed within the context of the preparation of the Aire Valley Leeds Area Action Plan.	No change
Mr Lee Davidson (2560)	Para. 2.38 needs to include references to the Public Rights of Way network in Leeds and 2.39 include a reference to the canals in	For completeness it is accepted that reference should be made to the scope and extent of the PROW network in Leeds. It is therefore proposed to reinstate the relevant extracts previously incorporate to PROW, incorporated as part of the Core Strategy Preferred	Minor change: 2.39 Add the following wording at the end of the



	Leeds.	Approach. For completeness it is also agreed to include references to the Leeds canals in para. 2.39.	<p>first sentence "...River Aire and canal corridors".</p> <p>Add after the final sentence of 2.39 <i>"In addition, the network of Public Rights of Way (PROW) represents the arteries that help people access the countryside and urban greenspaces, linking people with place and linking urban to rural. Within Leeds there are 819km of rights of way, 628kn of footpath, 180km of bridleway, together with a short network of byways and other routes with public access. Included within this total area are key strategic routes (such as the Leeds Country Way and local recreational routes (such as the Meanwood Valley Trail). Within this context also, the City Council has produced a Rights of Way Improvement Plan, in response to the Countryside Rights of Way Act (2000), setting out a 10n year improvement plan for the Rights of Way network."</i></p>
Mr Cedric Wilks (4783)	Need to include a district wide tree management scheme across the district	At a strategic level, the Core Strategy seeks to provide a framework to protect and enhance the environment. Within this overall context Policies are included for Green Infrastructure (SP13) and for the Creation of new tree cover (Policy G2). Although the need for tree management is integral to this overall approach, the preparation and implementation of a detailed tree management scheme for the district is beyond the scope of the Core Strategy and part of the day today responsibilities of the City Council's Parks and Countryside service and individual landowners.	No change.

West Yorkshire Archaeology Advisory Service (5051)	Need to incorporate a new strategic policy to safeguard and promote the diverse historic heritage across the district.	A key theme of the Core Strategy is to plan for regeneration and growth, whilst maintaining local character and distinctiveness. Integral to this approach is the desire to safeguard the diverse and historic heritage of the district. This is reflected in the general scope of Policy SP1 (iii) (Location of Development) and the focus of detailed Policies for Design and Conservation (P10 and P11). In addition to a range of detailed UDP saved policies. As a consequence, it is not considered necessary to introduce a new strategic policy to reflect this issue, this is especially the case given that both P10 and P11 have been strengthened (considered by Development Plan Panel, 7 <sup>th</sup> August 2012), in response to representations made.	No change.
WARD (Wharfedale & Airedale Review Development) (5852)	Need to clarify the meaning of sustainable development	It is accepted that the term and application of “Sustainable Development” is open to much interpretation. With regard to the Core Strategy, a definition has been included in the Glossary and within the context of national guidance, the NPPF provides an overall definition and the range of simultaneous considerations to be taken into account.	No change.
	<b>Key Challenges</b>		
Hallam Land Management (via Barton Willmore Planning Partnership - Northern) (0057)  Templegate Developments (via Barton Willmore Planning Partnership - Northern) (0057)	Support for Key Challenges listed.	Support welcome.	No change.
	<b>3. Spatial Vision</b>		
Ashdale land and Property Company Ltd (via Barton Willmore Planning Partnership-Northern), Hallam Land Management (via Barton Willmore Planning Partnership-Northern) (0057)	General Support for Spatial Vision	Support welcome.	No change.

Craven District Council (5888)	Support for spatial vision and role of city as a strategic hub, better connected by an accessible and integrated transport system which supports communities and economic competitiveness.	Support welcome	No change.
Caddick Developments, Leeds Trinity University College, D Westwood & son (via White Young Green Planning) (0420)	Support for spatial vision – in particular need to balance brownfield and greenfield land through promotion of development in sustainable locations in order to meet identified need.	Support welcome	No change.
White Young Green Planning (0420)	Support urgency to progress Core Strategy and need to work with businesses in a proactive way to deliver the Vision for Leeds by planning for jobs and homes in a sustainable way.	Support welcome.	No change.
Leeds Bradford International Airport (via White Young Green) (0420)	General support for overriding aim of the objective to increase the use of sustainable transport by delivering new infrastructure and improvement of the existing transport hubs and for Leeds district to have better connected, more accessible and integrated transport system in supporting communities and economic growth.	Support welcome.	No change.
Harrow Estates (via White Young Green Planning) (0402)	Support adoption of Core Strategy as soon as possible to facilitate economic growth and associated delivery of housing.	Support welcome	No change.
Templegate Developments (via Barton Willmore Planning Partnership-Northern) (0057)	Reference should be made in para. 3.2, 6 <sup>th</sup> bullet, to the need for a district/neighbourhood centre within Aire Valley Leeds to support growth	The precise details and configuration of the Aire Valley Urban Eco-Settlement will be addressed as part of the preparation of the Aire Valley Area Action Plan. At this stage it is not possible to specify what scale and form a new centre might take. Within this context Policy P7 of the Core Strategy provides criteria for the creation of new Centres. However, it is acknowledged that ‘community facilities’ and infrastructure will be necessary to achieve the vision	Minor change as follows: “Aire Valley will become an innovative new living and working community, <i>supported by the necessary community facilities and</i>

		for the Aire Valley and it is therefore proposed that the wording of the 6 <sup>th</sup> bullet point is amended accordingly.	<i>infrastructure, which is a national model for sustainable development...</i> ”.
Leeds Civic Trust (0062)	The long term vision set out in para. 3.2 needs to be revised to be more visionary.	As set out in para. 1.5 of the Core Strategy, a key role of the document is to provide a spatial planning framework for the Vision for Leeds. It is important therefore that the high level objectives of the VFL are translated and implemented through the Core Strategy, into realistic and deliverable Policies. The proposed wording advocated by the Civic Trust is noted but largely restates what the Core Strategy’s objectives and Policies are seeking to achieve. These objectives are in turn, set within the context of the NPPF and the overall commitments to sustainable development.	No change.
Oulton Civic Society (0065)	Consider the plan to be unsound as Oulton is not considered part of Rothwell within the Settlement Hierarchy.	It is accepted that locally Oulton and Rothwell are distinct places and it is a key objective of the Core Strategy to safeguard local character and distinctiveness, in planning for regeneration and growth. However, For the purposes of the Core Strategy, the focus of the Settlement Hierarchy (as illustrated on Map 3), is to categorise the settlement structure of the district, within this overall context Oulton form part of the wider urban area of Rothwell, which has been identified as a Major Settlement.	No change.
Wakefield Metropolitan District Council (0104)	Whilst it is accepted that that the document sets out an appropriate spatial vision and development strategy for Leeds, a number of concerns are raised regarding the soundness of the plan and legal compliance issues. These are the presentation of the Key Diagram, the need to demonstrate how ‘Duty to Cooperate issues have been addressed, the justification for the scale of growth envisaged and the scope of the Green Belt review, the effectiveness of the plan in delivering housing growth and accordance with the NPPF (including the approach to meeting the housing requirement).	Issues concerning the presentation of the Key Diagram are set out below and as a result of the Publication draft consultation a number of changes are being proposed. In terms of the detailed points regarding the scale of housing and employment growth, the City Council’s position has been informed by more recent evidence, which supersedes the adoption of the RSS in 2008. This includes the Strategic Housing Market Assessment and the Employment Land Review (which itself is informed by the Regional Econometric Model). The City Council considers this evidence to be sound as a basis to develop the Spatial Vision and underpinning specific policies. In terms of detailed comments in relation to SP6 (The Housing Requirement and Allocation of Housing Land), SP7 (Distribution of Housing Land and Allocations) and SP10 (Green Belt), these are addressed in the relevant topic analysis. With regard to the ‘Duty to Co-operate’, it is acknowledged that the references in the document can be strengthened and supplemented with a background topic paper, setting out the arrangements and approach to tackling cross boundary issues in further detail. Within this context, the City Council is committed to working closely with neighbouring authorities and relevant agencies, to discuss issues and where necessary, approaches to mitigation. In terms of	No change (see Key Diagram analysis below).  Minor change: Add the following text to para. 1.17 after ‘interim Strategy Statement’ “(approved by the Leaders Board in April 2011)”.  Add a new para 1.19 as follows, “ <i>Since the Localism Act received Royal Assent, the NPPF has been finalised and includes further policy in regard of strategic planning. In light of this the city region partnership has further developed its role in support of the Local Planning Authorities in exercising the</i>

		<p>infrastructure, in support of the Core Strategy a draft Infrastructure Delivery Plan has been prepared and the City Council is in the process of developing its approach to the Community Infrastructure Levy, in identifying detailed requirements and an appropriate charging schedule.</p>	<p><i>Duty. This ranges from developing common approaches to documentation through to the commitment to develop a spatial investment plan in the City Deal. These actions will help local planning authorities to better understand and respond to activities that take place beyond their plan area and impact on their plan”.</i></p> <p>It is also proposed to prepare a Background paper detailing cross boundary working arrangements and issues.</p>
<p>Leeds Bradford International Airport (via WYG) (0420)</p>	<p>Whilst generally supporting the Spatial Vision, it is considered that stronger references to the role of Leeds Bradford International Airport (LBIA) need to be made</p>	<p>In response to these comments, revisions are propose to the supporting text for SP12 (Managing the Growth of Leeds Bradford International Airport), which is the subject of a separate topic report.</p>	<p>See changes proposed under SP12 topic report.</p>
<p>Kebbell, Keyland, Chatford, Taylor Wimpey and Ashdale, Barratt Leeds, Mirfield, Miller, Barratt York, Warner, Redrow (via Dacre Son and Hartley) (0480)</p> <p>Redrow Homes (Yorkshire) Ltd (1938) Banks Development (5036) Pegasus Planning Group (4388) Linton Land Owners (via Ian Bath Planning)</p>	<p>Concern that Objective 8 of the Core Strategy is not sound/consistent with the NPPF and should be reworded</p>	<p>The City Council considers that it’s approach to the phased release of sites is consistent with the NPPF and the evidence base for the Core Strategy. Whilst prioritising PDL, the Core Strategy is ensuring that housing land can be brought forward in sufficient quantities, to meet the housing requirement. Detailed consideration of comments in relation to SP6, SP7 and Policy H1 (Managed Release of Sites), is covered in a separate topic paper.</p>	<p>No change</p>

<p>(5883) Barratt David Wilson Homes (5895)</p> <p>Wortlea Estates, Redrow Homes, Robert Ogden Partnership Ltd, Housebuilder Consortium, Great North Development, Edmund Thornhill, Thornhill Estates, ELE Northern Quadrant Consortium, Great North Developments c/o Evans Property Group (via ID Planning) (5671)</p>			
<p>Pegasus Planning Group (4388)</p>	<p>Whilst there is general support to the recognition of the role of both brownfield and greenfield land in suitable locations, as a sustainable way of meeting identified needs, it is suggested that that the 3<sup>rd</sup> para. of 3.2 is reworded to make reference to demonstrate that the plan has been positively prepared.</p>	<p>In reflecting this point, a number of minor wording changes are proposed to improve the clarity and intent of the wording.</p>	<p>Minor change to para. 3.2 3<sup>rd</sup> bullet as follows:</p> <p>“The spatial <del>management</del> <i>distribution</i> of growth will be planned <i>and delivered</i> to balance the use of brownfield and greenfield land in a sustainable way...”.</p>
<p>Morley Town Council (4825)</p>	<p>Concern is expressed that the Core Strategy does not reflect the requirements of the NPPF/‘Duty to Co-operate’, with regard to cross boundary planning issues with Bradford, Kirklees and Wakefield. Concern also that flood risk issues need to be taken seriously.</p>	<p>Paragraphs 1.16 – 1.18 of the Core Strategy Publication document, describe the Leeds City Region context. It is accepted that further to the Publication of the Core Strategy new City Region arrangements have been and are being introduced. Consequently, it is proposed that this section should be updated accordingly and further information on detailed arrangements and consideration of specific issues, detailed in a background paper.</p>	<p>Minor change; Add the following text to para. 1.17 after ‘interim Strategy Statement’ “(approved by the Leaders Board in April 2011)”.</p> <p>Add a new para 1.19 as follows, “Since the Localism Act received Royal Assent, the NPPF has been finalised and includes further policy in</p>

			<p><i>regard of strategic planning. In light of this the city region partnership has further developed its role in support of the Local Planning Authorities in exercising the Duty. This ranges from developing common approaches to documentation through to the commitment to develop a spatial investment plan in the City Deal. These actions will help local planning authorities to better understand and respond to activities that take place beyond their plan area and impact on their plan”.</i></p> <p>It is also proposed to prepare a Background paper detailing cross boundary working arrangements and issues.</p>
<p>Banks Development (5036) Linton land Owners (via Ian Bath Planning) (5883)</p>	<p>Consider that the plan period should be extended to 2030, to reflect the timeframe of the Vision for Leeds</p>	<p>The plan period of 2012 – 2028, is consistent with NPPF advice, which states that plans should be drawn up over an appropriate time scale, ‘preferably a 15 year time horizon’. The 15 plan period specified in the Core Strategy is therefore sound in relation to this advice. Whilst the desire for alignment with the time scale of the Vision for Leeds is noted, the Core Strategy is consistent with the strategic objectives of the Vision for Leeds in aiming for Leeds to be the ‘Best City in the UK’. A change to the Core Strategy’s plan period at this stage in the process, would have major implications for the plan and spatial strategy as a whole, for example the overall scale of housing growth. As emphasised above, the plan is sound in relation to the plan period advocated by the NPPF and the supporting evidence base.</p>	<p>No change.</p>
<p>Directions Planning (on Behalf of the Otley Town Partnership and</p>	<p>Express concern that the strategic objectives are inward looking and do not recognise the wider role of</p>	<p>The role of Leeds within the context of the City Region, is covered as part of the first bullet point in para. 3.2.</p>	<p>No change</p>

Mr & Mrs Haigh).(5121)	Leeds within the City Region.		
	The vision needs to be referred to throughout the document	Point noted and opportunities will be taken to improve cross references where necessary and do not result in repetition.	Change: Consider minor cross references where necessary through editing.
	<b>Objectives</b>		
Hallam Land Management Ltd, Ashdale Land & Property Company Ltd, Templegate Developments (via Barton Willmore Planning Partnership-Northern) (0057)	Support for Core Strategy Objectives	Support welcome	No change.
	<b>(i) City Centre</b>		
Highways Agency (0060)	Objective 2 re. development in southern part of city centre and the South Bank, should be dependent on firm City Council proposals for a revised route to extend the loop road and upon the agreement of a management strategy for the M621 and its junctions with the local primary road network.	These issues are subject to ongoing consideration and technical work between the City Council and the Highways Agency and the scope for revisions will need to be considered within the light of the outputs of this work	No change
WYG (0420), Renew (5105)	WYG support the 4 City Centre objectives but consider but consider that they need to be expressed in greater detail elsewhere, together with an assessment of the approach to the southern half of the City Centre Renew consider that reference could be made for mixed use housing development in Holbeck Urban Village.	The purpose of the objective for these areas, is to identify the locations positively as strategic opportunities as part of the Core Strategy. Further work will be necessary outside of the Core Strategy process to work up more detailed proposals.	No change
	<b>(ii) Managing the needs of a Successful District</b>		
Craven District Council (5888)	Support for Objective6 and (ii)		



ASDA Stores Limited (via Osborne Clarke) (5889)			
Kebbell, Keyland, Chatford, Taylor Wimpey and Ashdale, Barratt Leeds, Mirfield, Miller, Barratt York, Warner, Redrow (via Dacre Son and Hartley) (0480)  Redrow Homes (Yorkshire) Ltd (1938) Wortlea Estates, Redrow Homes, Robert Ogden Partnership Ltd, Housebuilder Consortium (via ID Planning) (5671)  Barratt David Wilson Homes Yorkshire Homes (5895)  T G M F Emsley (via ID Planning) (1186)	Concern that Objective 8 of the Core Strategy is not sound within the context of the NPPF.	The City Council considers that it's approach to the phased release of sites is consistent with the NPPF and the evidence base for the Core Strategy. Detailed consideration of comments in relation to SP6, SP7 and Policy H1 (Managed Release of Sites), is covered in a separate topic paper.	No change.
Harrow Estates (via WYG) (0420)	Consider that Objective 8 should be expanded to make reference to opportunities outside the main settlement hierarchy as set out in para. 4.6.17	A key spatial approach of the Core Strategy is to deliver regeneration of growth in sustainable locations as part of the identified Settlement Hierarchy. Whilst para. 4.6.17 recognises that there may be circumstances, where opportunities exist outside the hierarchy, this is not the overall focus of the plan and on that basis it is not considered that Objective 8 should be amended.	No change
	<b>(iii) Place Making</b>		
English Heritage (0099)	Support for (iii)	Support welcomed	No change.
Templegate Developments (via Barton Willmore	There is no reference to the need for new town and local centres which will be required as a result of the	This is a detailed point, covered by the scope of Policy P7 (The Creation of New Centres), rather than a strategic matter to be covered under the objectives.	No change.

Planning Partnership – Northern) (0057)	growth aspirations of Leeds. The objective should be amended accordingly		
Leeds Civic Trust (0062)	Objective 12 needs to be reworded to make reference to the need to “enhance” existing areas. Objective 13 needs to be amended to make reference to the “refurbishment and/or re-use of buildings’.	The focus of Objective 12, is to enhance design and positive use of the historic environment. The refurbishment/reuse of buildings is a component of the wider regeneration of areas.	No change.
The Victorian Society (3059)	General support for objective 12 but suggest amendment to make reference to need to ‘create and maintain’.	The need for maintenance is an important issue as a consequence, the need to “maintain” areas is supported for inclusion as a change.	Minor change Objective 12 add the following wording “...historic environment to create <i>and maintain</i> , distinctive...”
Inner NW Area Committee Planning Sub Group (5696)	Support for Objective 14 but suggest amended wording to add “ ...and workforce <i>and support the creation of more equal communities which narrow the gap between rich and poor</i> ”.	The comments are noted but the Core Strategy as a whole has been set to help deliver the priorities of Vision for Leeds 3. The need to support equal communities and economic prosperity for all is integral to this approach.	No change.
	<b>(iv) Well Connected District</b>		
(5942) North Yorkshire County Council	General support	Support welcome	No change.
Templegate Developments (via Barton Willmore Planning Partnership-Northern)	General support for Objective 16	Support welcome	No change.
Highways Agency (0060)	Need to promote development in locations that are accessible and sustainable	This point is accepted and central to the Core Strategy’s approach to the delivery of regeneration and growth through the settlement hierarchy, in locations considered to be accessible and sustainable. Detailed consideration of these in relation to individual sites, will be considered as part the preparation of the Site Allocations DPD.	No change.
Leeds Civic Trust (0062)	Suggest additional objective, “Promote the improvement and reconfiguring of existing neighbourhoods and centres and other places and routes to make them easier and more attractive for walking/cycling”.	These principles are covered within the context of the current Objectives.	No change.

Mr Lee Davidson (250)	Objective is vague on how new opportunities for cycling and walking might be achieved.	The purpose of the Objectives is to help provide a strategic focus and overall direction. Detailed implementation issues, will need to be considered as part of the Infrastructure Delivery Plan, related programmes and within the context of individual development proposals.	No change.
	<b>(v) Managing Environmental Resources</b>		
Environment Agency (0046)	Amend Objective 18 to include the following principle: "Wherever possible there should be the principle that in order to achieve sustainable forms of development, development should be located in low flood risk areas and only when it is demonstrated that this is not possible through the appropriate tests, measures to mitigate the risks should be implemented".	This comment is noted but is dealt with as part of Policy EN5.	No change.
Meadowside Holdings Ltd, The Hatfield Estate, The Ledstone Estate, The Diocese of Ripon and Leeds, AR Brigg and Co, The Bramham Park Estate, Lady Elizabeth Hastings Estate Charity (via Carter Jonas) (5681)	Objectives for Place making and Managing Environmental Resources give emphasis to Green Infrastructure, Landscape, Natural Habitats, rather than to built or cultural heritage.	Objective 11 makes reference to 'cultural facilities' and Objective 12 makes reference to the 'positive use of the historic environment'. On balance it is considered that the objectives give sufficient emphasis to both the 'green' and 'built' heritage.	No change
	<b>(vi) Implementation &amp; Delivery</b>		
Highways Agency (0060)	Need to take into account transport/accessibility issues	Through the preparation of the Core Strategy (and supporting material, including the draft Infrastructure Plan), the City Council recognises that planning for the scale of regeneration and growth envisaged in the plan, presents major opportunities and challenges. Within this context (and the objectives of the Local Transport Plan), the City Council is working actively with the Highways Agency and other City Region Partners, including neighbouring local authorities, to manage growth and to seek to mitigate against, any adverse impacts.	No change.
	<b>4. Spatial Development Strategy</b>		

	<b>Overview &amp; Location of Development</b>		
Directions Planning (On Behalf of Otley Town Partnership & Mr & Mrs Haigh) (5121)	Welcome classification of Morley and Otley as major settlements.	Support welcome.	No change.
Boston Spa Parish Council (0112)	Discrepancies in Settlement Hierarchy roles and definitions/ Discrepancies on Town & Local Centre roles	In support of the Core Strategy, the City Council has completed background work in the development of the Settlement Hierarchy and it is considered that the approach to the role of settlements and centres is consistent with this evidence.	Incorporate material as part of a Background Paper.
Collingham with Linton Parish Council (0115)	The criteria for identifying a small settlement in para 4.1.10 are unsound	In support of the Core Strategy, the City Council has completed background work in the development of the Settlement Hierarchy and it is considered that the approach to the role of settlements and centres is consistent with this evidence.	No change.
Mr Stuart Andrew MP (0165)	The final sentence of para. 4.1.4 needs to be strengthened and clarified and redrafted to reflect the desire of the NPPF to preserve the Green Belt.	The reference to 'exceptional circumstances' referred to in para. 4.1.4 is consistent with the NPPF.	No change.
Savills (0466)	The Council has failed to produce a robust evidence base for the identification of the smaller settlements in the District, listed in Table 1., need to amend the table to include Thorner in the list of small settlements.	In support of the Core Strategy, the City Council has completed background work in the development of the Settlement Hierarchy and it is considered that the approach to the role of settlements and centres is consistent with this evidence. Small Settlements are defined on the basis of a population of at least 1500, with supporting facilities (a primary school, shop or pub). Thorner has a population of 1284 and is therefore below the threshold for Small Settlements.	No change.
Chatford, Warner,, Miller, Redrow, Kebbell, Taylor Wimpey, Barratt Leeds, Taylor Wimpey and Ashdale, Barratt York, Keyland, Mirfield (via Dacre Son & Hartley) (0480)  Redrow Homes (Yorkshire) Ltd, Housbuilder	Para. 4.1.4 should be amended to read, "... the majority of growth should be focused within <i>and adjoining</i> the Main Urban Area <i>and Major Settlements</i> ...".	The focus of the Core Strategy approach is to deliver major regeneration and growth, within the context of the settlement hierarchy. The introduction of the proposed wording would dilute this focus. Opportunities for development adjacent to settlements, will be considered as part of the Site Allocations DPD process.	No change.

Consortium, Wortlea Estates, Robert Ogden Partnership Ltd (via ID Planning) (5671)			
Directions Planning (on Behalf of the Otley Town Partnership and Mr & Mrs Haigh) (8121)	Support for the identification of Otley as a major settlement but concern that the settlement needs employment opportunities as well as housing.	Support for Otley as Major Settlement welcomed. The point regarding the need for employment opportunities is noted and is covered as part of SP8 and EC3 within the Core Strategy and as part of the Site Allocations DPD process.	No change.
AR Briggs and Co, The Bramham Park Estate, The Diocese of Ripon and Leeds, Meadowside Holdings, Lady Elizabeth Hstings Estate Charity, the Hatfield Estate (via Carter Jonas) (5681)	The document is not clear where and when evidence and appraisal of the District's settlements was undertaken/in undesignated villages, development proposals should be considered on their merits/support for a number of settlements within the hierarchy: Swillington Collingham, Boston Spa and Thorp Arch	The City Council has undertaken technical work, which will be made available as a Background paper.	No change.
	<b>KEY DIAGRAM</b>		
	<b>Settlement Hierarchy</b>		
The Bramham Park Estate; AR Briggs and Co; Meadowside Holdings Ltd; Lady Elizabeth Estate Charity; The Hatfield Estate; The Diocese of Ripon & Leeds (Carter Jonas)	Clifford and Thorp Arch should be indicated in pink (i.e. as a small settlement).	Clifford and Thorp Arch do not fall within the definition of a smaller settlement (at least 1,500 population, primary school and shop or pub).	No change.
	<b>Location for New Housing</b>		
Ashdale Land & Property Company Ltd (Barton Willmore Planning Partnership – Northern)	Support identification of Micklefield and Kippax for 500-1,000 new homes and Allerton Bywater for 1-2,000 new homes. Housing should be provided at the top end of the range, if not in excess.	Comment noted	No change.
Boston Spa Parish Council	Boston Spa expected to carry 500-1,000 new homes, representing an	Boston Spa (smaller settlement) is promoted for new housing consistent with the Spatial Strategy, the availability of sites and	No change.

	<p>increase in housing stock of between 28% and 55%. As a 'smaller settlement', it should only carry a smaller proportion of new homes in the NE quadrant. The designation of Boston Spa on the Key Diagram should be removed. Clifford is not shown as carrying any new homes, but the SHLAA identifies 616 houses, of which 327 are on boundary with Boston Spa.</p>	<p>access to services.</p> <p>Clifford is a village not a smaller settlement. Promoting further significant new housing at Clifford is not consistent with the spatial strategy/settlement hierarchy. The inclusion of sites in the SHLAA does not necessarily mean they are acceptable or will be allocated for housing.</p>	
Harrow Estates (White Young Green)	<p>5-10,000 homes in the City Centre is reliant on apartment schemes and does not match market delivery in recent times. SP3 talks about family housing, but there is a lack of sites to meet this aspiration in the required quantities.</p>	<p>The SHLAA (2011) identified capacity for 16,000 units in the City Centre. The Core Strategy sets out a figure 10, 200 dwellings for the City Centre, which is considered to be realistic.</p>	No change.
D Westwood & Son (White Young Green)	<p>Support Lofthouse and East Ardsley as key locations for new housing growth. 1,000 and 2,000 respectively.</p>	<p>Comment noted.</p>	No change.
DPP	<p>Wetherby should accommodate significantly more than 500 to 1,000 new homes. It can accommodate at least 1-2,000 new homes. Support Collingham, Barwick-in-Elmet and Bardsey as smaller settlements wherein 8,000 new homes are to be built.</p>	<p>The figures given are a broad indication of housing numbers for each settlement. If more housing came forward in Wetherby above the numbers shown in the Core Strategy, they would be considered having regard to Policy SP1 and SP7.</p>	No change.
Redrow Homes (Yorkshire) Ltd (ID Planning)	<p>Land east of Rawdon should be identified as strategic location for housing growth. There should be a specific policy linkage between strategic housing growth and delivery of the A65 Leeds/Bradford Airport link.</p>	<p>The symbol for new housing in the Key Diagram (KD) is not site specific. The symbol shown covers the Guiseley / Yeadon / Rawdon area. The Core Strategy does not identify strategic housing sites. No evidence has been presented to justify the link between strategic housing growth and the Airport link road.</p>	No change.
Edmund Thornhill, Thornhill Estates (ID Planning)	<p>New strategic locations for housing growth:</p>	<p>Farsley lies within the Main Urban Area (MUA). Given the geographical size of the MUA a symbol is not used. The Farsley area will contribute towards the 33,300 total for the MUA. The Core</p>	No change.

	<p>Calverley -Sites at Foxholes Crescent (1.15ha), Upper Carr Lane (0.6ha), East of Calverley Cutting (2.5ha) and West of Calverley Cutting (4.9ha)</p> <p>Farsley - Site at Kirklees Knowl, Farsley (45 acres).</p>	Strategy does not identify strategic housing sites.	
Great North Developments Ltd c/o Evans Property Group (ID Planning)	<p>New strategic location for housing growth:</p> <p>Micklefield – north and south of Church Lane (350 acres)</p>	The symbol for new housing is not site specific. The symbol shown covers the Micklefield area. The Core Strategy does not identify strategic housing sites.	No change.
Wortlea Estates (ID Planning )	<p>New Strategic location for housing growth:</p> <p>Whitehall Road, New Farnley</p>	New Farnley lies within the Main Urban Area (MUA). Given the geographical size of the MUA a symbol is not used. The New Farnley area will contribute towards the 33,300 total for the MUA. The Core Strategy does not identify strategic housing sites.	No change.
The Ledston Estate (Carter Jonas)	Allerton Bywater should be identified as a location for growth	A symbol for new housing is already shown for Allerton Bywater.	No change.
	<b>Strategic Locations for Job Growth</b>		
Aberford Parish Council	The KD shows a strategic location for job growth in the wrong location. The industrial site is to the west of the Garforth-Aberford road.	The symbol for strategic locations for job growth are not site specific. The symbol shown covers the Garforth area.	Minor change: Reposition the symbol for the strategic location for job growth for the Garforth area on the Key Diagram.
British Library (via Drivers Jonas Deloitte)	British Library at Boston Spa covers 17 ha is required to be retained for employment related uses for the duration of the plan period in line with the library's Property Strategy 2002. Identify the British Library on the KD and in supporting text, as a Key Employment Location for the promotion and growth of digitisation and archiving services in particular	The Core Strategy is not the appropriate means for considering individual site specific proposals, notwithstanding this, Policy SP8 of the Core Strategy does support existing economic priorities and existing businesses. If the British Library wishes to promote its future development proposals, it is recommended to do this through the Site Allocations DPD process.	No change.
	<b>PAS</b>		
Gaunts Ltd (Peacock	KD shows land west of Calverley	The CS cannot show specific sites to be allocated. This is the role	Minor change;

& Smith)	lane B6165 and south of the Ring Road A6120 (Farsley) as green belt and green infrastructure. It is PAS land. Policy should identify land allocated as PAS both currently in UDP and new sites to be allocated through Site Allocations.	of the Site Allocations DPD.  It is noted that the Key Diagram inadvertently shows the PAS site areas as Green Belt, this will be addressed in the revisions to the Key Diagram. The PAS site areas will now be excluded from the Green Belt designation	Revise the Key Diagram to remove the areas occupied by PAS sites from the Green Belt.
Robert Ogden Partnership (ID Planning)	The Tingley PAS site should be identified as a strategic location for housing growth	The future use of the Tingley PAS site will be considered by the Site Allocations DPD. The Core Strategy does not identify strategic housing sites.	No change.
	<b>Transport</b>		
The Bramham Park Estate; AR Briggs and Co; Meadowside Holdings Ltd; Lady Elizabeth Estate Charity; The Hatfield Estate; The Diocese of Ripon & Leeds (Carter Jonas)	Following improvements to the A1 from Bramham to Wetherby this is now a motorway. This should be shown on the KD and the correct route of the carriageway.	The KD shows the A1 correctly, referenced as A1(M).	No change.
Gareth Brown	Missing link in the masterplan for the Outer Ring Road to match the East Leeds Orbital. Access between J26/27 of the M62 and Dawson's Corner (Junction A647/A62120) is very poor and a missing link in the orbital route around Leeds that is A62120/M1/M62. Previous plans for a dual carriageway around the ORR get no mention.	The KD shows the proposals in the Leeds Transport Strategy.  Improvements to the ORR are covered under SP11 (iii) 'Targeted highway schemes to alleviate congestion and assist improved connectivity for local and strategic orbital movements.'  There are no proposals for a new link between M62 Jn 26 and Dawson's Corner.	No change.
Highways Agency	Proposals on the KD expected to have significant traffic impact on the Strategic Road Network: <ul style="list-style-type: none"> <li>• City Centre and the Aire Valley – east, south and west of Leeds</li> <li>• Morley - M621 between Outer Ring Road and Stourton and less adverse impact on J27 Gildersome M62</li> <li>• Allerton Bywater, East Ardsley</li> </ul>	Leeds City Council are currently working with the Highways Agency and their consultants to assess 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.	No change.



	<p>and Rothwell - impact between Five Towns of Wakefield district, Aire Valley and the City Centre</p> <ul style="list-style-type: none"> <li>• Boston Spa. Scholes and Wetherby – commuting to Leeds and York, impact on M1 junctions</li> <li>• Employment locations in City Centre, Aire Valley, Leeds Valley Park, Tingley, Gildersome, Cross Gates and East Garforth – need for developer-funded enhancements to capacity of Strategic Road Network</li> <li>• Park and Ride sites – see SP11</li> </ul> <p>Lack of evidence of traffic modelling of impact of the Core Strategy</p>		
	<b>Opportunity for Regeneration &amp; BF land/ residential development</b>		
White Young Green	Support for KD recognising opportunity for regeneration and brownfield land/residential development in locality of Thorp Arch	Comment noted.	No change.
Samuel Smith Old Brewery (Tadcaster) (Cunnane Town Planning)	Re. Thorp Arch, no further explanation provided either within the CS or the KD. The CS fails to provide a clear and unambiguous policy framework to guide development of the area. Notation is not based on evidence of need, suitability, availability or viability of the sites development potential and should not be relied upon as 'deliverable' during the plan period. The notation should be deleted from the KD.	Paragraph 4.6.17 refers to the context of identifying Thorp Arch. Proposals are advancing through the pre-application process and form part of the background evidence to the Core Strategy.	No change.
Montpellier Estates	A similar opportunity for a 'brown triangle' in the South Bank area.	The site falls within the Leeds City Centre – Southern Area shown on the Key Diagram and is covered by Policy CC2 which identifies the development opportunities including suitable land uses.	No change.
	<b>Green Infrastructure</b>		

Land Securities & Evans Property Group (Quod)	Area of land between White Rose Shopping Centre and the railway line to the west is shown as GI on the KD. It is not clear what this relates to, given the proximity to the centre's perimeter road and car parking to the railway corridor. Request clarification from the Council.	The Key Diagram should reflect the location of GI as shown on Map 14 (Strategic Green Infrastructure). The land between White Rose Shopping Centre and the railway line is not GI or Green Belt as currently shown in the Key Diagram. The Key Diagram should be corrected to reflect this.	Minor change; Amend the Key Diagram to remove the Green Infrastructure and Green Belt from the area between White Rose Shopping Centre and the railway line and extend the area shaded in grey (Main Urban Area).
Mr C and Mr A Haigh (Directions Planning)	Object to inclusion of land to the west of Dewsbury Road and east of Morley as Green Infrastructure. It does not perform several of the functions as stated is a requirement of GI under para. 4.10.5.	The Key Diagram is indicative only and should not be used to show site specific designations. A full response is provided by the Council in relation to Policy SP13 (Strategic Green Infrastructure).	Minor change: Amend text at 4.10.4 to assist understanding of SGI shown on plan 14 and key diagram. Also legend needs amending to refer to SGI and not GI.
	<b>Regeneration Priority Areas</b>		
Land Securities & Evans Property Group (Quod)	The South Leeds Priority Regeneration Area is identified on the KD with its boundaries reflecting the MUA and Major Settlements in the vicinity. This boundary is different to that set out in the Investment Strategy and excludes all existing open space. It is not clear why the open spaces are excluded but given the need for the image of the area to be enhanced and the recognition in the Investment Strategy of the need for landscape enhancements, the boundary should be amended to better reflect the Investment Strategy.	The areas of existing open space lie within the GB. The Regeneration Priority Areas boundary has been drawn to exclude the GB areas of the South Leeds Investment Strategy as decisions on Green Belt release are a matter for the Site Allocations DPD.	No change.
	<b>Adjoining Authorities</b>		
Wakefield MDC	Wakefield Core Strategy Key Diagram shows key issues and links to adjoining authorities. In the	The Key Diagram already indicates the links between Leeds and the adjoining authorities. More detailed consideration of cross-boundary issues is being considered in the context of the Leeds	No change.

	Wakefield Site Specific Proposals document sections 3, 6, 7 and 15 are where key links and the interrelationship with Leeds are refined. Highlight relationship with Leeds and provide context for the Leeds Core Strategy and the role of larger places in Leeds City Region and transport links.	City Region and the Duty to Cooperate. It is not considered appropriate to provide more detailed references in the Key Diagram. Specific cross boundary issues will be addressed via the identification of issues and appropriate mitigation, through the Duty to Cooperate arrangements and as necessary via the Infrastructure Delivery Plan.	

## **APPENDIX 2 - CHANGES TO CORE STRATEGY TEXT**

### **1. INTRODUCTION**

- 1.15 In progressing the Vision for Leeds there are a range of partnership arrangements and mechanisms in place, focusing on priorities for action, which will be subject to regular review. As part of this framework, a City Priority Plan (2011-2015) has been developed, along with the City Council's own Business Plan (2011-2015). The Council has also agreed areas for priority housing investment with the Homes and Communities Agency and set these out in a shared Local Investment Plan (2011-15). Leeds is also an active partner in the Leeds City Region grouping of local authorities, acting through the Local Enterprise Partnership, as a focus to tackle strategic issues across the City Region. *Within this context also, the City Council has worked closely with Metro, through the West Yorkshire Local Transport Plan Partnership, in the preparation of the West Yorkshire Local Transport Plan (My Journey – Connecting people and Places) 2011 – 2026.*

#### The Regional Context

- 1.16 The Regional Spatial Strategy (RSS) for Yorkshire and the Humber provides the regional level planning framework. The RSS was developed over a number of years and was adopted in 2008, and the Core Strategy work is therefore firmly based on its policies and overall vision. Subsequently, the Government has announced its intention to abolish all RSSs, although this is not anticipated to be confirmed until later 2012.
- 1.17 The Leeds City Region partnership has therefore developed its own 'Interim Strategy Statement' (*approved by the Leaders Board in April 2011*) to provide a strategic context for both plan making and major development proposals. This is to reflect the context of the wider strategy setting work of the Leeds City Region, the uncertainty over RSS, and the duty to co-operate with neighbouring authorities as set out in the Localism Act (Nov 2011). The Heads of Planning and Chief Executives believe that such a statement was urgently needed to provide a framework for the continuing preparation of development plans.
- 1.18 The strategy statement includes some of the exact policies in the RSS in order to ensure that it has broad support in the City Region, as agreed through the extensive stakeholder consultation during the RSS process. All Leeds City region authorities have recognised that these key policies in the former RSS are those which articulate the urban transformation ambition, safeguard environmental assets, and identify the key spatial investment priorities.
- 1.19 *Since the Localism Act received Royal Assent, the NPPF has been finalised and includes further policy in regard of strategic planning. In light of this the city region partnership has further developed its role in support of the Local Planning Authorities in exercising the Duty. This ranges from developing common approaches to documentation through to the commitment to develop a spatial investment plan in the City Deal. These actions will help local planning authorities*

*to better understand and respond to activities that take place beyond their plan area and impact on their plan.*

## **2. PROFILE OF LEEDS METROPOLITAN DISTRICT**

### **The Growth of Leeds**

- 2.6 ~~Parts of Leeds have a long history, dating~~ *Leeds has a rich and diverse history. Within the District there are stone hut circles dating from the Bronze Age. The majority of the City Centre dates from 1207 when the Lord of the Manor founded a new town with a new road called Briggate leading up to a river crossing. The rest of the City Centre layout has medieval origins, still evident in its street patterns and covered arcades, and the relocation in 1684 of the cloth market onto Briggate created the core of the modern city of Leeds. The City Centre was extended in the mid 1700s on the west side resulting in the numerous squares, which survive today. The population grew to 30,000 at the end of the 18<sup>th</sup> Century and Leeds became one of the busiest and most prosperous urban centres in the north of England.*

### **Housing**

- 2.13 One of the biggest challenges Leeds faces is to provide enough quality and accessible homes to meet the city's growing population, whilst protecting the quality of the environment and respecting community identity. *Within this overall context the need for affordable housing and affordable warmth are key issues.* It is clear that house building in Leeds needs to significantly increase. Housing starts decreased sharply in July 2008 and since then the rate of new starts has averaged just 80 units a month, compared to a monthly average of 330 in the four previous years. The impacts of the recession are clearly seen in that the completion of new dwellings fell to their lowest level in years during 2010/11.

### **iii) Our Green Environment**

- 2.39 The environment in Leeds is continually improving, including air quality and the cleanliness and attractiveness of the waterways for wildlife, particularly the River Aire and canal corridors. However, the City Centre does have a relatively small amount of greenspace, and so the Council's ambition is to develop a major new City Centre park just south of the River Aire, with strong pedestrian links across the river into the heart of the shopping and commercial area. The upgrading of other City Centre public spaces is also important. *In addition, the network of Public Rights of Way (PROW) represents the arteries that help people access the countryside and urban greenspaces, linking people with place and linking urban to rural. Within Leeds there are 819km of rights of way, 628kn of footpath, 180km of bridleway, together with a short network of byways and other routes with public access. Included within this total area are key strategic routes (such as the Leeds Country Way and local recreational routes (such as the Meanwood Valley Trail). Within this context also, the City Council has produced a Rights of Way Improvement Plan, in response to the Countryside Rights of Way Act (2000), setting out a 10n year improvement plan for the Rights of Way network.*

### 3. SPATIAL VISION

#### Spatial Vision and Objectives

Para. 3.2 6<sup>th</sup> Bullet Point

- Aire Valley will become an innovative new living and working community, *supported by the necessary community facilities and infrastructure*, which is a national model for sustainable development, accommodating up to 9,000 new homes and 35,000 new jobs within a distinctive green environment. An integral part of the urban eco-settlement will be the establishment of low carbon solutions, and energy requirements in established communities will have been significantly reduced by retrofitting,

#### Objectives

- |     |   |
|-----|---|
| 12. | Support high quality design and the positive use of the historic environment to create <i>and maintain</i> distinctive and cohesive places that include measures to improve community safety. |
|-----|---|