

**Report of the Director of City Development**

**Report to: Development Plan Panel**

**Date: 11<sup>th</sup> September 2012**

**Subject: LDF Core Strategy – Publication Draft, Analysis of Consultation Responses: Placemaking - Retail and Centres**

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. A number of representations gave general support to this Chapter and the Council's 'centres first' approach, and all the policies had representations in support. Many comments received have helped improve and clarify specific policies. The majority of comments warrant no changes, and a few issues warrant only minor changes to the supporting text in order to add clarity. There are a couple of issues which are significant enough to justify major changes to the relevant policies, and the analysis and suggested changes in this regard are set out in Appendices 1 and 2.

**Recommendations**

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).

## **1.0 Purpose of this Report**

- 1.1 The purpose of this report is to review consultation responses in relation to the overall approach to retailing and centres including Strategic Policy SP2 and the Placemaking chapter Policies P1 to P9 (the City Centre is covered by a separate report). 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 (and 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, the Leeds City Centre, Town and Local Centres Study, Housing Growth in Leeds, the Strategic Housing Land Availability Assessment, the Strategic Housing Market Assessment and the Leeds Open Space, Sport and Recreation Assessment).

## **3.0 Main Issues**

### Floorspace projections

- 3.1 Some developers had concerns over the Core Strategy taking a cautious approach to the comparison shopping floorspace projections in the Leeds Centres Study (2010).
- It is considered that sufficient justification for this approach is set out in the Core Strategy. This includes the key issue that within the first five years priority needs to be given to Trinity and the Eastgate Quarter to ensure their success, and also to give time for the rest of the City Centre to adjust to any resulting trading effects. Additionally, growth forecasts have decreased since the Study was published and projecting future retail trading is currently at its most uncertain. An updated retail study in a few years is proposed as the appropriate mechanism to identify further floorspace requirements.

### Out of town shopping centres

3.2 A range of conflicting opinions were expressed, including general support for the policy approach, concern that more weight should be given to the regeneration and economic benefits of the White Rose Centre, and also the contrary opinion that too much weight is given to potential for expansion of out of town shopping centres.

- The CS does recognise the importance of the White Rose Centre and other out of centre retail parks. However, national policy is clear on how in general terms such out of town centres should be addressed and it would be inappropriate for the CS to depart from this centres first approach without a significantly greater amount of evidence. The Centres Study identified capacity in the sector of the City containing the White Rose Centre, but made it clear that the market share approach should not support its extension in isolation from other policy considerations. No changes are proposed to the CS in this regard as consider that it is in conformity with the NPPF and is sufficiently clear in its approach.

### Spatial Policy 2 – Hierarchy of Centres and Spatial Approach to Retailing, Offices, Intensive Leisure, and Culture

3.3 General support was given to SP2, and there were no particular comments which required any changes making. A number of the more detailed comments were considered better addressed under the Placemaking policies. Respondents raised similar points on floorspace projections as have already been discussed above.

### Policy 1 – Town and Local Centre Designations

3.4 Need more clarity as to new centres proposed in the Aire Valley.

- The Aire Valley Area Action Plan is to identify which centres are necessary.

3.5 More clarity is needed as to why certain centres are designated within their level of the hierarchy.

- As a result of emerging survey data undertaken to inform the Site Allocations DPD, it has now been possible to further clarify and address some anomalies in the ranking of some centres within the overall hierarchy. When the data is sorted by gross retail floor space (A1), some centres appear to be anomalies:

<b>Centre</b>	<b>Anomaly</b>	<b>Proposal</b>
Holt Park	Small for a town centre	No change
Middleton	Small for a town centre	No change
Dewsbury Road	Small for a town centre	No change
Farsley	Small for a town centre	No change
Street Lane	Large for a lower order local centre	Change to higher order local centre
Chapelton Road	Large for a lower order local centre	Change to higher order local centre
Lower Wortley	Large for a lower order local centre	No change
Chapelton, Pudsey	Small for a higher order local centre	Change to lower order local centre

- It is considered that Farsley, Dewsbury Road, Middleton and Holt Park all continue to be valid as town centres due to a combination of their community facilities, scope for additional retail provision and further expansion, recent planning permissions, and regeneration projects. Street Lane and Chapelton

Road are proposed to become higher order due to their overall volume of retail floorspace and the presence of larger format convenience provision through the Co-op (Street Lane) and the Continental Supermarket (Chapelton Road). Lower Wortley is an anomaly due to the presence of Matalan which makes up 63% of the total gross floor space in the centre (with another 13% being residential). Its designation as lower order is therefore justified due to its limited range of retail and community facilities. Chapelton Pudsey is relatively small with overall retail provision relatively limited. The largest building is occupied by Rhodes and Scholes for manufacture of office furniture, and the largest unit for food shopping is a very small Sainsbury's which only provides a neighbourhood 'top-up' shopping role. Therefore there appears no justification for this centre to remain as a higher order local centre, and propose it should be changed to lower order.

- 1,500 sqm total gross A1 retail is therefore proposed as a basic threshold to differentiate between higher and lower order local centres (notwithstanding the Lower Wortley anomaly and any other site specific issues which may arise in individual centres).
- There are also a number of centres which are now considered too small for inclusion as lower order local centres as they are no larger than any other neighbourhood parade across the District. This has been assessed using a threshold of a lower order local centre needing to have more than 500 sqm retail (A1) and at least an additional 500 sqm across all other uses:
  - Galloway Lane
  - Coldcotes Circus
  - Ireland Wood
  - Woodlesford
  - Adel
- Weetwood Far Headingley also comes below this threshold for at least 500 sqm retail, but due to its configuration, range of uses, and having a total floorspace far exceeding a number of other centres, it is clearly larger in size and function than a neighbourhood parade and is proposed to remain as a lower order local centre.

#### Policy P2 – Acceptable Uses in and on the Edge of Town Centres

#### Policy P3 – Acceptable Uses in and on the Edge of Local Centres

3.6 Use of upper floors for residential should be encouraged not just acceptable. Policies are overly prescriptive.

- Agree that NPPF encourages residential on appropriate sites within centres. The policies provide clarity and a locally distinctive interpretation of national policy. The acceptable threshold size for a supermarket in higher order local centres is stated as only for guidance and subject to local circumstances. Having a threshold and list of acceptable uses gives more clarity in advance, is more transparent, and allows consistency of decisions. However, based on emerging survey data undertaken to inform the Site Allocations DPD and the range of sizes of stores in the different levels of the hierarchy, it is proposed to reduce this threshold slightly to 1,500 sqm. This also aligns better with Policy P8 requiring sequential and impact tests.

## Policy P4 – Shopping Parades and Small Stand Alone Foodstores Serving Local Neighbourhoods and Communities

- 3.7 Inappropriate for the policy to be too precise regarding scale of small scale food stores allowed. Also the threshold should be more flexible to allow larger stores in Regeneration Priority Areas.
- P4 provides clarity and a locally distinctive interpretation of national policy, and setting no threshold would mean that a sequential test would be required for even the smallest sized proposals for a main town centre use. It is set in order to support local communities and promote local provision. Having this threshold also gives more clarity in advance, is more transparent, and allows consistency of decisions. It is important in Regeneration Areas to promote their existing centres and Policy P8 addresses proposals for larger stores through the centres first approach.
- 3.8 Differing views were offered, in that promoting retail uses above those such as property management/letting offices does not take account of changing demands and would stop opportunity for local employment and keep units empty. Alternatively, it was suggested that a % figure should be specified to retain an amount of retailing within parades.
- P4 aims to maintain the retail function of local parades to provide at the very local level. Aspects such as length of vacancy would be material considerations at planning application stage. P4 does consider cumulative impact but there is no evidence to impose a % figure, and the range of parades across the District is too varied to do this in the Core Strategy.
- 3.9 Considerations of change of use from retail to non-retail (including hot food takeaways) are equally applicable to other defined centres and not just neighbourhood parades.
- It is agreed that this is the case. As town centres and higher order local centres are/will be covered by shopping frontage policies, it is proposed to add the last paragraph and related criteria of P4 also into P3 to relate to lower order local centres.

## P5 – Approach to Accommodating New Foodstores Across Leeds

- 3.10 Some respondents considered that in the centres listed as those where the Council is promoting further foodstore provision, there is no evidence to show availability of sites. Respondents from Headingley also queried why other town centres were not included on the list, and that the character and amenity of Headingley would be harmed by a new major foodstore as it is already a successful centre serving a unique local community.
- Improved provision does not necessarily require a new site or an extension, and also by supporting these centres in principle over the timescale of the Core Strategy, sites may be encouraged to come forwards. The centres listed were identified through the Centres Study based on health checks, capacity/need figures, recent commitments, and the distance to other town centres. Other CS policies would still apply regarding scale, impact, and amenity. The Site Allocations DPD will also provide the opportunity to take into account such detailed issues.

## P6 – Approach to Accommodating New Comparison Shopping in Town and Local Centres

3.11 No special issues were raised.

## P7 – The Creation of New Centres

3.12 The need for the policy was queried, and that the location of new centres should be specified further and with a limit on the amount of main town centre use floorspace within them.

- The intention of the policy is to support the Site Allocations DPD and reflect that over the timescale of the CS a blanket rejection of new centres would be inappropriate. It would be too onerous to set floorspace limits in advance.

## P8 – Sequential and Impact Assessments for Town Centre Uses

3.13 Policy P8 was the most contentious of all the centres policies, primarily because of its very detailed nature allowing for a range of specific comments to be made. Overall, representors felt that it was unduly complicated, too long, too prescriptive including setting catchment areas, and confusing.

- If thresholds were not set then the Council would have to apply a sequential test against every town centre use proposal, whereas P8 reduces the severity of the test. This is therefore both pragmatic, and proactive to growth, especially at the local level to support communities' needs. Having detailed criteria allows for clarity in advance, consistency, and transparency.
- However, in response to the detailed comments a number of changes have been made to Policy P8, which in their entirety have greatly increased its clarity, and reduced its complexity and length. This is primarily to make more clear which main town centre uses apply and to which criteria, and remove duplication. Overall this is considered to be a major change to Policy P8.

3.14 Another key comment was querying the reduction from the NPPF threshold of 2,500 sqm for impact tests, to 1,500 sqm.

- Again, the underlying reason is that a local interpretation of centres policy is required, and the NPPF allows for a local threshold to be set. It was based on recommendations in the Centres Study and on the general size banding of different types/formats of stores.

3.15 There were queries over Criteria A and that the NPPF does not require an impact test within an existing centre.

- The aim of Criteria A was to allow the Council to address potential disproportionate impacts even where a new store was sited in centre. However, it is agreed that it is difficult to set an appropriate size threshold for the test, especially based on recent survey work undertaken for the Site Allocations DPD. Considered alongside the overall CS approach to directing growth into centres, propose to remove reference to requiring impact tests within existing centres.

## P9 – Community Facilities and Other Services

3.16 One school provider and the Conservative Group considered that Core Strategy could give more emphasis on the need for school provision in relation to new development. Sport England requested that 'sport and recreation' should be added to the list of community facilities.

- It is considered that school provision is adequately covered in P9, because due to the Council's statutory obligations for providing school places, repeating this

in the CS would not give the requirement any further weight. There has been (and is ongoing) close working with Education colleagues to ensure that there will be sufficient school infrastructure to support growth. The Site Allocations DPD and the Infrastructure Delivery Plan will in addition identify school requirements relating to specific locations. It is agreed that sport and recreation should be added.

#### **4.0 Corporate Considerations**

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

#### **4.1 Consultation and Engagement**

4.1.1 As outlined in this report, the Core Strategy Publication draft has been subject to a further 6 week period of consultation. This has been undertaken in accordance with the LDF Regulations and the City Council's adopted Statement of Community Involvement (SCI).

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

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

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

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

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

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

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

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

## **4.6 Risk Management**

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

## **5. Conclusions**

- 5.1 This report provides an overview of the issues raised about the Centres policies SP2 and P1 – P9. The issue of needing further clarity to Policy P8 is considered significant enough to justify a major change and the policy has been substantially altered in response. Recent survey work undertaken to support the emerging Site Allocations DPD has also identified more appropriate thresholds for classification between the different levels of the centres hierarchy, and allowed rectification of anomalies in the classifications of a few specific centres within Policy P1. The remaining issues warrant only minor changes or no changes at all, and the reasons for not making the changes suggested by respondents have been set out in detail.

## **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

#### Placemaking Chapter – Centres and Retail: SP2, P1 – P9

Representor/ Agent	Representor Comments	LCC Response	Action:
<b>TOWN AND LOCAL CENTRES – GENERAL (Qu 32)</b>			
ASDA Stores (via Osborne Clarke 5889)	The proposed retail strategy (other than Policy P3) is broadly supported.	Support welcomed.	No change
CAMRA (0085)	Support identification of importance of city centre, suburban centres and outlying town centres. Is important in these centres to retain amenities to produce a vibrant community and environment.	Support welcomed.	No change
CAMRA (0085)	Although A4 uses are mentioned as local centre amenities, should be distinction between the traditional pub and other types of bars as the former is the type under threat and therefore needs more recognition of importance and more specific weighting to help retain these institutions.	A public house is regarded as a town centre use within the NPPF therefore its role is supported within the CS through its approach to town and local centres. It is not possible within the use class system to distinguish between the range of uses covered by the A4 classification. But Policy P9 gives protection to pubs where they act as community facilities and services, and P11 gives protection where the building is of merit. In addition, the NPPF identifies pubs as community facilities and resists their unnecessary loss; recent appeals have been won on this basis. It is therefore considered that repeating NPPF would be unnecessary.	No change
Aviva Life & Pensions UK and the Crown Estate (via Indigo Planning 0806)	Identify Crown Point Retail Park as a complementary and preferable retail destination to alternatives outside of the PSQ.	See full response to this point in City Centre Chapter.	No change
Otley Town Partnership (via Directions Planning 5121)	Otley is an important town centre within the district and fulfils a market town function serving a wider rural area. The town centre strategy should include guidance/ support in relation to regeneration and renewal.	Policy SP4 on regeneration priority areas includes reference to supporting additional Council led regeneration initiatives that can demonstrate a positive impact.	No change
Scarborough Development Group (5719)	Could acknowledge that large development proposals, i.e. Thorpe Park, are also opportunities for placemaking.	Already addressed by design policies and Vision.	No change

Leeds Civic Trust (0062)	Need to reference importance of historic character of town and local centres and the importance and quality of the public realm. State that there is an intention to carry out character assessments. Development should enhance character of public realm.	Importance of historic character referred to in Policy P11, and Policy P10 refers to new development that respects and enhances streets, spaces etc according to local distinctiveness and the wider setting of the place, contributing towards placemaking, quality of life and being accessible to all. Additionally, strengthened wording to P10 and P11 has already been agreed at the previous Development Plan Panel. Amend para 5.3.4 to include reference to historic character and public realm.	Minor change - Amend para 5.3.4
Land Securities and Evans Property Group (via Quod 1091)	As a result of cautious approach, the CS only positively plans for 31,000 sqm of net additional comparison retail space, which is only 24% of the overall need (low growth scenario) at 2016, 19% of the need at 2021, and 18% of the need at 2026, after taking account of existing commitments. Since the evidence base was prepared, revised expenditure growth rates and special forms of trading rates have been published in the form of Experian Retail Planner Briefing Note 9, which do not dramatically alter the identified need for comparison retail floorspace across the District. Therefore, for NPPF consistency, need to positively plan for the full retail needs of the District. The evidence base demonstrates that this (new) requirement has not been met.	<p>The 31,000 sqm figure only applies to the City Centre. We are positively planning for comparison retail in the City Centre, as explained at Para 5.1.7. It is a market driven approach, taking into account local conditions, and Paras 4.2.3 and 4.2.4 also clearly set out the reasons why we have taken this approach.</p> <p>The NPPF sets out that plans should be justified: “the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.” Whilst the Leeds Centres Study shows there is wider need for comparison space in the White Rose area and identifies a level of overtrading, it also suggests that the evidence be treated with caution and that particularly in the first 5 years there needs to be the opportunity for Trinity and Eastgate (and Trinity Wakefield) to be successful and for the City Centre to readjust to this floorspace. This is therefore consistent with all the NPPF principles. As with all major schemes, they will cause internal trading effects and there will be readjustments, as has occurred over the past few decades. Additionally the Eastgate and the Harewood Quarter is a major commitment, and its delivery must be a priority due to its significant physical and economic regeneration benefits. This could bring forward other redevelopment opportunities within or closely related to the Prime Shopping Area. A further retail study will be necessary before any further addition to the floorspace.</p> <p>Experian assumptions and other data sources since the Study was published have decreased growth forecasts, and increased forecasts for online shopping. Retail trading is probably at its most uncertain in the modern era. Future</p>	No change

	<p>Also attached Land Securities letter originally sent 3rd August 2011 regarding concerns over the Centres Study:</p> <ul style="list-style-type: none"> <li>- Assertions about the future of the White Rose Centre fail to have regard to the wider context, including benefits to the local and regional economy, work undertaken through the Investment Partnership, the Investment Strategy for South Leeds, and the views of the public. No weight given to issues of regeneration.</li> <li>- No evidence or analysis on the impacts of development at White Rose on the City Centre. That Land Securities is investing in both the City Centre through Trinity and at White Rose is hard evidence that they can both add to the economy.</li> </ul>	<p>'capacity' based on trend projections can only be subject to similar uncertainty. Alongside the ongoing recession this means that it is necessary to take a cautionary approach to providing the full level of floorspace identified in the Study. An updated study once the impact of Trinity and Eastgate has been established is the appropriate mechanism to identify how much further floorspace would be required in the longer term. The Site Allocations DPD will also consider opportunities within and on the edge of centres including opportunities to change boundaries. As the main City Centre commitments are delivered and begin to trade, medium and longer term prospects will become clearer. Major schemes are being brought forward and the context established to address longer term needs, therefore it is considered that the approach is justified and in broad terms provides significant flexibility for the LDF to bring forward development of an appropriate scale and location as evidence becomes more certain. It is concluded the approach is sound in the context of NPPF para 182 when read in its entirety.</p> <p>The White Rose Centre has clearly developed into a successful shopping destination, drawing trade from a significant catchment area, both within and beyond Leeds District. The CS does recognise the importance of the WRC including its economic benefits, for instance at 5.3.9. However, whilst the site owners may well progress proposals to broaden its character, at present it can only be described as a freestanding sub-regional shopping centre. National policy context is quite clear as to how policy in general terms should address such developments.</p> <p>For example, the representation makes reference to the employment benefits of the WRC for the Morley area, but it is believed that there has been no assessment of how it may have already diverted investment from defined town and city centres within and beyond the Leeds District, nor relocated development. Such concerns are key to the national policy approach and have not been addressed. The impact of overtrading on centres outside the Leeds District needs to be considered in our duty to co-operate. Essentially, the representation is very specific focusing that the CS should</p>	
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		<p>generally be amended to facilitate proposals to expand and alter development at the WRC. Any such proposals and the case and evidence behind them should be developed in far more detail than has been provided at this stage, within the context of relevant national and local policies. It would be inappropriate for the CS to depart from the centres first approach, and so specific expansion opportunities starting from this centres first approach will be identified through the Site Allocations DPD.</p>	
<p>Hammerson UK Properties Ltd (via Barton Willmore 4816)</p>	<p>Majority of previous representations to the CS Preferred Approach and to the Colliers Centres Study are outstanding and still relevant [only retail related ones shown below]:</p> <ul style="list-style-type: none"> <li>- Out-of-town retail parks should not be considered as town centres, further out-of-centre development should be resisted.</li> </ul> <p>- Specific reference should be made to support the delivery of the Eastgate &amp; Harewood scheme, given its importance to the City Centre. Support the economic role of the City Centre. EHQ will provide a leading role in delivering the primary objective of Policy EC2.</p>	<p>For clarity, the Hammerson representation to the Preferred Approach, and LCC responses at that time are set out in summary:</p> <ul style="list-style-type: none"> <li>- Support that out of town retail parks should not be considered as town centres and further out of centre developments to be resisted. Such sites should not have policy or be a regeneration priority. Need additional policy that the expansion of retail floor space at existing out of centre retail parks will be resisted.</li> <li>*Support welcomed. Proposals to extend out of town centre locations would be judged against PPS4 and therefore an additional CS Policy is not required; the existing CS policies also control development in such locations.</li> <li>- LCC support for large hypermarkets and out of town shopping is bad for the sustainability of local community and therefore bad for the environment, so Vision for Leeds is contradicted.</li> <li>*LCC does not support out of centre shopping. Promoting shopping choice through large supermarkets is in line with PPS4.</li> <li>- Support that development of out of centre retail parks must be linked with development of public transport to encourage modal shift.</li> <li>*Support welcomed, although it is not the intention to develop out of centre retail parks.</li> <li>- Given the scale of the Eastgate and Harewood Quarter scheme and its importance to the future vitality and viability of the City Centre, it is of strategic importance and so the CS should make explicit reference to supporting its delivery, as it should not be undermined by ambiguous policies.</li> <li>*LCC agrees, and will also be addressed further through the</li> </ul>	<p>No change</p>

	<p>- Flexibility should be allowed to enable sustainability merits of a scheme to be negotiated on an individual basis, which would otherwise affect viability.</p> <p>The concerns raised regarding the Centres Study were focused on:</p> <ul style="list-style-type: none"> <li>- The robustness of the household survey;</li> <li>- The level of capacity identified for additional floorspace at White Rose;</li> <li>- How the EHQ commitment had been taken into account; and</li> <li>- The use of benchmark sales densities to inform the assessment.</li> </ul> <p>Also attached their letter originally sent 6<sup>th</sup> October 2011 regarding concerns over the Centres Study:</p> <ul style="list-style-type: none"> <li>- Maximum levels of retail floorspace permitted for EHQ and Trinity should be included as a commitment in the retail capacity assessment. Clarification of the turnover figure.</li> <li>- Priority should be given to the delivery of the EHQ and Trinity schemes and the resulting consolidation of the City centre before additional floorspace is planned.</li> <li>- Household survey questionnaire – only split comparison into non-bulky and bulky goods, rather than more specific categories. This overestimates the market shares of larger centres and retail destinations, showing particularly high levels of ‘need’ in Zone 4 City Centre and Zone 9 White Rose Centre. Unrealistic capacity shown at White Rose, although welcome that there is no planning case to encourage its further development.</li> </ul>	<p>Town Centre Study.</p> <ul style="list-style-type: none"> <li>- Policy CC1 as rigidly worded could have a significant adverse impact on the viability of current pipeline schemes. Flexibility should be introduced here to allow for the sustainability merits of a scheme to be negotiated on an individual basis having regard to site specific constraints and development costs.</li> </ul> <p>*Viability can be assessed on every application and considered alongside other policies on affordable housing and other contributions. This will mean more work at planning application stage but they will achieve the standards for some schemes, whereas without the policy no schemes would achieve them. Also, the CS is a long term document and over time the costs will come down.</p> <p>The committed retail floorspace for Eastgate and Harewood Quarter was included as a commitment in the Centres Study, which was clear in prioritising the committed schemes before looking to further extensions.</p> <p>Capacity was not identified for the White Rose Centre, but rather ‘capacity’ within that sector of the City. The Study made it clear that the market share approach should not be taken to demonstrate a particular need for that quantum of development within any particular sector nor to support any proposals for extension of non town centre developments in isolation from other policy development.</p> <p>In relation to the household survey, while it may be of interest to have a more detailed breakdown of comparison shopping habits, the purpose of the study was to provide information to assist policymaking. Planning policy can differentiate between major goods types, but it is not possible to influence provision of detailed sectors. Consequently, this would have been more for academic interest than of value in policy generation.</p> <p>The calculation of spend in all regards took into account primary and second choices and Colliers International standard methodology apportioned these to create the overall spending figures, an approach which has been</p>	
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	- Believe sales densities are lower which therefore overstates the levels of overtrading. Densities are Colliers estimate rather than being sourced from particular data providers, and therefore need clarification.	applied consistently and is generally supported.	
Carter Jonas (5681) on behalf of Lady Elizabeth Hastings Estate Charity. The Hatfeild Estate, AR Briggs and Co, The Bramham Park Estate, The Ledston Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds	Policies are too prescriptive and overly detailed with a high level of repetition. Could slim down and remove repetition.	Repetition of policies has been reviewed, and is addressed through specific comments on each policy below.	No change
St James Securities Ventures (Leeds) Ltd (via Indigo Planning 3010)	No criteria based policy for the sequential and impact assessment of town centre uses outside centres.	Policy P8 addresses proposals for out of centre retail proposals.	No change
<b>Out of centre retail parks - general</b>			
Hammerson UK Properties Ltd (via Barton Wilmore 4816), Morley Town Council (4825), Cllr Thomas Leadley (2956)	Object to CS in suggesting even limited expansion of out-of-centre retailing, which would cause harm to traditional town centres in Leeds and in neighbouring districts. This could impact on the delivery of Eastgate and should not be encouraged. The wording in para 5.3.9 is contrary to NPPF and contradicts the aims and objectives of spatial policies 1,2,3 and 8. The White Rose Centre is a major generator of employment and an asset to Leeds, but out of centre shopping must be contained.	The CS has to recognise the existence of out of town retail parks, and they do provide an important contribution to the economy. 5.3.9 does state that any out of centre retail development must be in line with and not compromise the centres first approach, and also confirms the Council's commitment to delivering the city centre major retail proposals of Trinity and Eastgate. It is therefore not considered that it is inconsistent with the NPPF.	No change
Scarborough Development Group (via RED Property Services 5719)	5.3.9 - support general thrust but consider that the text could also refer to 'and other areas of major growth' after the words 'established retail park locations.'	Support welcomed. The Core Strategy supports a centres first approach and therefore new centres will be considered against Policy P7.	No change
Land Securities & Evans Property	Para 5.3 7 5.39 - fully endorse the recognition of the role of out of centre retail facilities. Additional development	Support welcomed. Any additional development at White Rose will be subject to the appropriate sequential and impact	No change

Group (via Quod 1091)	and diversification at White Rose Shopping Centre (if demonstrate no detrimental impact on the city centre or other centres) can build on the existing linkages with the local community by leveraging further direct economic benefits, as well as indirect opportunities i.e. public transport enhancements, which together can deliver regeneration to South Leeds.	assessments and would need to align within a clear regeneration framework.	
St James Securities Ventures (Leeds) Ltd (via Indigo Planning 3010)	Should be a policy allowing new out of centre retail development where it is demonstrated that there are no sequentially preferable sites within existing centres and that the proposal does not result in significant adverse impact in accordance with the retail tests of the NPPF.	Consider that this is covered in Policy P7 and P8. Also, as stated in Policy P5 improved provision doesn't necessarily require new floorspace but could be improvements to existing provision within the existing boundaries.	No change

**SPATIAL POLICY 2 – HIERARCHY OF CENTRES AND SPATIAL APPROACH TO RETAILING, OFFICES, INTENSIVE LEISURE AND CULTURE (Qu 6)**

**General support**

<p>S.W Fraser - Cannon Hall Estate (via Smiths Gore 5017), Tesco, Yelcon (via DPP 5543)</p>	<p>Support the content of Spatial Policy 2.</p>	<p>Support welcomed.</p>	<p>No change</p>
<p>Templegate Developments (via Barton Willmore Planning Partnership-Northern 0057), Land Securities and Evans Property Group (via Quod 1091), Hammerson UK Properties Ltd (via Barton Willmore 4816), Morley Town Council (4825), ASDA Stores (via Osborne Clarke 5889)</p>	<p>Support the hierarchy of centres and policy's overall commitment to the 'centres first approach' as being consistent with the NPPF.</p> <p>Support given to the promotion of the delivery of the EHQ scheme (Hammerson).</p> <p>Supports the definition and location of designated centres shown on Map 4 (Hammerson).</p> <p>Agree with 4.2.5 and the need to not having a detrimental impact on regional/sub-regional shopping hierarchy (Morley Town Council)</p> <p>Welcome that the City Centre will be the focus for growth (Asda).</p>	<p>Support welcomed.</p>	<p>No change</p>
<p>The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon</p>	<p>Welcome that policy seeks to maintain the local distinctiveness of the District's Centres.</p> <p>Welcome variously a number of specific centres: Boston Spa and Collingham, Horsforth Town Street, Wetherby, Boston Spa (with Thorp Arch).</p>	<p>Support welcomed.</p>	<p>No change</p>



and Leeds (via Carter Jonas 5681)			
<b>Out of centre</b>			
Hammerson UK Properties Ltd (via Barton Willmore 4816)	4.2.5 - for clarity and to avoid any confusion in a section of the CS entitled 'City and Town Centres', the references to the White Rose Centre should be prefixed with the word 'out-of-centre'.	Agree would improve clarity.	Minor change – add wording 'out-of-centre'
Land Securities and Evans Property Group (via Quod 1091)	SP2 states that proposals which undermine the town centres first approach will not be supported. However, this is not consistent with NPPF (which recognises the potential for edge and out of centre development subject to tests) or Policy P8 which sets out the manner in which proposals in out of centre locations will be assessed. Should change to: "Proposals which would undermine that approach, following an assessment under Policy P8, will not be supported."	It is not considered that SP2 is inconsistent with the NPPF. Such detailed wording is not appropriate for this overarching Spatial Policy. Sequential tests and impact assessments are dealt with and clarified by the Placemaking policies.  It would not be appropriate for all applications for main town centre uses across the District to be directed to the City Centre with no other centres allowed to accommodate major developments. The hierarchy of centres allows and encourages town centres to perform their own important roles, particularly relevant in Leeds where there is such a wide range of types of town and local centres. There is the need to maintain the vitality of all centres. In any case, due to the nature of the hierarchy it is considered that any proposals of city wide or regional significance will be most likely to come forwards in the City Centre. If proposals were to come forward at other centres to an extent that would affect the place of that centre in the hierarchy, then that would be a matter for separate consideration, and is addressed through e.g. Policy P8.	No change
Hammerson UK Properties Ltd (via Barton Willmore 4816)	Detailed wording should be redrafted so that it is consistent with the NPPF (paras 23 – 27) particularly in relation to the wording relevant to the sequential test and impact assessment. It should also be explicit that applications for major town centre uses should be directed to the City Centre in the first instance.		
<b>New centres and Regeneration Priority Areas</b>			
West Properties Ltd (1998)	The Kirkstall Road Renaissance Area should be recognised within SP2 and supporting text, as a focus for new development which maximises existing brownfield regeneration opportunities in a highly accessible location.	Notwithstanding the range of current retail and leisure uses in the Kirkstall Road area, new town centre uses would still have to comply with the sequential approach.	No change
ASDA Stores (via Osborne Clarke 5889)	It should be recognised that the designation of new centres may be required to support housing growth. The hierarchy should be reviewed throughout the plan period to reflect any changes as a result of growth areas with Leeds.	This is recognised and addressed by Policy P7.	No change
Airebank Developments	Should recognise that those sites within Regeneration Priority Areas should have a more flexible approach that will enable	All the CS policies need to be read in conjunction. The criteria for smaller scale developments proposed in P8	No change

(via WYG Planning and Design 0420), Land Securities and Evans Property Group (via Quod 1091)	convenience retail opportunities to come forward (as paragraphs 4.4.6 and 4.4.7 note that a lack of retail facilities is one indicator of a poorly performing area). In PRAs if such uses are appropriately scaled and justified, they would contribute to reversing the social and economic decline of local communities, without detrimentally impacting on the vitality and viability of existing centres. Aims and objectives of SP2 need to be consistent with SP4. Should add to policy: "...unless directed to other locations in accordance with other policies in this Core Strategy."	will help to address regeneration needs. Regeneration areas contain centres so it is even more important to promote their vitality and viability through the detailed approach in the Placemaking Chapter.	
<b>New Centres</b>			
Templegate Developments (via Barton Willmore Planning Partnership-Northern 0057)	No reference to the potential for new centres that will be required as a result of the overall level of growth planned within the District over the next 15 – 20 years.	Not necessary as addressed by Policy P7 and due to need for caution in forecasting and as result of Site Allocations DPD identifying specific areas of growth.	No change
Templegate Developments (via Barton Willmore Planning Partnership-Northern 0057)	Unclear why the 2011 Centres Study does not build on the detailed evidence in the 2009 EASEL/Aire Valley Town and Local Centre Assessment, which sets out clear recommendations for a town centre on either area 6 or 11 of the AVL. This requires clarification, and the CS maps should show a town centre located at Skelton Grange. Nevertheless it is clear that the principle of retail development is accepted at Skelton Grange. (Representor provides further detailed comments in support of a town centre at Skelton Gate, based on criteria in P7.)	The evidence of retail need in the AVL in the 2009 EASEL/AVL Study remains of some relevance, but was based on assumptions of development set out the AAP Preferred Options (Oct 2007). Subsequent further detailed financial modelling and other assessment work has shown that Area 6 (Temple Green, Skelton Grange) is not a suitable or deliverable housing site. The assumptions on the overall number of new homes to be provided in the eastern part of the AVL have therefore been substantially reduced to around 2,250 on the Skelton Gate site (Area 11). This amount of development is unlikely to sustain retail development of the scale associated with a town centre, e.g. a major foodstore, plus the site is not close to other established communities to meet other deficiencies. It would not be sustainable for the site to become a destination in itself attracting shoppers from a much wider area. The city-wide Centres Study took the AVL Study into account but was based on more up to date evidence and was able to take into account the effects of the economic downturn.  There is however clearly a need for some retail and other uses within the AVL, likely to be at the scale of a	No change

		local centre. Policy P7 allows for the creation of new centres, and this will be addressed through the Aire Valley AAP. In the western part of the extended AVL area there is evidence to support a new town centre based on the need to address a deficiency in existing convenience provision, derived from the Centres Study and proposals for new residential development in the area.	
<b>NPPF consistency</b>			
ASDA Stores (via Osborne Clarke 5889)	There is no requirement for the sentence, "Proposals which would undermine that approach will not be supported", which would be unduly inflexible.	This would not be unduly flexible, as it is the aim of the CS not to support out of centre development. The specific criteria for out of centre development are set out in P2.	No change
Scarborough Development Group (via RED Property Services 5719)	Para 4.2.3 - Focusing on first 5 year period does not satisfy the soundness test set out under NPPF paras 23 and 192: 'It is important that needs for retail, leisure, office and other main town centre uses are met in full'. The retail study highlighted need for additional comparison retailing, these should be properly planned for.	See previous responses above under 'Town and local centres – general' in relation to Hammerson UK (via Barton Willmore 4816) and Land Securities and Evans Property Group (via Quod 1091), as the issues of taking a cautious approach and focusing on the first five years are addressed comprehensively there.	No change
Aviva Life & Pensions UK, and The Crown Estate (via Indigo Planning 0806)	Para 4.2.3 - Only referring to projections made for the first 5 years does not represent a sound approach to plan-making, object on the basis of consequent uncertainty it delivers. The York Inspector summarised (explanatory meeting 23rd April) that "the CS is the place to make key discussions about distribution of development and to set out clear guidance for the allocation of sites in future plans. The strategy for the amount and distribution of development needs to be clear and based on a robust justification." Paragraph 4.2.3 clearly contradicts this approach which has implications for the retail policies of the draft DPD, and the Crown Point Retail Park.	<p>The Core Strategy discusses the City Centre south of the river with the objective of securing better integration with areas to the north. The CS policies give scope to consider the relationship between the Crown Point Retail Park and the South Bank in the relatively short term, and specific proposals to address this are to be developed in subsequent DPDs. This is also relevant in the context of the cautious approach being promoted in relation to projection based expenditure estimates. The Site Allocations DPD will identify opportunities within centres including the consideration of boundary definitions.</p> <p>The situation in Leeds (and specifically the City Centre) is different to that at York. Major schemes are being brought forward and the context established to address longer term needs. The approach in broad terms provides significant flexibility for the LDF to bring forward development of an appropriate scale and location as evidence becomes more certain.</p>	No change

		Much of these representations appear more relevant to the Site Allocations DPD. It is considered that the strategic approach in the CS would not inevitably rule out the approach being promoted.	
The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)	<p>NPPF recognises that in rural areas it may be appropriate to consider that certain villages act as clusters and share facilities. It would be appropriate for the policy therefore to recognise the creation of new centres and local shopping parades particularly where these reduce the need to travel.</p> <p>One such circumstance could be the cluster of Bardsey with East Rigton and East Keswick (The Bramham Park Estate).</p>	The NPPF rural focus is more aimed at rural areas which are not located near to major urban areas and therefore which need to be more self sustaining. Although the rural economy is important in Leeds, the District's rural areas are all in relatively close proximity to identified centres in the main urban area and major towns; the settlement hierarchy and centres hierarchy has been developed to reflect that and the linkages between the urban and rural areas in Leeds. The identification of new centres would need to be in line with P7.	No change
<b>Miscellaneous</b>			
Scarborough Development Group (via RED Property Services 5719)	CS section 4.2 should be amended so that it does not focus too narrowly on City Centre in terms of planning for future comparison retailing, and be more strategic in the long term.	The City Centre is the key location for comparison provision, therefore it is appropriate to focus on this. SP2 does state that development will be directed to the appropriate level of centre based on its scale and catchment.	No change
The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)	Rather than just 'promoting' vitality and viability suggest should be more positive and seek to enhance the vitality and viability of such centres. This would accord with the wording of SP3.	SP3 also uses the word 'promote'. Consider would be make no material difference to the policy if this change were made and therefore not necessary.	No change

POLICY P1 - TOWN AND LOCAL CENTRE DESIGNATIONS (Qu 33)			
Templegate Developments (via Barton Wilmore Planning 0057)	Not clear whether the new centre at Richmond Hill will act as the main centre for the Aire Valley or whether the existing Hunslet centre would act as the centre. The Retail Study refers to a potential town centre at AVL6 (Temple Green) or AVL11 (Skelton Gate). Suggest Skelton Grange is added to the town and local centre designation listed in P1.	Policy P7 supports the creation of new centres that may be required as a result of housing growth. The Aire Valley AAP will identify further centres if considered necessary.	No change.
Metro (1933)	Clarification required on higher and lower order centres. Needs to be better cross referenced with SP2.	<p>Para 5.3.7 states that due to the significant differences in scale and function of local centres across Leeds a two tier approach to local centres has been introduced to recognise this. Para 4.2.9 (relating to SP2) also addresses this issue. The Leeds Centres Study was prepared by retail planning experts Colliers International, and included site visits and centre health checks. The Study recommended a sub-division of local centres into higher and lower order, partly to do with size but also to do with function.</p> <p>Further survey work as part of the Site Allocations DPD has allowed detailed analysis of the types of floorspace across the centres. 1,500 sqm total gross A1 retail is therefore proposed as the basic threshold to differentiate between higher and lower order local centres (notwithstanding any site specific issues which may arise in individual centres).</p> <p>There are also a number of centres which are now considered too small for inclusion as lower order local centres as they are no larger than any other neighbourhood parade across the District. This has been assessed using a threshold of a lower order local centre needing to have more than 500 sqm retail and at least an additional 500 sqm across all other uses.</p>	Major change – upgrade Chapeltown Road and Street Lane to higher order local centres, downgrade Chapeltown Pudsey to a lower order local centre, and remove Galloway Lane, Coldcotes Circus, Ireland Wood, Woodlesford, and Adel from the list (i.e. they become neighbourhood parades).

Boston Spa Parish Council (0112)	Boston Spa has been classed as a higher order local centre yet has fewer facilities than some of the lower order centres.	Boston Spa is categorised as a higher order local centre because it acts as the main centre for the wider rural area and therefore has an important function even though it has fewer facilities than some of the lower order local centres. This approach is further justified through the recent survey work undertaken for the Site Allocations DPD. With the proposed upgrading of Chapeltown Road and Street Lane to higher order local centres, Boston Spa has more overall floorspace and more A1 floorspace than any lower order local centre. It has more A3 and A4 combined floorspace than all but two lower order centres, more B1a offices than all but one, and more D1 than all but two.	
Wm Morrison Supermarkets Plc (via Peacock and Smith 1027)	Object to the town centre proposed at Richmond Hill as insufficient evidence has been provided. The Retail Study states that a town centre at RH merits further investigation. Further evidence therefore needs to be provided for the requirement of a centre in this location. Site is adjacent to a busy dual carriageway and a railway which both act as barriers.	The EASEL and Aire Valley Centres Study identified a need for a foodstore in this area, which was maintained by the Centres Study (2011). This location would allow for linked trips to the range of existing adjacent complementary uses and provide wider benefits than a stand alone foodstore. Further evidence would be required at planning application stage in line with policy, where any proposal would be judged on its merits. Initial work done by the developer identified that the physical barriers could be overcome through design solutions.	No change
Hammersons UK Properties Ltd (via Barton Wilmore 4816)	For avoidance of doubt should include City Centre as part of the hierarchy and amend title to 'Hierarchy of Centres' in accordance with NPPF para 23 and to ensure consistency with SP1, 2, 3, 8, 9.	The Leeds hierarchy is already identified in SP2, including reference to the City Centre in SP2, SP3, and CC1. This policy is specifically about identifying the other centres.	No change
Arcadia Group (via Montagu Evans LLP 5723)	Harehills Lane serves an area of east Leeds that is poorly served by shopping facilities and Arcadia consider that there is an opportunity to enhance retail provision in this area.	Harehills Lane is identified as a town centre in part to reflect the new Morrisons store, and Harehills Corner is a higher order local centre. Town centre uses will be directed to these centres. There is the opportunity to identify further appropriate sites through the Site Allocations DPD.	No change
ASDA Stores (via Osborne Clarke 5889)	ASDA have a number of existing stores within the identified locations in Policy P1. These stores should fall within the boundary of the designated town and local centres, and be defined through the site allocations process.	Centre boundaries will be reviewed as part of the Site Allocations DPD as referred to in para 5.3.8.	No change

ASDA Stores (via Osborne Clarke 5889)	Policy P1 should take account of new housing growth areas within the plan period in relation to potential changes between the hierarchy of centres. Should provide flexibility for further expansion of centres to support growth and catchment needs, especially when defining centre boundaries. Policy P1 should make reference to Policy P7 (and vice versa) in relation to the creation of new centres, to ensure there is adequate flexibility for changes in centre sizes for development growth.	Para 5.3.8 states that scope to change centres' designation and proposals to extend or include new centres to reflect retail need as a result of housing growth proposals will be considered in the interim. Not considered necessary to cross reference P1 and P7.	No change
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<b>POLICY P2 – ACCEPTABLE USES IN AND ON THE EDGE OF TOWN CENTRES (Qu 34)</b>			
Mr C & Mr A Haigh, Otley Town Partnership (via Directions Planning 5121)	The UDP considered housing to play a positive role in sustaining the viability of town centres, so is surprising to see that CS suggests housing is considered to compromise the function of the town centre. Object to this change in strategy, particularly as no justification. Suggest that the wording should be amended to reflect the strategy previously set out in the UDP and which supported residential development within centres.	The UDP does not support residential over the need to maintain the vitality and viability of shop frontages. However, agree that as wording of NPPF Para 23 states that residential within centres should be encouraged on appropriate sites, should change CS text in the housing bullet point from 'Housing would be acceptable...' to 'Housing is encouraged...'	Minor change – change 'acceptable' to 'encouraged'.
Leeds Civic Trust (0062)	Use of upper floors for residential should be encouraged not just acceptable.		
ASDA Stores (via Osborne Clarke 5889)	P2 should also take account of regeneration policies within the Core Strategy and potential growth areas.	Policy P2 supports a centre first approach. Regeneration areas are referred to in Policy SP2. Policy P7 refers to the creation of new centres as a consequence of housing growth.	No change
The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)	This policy contains a prescriptive list of uses which could be simplified.	The policy provides clarity regarding what uses are considered acceptable. The Council needs a local interpretation of town centres policy. P2 refines the NPPF (and PPS4 before it) to make it locally distinctive.	No change



<b>POLICY P3 – ACCEPTABLE USES IN AND ON THE EDGE OF LOCAL CENTRES (Qu 35)</b>			
ASDA Stores (via Osborne Clarke 5889)	Support the flexibility within the Policy and the acknowledgement to take account of local circumstances is in relation to identify the size of a food store.	Support welcomed	No change
GVA Grimley (2996)	Accept approach of reviewing boundaries through Site Allocations DPD as referenced within para 4.2.9.	Support welcomed	No change
Boston Spa Parish Council (0112)	Reference to small supermarkets ignores the size of local population and ability of the area to absorb a facility. Amend policy to exclude small supermarkets where existing convenience or food shopping provision is adequate for the local populations needs.	P3 references acceptable uses and therefore needs to be somewhat general. P8 is more specific in relation to size and levels of existing provision.	No change
GVA Grimley (2996)	Supporting text to Policy P3 should reference Paragraph 4.2.9 recognising the acceptability of potential changes to the classification of a local centre within the settlement hierarchy.	Not necessary as P3 refers to uses within a local centre, not the classification of a local centre within the overall hierarchy.	No change
Mr C & Mr A Haigh, Otley Town Partnership (via Directions Planning 5121), Leeds Civic Trust (0062)	Use of upper floors for residential should be encouraged not just acceptable, in line with UDP approach.	The UDP does not support residential over the need to maintain the vitality and viability of shop frontages. However, agree that as wording of NPPF Para 23 states that residential within centres should be encouraged on appropriate sites, should change CS text in the housing bullet point from 'Housing would be acceptable...' to 'Housing is encouraged...'	Minor change – change 'acceptable' to 'encouraged'
The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)	Provisions repeat P2, the two policies could be merged.	The separation of town and local centres into P2 and P3 is for clarity and to reflect their difference in scale, and was based on advice from Colliers who conducted the Centres Study. The policies need to be locally distinctive, plus a merged policy would be too complex.	No change

<b>Overly prescriptive</b>			
ASDA Stores (via Osborne Clarke 5889)	Approach in relation to identified uses in and on the edge of local centres is too descriptive to be sound. The Policy should set a framework to allow for an assessment of the scale of development appropriate to the size of the centre rather than restricting development.	The Council needs a local interpretation of town centres policy. Policy P3 does state that the threshold is given as guidance and would be subject to local circumstances. It is therefore accepted that because of the range of different centres, there may be different scales of foodstore that might be considered acceptable in some centres. However, it is considered appropriate to provide some guidance at this level. The suggested amendment to P3 is not appropriate as it suggests a departure from the hierarchy may be acceptable without full justification and simply on the basis of sequential assessment, rather than sequential and impact assessments. P8 assesses scale. The ASDA suggestion is considered to be met in the wording of the policy. The threshold and acceptable uses in local centres provides more clarity in advance rather than waiting for discussions to be held at planning application stage, and allows consistency of decisions and transparency.	Major change – change threshold size for supermarkets in higher order local centres to 1,500 sqm.
GVA Grimley (2996)	The maximum size threshold of 1,858 sqm for the provision of a small supermarket within higher order local centres is unsubstantiated with no reference to evidence that this represents a reasonable or appropriate level beyond which a supermarket would be unacceptable. Specific reference to size thresholds within the policy is overly prescriptive, unjustified and renders the policy ineffective, it should be removed. The reference to consideration of appropriateness of proposals based on local circumstance, also guidance within policy P1 and P2 regarding a sequential preference for consideration of town centres first, is considered to be sufficient to support the aspirations of the CS retail approach. Policy P3 should be amended to read: “Within higher and lower order local centres food stores that are compatible with the size of the centre would be acceptable. The acceptability of proposals will be subject to consideration of local circumstance. A larger scale store may be appropriate if identified need cannot be met within a nearby town centre.”	However, based on emerging survey data undertaken to inform the Site Allocations DPD and the range of sizes of foodstores stores in the different levels of the hierarchy, it is proposed to reduce this threshold slightly to 1,500 sqm. This also aligns better with Policy P8.	
The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)	Policy is overly prescriptive.		

**POLICY P4 – SHOPPING PARADES AND SMALL STAND ALONE FOOD STORES SERVING LOCAL NEIGHBOURHOODS AND COMMUNITIES (Qu 36)**

<p>The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)</p>	<p>It is important that local shopping parades are supported and that new retail facilities are provided to cater for day to day needs of local communities. NPPF supports the provision of local shopping and other facilities where these can serve a cluster of villages.</p> <p>Have submitted a site at Bardsey through just off the Wetherby Road close to an existing parade which could be considered suitable for a small scale stand alone store.</p>	<p>Support welcomed.</p> <p>Sites submitted through the 'call for sites' will be assessed as part of the Site Allocations DPD.</p>	<p>No change</p>
<p>Montpellier Estate (via WYG Planning &amp; Design 0420)</p>	<p>Inappropriate for the policy to be too precise regarding scale. If can demonstrate that proposed convenience store has no significant adverse impact upon in centre facilities and there are no suitable sequential sites, P4 should support and recognise delivering a qualitative and potentially quantitative need in the local area as a mechanism to deliver local facility and support residential neighbourhoods.</p>	<p>The Council needs a local interpretation of town centres policy. If thresholds were not set then we would potentially have to apply a sequential test against every town centre use proposal. P4 reduces the severity of the tests for developments of a smaller scale in order to support local communities and to specifically allow for local provision while maintaining a centres first approach, as expanded upon in P8.</p> <p>The threshold also provides more clarity in advance rather than waiting for discussions to be held at planning application stage, it allows consistency of decisions and transparency. Also the policies were drawn up through looking at a range of real applications where it became apparent that one size fits all approach would not work in Leeds, especially for the smaller scale uses.</p>	<p>No change</p>

<p>Airebank Developments (via WYG Planning &amp; Design 0420)</p>	<p>Where local retailing above the threshold can positively contribute to the success of Regeneration Priority Areas, flexibility should be afforded. The lack of local retail facilities can be a contributing factor to neighbourhood's performing poorly. In order to achieve the strategic aims of SP1 (v) and SP4. Policy P4 should be amended to be flexible in those areas identified as Regeneration Priority Areas so as to enable successful regeneration.</p>	<p>All the CS policies need to be read in conjunction. The criteria for smaller scale developments proposed in P8 will help to address regeneration needs, and also addresses proposals for larger scale stores, supporting a centre first approach. Policy P4 is specifically to cater for small scale local need across all areas. Regeneration areas contain centres so it is even more important to promote their vitality and viability through the detailed approach in the Placemaking Chapter.</p>	<p>No change</p>
<p>Leeds Residential Property Forum (via Bury &amp; Walker Solicitors 2527)</p>	<p>Object in relation to changes of use of existing retail units to non retail uses, including within Use Class A2. This is particularly relevant to private rented sector landlords who may wish to use such units for the purpose of letting/ managing properties. Promoting retail uses over and above non retail uses of this kind fails to take account of changing needs and demands. More and more retail activity is moving towards supermarkets and away from local shops. It is vital that shops are kept in use rather than standing empty, and with greater emphasis given to local employment opportunities that could be provided.</p>	<p>The purpose of P4 is to maintain the retail function of neighbourhood parades to provide at the very local level. There is no objection in principle to non retail uses on parades providing that they do not undermine their vitality and viability. If a shop unit were left vacant for a length of time even with marketing, this would be regarded as a material planning consideration at planning applications stage.</p>	<p>No change.</p>
<p>The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)</p>	<p>Considerations of vitality and viability, availability of transport and residential amenity are equally applicable to other defined centres, although they appear not to be relevant to Policies P2 and P3.</p>	<p>Agree that issues of transport and residential amenity are applicable to other centres. Town centres and higher order local centres are/will be covered by shopping frontage policies which include similar considerations. It is therefore appropriate to also include the last paragraph of P4 and the related criteria within P3 relating to lower order local centres.</p>	<p>Major change – add the 3<sup>rd</sup> para and three criteria in P4, also into P3 relating to lower order local centres.</p>

<p>The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)</p>	<p>Policies P2-P4 could be merged and simplified.</p>	<p>The separation of the different types of centres into P2 to P4 is for clarity and to reflect their difference in scale, and was based on advice from Colliers who conducted the Centres Study. The policies need to be locally distinctive, plus a merged policy would be too complex.</p>	<p>No change</p>
<p>Friends of Allerton Grange Fields (5857)</p>	<p>Policy P4 fails to protect and enhance neighbourhood shopping parades for A1 uses. The proliferation of hot food takeaways and drinking establishments can have a detrimental impact on residential amenity due to noise, litter and car parking problems. Should be more explicit that over 50% of the units on neighbourhood shopping parades must remain in A1 use. A stronger policy protecting neighbourhood shopping parades for A1 uses will also prevent the proliferation of hot food takeaways on parades in close proximity to schools and therefore have positive health and well being outcomes.</p>	<p>The aim of Policy P4 is to protect neighbourhood parades for retail uses and looks at the cumulative impacts of their changes of use. It cannot impose a % policy as the range of neighbourhood parades across the whole District is so varied that this would be too prescriptive, and there is also insufficient evidence to support this.</p>	<p>No change</p>
<p>ASDA Stores (via Osborne Clarke 5889)</p>	<p>Welcome the locations listed within P4, but should provide the flexibility to take account of other new potential opportunities within the plan period. This includes listing existing commitments.</p>	<p>P4 does not preclude provision across the City. Listing existing commitments would not add anything to the policy, and would become out of date.</p>	<p>No change</p>

**POLICY P5 – APPROACH TO ACCOMMODATING NEW FOOD STORES ACROSS LEEDS (Qu 37)**

<b>Support</b>			
Highways Agency (0060)	It is stated that as part of the Aire Valley developments, a new town centre is proposed at Richmond Hill that would support a new food store. This would serve the housing development in inner parts of the Aire Valley leaving only housing on the site to the east of M1 Junction 45 reliant to an extent on facilities at Colton.	Support welcomed for a potential town centre at Richmond Hill.	No change
ASDA Stores (via Osborne Clarke 5889)	Support in relation to the approach to accommodate new food stores across Leeds. Welcome the locations listed.	Support welcomed	No change
<b>Aire Valley centres</b>			
Templegate Developments (via Barton Willmore Planning Partnership-Northern 0057)	The wording is a little ambiguous, as it is not clear whether the reference to the new town centre at Richmond Hill would be the main centre for the Aire Valley, or whether the existing Hunslet centre would be at as its centre.	Consider wording is sufficiently clear. Further detail on the existing and new centres in relation to the Aire Valley will be provided in the AVL AAP.	No change
Templegate Developments (via Barton Willmore Planning Partnership-Northern 0057)	The Leeds City Centre, Town and Local Centres Study includes references to Richmond Hill, but paragraph 10.59 only states that “inner east Leeds has long been identified as an area of deficiency and our latest qualitative assessment confirms capacity. Consequently it is considered that this opportunity merits further investigation.” It is also noted that the Centres Study refers to the CS Preferred Approach, which proposes a potential town centre at AVL6 (Temple Green) or AVL11 (Skelton Gate). Therefore the evidence of a new town centre in this locality is unequivocal. Include Skelton Grange as an additional town centre for which a food store would be directed towards.	See detailed response to Templegate on this point under SP2 ‘new centres’ above. In summary, the assumptions on the overall number of new homes to be provided in the eastern part of the AVL have been substantially reduced, and the associated need for retail development downsized accordingly. New local centres will be addressed through the Aire Valley AAP.  In the western part of the extended AVL area there is evidence to support a new town centre based on the need to address a deficiency in existing convenience provision, derived from the Centres Study and proposals for new residential development in the area.	No change

Airebank Developments (via WYG Planning & Design 0420)	Richmond Hill would not necessarily be the best location for a new town centre for the purposes of serving Hunslet. Cross Green Estate and the Ring Road present major obstacles between large areas of Hunslet and Richmond Hill and is likely to detract potential customers from travelling between Hunslet and Richmond Hill to undertake their shopping needs. It is acknowledged that the Council wish to protect the function of Hunslet's existing town centre; however the centre is separated from large areas of Hunslet by major roads. In light of SP5 which promotes an Urban Eco-Settlement within the Aire Valley, there is no reason why a number of local and district centres could not be promoted throughout the Aire Valley to ensure that local residents and those employed within the Aire Valley have appropriate provision of retail facilities and other community services in one location.	Policy P7 supports the creation of new centres that may be required as a result of housing growth. The Aire Valley AAP will identify further centres if considered necessary.	No change
<b>Out of centre / new centres</b>			
Scarborough Development Group (via RED Property Services 5719)	NPPF Para 23 - does not place moratorium of development in out of centre locations, it recognises that out of centre will be inevitable to meet some retail development needs. Policy P8 requires a sequential test, and para 5.3.22 recognises that where insufficient sequentially preferable sites exist, accessible out of centre locations can be considered. However, this is not reflected in policies P5 or P6, which should therefore be amended to better reflect the NPPF.	The suite of policies have to be read as a whole, and P5, P6, and P7 do not contradict one another. P8 provides the detailed sequential approach for all uses, P5 expands on this for food provision.	No change
ASDA Stores (via Osborne Clarke 5889)	P5 should provide the flexibility to take account of other new potential opportunities within the plan period that are not listed at present. It should recognise that there are existing commitments in certain areas of the city which are yet to be implemented	Listing existing commitments would not add anything to the policy, and would become out of date. The Centres Study used the list of commitments provided by LCC in its preparation, as would an update to the Centres Study in a few years time.	No change
<b>Miscellaneous</b>			

<p>Aviva Life &amp; Pensions UK, and The Crown Estate (via Indigo Planning 0806), St James Securities Ventures (Leeds) Ltd (via Indigo Planning 3010)</p>	<p>No evidence to show availability of sites in the centres listed in P5. A number of these centres are so constrained that they clearly could not support new major food stores. NPPF Para 23 highlights that it is important that the needs for retail, leisure, office and other main town uses are met in full and are not compromised by limited site availability. P5 should recognise that when no sites are available, suitable or viable within the existing centres, proposals for sites outside the centres should be supported where they will not have a significant adverse impact. Unsound due to deliverability, with the consequence being that otherwise appropriate locations to meet food shopping needs may be overlooked.</p> <p>Crown Point Retail Park could serve the general area around Holbeck, particularly in conjunction with some of the enhanced linkages suggested in the South Bank proposals and the growing residential population in the immediate area, and could therefore represent an appropriate location to accommodate identified needs. This would represent a more deliverable option than many of the locations specified in P5 (Aviva Life &amp; Pensions UK, and The Crown Estate).</p>	<p>The locations specified are existing centres. Improved provision doesn't necessarily require a new foodstore but could be improvements to existing provision within the existing boundaries. Alternatively, although some centres may not currently have room for additional provision, by supporting new foodstore development in principle may help to bring sites forwards within the timescale of the CS. This will also be addressed further through the Site Allocations DPD. Priorities were based on the health checks, the capacity/ need figures, and the distance to other town centres.</p> <p>CPRP is not a recognised centre, albeit it is within the wider city centre. Any proposal for a foodstore at CPRP would go through the tests in P8.</p>	<p>No change.</p>
<p>Hammerson UK Properties Ltd (via Barton Willmore 4816)</p>	<p>Concerned that the Policy does not make explicit reference to the City Centre, wherein new foodstores should be supported and are acceptable in principle in accordance with the NPPF and Spatial Policies 1, 2, 3 and 8. Policy P5 should therefore be amended to include specific reference to the City Centre in addition to the Town and Local Centres.</p>	<p>The City Centre is addressed within the City Centre chapter and it is not considered necessary to cross-reference it in P5.</p>	<p>No change</p>
<p>The Diocese of Ripon and Leeds, The Hatfeild Estate, The Bramham Park Estate, Lady Elizabeth Hastings Estate Charity, The Ledston Estate, AR Briggs and Co, Meadowside Holdings Ltd (via Carter Jonas 5681)</p>	<p>This policy is overly detailed and repeats the provisions of Policy P1. No indication is given to the scale of such new foodstores. Could be merged with P2 and deleted.</p>	<p>P5 provides a local geographical element to the centres approach and the specific needs of foodstore provision. Scale is addressed in P8. For clarity it was felt necessary for P5 to cross-reference P1.</p>	<p>No change</p>



<p>Inner NW Area Committee Planning Sub Group (5696)</p>	<p>Although point (iii) doesn't state that a new major food store would be the only option to expand the retail offer or function of Headingley, the group has concerns that this is one of a number of options encouraged in this policy. Headingley is one of ten town centres identified in the Leeds City Centre, Town and Local Centres Study (July 2011) which lacks a major anchor foodstore. However, three of the other town centres identified in the report (Garforth, Halton and Harehills) have not subsequently been included in the list of town centres included in Policy P5. Inadequate justification for this.</p> <p>The Leeds City Centre, Town and Local Centres Study states: there is little opportunity for the creation of a major food store in Headingley; the centre currently functions well in its existing form acting as a 'strong local community base'; the centre performs successfully in a situation where it serves a large number of individuals whose shopping habits will be rather different to the majority of shoppers in other parts of Leeds; and there is adequate provision to meet weekly shopping provisions at the centre in combination with nearby major food stores. NPPF requires to "take account of the different roles and character of different areas, promoting the vitality of our main urban areas" but this aspect of policy P5 fails to sufficiently take into account the unique role and character of Headingley Centre, which serves a relatively unique local community successfully in its current form. Headingley has a character and amenity value resulting from a diverse range of small retailers and non-retailers, in combination with medium sized units provided by major supermarket chains (with a new store set to be opened at the Former Lounge Cinema site shortly), which successfully serve the unique local community. This character and amenity would be significantly harmed by the introduction of a major food store in the centre or on the edge of the centre.</p>	<p>Although Headingley may not currently have room for expansion, supporting this in principle may help to bring sites forward both within or on the edge of the centre within the timescale of the CS. and This will also be addressed further through the Site Allocations DPD. Priorities identified through the Study were based on the health checks, the capacity/need figures, recent commitments, and the distance to other town centres. The moving of the Sainsbury's Local to the former Lounge Cinema may help to address this depending on the whether its former store stays in convenience use. Other CS policies will still apply regarding scale, impact, and amenity issues.</p> <p>The Site Allocations DPD will also provide the opportunity to consider further sites and boundary changes and take into account any such detailed issues.</p> <p>Harehills is very constrained, is in close proximity to Oakwood town centre (with its commitment for a very large store) and has recently benefited from new foodstore provision. As Garforth is a stand alone settlement, development in the area would automatically be directed to Garforth through the centres first approach. Growth there would also be better addressed once the extent of adjacent housing growth is identified. Halton has also benefited from recent food store provision. Encouragement of food stores in all the centres across Leeds will be supported, but P5 is necessary to identify the priorities.</p>	<p>No change</p>
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<b>POLICY P6 – APPROACH TO ACCOMMODATING NEW COMPARISON SHOPPING IN TOWN AND LOCAL CENTRES (Qu 38)</b>			
Hammerson UK Properties Ltd (via Barton Willmore 4816)	Support the general aim of Policy P6.	Support welcomed.	No change
Hammerson UK Properties Ltd (via Barton Willmore 4816)	In accordance with the NPPF and Spatial Policies 1, 2, 3 and 8, Policy P6 should clarify that major new comparison goods floorspace should be directed to the City Centre in the first instance, followed by the town and local centres subject to being of an appropriate scale commensurate with the role of the Centre in the hierarchy (identified in Policy P1) and compliance with Policy P8. Policy P6 should therefore be amended to prioritise the City Centre as a location for major new comparison goods development.	The key issue relates to provision being at the appropriate scale in the hierarchy, and agree that this would be the key consideration for major comparison goods proposals within any town or local centres. However, criteria (i) states “in addition to the PSQ of the City Centre...” plus Policy SP2, SP3, and CC1 provide the retail hierarchy. Therefore do not consider P6 needs additional emphasis on the City Centre.	No change
The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)	Again this policy could be merged with a revised P3 as it adds nothing to the documents and is therefore unnecessary.	Although similar to P3, the Policy was included to attempt to highlight the differences between comparison and convenience shopping, and to show equal importance.	No change

<b>POLICY P7 – THE CREATION OF NEW CENTRES (Qu 39)</b>			
ASDA Stores (via Osborne Clarke 5889)	Support in relation to the creation of new centres.	Support welcomed.	No change
Pegasus Planning Group (4388)	Support Policy P7 and consider that this is consistent with the overall approach of the Core Strategy and the role of sustainable urban extensions in meeting growth.	Support welcomed.	No change
ASDA Stores (via Osborne Clarke 5889)	Policy P7 should make reference to Policy P1 (and vice versa) in relation to town and local centre designations, to ensure there is adequate flexibility for changes in centre sizes for development growth.	New centres under P7 would be in addition to those listed in P1 therefore do not see the need to cross reference further.	No change
L Ward (via LDP Planning 5867)	Policy should be expanded to provide clear support for the expansion of existing town centres and local centres where possibilities arise, to meet needs of growing populations to protect viability of existing centres and promote use of existing public transport links for sustainable access. New centres require new public transport links, rail stations are unlikely to be an option, and difficult to discourage use of private motor vehicles.	This policy does not encourage new centres, and in conjunction with the other policies is clear that the CS supports a centres first approach as being most sustainable. However, P7 is necessary to reflect and direct change that will inevitably occur over the CS time period, and be resilient to anticipated future economic changes as required by NPPF (para 23).	No change
The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)	Unless P7 infers additional centres over and above those identified in P1 it should be deleted and the general considerations included within an overarching retail and town/local centres policy.	The intention of P7 is to potentially allow for additional centres to those in P1, reflecting future significant housing growth.	No change

<p>Templegate Developments (via Barton Willmore Planning Partnership-Northern 0057)</p>	<p>The evidence from EASEL and AVL Centres Study for a new town centre at Skelton Grange is unequivocal. A new town centre meets all those tests listed in parts i) – iv), and should be included on the maps and in the CS.</p>	<p>See detailed response to Templegate on this point under SP2 'new centres' above. In summary, the assumptions on the overall number of new homes to be provided in the eastern part of the AVL have been substantially reduced, and the associated need for retail development downsized accordingly. New local centres will be addressed through the Aire Valley AAP.</p>	<p>No change</p>
<p>Hammerson UK Properties Ltd (via Barton Willmore 4816)</p>	<p>Concerned that P7 will allow the creation of new centres in a development management application scenario, as it should be a strategic planning decision set out in the CS and based on a credible evidence base.</p> <p>P7 should also place a limit on the level of acceptable floorspace.</p> <p>Neither Policy P7 (nor the Centres Study 2011) identifies a need for new centres as required by NPPF (para 23).</p> <p>In the absence of an identified need, any new centres or the expansion of existing centres will require a sequential and impact assessment in accordance with Policy P8.</p> <p>The Policy should also clarify that new / expanded centres should be of an appropriate scale commensurate with their role in the hierarchy (identified in Policy P1).</p>	<p>P7 clearly sets out that new centres are required where convenience provision is needed to support housing growth or specific new centres identified within housing sites. Therefore any other major growth areas which might justify supporting facilities will be promoted through the Site Allocations DPD.</p> <p>Proposals for new centres would have to show a need for the floorspace, and therefore while placing limits in advance is relevant for other policies in relating to existing centres, setting this for potential centres for the full extent of the CS period would be too onerous.</p> <p>In the full timescale of the CS, it would be unsustainable to have a policy blanket rejection of supporting facilities relating to significant residential proposals. Consider that P7 is fully in line with NPPF para 23.</p> <p>Criteria (i) incorporates requirements of P8.</p> <p>The criteria in P7 are to ensure that any new centre would be of an appropriate scale.</p>	<p>No change</p>

**POLICY P8 – SEQUENTIAL AND IMPACT ASSESSMENTS FOR TOWN CENTRE USES (Qu 40)**

**Support**

Land Securities and Evans Property Group (via Quod 1091)	Fully support paragraph 5.3.23	Support welcomed	No change
Hammerson UK Properties Ltd (via Barton Willmore 4816), ASDA Stores (via Osborne Clarke 5889)	Support the general aim of the Policy	Support welcomed	No change

**Contrary to NPPF – Scale and floorspace thresholds**

Aviva Life & Pensions UK, The Crown Estate (via Indigo Planning 0806), Wm Morrison Supermarkets Plc (via Peacock and Smith 1027), Tesco, Yelcon (via DPP 5543), The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681), ASDA Stores (via Osborne Clarke 5889), Hammerson UK Properties Ltd (via Barton Willmore 4816), NewRiver Retail (via GL Hearn 5856)	<p>Unduly complicated and prescriptive with a series of thresholds applied to different uses with no apparent justification.</p> <p>As in PPS4, NPPF does not state that scale is a factor to be taken into consideration.</p> <p>The different thresholds are confusing and unnecessary.</p> <p>Setting floorspace thresholds in relation to sequential assessments is not in line with NPPF para 24 (which states should apply a sequential test to planning applications for main town centre uses not in an existing centre and not in accordance with up to date development plan).</p>	<p>LCC needs a more local interpretation of town centres policy now that PPS4 is superseded by NPPF. P8 refines the NPPF to make it locally distinctive. Silence on a topic area by the NPPF does not mean that local policies on such aspects are not in conformity.</p> <p>If thresholds were not set then LCC would potentially have to apply a sequential test (and possibly an impact test) against every town centre use proposal. P8 reduces the severity of the tests for developments of a smaller scale. LCC has therefore been both proactive to growth and regeneration, and pragmatic in this regard.</p> <p>The policy criteria also provide more clarity in advance rather than waiting for discussions to be held at planning application stage, it allows consistency of decisions and transparency. Also the criteria were drawn up through looking at a range of real applications where it became apparent that one size fits all approach would not work in Leeds, especially for the smaller scale uses.</p> <p>However, LCC does agree that the above justification for P8 is not set out sufficiently in its supporting text, therefore propose to include this to make the reasons and justification for P8 more clear. P8 has also been</p>	<p>Major change - See revised Policy P8 at the end of this table. P8 has been made more concise and clear. (Detail on individual changes in relation to specific comments provided below).</p> <p>Also paragraph added to supporting text further clarify the need for P8.</p>
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		consolidated to make it more concise and give better clarity. The detail of the specific changes is outlined in relation to the specific representations below.	
NewRiver Retail (via GL Hearn 5856)	Part H - there is no national policy justification for in centre extensions of above 200 sqm to conduct sequential and impact assessments. If the intention of this part of the policy is to set the “proportionate, locally set threshold” as required by the NPPF, then it should be made clear that this only applies to retail proposals outside of centres.	Agree needs clarity that is intended to only apply to retail proposals outside of town centres.	Minor change – alter ‘existing units’ to ‘existing out of centre units’
<b>Contrary to NPPF - Impact assessments</b>			
L Ward (via LDP Planning 5867)	NPPF sets threshold requiring submission of impact assessments where development exceeds 2,500 sqm but CS decreases this to 1,500 sqm without any justification.	<p>The threshold was set in the context that the Centres Study suggested that LCC should consider adopting a more positive approach to the development of small to medium size supermarkets in areas of deficiency either within or associated with local as well as town centres. However, also needed to ensure that such proposals would be tested appropriately in terms of any potential impacts on centres. The 1,500 sqm threshold means that the formats generally being promoted by the major operators including the discounters would need to demonstrate that they could address deficiencies without impacting unacceptably on existing centres and their functions.</p> <p>Proposals for stores under 1,500 sqm would have a sales area of approximately 1,200 sqm and would be almost exclusively convenience based. In practice there are few current proposals for stores between 500 sqm to 1,500 sqm. This also takes account of advice in previous versions of national policy guidance relating to the reliability of statistical analysis, and because at this smaller scale of stores, the statistical assessments and the assumptions upon which they are based become inevitably more imprecise.</p> <p>It is considered that the threshold would ‘catch’ all proposed developments of the scale that might be brought forward that might impact on centres, while proposals below could not be shown as having such impacts. In any case those below the 1,500 sqm threshold would generally consist of much smaller</p>	No change
Hammerson UK Properties Ltd (via Barton Willmore 4816)	Concerned that edge or out-of-centre schemes below the identified thresholds could have the potential to impact upon the vitality and viability of existing centres. Policy should require an impact assessment for schemes below the identified thresholds where there is the potential to impact upon existing centres.		

		stores, where development should be encouraged as meeting a highly local need and reducing the need to travel. It is also important to note that this approach will be monitored and, should the threshold be found inappropriate in practice, then it could be modified.	
Wm Morrison Supermarkets Plc (via Peacock and Smith 1027), Scarborough Development Group (via RED Property Services 5791), ASDA Stores (via Osborne Clarke 5889), NewRiver Retail (via GL Hearn 5856), Tesco, Yelcon (via DPP 5543)	<p>Criteria A - NPPF para 26 states need impact assessment if development outside of town centres is over a proportionate locally set floorspace threshold, if no locally set threshold then default is 2,500 sqm. Therefore is clear that there is no requirement to submit impact assessments for town centre uses within existing centres, it is not necessary or appropriate.</p> <p>Difficult to calculate 10% or more of the total gross retail floor space, and is unreliable for future assessments. Should be revised to enable flexibility for growth and avoid unduly preventing development through prescriptive policies. The policy would require impact assessments for what could be small proposals in a town centre.</p> <p>Cannot apply blanket presumption as contradicts various other policies of the plan, primarily P5 which identifies centres where growth and new convenience retailing is to be encouraged and where a facility of more than 10% may be appropriate to achieve the objectives which have been identified for those centres.</p>	<p>Silence on a topic area by the NPPF does not mean that local policies on such aspects are not in conformity. The Council needs a more local interpretation of town centres policy now that PPS4 is superseded by NPPF, and P8 refines the NPPF to make it locally distinctive.</p> <p>However, although the aim of criteria A is to allow LCC to address potential disproportionate impacts of a development on that centre or other centres, it is agreed that it is difficult to set an appropriate size at which impact assessments would be required. Surveys have now been undertaken of local centres, and 10% is too onerous as it could be less than one unit within the smallest centres. It is therefore too low a figure to be applied against all centres. There is limited evidence which would support setting a higher percentage. Considering the need to cross-reference with P5, the overall CS approach to directing growth into centres, and the other requirements of P8, agree that there should be no reference to requiring impact assessments for in-centre proposals for main town centre uses.</p>	Major change – Remove criteria (A) from P8 so that there is no reference to in-centre impact assessments.
Tesco, Yelcon (via DPP 5543)	<p>Criteria D and E - no requirement in national guidance for such uses to be assessed in either sequential or impact terms. Should be deleted.</p> <p>Criteria D and E query the reference to bulky goods within Use Classes A2-A5 as these are not retail.</p>	<p>Consider this is incorrect, Use Classes A2-A5 are main town centre uses under NPPF and therefore generally require a sequential test. However, agree that need more clarity on which uses are encompassed under which criteria in P8. Will be undertaken in conjunction with updated Glossary.</p> <p>Bulky goods to be removed from D/E along with reference to City Centre catchment. B/C now to split into convenience/comparison above 1,500 sqm, which incorporates bulky goods (see below for further explanation).</p>	Major change: a) Make clearer which uses are relevant for each criteria. b) Remove bulky goods from D/E.
<b>Difference within or outside of residential areas</b>			

Wm Morrison Supermarkets Plc (via Peacock and Smith 1027), Tesco, Yelcon (via DPP 5543)	No justification or definition with regards to the difference in requirements for proposals within or outside residential areas.	This is based on general experience of planning applications in Leeds. Reflects local catchments and intention of provision for 'walk in' versus 'drive time', as proposals in non-residential areas would be intended/necessary to have larger catchment areas as no local population, whereas within residential areas there is an immediate catchment population.	No change
<b>Catchment areas</b>			
Wm Morrison Supermarkets Plc (via Peacock and Smith 1027), Tesco, Yelcon (via DPP 5543)	Specifying drive times based on size of proposal is overly prescriptive. Totally inappropriate to define catchment areas for individual store proposals within a DPD. Catchment areas will be largely driven by its local context and population it's likely to serve. It is simply not possible to state that all stores of a certain size have a drive time of 5 minutes and stores of a larger size should have a drive time of 10 minutes as this depends on location, existence of competing facilities, and peoples' existing shopping patterns. Should be a matter for discussion with the Council at the pre-application stage of proposals. The policy needs to allow for flexibility based on local circumstances.	The policy criteria provide more clarity in advance and allows consistency of decisions and transparency, rather than waiting for discussions to be held at planning application stage. Even if catchments of all proposals were solely negotiated through pre-application agreement, the Council would still need to rely on standard catchment areas in order to form the basis of such discussions. Acknowledge that drive times are a proxy but there are limited other methods available. The Council uses software called Strat-e-gis as an accurate tool to determine isochrone creation (thematic bands of equal time) to support accessibility analysis and determine drivetimes. It takes into account speed, distance, congestion, and the hierarchy of the road network. It provides real travel times for different times of the day as opposed to theoretical default speeds determined by road classification. Other material considerations will always apply.	No change
Land Securities and Evans Property Group (via Quod 1091)	Defining the size of catchment areas for various scales and types of proposals is presumably in the context of the impact assessments, however, the policy would benefit from clarification.	Further clarification/justification of P8 will be added to supporting text.	Minor change - Insert paragraph to clarify the need for P8.
Land Securities and Evans Property Group (via Quod 1091)	May be acceptable to apply a 10 minute drive time to a convenience store proposal above 1,500 sqm on the basis that this represents the likely catchment area of the proposal, but a similar sized comparison proposal associated with an existing out of centre retail facility will draw custom from a larger area and hence necessitate a larger catchment area.	Agree there is a difference in catchments between comparison and convenience for larger A1 stores. This also addresses removal of bulky goods from D/E. Propose to split convenience and comparison into separate rows. For comparison also include in catchment area the City Centre and main centres of neighbouring authorities as appropriate.	Major change – split into convenience and comparison. Add city centre boundary (and edge of) and neighbouring authorities' main centres to



			catchment area for comparison.
Tesco, Yelcon (via DPP 5543)	Criterion (I) - does contain a far more sensible statement regarding the definition of catchment areas, which could be used to apply to all retail developments.	Criterion (I) is necessary because it is specific to proposals for a mix of uses where no other single criteria applies. Even if catchments of all town centre use proposals were solely negotiated through pre-application agreement, the Council would still need to have standard catchment areas in order to form the basis of such discussions. Having this clearly set out in the CS ensures consistency and transparency.	No change
<b>Contrary to NPPF – General / Miscellaneous</b>			
Tesco, Yelcon (via DPP 5543)	Sheer length of P8 contrary to the Government's approach to simplify matters and to encourage development.	A detailed policy is necessary in order for clarity and to reflect NPPF through local circumstances. However, P8 has been made more concise in relation to specific comments below.	Minor change – length of P8 reduced
Hammerson UK Properties Ltd (via Barton Willmore 4816)	Reference should be made to offices in criterion F and G (as in NPPF Annex 2).	See full LCC comments in relation to EC2 representations. In summary, EC2 was drafted in the context of the draft NPPF which did not include offices as a main town centre use. Now they are included and therefore P8 does also need to include offices, worked up in conjunction with changes to EC2 to include a sequential test.	Major change - offices are now incorporated within the 'main town centre uses' in P8.
Tesco, Yelcon (via DPP 5543), Hammerson UK Properties Ltd (via Barton Willmore 4816)	Criteria F and G – no clarity as to what the phrases 'intensive' and 'culture' mean, and do not accord with the simplified guidance contained within the NPPF. Reference should be made to other 'main town centre uses' in criterion F and G (as in NPPF Annex 2).	<p>The phrases are included in the Glossary (and were taken originally from PPS4 and updated from Draft NPPF). However, in light of NPPF and to increase clarity, agree need to refine this further as to which criteria the different uses are related to, aligned with changes to glossary.</p> <p>Changes proposed to P8 in relation to this issue:</p> <ol style="list-style-type: none"> <li>1) Remove G.</li> <li>2) Remove E, and add additional column to D to show catchment distinguished between within or outside residential area.</li> <li>3) Remove F, and add additional rows to D to incorporate and clarify additional uses – through NPPF terminology aligned with use classes.</li> <li>4) Include reference to offices in D and cross reference to EC2.</li> </ol>	Major change – make changes as outlined to a number of the criteria

		<p>5) Bulky goods to be removed from D along with reference to City Centre catchment (as B/C now to split into convenience/comparison above 1,500 sqm which incorporates bulky goods)</p> <p>6) Update Glossary for 'main town centre uses' to reflect NPPF and include as asterisk to D.</p> <p>See updated version of Policy P8 at the end of this table to illustrate all the changes proposed.</p>	
Scarborough Development Group (via RED Property Services 5791)	Para 3.2.25 agree that these criteria are important, but the text could be updated to better reflect the NPPF rather than PPS4.	Not necessary as criteria are still valid considerations.	No change
<b>Miscellaneous</b>			
Tesco, Yelcon (via DPP 5543)	Criterion B – unnecessary as duplicates P4.	P4 expands on detail of B, especially for small scale proposals, and also B only refers to within residential areas. It is useful to have all the thresholds identified in one place.	No change
Tesco, Yelcon (via DPP 5543)	Criterion C - Object to the use of the phrase off-peak. This is not defined and is open to interpretation. The fact that this only refers to in bound is also completely irrelevant in terms of how people actually undertake shopping trips. Rather than adding clarity, this criterion merely causes confusion.	'Off-peak' is defined underneath P8 as between 10 am and 2pm. This ensures the maximum realistic driving distance can be captured. The Council uses software called Strat-e-gis as an accurate tool to determine isochrone creation (thematic bands of equal time) to support accessibility analysis and determine drivetimes. It takes into account speed, distance, congestion, and the hierarchy of the road network. It provides real travel times for different times of the day as opposed to theoretical default speeds determined by road classification.	No change
ASDA Stores (via Osborne Clarke 5889)	Policy should also take account of regeneration policies within the Core Strategy and potential growth areas.	<p>New town centre uses would still have to comply with the sequential approach within regeneration areas. the CS policies need to be read in conjunction with each other. The criteria for smaller scale developments proposed in P8 will help to address regeneration needs. Regeneration areas contain centres so it is even more important to promote their vitality and viability through the detailed approach in the Placemaking Chapter.</p> <p>See further comments on these points in the separate document relating to the Regeneration Policy SP4.</p>	No change

<b>POLICY P9 – COMMUNITY FACILITIES AND OTHER SERVICES (Qu 41)</b>			
Brownberrie Farm, Horsforth Gospel Hall Trust (via J & J Design 5666)	Support Para 5.3.31 especially the recognition of increasing and significant pressures for education facilities, including free schools.	Support welcomed.	No change
Brownberrie Farm (via J & J Design 5666)	Para 5.3.34 – needs additions to address existing deficiencies as well as complementing new housing growth, and to acknowledge communities of interest as well as geographical communities.	Agree could include the word ‘particularly’ before phrase ‘as a result of new housing growth’.	Minor change – Para 5.3.34 add ‘particularly’ before ‘as a result of new housing growth’
Brownberrie Farm, Horsforth Gospel Hall Trust (via J & J Design 5666)	Need policy to direct spatial planning for new school provision otherwise question effectiveness in meeting the Vision of being fair, open and welcoming to all Leeds communities. Must not hide behind the Council’s statutory educational provision duties (as implied by the response to the Trust’s previous representations) as seeking to address need through the Site Allocations or IDP in association with Education Leeds gives appearance that private education providers are likely to be overlooked or ignored. The absence of a clear unequivocal support for such facilities is inconsistent with national policy. Suggest add new policy ‘Education Provision’: “The Council recognises the importance of ensuring that a sufficient choice of school places is available in Leeds and the surrounding settlements to meet the needs of existing and new communities. The Council will take a proactive, positive and collaborative approach to meet this requirement and to widen choice in education. The Council will give great weight to the need to create, expand and alter schools and cooperate with school promoters to identify and resolve key planning issues before applications are submitted. Detailed proposals will have regard to the level of need within the community and its proposed location within the settlement hierarchy, together with accessibility by foot, cycling and public transport in the interests of sustainability and of health and wellbeing.”	Consider that provision for new school provision is adequately covered in P9, along with other important community facilities and services. The statutory provision requirements are not being ‘hidden behind’, but as they do require the Council to provide the sufficient choice of school places and widen choice in education, it is considered that stating this in a CS policy would not give it any further weight. Identifying and resolving key planning issues at pre-application stage is also important to all types of proposal, not just schools. (The last sentence of Brownberrie/Gospel Hall Trust proposed new policy is the same wording as that at present.)  LCC comments made in response to Preferred Approach representations are still relevant. The policy has changed from the PA to recognise that education facilities will not always be appropriate to be located within centres. The Site Allocations DPD and the IDP will in addition identify school requirements.	No change

Conservative Group (2950)	Given the housing numbers there will be a key need to deliver additional schools in order for the Council to meet its statutory requirements around provision of school places. Paragraphs 5.1.17 and 5.3.32 reference this issue but there could be more emphasis placed on school places and the need for more schools to service new development.	There has been close working with Education colleagues to ensure that there will be sufficient school infrastructure. This is further expanded in the IDP.	No change
The Hatfeild Estate, The Ledston Estate, Lady Elizabeth Hastings Estate Charity, AR Briggs and Co, The Bramham Park Estate, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds (via Carter Jonas 5681)	Could be subsumed into a general town and local centre policy.	Some of these facilities and services should where possible be located within centres, but are not required to be located there. Therefore it is appropriate to have a specific policy to support and encourage such uses.	No change
Sport England (1982)	The Core Strategy should contain policies that protect and enhance both indoor and outdoor sport facilities. Add 'sport and recreation' to the list of community facilities.	Agree is important to protect and enhance indoor and outdoor sport facilities.	Minor change - add sport and recreation to the list, and refer in supporting paragraphs.

**Other LCC comments not in relation to specific representations:**

Need to include copy of Use Class Order as an Appendix both to support Centres policies (especially P8) and in case Use Classes changes in future to have a record of what was meant at the time of CS publication.

Clarify that all measures/thresholds are Gross Internal Areas

## APPENDIX 2 – RELEVANT TEXT CHANGES TO CORE STRATEGY

### 4.2 City and Town Centres

- 4.2.1 Town and local centres within the district have generally become established as a consequence of historical growth of the main urban area and outlying towns. They are at the heart of their communities and contribute much to local character and distinctiveness. *Alongside Spatial Policy 2 below, the Placemaking Chapter contains a number of policies setting out the detailed approach towards proposals for main town centre uses, including shopping.*
- 4.2.2 The Leeds City Centre, Town and Local Centres Study 2011 (Centres Study) was commissioned by the Council in order to review existing centres within the district and consider future demand for town centre uses in accordance with national policy guidance. As part of the study, a health check of existing centres was undertaken, the centres' hierarchy was reviewed and options put forward to meet identified requirements. The approach was based on the policy context formed by the UDP, the RSS and national policy guidance.
- 4.2.3 The Centres Study was carried out during a time of great economic uncertainty. Nonetheless, the Study inevitably not only adopted the population projections upon which the Core Strategy is founded but also trend projections of consumer spending. The Study consequently cautioned against reliance on higher projections, advised that a cautious approach be adopted for the short term with a need to review the position at an early stage. Since the study was written, consumer expenditure has continued to fall and the rate of on-line shopping has increased, both of which will have a negative effect on retail floor space need projections. Nationally, new retail development has slowed significantly. The Centres Study states that only 230,000 sq m of new shopping centre floor space opened in 2010, whilst the longer term pipeline has slipped back from 5 million square metres in 2008 to 3.2 million square metres in 2010, but of this only 11% is under construction, so the majority may be subject to delay or cancellation, reducing the pipeline even more. Whilst the Centres Study makes retail projections for Leeds up to 2028, to cover the lifetime of the Core Strategy, the current economic climate is still very unstable. Consequently the Core Strategy ~~will refer only to the projections made for the first 5 years and even then~~ takes a cautious approach given the continuing uncertainty relating to *the economic* climate and the importance of delivering particular major schemes.
- 4.2.4 Leeds has slid down the national retail league table in its retail offer. However, with the Trinity development projected to be completed in 2013 and the first phase of the Eastgate development to follow, Leeds' retail offer will be improved significantly, which will boost its position nationally as well as regionally. The Centres Study and the Core Strategy give full support to the completion of these two developments, which is vital during an uncertain economic climate. It is also important that time be allowed for the city centre to readjust to the development of a significant quantum of new retail floor space, particularly that which will be delivered at Eastgate which will inevitably cause readjustment of retail provision and shopping patterns in the city centre as did comparable new developments in the past.

- 4.2.5 Moreover, it is necessary to have regard to the regional/sub-regional shopping hierarchy and the need not to have a detrimental impact on this generally or on other important centres outside the district. Since the Centres Study was completed in 2010, Trinity Walk in Wakefield has opened adding 44,000 sq m (471,000 square feet) of new retail floor space to the centre. It is reasonable to assume, given the findings of the surveys which underpinned the Centres Study, that this will inevitably lead to 'claw back' in retail expenditure by Wakefield residents from Leeds city centre and in particular, *the out of centre* White Rose *Centre*. In addition to this, Bradford city centre's planned retail scheme Westfield, totalling over 55,000 square metres (nearly 600,000 square feet) is now progressing. This is likely to result in Bradford residents choosing to shop locally in Bradford rather than in Leeds or at the *out of centre* White Rose *Centre*. The delivery of this centre is crucial to Bradford and to the maintenance of a sustainable hierarchy of shopping centres within the City Region. The completion of such retail development schemes need to be taken account of when assessing how the trend based projections set out in the Centres Study should be used for policy development.
- 4.2.6 The Core Strategy approach, in line with the Centres Study and national guidance, is to achieve growth within centres, with a "centres first" approach, protecting the vitality and viability of centres. This requires a sequential assessment and where appropriate, impact assessment to be conducted to direct town centre uses to the appropriate level within the centres hierarchy. Further details regarding this approach are in Policy P8.
- 4.2.7 The City Centre performs the role of a regional city and the Core Strategy aims to maintain the primacy of the City Centre for comparison shopping and recognises its role as a major employment centre.
- 4.2.8 Beneath the City Centre, town centres and local centres perform an important role in:
- providing for weekly and day-to-day shopping requirements, employment, community facilities and leisure opportunities in easily accessible locations,
  - helping to minimise the need to travel, by providing the opportunity for 'linked trips' to shopping, employment and other services,
  - performing an important role in place making through contributing towards the character and identity of an area.
- 4.2.9 Higher order local centres are distinguished from lower order centres on the basis of a number of considerations. These can include most notably the range of shops in particular, and so the service they provide to the local community, but also other facilities that are offered and the consequent role the centre can play in meeting wider local needs. This is generally supported by assessment of vitality and viability of each centre at the time of survey. Other relevant considerations are the presence of a supermarket of some scale and also the potential scope for expansion or redevelopment. It is expected that centres may move from one category to the other".

## **SPATIAL POLICY 2: HIERARCHY OF CENTRES & SPATIAL APPROACH TO RETAILING, OFFICES, INTENSIVE LEISURE & CULTURE**

The Council supports a centres first approach supported by sequential and impact assessments. The Council will direct retailing, offices, intensive leisure and culture, and community development to the city centre and designated town and local centres in order to promote their vitality and viability as the focus for shopping, employment, leisure, culture, and community services.

Proposals which would undermine that approach will not be supported.

The following hierarchy of centres is to be maintained to ensure that development is directed to the appropriate level of centre based on its scale and catchment.

1. The City Centre
2. Town Centres
3. Local Centres

The Leeds district currently contains a great variety of centres with different characteristics and history, and the need to maintain this local distinctiveness remains an overarching consideration.

4.2.10 Map 4 shows the location of centres within Leeds which are designated under Spatial Policy 2 and Policy P1.

### **5.3 PLACE MAKING**

#### **TOWN AND LOCAL CENTRES**

- 5.3.1 Leeds City Centre is the major centre in the Leeds district and the Leeds City Region as outlined in Spatial Policy 2. The City Centre chapter sets out the importance of its shopping, employment, leisure and cultural offer. Leeds is, however, a large district with many other established centres providing facilities within communities. The Core Strategy seeks to maintain and enhance this sustainable pattern of development across the district, ensuring that town and local centres remain the focus for shopping, intensive/built leisure, employment and services.
- 5.3.2 The UDP established a centres hierarchy which included shopping frontages for the City Centre, 28 town centres and 11 other local centres. The function and performance of these centres has been reviewed in the Leeds City Centre, Town and Local Centres Study, (July 2011). In addition to the City Centre, the Core Strategy now identifies 29 town centres and 38 local centres. A network of neighbourhood parades and shops within smaller settlements also make a contribution towards meeting basic day to day shopping and service requirements.
- 5.3.3 The aim of the policies within this section is to support the vitality and viability of these centres for weekly shopping requirements, leisure, local employment provision, and a range of services and community facilities and to promote sustainable and linked trips.

- 5.3.4 Town centres are at the heart of communities within Leeds and contribute towards the character and identity of communities. They provide for weekly and day-to-day shopping and service needs close to where people live and work. A town centre has a range of uses including the A1 (Shops) to A4 (Drinking Establishments), D1 (non residential institutions), D2 (assembly and leisure), C1 (hotels) and C2 (Residential uses and in some cases B1. Typically, the range could include a supermarket/superstore, financial services, a Council presence either in the form of a library or council offices, healthcare presence and community facilities, for example, a community hall. A town centre has a good range of retail of both convenience and comparison, including the presence of local independent traders. Apart from the purpose built town centres built during the 1950s and 1960s (e.g. Bramley and Crossgates), town centres have evolved over time and are surrounded by residential development, without major barriers to hinder their accessibility from these communities (e.g. major road or rail network). The range of uses and the presence of independent traders are important characteristic of a town centre.
- 5.3.5 The defined primary shopping frontage in town centres is predominantly A1 uses. Saved UDP Policy SF7 seeks to maintain this core focus for town centres with a 70/30 split between A1 and other uses. Greater flexibility is given to the mix of uses within the secondary frontage with applications being determined on their merits with the purpose to safeguard the overall retailing character of shopping centres. This approach to primary and secondary shopping frontages is taken forward within the Core Strategy as part of the definition of town centres.
- 5.3.6 Local centres cater for daily shopping needs, and often provide shopping provision to complement weekly shopping. They consist largely of a mix of A1-A4, and may have D1 and D2 present. The range of uses and the scale of units is much less than what a town centre can offer and depending on the size of the local centre, there is often no Council, health or community facility. Higher Order Local Centres may have a small supermarket (see Policy P23 for scale), and some service and community facilities whereas lower order local centres may only have a small local convenience store of a size that trades outside of Sunday licensing restrictions and a mix of shops, including a post office, and a public house.
- 5.3.7 Policy P1 sets out the town and local centre designations. Richmond Hill All (area) is the location of a new town centre, to support Hunslet town centre in the Aire Valley Eco Settlement. Kippax has been redefined as a local centre as the facilities there do not reflect those of a town centre and are more akin to a higher order local centre. The term district centre has been removed and all those centres that were previously district centres within the UDP are now classed as town centres. 'Local centre' is a new designation to replace Policy S4 centres within the UDP and the number of designated local centres has increased to recognise their importance in providing day-to-day local service needs. Due to the significant differences in scale and function of local centres across Leeds a two-tier approach to local centres is established in the Core Strategy, recognising that there can be significant differences in the scale and function of local centres.

*Town centres are at the heart of communities within Leeds and contribute towards the character and identity of communities. They provide for weekly and day-to-day shopping and service needs close to where people live and work. The range of uses and the presence of independent traders are important characteristics of a town centre, as are their historic characters and provision of public realm. Apart from the purpose built town centres constructed during the 1950s and 1960s (e.g. Bramley and Cross Gates), town centres have evolved over time, and in some cases have a long history with many historic features remaining. They are embedded in the communities which they serve, with the*



*town centres of stand alone settlements particularly having an important role in serving their local catchments.*

*The main element of town centres is the 'A' use classes (e.g. shops, financial services, restaurants, public houses and bars). In Leeds town centres have a good range of convenience and comparison retail, including the presence of local independent traders, and the great majority contain a medium sized supermarket (around 1,000 sqm trading floorspace), or a superstore (larger than 2,500 trading floorspace). They also contain financial services such as banks, estate agents, and employment offices, and restaurants or cafes. The town centres in Leeds also contain either a library or Council offices, some form of health provision, and community facilities such as a community hall or place of worship (D1 use). The large majority also include office employment (Class B1a) and leisure uses (Class D2) such as gyms or indoor sports facilities.*

*The defined primary shopping frontages in town centres are those with predominantly A1 uses. Saved UDP Policy SF7 seeks to maintain this core focus for town centres with a 70:30 split between A1 and other uses. Greater flexibility is given to the mix of uses within secondary frontages, with applications being determined on their merits with the purpose to safeguard the overall retailing character of shopping streets and maintain vitality of town centres as a whole. This approach to primary and secondary shopping frontages is taken forward in principle within the Core Strategy with the detail to be established in the Site Allocations DPD.*

*'Local centre' is a new designation to replace the UDP 'Policy S4 centres' and the number of designated local centres has increased to recognise their importance in providing day-to-day local shopping and service needs. Local centres cater for daily shopping needs, and provide shopping provision to complement weekly shopping, known as 'top up' shopping. The range of uses and the scale of units is less than that offered by town centres and there may be no Council, health or community facility, although they provide financial services such as banks and estate agents and a third contain office uses.*

*Due to the significant differences in scale and function of local centres across Leeds the Core Strategy establishes a two-tier approach to split them into higher and lower order. 1,500 sqm of total gross retail floorspace is the general threshold above which a local centre is higher order (notwithstanding any site specific issues which give rise to individual anomalies). Higher order centres also generally have a small supermarket up to 1,500 sqm, and some service and community facilities. They normally have more health centre and library type uses than lower order local centres.*

*Lower order centres only have a small convenience store which allows trade outside of Sunday licence restrictions (up to 280 sqm trading floorspace), fewer restaurants and cafes, and less of a mix of other shops and small scale community facilities. They ordinarily have to contain at least 500 sqm of A1 retail, and at least an additional 500 sqm across all other uses, otherwise they are simply neighbourhood parades.*

*Policy P1 sets out the town and local centre designations. The term 'district centre' no longer applies and all those centres that were previously district centres within the UDP are now classed as town centres. Kippax has been redefined from its UDP town centre classification, to be a higher order local centre as its facilities do not reflect those of a town centre. The Richmond Hill All Saints area is proposed as the location of a new town centre (subject to further evidence and assessment), to complement Hunslet town centre in the Aire Valley Eco Settlement.*

## **POLICY P1: TOWN AND LOCAL CENTRE DESIGNATIONS**

Town and local centres are designated in the following locations:

<b>Town Centres</b>	<b>Higher Order Local Centres</b>	<b>Lower Order Local Centres</b>
Armley	Beeston	Adel
Bramley	Boston Spa	Alwoodley, King Lane
Chapel Allerton	Harehills Corner	Beeston Hill
Cross Gates	Kippax	Burley Lodge
Dewsbury Road	Moortown Corner	Butcher Hill
Farsley	<i>Chapelton Road</i> ←	<del>Chapelton Road</del>
Garforth	Montreal, Harrogate Road	<del>Coldcotes Circus*</del>
Guiseley	<del>Chapelton, Pudsey</del> →	<i>Chapelton, Pudsey</i>
Halton	Hollins Park	Collingham Village Centre
Harehills Lane	Horsforth, New Road Side	Drighlington
Headingley	Kirkstall Road	East Ardsley
Holt Park	Middleton Park Circus	<del>Galloway Lane, Pudsey</del>
Horsforth Town Street		Guiseley, Oxford Road
Hunslet		Hawksworth Estates Centre
Kirkstall		Holbeck
Meanwood		Horsforth, Station Road
Middleton		Hyde Park Corner
Moor Allerton		<del>Ireland Wood</del>
Morley		Lincoln Green
Oakwood		Lower Wortley
Otley		Rawdon, Leeds Road
Pudsey		Royal Parks
Richmond Hill, area*		Slaid Hill
Rothwell		Stanningley Bottom
Seacroft	<i>Street Lane, Roundhay</i> ←	<del>Street Lane, Roundhay</del>
Wetherby		Tommy Wass
Yeadon		Weetwood, Far Headingley
		Woodlesford

\* *Newly identified centres in the City Centre, Town and Local Centres Study*

- 5.3.8 Boundaries of all centres, and their shopping frontages, will be reassessed through the Site Allocations DPD (and future LDF allocations documents as appropriate), and the scope to change their designation and proposals to extend or include new centres to reflect retail need as a result of housing growth proposals will be considered in the interim. Centre boundaries shown in the Centres Study will be a material consideration in the determination of planning proposals until boundaries are reconfirmed in LDF allocations documents.
- 5.3.9 Out of centre shopping retail parks do not perform the role of a city, town or local centre, as they lack the broad range of facilities and services which should be available within such centres. Nevertheless major out-of-centre retailing is a feature of most regional economies, usually associated with the regional city. Such retail parks provide a valuable part of the wider retail offer and make a significant contribution to the local economy and as a source of employment. It is not in the interest of the local economy that such centres should be allowed to decline. In recognition of the important role of such retail parks it is considered that some element of the retail capacity identified in the Core Strategy could be acceptable in established retail park locations where this is clearly demonstrated not to compromise the centres first approach, including consideration of the impact on centres beyond the Leeds boundary. Such proposals should be considered within the context of the delivery of major retail proposals in the City Centre (Trinity and Eastgate).
- 5.3.10 To support the centres first approach, town centre uses should be focused in the identified centres to help to maintain the vitality and viability of centres. Where this is not possible edge of centre locations are appropriate (see Policy P8 and its supporting text for further guidance). This in turn ensures that facilities are available where they can be readily accessed by sustainable modes of transport and provides the opportunity for linked visits to other services. Policy T2 sets out accessibility standards. The full range of uses considered appropriate within town and local centres are listed in Policy P2.
- 5.3.11 The Policy for office development is explained in more detail in Spatial Policy 3 and Policies CC1 and EC2. This indicates that while the City Centre and locations on the edge of the City Centre will be the major focus for new office development, town centres and edge of town centres will also be promoted as locations for office development, with a target of 23,000 sq m set for locations in or on the edge of town centres.
- 5.3.12 While respecting the centres hierarchy, it is also important that the role of Leeds within the wider Leeds City Region is recognised. In particular, nearby centres such as Bradford, Harrogate, Wakefield and Castleford provide important services for Leeds' residents living near the district boundary, just as residents outside Leeds travel into the district to access employment and services. Improving sustainable transport links within the Leeds City Region is therefore of key importance.

## **POLICY P2: ACCEPTABLE USES IN AND ON THE EDGE OF TOWN CENTRES**

Town centres offer shopping and services intended to meet weekly and day-to-day requirements. The uses set out below are acceptable in principle in and, subject to a sequential assessment edge of centre, and will be directed towards the centres listed in Policy P1.

- Shops, supermarkets and superstores
- Non-retail services
- Restaurants and cafes, drinking establishments and hot food takeaways,
- Intensive leisure and cultural uses including theatres, museums, concert halls, cinemas, leisure centres, gyms and hotels
- Health care services
- Civic functions and community facilities
- Offices
- Housing ~~would be acceptable~~ *is encouraged* in centres above ground floor in the primary and secondary shopping frontages or outside the shopping frontages, providing it did not compromise the function of the town centre.

### **POLICY P3: ACCEPTABLE USES IN AND ON THE EDGE OF LOCAL CENTRES**

Local Centres offer shopping and services that meet day-to-day requirements. The uses set out below are acceptable in principle in and, subject to a sequential assessment, edge of centre, and will be directed towards the centres listed in Policy P1:

- Within higher order local centres small supermarkets would be acceptable in principle up to around **1,500 sqm** ~~1,858 square metres gross (20,000 square feet)~~. Within lower order local centres small food stores that are compatible with the size of the centre would be acceptable. These size thresholds are given as guidance and would be subject to local circumstances. A larger store may be appropriate if identified need cannot be met within a nearby town centre.
- A basic range of facilities including shops, banks, health care facilities, public-facing Council services and community facilities that serve a local catchment area
- Restaurants, cafes and hot food takeaways
- Offices
- Housing is **encouraged** acceptable within local centres above ground floor or outside of the shopping frontages providing it maintains the vitality and viability of the retail area.

*Within lower order local centres, proposals for the change of use of existing retail units to non retail units (including restaurants, cafes and take-away hot food shops) will be resisted where the vitality and viability of the centre to meet day to day local needs will be undermined and increase the need to travel, or where the proposal will lead to a concentration of non retail uses in a locality which will detrimentally impact on the community. Proposals for such uses will be considered against the following criteria:*

- The cumulative impact of such development, particularly upon the amenity of the area and traffic generation, especially where concentrations of such uses already exist,*
- Where a proposal involves evening opening, account will be taken of the proposal in relation to the proximity of the premises (and associated parking requirements), to nearby residential accommodation, the nature and character of the neighbourhood parade and existing noise levels;*
- The availability of public transport, convenient on/off street car and cycle parking provision and impact on highway safety. Where there is insufficient car parking or where traffic movements are such as to create a traffic hazard, planning consent is likely to be refused.*

#### **Neighbourhood Shopping**

5.3.13 Neighbourhood shopping parades offer a retail and service function providing a basic range of facilities for day-to-day shopping requirements for people living in local communities. They are particularly important for those without access to a car or with limited mobility, but they are not seen as the main focus of local provision or intended growth.

5.3.14 Small scale stand alone food stores can help to meet a local deficiency where there is no nearby food provision on neighbourhood parades or in centres. It is important that new small stand alone food stores or groups of shops are not in close proximity

to existing parades or centres as they could undermine the vitality and viability of existing parades and centres.

5.3.15 It is important that the function of neighbourhood shopping parades, is not compromised through the loss of retail uses to non retail uses which could create inactive frontages during the day, or a proliferation of A3, A4 and A5 uses (restaurants and cafes, drinking establishments, and hot food takeaways) which could lead to the loss of the shopping function of the centre or parade in a local area.

5.3.16 Whilst A4 and A5 uses can be appropriate uses for parades of shops, their cumulative impact give rise to amenity concerns for nearby residents, including noise, disturbance, litter and car parking, which can occur when a number of such uses are located in close proximity to each other. In addition to this, health issues are now a material planning consideration. As such, sensitive control of the number of A3, A4 and A5 uses in a parade/ local area should be exercised to prevent a loss of the retail function of the parade /local area will be assessed. Where concentrations of such uses exist that are already causing such problems, planning consent may be refused if the additional use would cause further demonstrable harm.

**POLICY P4: SHOPPING PARADES AND SMALL SCALE STAND ALONE FOOD STORES SERVING LOCAL NEIGHBOURHOODS AND COMMUNITIES**

Local service facilities, including extensions to existing retail uses to improve their viability, will be supported within shopping parades in residential areas, providing that they are of a size compatible with the scale and function of the shopping parade, do not compromise the main retail function of the parade to service day-to-day shopping requirements, and other relevant planning policies.

Proposals for stand alone for small scale food stores up to 372 sqm (~~4,000 square foot~~) gross within residential areas, will be acceptable in principle where there is no local centre or shopping parade within a 500 metre radius that is capable of accommodating the proposal within or adjacent to it. Consideration will also be taken of the number of existing small stores in the vicinity to avoid cumulative impact on parades and centres.

Proposals for the change of use of existing retail units to non retail units (including restaurants, cafes and take-away hot food shops) will be resisted where the vitality and viability of the range of shops to meet day to day local needs will be undermined and increase the need to travel, or where the proposal will lead to a concentration of non retail uses in a locality which will detrimentally impact on the community. Proposals for such uses will be considered against the following criteria:

- (i) The cumulative impact of such development, particularly upon the amenity of the area and traffic generation, especially where concentrations of such uses already exist,
- (ii) Where a proposal involves evening opening, account will be taken of the proposal in relation to the proximity of the premises (and associated parking requirements), to nearby residential accommodation, the nature and character of the neighbourhood parade and existing noise levels;
- (iii) The availability of public transport, convenient on/off street car and cycle parking provision and impact on highway safety. Where there is insufficient car parking or where traffic movements are such as to create a traffic hazard, planning consent is likely to be refused.

**Meeting the need for food stores and other retail uses within Leeds**

5.3.17 The Core Strategy supports new retail provision in a sustainable manner, directing it towards town and local centres where there is a known deficiency rather than following a market share approach. A market share approach would undermine the vitality and viability of centres that have known deficiencies and only give support to locations that are successful contrary to the 'centres first' approach that the Core Strategy advocates. Whilst the Core Strategy will continue to support successful centres, the focus of new provision will be directed towards centres in areas of known deficiency to enable people to shop locally and with good access to sustainable transport.

5.3.18 The Leeds City Centre, Town and Local Centres Study will be reviewed periodically to ensure its is kept up to date. The following policies set out the Council's approach to the provision of new floor space for convenience and comparison goods, and support the centres first approach.

**POLICY P5: APPROACH TO ACCOMMODATING NEW FOOD STORES  
ACROSS LEEDS**

- (i) Food stores will be directed towards the town and local centres identified in Policy P1.
- (ii) Sites on the edge of town and local centres will be considered where there are no available, viable or suitable sites within centres.
- (iii) A number of town centres could perform more successfully as major locations for weekly shopping needs if they included a major food store or redevelopment of existing facilities to expand their retail offer or expand their function. Appropriate provision within centre or on the edge of centre ~~subject to policy P8 (A)~~ will be encouraged, and will be supported where sites can be identified in the following locations:
  - Armley
  - Chapel Allerton
  - Cross Gates
  - Dewsbury Road
  - Farsley
  - Headingley
  - Holt Park
  - Horsforth Town Street
  - A new town centre is proposed in the Richmond Hill area, to support the provision at Hunslet, which is the main centre for the Aire Valley Eco-Settlement. The new centre will meet the local deficiency in convenience goods shopping and improve the provision of non-retail services and local facilities that cannot be met by Hunslet town centre. Delivery of this centre is subject to Policy P7.
  - A site for convenience retailing will be sought in the Holbeck area to meet an existing deficiency and complement wider regeneration initiatives.

**POLICY P6: APPROACH TO ACCOMMODATING NEW COMPARISON SHOPPING  
IN TOWN AND LOCAL CENTRES**

- (i) In addition to the Primary Shopping Quarter of the City Centre, the town and local centres identified in Policy P1 are acceptable locations for comparison goods providing that they are of a scale compatible with the size of the centre ~~subject to Policy P8 (A)~~.
- (ii) Sites on the edge of town and local centres will be acceptable in principle where there are no suitable sites within centres. ~~subject to Policy P8 (A)~~

**Creation of New Centres**

5.3.19 Centres that have the potential for extension and the scope to meet particular geographical retail need will be explored in subsequent LDF allocations documents.

5.3.20 The commitment to housing growth as set out in Spatial Policy 6, may lead to a requirement for new centres if existing centres do not have capacity, expansion potential or where the volume of housing proposed justifies a centre on its own merit. A new centre would need to be the focal point of a residential community, have a mix of shops, including independent retailers, services and facilities and be



accessible by foot, cycle and public transport for it to be considered a centre. It should not undermine the vitality and viability of nearby centres.

### **POLICY P7: THE CREATION OF NEW CENTRES**

New centres may be required where there is need for additional convenience and local service facilities as a consequence of significant housing growth if existing centres are not capable of expansion to support the level of development proposed. The following criteria should all be met:

- (i) The proposed centre should not undermine the vitality and viability of the City Centre or any town or local centre, or any committed or planned investment within or on the edge of these centres;
- (ii) The proposed centre should have good pedestrian and cycle access, and good public transport links to the community it is intended to serve;
- (iii) The proposed centre should be of good design quality, in helping to maintain and enhance local distinctiveness;
- (iv) Based on the scale of the centre, the centre should have a mix in type and scale of facilities, services and shops, to reflect a range of uses as outlined in Policy P2 in order to ensure sustainable provision within the proposed centre.

### **Sequential and Impact Assessments for *main* town centre uses and intensive leisure.**

XX.X *Now that the previous national guidance is superseded by the NPPF, the Council needs a more local interpretation of town centres policy in order to make it locally distinctive to Leeds. Therefore Policy P8 refines the NPPF and sets out local thresholds for sequential and impact tests, including catchment areas. If thresholds were not set then the Council would potentially have to apply a sequential test (and possibly an impact test) against every main town centre use proposal, whereas P8 reduces the severity of the tests for developments of a smaller scale and is therefore proactive towards growth and regeneration. Setting these policy criteria also provide more clarity in advance rather than waiting for discussions to be held at planning application stage, it allows consistency of decisions and transparency.*

5.3.21 In assessing proposals for *main* town centre uses the Council will require development proposals to follow a sequential approach to site selection. This requires development proposals for town centre uses to assess sites for their availability, viability, and suitability within existing centres of their catchment area in the first instance. Where no in-centre sites exist, preference will be given to 'edge of centre' locations which are well connected to the centre by means of easy pedestrian access. Edge of centre is defined as up to 300 metres from the primary shopping area for retail uses. For non retail uses edge of centre is defined as up to 300 metres from the town centre boundary. For local centres where there is no defined primary shopping area, edge of centre is defined as up to 300 metres from identified shopping frontages. Sites on the edge of centres should be well connected to the centre and not be constrained by major roads, railway lines or waterways.

5.3.22 If there are no sites available, viable or suitable in or edge of centre, out of centre locations that are well served by a choice of transport modes and that are close to the centre with the potential of forming linkages with the centre in the future will be favoured before other less sustainable sites. Developers must demonstrate flexibility in their business model in terms of the scale, format, car parking provision and scope for disaggregating specific parts of the development to enable them to locate within the centre before considering less central sites.

5.3.23 The Council has recognised the role of existing major out of centre retail locations in terms of the wider retail offer of the district and in providing significant employment opportunities. The need for limited expansion to allow such centres to continue to fulfil this role is recognised and will be taken into account when considering the sequential approach.

5.3.24 The sequential approach will be carried out in accordance with the thresholds set out in Policy P8, which also indicates the scale of development at which an impact assessment will be required for town centre uses. Impact assessments will be required to consider the following criteria:

- The impact of the development on existing, committed and planned investment in centres located within an agreed catchment area,
- The impact of the development on town centre vitality and viability, including consumer choice and range,
- The impact of the development on allocated sites outside of town centres being developed in accordance with future LDF allocations documents.
- The impact of the development on in-centre trade/turnover in the wider area, taking account of current and future consumer expenditure capacity in the catchment area up to 10 years from the time the application is made.
- If located in or on the edge of a centre, whether the proposal is of an appropriate scale (in terms of gross floor space) in relation to the size of the centre and its role in the hierarchy of centres as set out in Spatial Policy 2.
- The impact of the development of proposal on local independent traders. They add essential variety and individuality to centres which contributes to place making and overall character and any detrimental impact to them through any likely disproportionate effect on the centre should be avoided. Impact assessments should be proportionate to the level of development proposed.

5.3.25 All proposals for town centre uses should consider the following:

- Plan over the lifetime of the development to limit carbon dioxide emissions and be resilient to climate change.
- The accessibility of the proposal to be considered against choice of transport including walking, cycling, public transport and the car. The effect on local traffic levels and congestion after public transport and traffic management measures have been secured.
- High quality and inclusive design – improve character and quality of the area and the way it functions.
- Impact on economic and physical regeneration in the area.
- Impact on local employment.

## **POLICY P8: SEQUENTIAL AND IMPACT ASSESSMENTS FOR MAIN TOWN CENTRE USES\***

Leeds City Council has adopted a centres first approach to main town centre uses\* as set out in Policy SP2. Proposals must accord with the following sequential and impact assessment requirements:

A) Proposals for up to 200 sqm extensions to existing units or up to 200 sqm change of use will not require sequential or impact assessments. This will not apply where the Council considers that a combination of conversions / extensions / new build is being used to attempt to avoid the below thresholds. Proposals for extensions or change of use to existing edge or out of centre units above 200 sqm will be required to conduct assessments based on the gross floorspace of the resulting unit in accordance with the thresholds set out below.

B) Proposals for edge of centre or out of centre A1 within residential areas:

<b>Total gross size of built development</b>	<b>Sequential Assessment</b>	<b>Impact Assessment</b>	<b>Catchment Area (radius)</b>
Below 200 sqm	NO	NO	N/A
200 – 372 sqm	YES	NO	500 metre walking
373 – 1,499 sqm	YES	NO	5 minute inbound off peak drive time
1,500+ sqm: Convenience	YES	YES	10 minute inbound off peak drive time
1,500+ sqm: Comparison	YES	YES	10 minute inbound off peak drive time, and in addition the City Centre (and edge of), and the main centres of neighbouring authorities as appropriate depending on distance and the scale of the proposal

C) Proposals for edge of centre or out of centre A1 outside residential areas:

<b>Total gross size of built development</b>	<b>Sequential Assessment</b>	<b>Impact Assessment</b>	<b>Catchment Area (radius) inbound off peak drive time</b>
0 - 1,499 sqm	YES	NO	5 minute
1,500+ sqm: Convenience	YES	YES	10 minute
1,500+ sqm: Comparison	YES	YES	10 minute inbound off peak drive time, and in addition the City Centre (and edge of), and the main centres of neighbouring authorities as appropriate depending on distance and the scale of the proposal

D) Proposals for all other edge of centre or out of centre main town centre uses\*

<b>Total gross size of built development</b>	<b>Sequential Assessment</b>	<b>Impact Assessment</b>	<b>Within residential area: Catchment Area (radius) inbound off peak drive time</b>	<b>Outside residential area: Catchment Area (radius) inbound off peak drive time</b>
A2, A3, A4, A5 0 - 1,499 sqm	YES	NO	5 minute	10 minute and City Centre (including edge of)
A2, A3, A4, A5 1,500+ sqm	YES	YES	10 minute and City Centre	15 minute and City Centre (including edge of)
Main town centre uses except Class A 0 - 1,499 sqm	YES	NO	10 minute and City Centre (including edge of)	
Main town centre uses except Class A 1,500+ sqm	YES	YES	15 minute and City Centre (including edge of)	

E) Proposals for more than one unit will generally be required to carry out assessments based on their total gross floor area, unless disaggregation is more relevant for the sequential test. Pre-application discussions with Council officers will be required to agree a catchment search area for proposals for a mix of A1 convenience and comparison units.

F) All proposals will be required to accord with Policy T2 on accessibility standards.

*\* NPPF glossary identifies main town centre uses as retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities, and the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).*

*N.B. offices are also subject to Policy EC2.*

*Use Classes Order: Class A1 - shops, A2 – financial and professional services, A3 – restaurants and cafes, A4 – drinking establishments, A5 – hot food takeaways.*

*All measures/thresholds in Policy P8 are Gross Internal Areas.* The total gross size of built development is based on a 65/35 split of net sales area to storage/back office area. Proposals for development with a greater split will be required to submit justification for why their operations needs require this and will be judged on the merits of the application. 500 metres easy walking distance equates to a 10 minute walk time, which takes into account gradient and barriers such as road, rail and waterways. The catchment area includes all centres located within it, including the City Centre if it falls within the catchment area. Off peak is between 10am and 2pm.

**[SUPERSEDED POLICY P8:]**

## **POLICY P8: SEQUENTIAL AND IMPACT ASSESSMENTS FOR TOWN CENTRE USES**

Leeds Council has adopted a centre first approach to town centre uses as set out in Policy P2. Proposals for town centre uses must accord with the following sequential and impact assessment requirements where appropriate:

A) Any new proposals for town centre uses within a defined centre of a gross floor space of 10% or more of the total gross retail floor space in the centre will be subject to an impact assessment to ensure that the proposal would not undermine the vitality and viability of the centre in which it is located, or any centres within the catchment area, as a whole.

B) Proposals for edge of centre or out of centre A1 uses / stores within residential areas:

<b>Total gross size of built development</b>	<b>Sequential Assessment</b>	<b>Impact Assessment</b>	<b>Catchment Area (radius) inbound off peak drive time</b>
Below 200 square metres	NO	NO	N/A
200 – 372 square metres	YES	NO	500 metre walking
373 – 1,499 square metres	YES	NO*	5 minute inbound off peak drive time
1,500 square metres and above	YES	YES	10 minute inbound off peak drive time

\* unless the gross floor space of the proposal is more than 10% of the total floor space of each of the centres within the catchment area, then a local impact assessment is required.

C) Proposals for edge of centre or out of centre A1 uses / shopping, outside residential areas:

<b>Total gross size of built development</b>	<b>Sequential Assessment</b>	<b>Impact Assessment</b>	<b>Catchment Area (radius) inbound off peak drive time</b>
0 - 1,499 square metres	YES	NO*	5 minute inbound off peak drive time
1,500 square metres and above	YES	YES	10 minute inbound off peak drive time

\* unless the gross floor space of the proposal is more than 10% of the total floor space of each of the centres within the catchment area, then a local impact assessment is required.

D) Proposals for edge of centre or out of centre A2 – A5 (including bulky goods) and non-retail services within residential areas:

<b>Total gross size of built development*</b>	<b>Sequential Assessment</b>	<b>Impact Assessment</b>	<b>Catchment Area (radius) inbound off peak drive time</b>
0 -1,499 square metres	YES	NO*	5 minutes
1,500 square metres and above	YES	YES	10 minutes and City Centre

\* unless the gross floor space of the proposal is more than 10% of the total floor space of each of the centres within the catchment area, then a local impact assessment is required.

E) Proposals for edge of centre or out of centre A2 – A5 (including bulky goods), and non retail services outside residential areas:

<b>Total gross size of built development*</b>	<b>Sequential Assessment</b>	<b>Impact Assessment</b>	<b>Catchment Area (radius) inbound off peak drive time</b>
0-1,499 square metres	YES	NO*	10 minutes and City Centre (including edge of)
1,500 square metres and above	YES	YES	15 minutes and City Centre (including edge of)

\* unless the gross floor space of the proposal is more than 10% of the total floor space of each of the centres within the catchment area, then a local impact assessment is required.

**N.B. POLICY CONTINUES ON NEXT PAGE**

**SUPERSEDED POLICY P8 - CONTINUED FROM PREVIOUS PAGE**

F) Proposals for edge of centre or out of centre intensive leisure and culture within residential areas

Total gross size of built development*	Sequential Assessment	Impact Assessment	Catchment Area (radius) inbound off peak drive time
0-1,499 square metres	YES	NO*	10 minutes and City Centre (including edge of)
1,500 square metres and above	YES	YES	15 minutes and City Centre (including edge of)

\* unless the gross floor space of the proposal is more than 10% of the total floor space of each of the centres within the catchment area, then a local impact assessment is required.

G) Proposals for edge of centre or out of centre intensive leisure or culture outside of residential areas

Total gross size of built development*	Sequential Assessment	Impact Assessment	Catchment Area (radius) inbound off peak drive time
0-1,499 square metres	YES	NO*	10 minutes and City Centre (including edge of)
1,500 square metres and above	YES	YES	15 minutes and City Centre (including edge of)

\* unless the proposal is more than 10% of the total floor space of each of the centres within the catchment area, then a local impact assessment is required.

H) Proposals for extensions of up to 200 square metres to existing units will not require sequential or impact assessments. Proposals for extensions to existing units above 200 square metres will be required to conduct sequential and impact assessments based on the gross floor space of the resulting unit in accordance with the thresholds set out above.

I) Proposals for more than one unit will be required to carry out assessments based on their total gross floor area. Pre application discussions with Council officers will be required to agree a catchment search area for proposals for a mix of convenience and comparison units.

J) All proposals will be required to accord with Policy T2 on accessibility standards.

~~For clarification, in Policy P8 the total gross size of built development is based on a 65/35 split of net sales area to storage/back office area. Proposals for development with a greater split will be required to submit justification for why their operations needs require this and will be judged on the merits of the application. 500 metres easy walking distance equates to a 10 minute walk time, which takes into account gradient and barriers such as road, rail and waterways. The catchment area includes all centres located within it, including the City Centre if it falls within the catchment area. Off peak is between 10am and 2pm.~~

**Shopping frontages and their mix of uses**

5.3.26 Primary and secondary shopping frontages were identified in the UDP in order to maintain and enhance the viability of shopping centres and ensure a concentration of facilities. These primary and secondary shopping frontage policies are saved in UDP Appendix A12 until revised in LDF documents. Primary shopping areas will be identified within the City Centre and town centres. These will consist of primary frontages and any contiguous secondary frontages, large retail units and adjoining areas with potential for expansion of the primary shopping area. To maintain the

vitality and viability of Town and Local Centres (as set out in Spatial Policy 2), primary frontages and where appropriate secondary frontages will be identified in LDF documents.

5.3.27 As emphasised in the above section on Neighbourhood Shopping and Policy P4, the need to maintain retail uses as the predominant use in primary and secondary frontages in centres and in neighbourhood parades is a key issue. This is necessary to prevent inactive frontages during the day, or a proliferation of A3-A5 uses (restaurants and cafes, drinking establishments, and hot food takeaways), which could lead to the loss of the function of the centre or parade which is first and foremost for shopping. Whilst A4 and A5 uses are acknowledged as town centre uses, employment contributors, and can contribute to the tourism of an area, they can cause amenity issues to nearby residents. In addition to this, health issues are now a material planning consideration. As such, sensitive control of the number of A4 and A5 uses in a centre or parade should be exercised to prevent a loss of the retail function of the centre or parade and overexposure to such uses, which could contribute to poor health in the community. Therefore, the proportion of retail to non retail uses in primary and secondary frontages will be reviewed in future LDF documents with the aim to maintain retail uses as the predominant use.

### **Community Facilities and Other Services**

5.3.28 In addition to local shopping and built leisure facilities, local communities have a need for good access to health, education, training and community facilities and a range of high quality green space provision, which in turn is thought to have a positive impact on the health and wellbeing of a community. The projected increase in households across Leeds will lead to an increase in the demand for these facilities. Policies G3-G6 outline the delivery of new green space and enhancement of existing facilities. A Policy relating to other community infrastructure and services is outlined below.

### **Health**

5.3.29 Local health facilities need to be accessible to all, therefore it is important that they are provided in sustainable locations. Town and local centres are considered to be sustainable locations as they have sustainable transport access and are the focus for other community facilities which in turn can encourage services to co-locate to enable linked trips.

5.3.30 This supports the decentralised approach of providing health and social care services closer to where people live and away from central hospital locations, unless that is appropriate. Wherever possible, health and social care services will be integrated, to give individuals more choice and control over the services they need to stay healthy or return to independent lives following recovery from illness.

### **Education and Training**

5.3.31 An increasing school age population means that Leeds is facing significant pressure to ensure that basic need is met for statutory education. Educational provision is experiencing significant change with the introduction of academies and free schools. However the duty to ensure all children and young people have a school place remains the responsibility of the Council.

5.3.32 New educational facilities will be required to meet increased demand either through extensions to existing establishments or through the building of new schools in

areas of housing growth or adjacent to them. Developers will be required to reserve land for education facilities where this need is identified in LDF allocations documents and contributions will be sought through Section 106 agreements and/or the Community Infrastructure Levy to deliver these facilities. Similar consideration will also be given to community needs for sufficient early years, childcare, and appropriate youth provision.

5.3.33 The Council is committed to ensuring young people are in education, employment or training beyond the age of 16 and Government preparations are being made for the raising of the participation age in formal learning to 18 by 2015. The LDF will support provision of facilities required in appropriate locations.

### **Social and Community Facilities**

5.3.34 The provision of existing and new social and community facilities is integral to creating sustainable communities. One of the aspirations within the Vision for Leeds is for all communities to be successful. To be successful local services need to be easily accessible and meet people's needs therefore the Council needs to support the provision of new community facilities *particularly* as a result of new housing growth. The delivery of such facilities should be through effective community engagement and be of high design quality to help maintain local character and distinctiveness.

5.3.35 The provision of greenspace within communities has an important role to play in creating sustainable communities and there is often a link between social and community facilities and the provision of leisure and open space facilities. The Managing Environmental Resources and Green Infrastructure sections sets out the Council's requirements for greenspace across Leeds.

## **POLICY P9: COMMUNITY FACILITIES AND OTHER SERVICES**

Access to local community facilities and services, such as education, training, places of worship, health, and community centres, is important to the health and wellbeing of a neighbourhood. New community facilities and services should be accessible by foot, cycling, or by public transport in the interests of sustainability and health and wellbeing. Facilities and services should not adversely impact on residential amenity and should where possible, and appropriate, be located in centres with other community uses.

The scale of the facility or service should be considered in conjunction with the level of need within the community and its proposed location within the settlement hierarchy.

Where proposals for development would result in the loss of an existing facility or service, satisfactory alternative provision should be made elsewhere within the community if a sufficient level of need is identified.