

Report of the Director of City Development

Report to: Development Plan Panel

Date: 11 September 2012

Subject: LDF Core Strategy – Publication Draft, Analysis of Consultation Responses: Spatial Policy 1: Location of Development

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

Summary of main issues

- The key issues which have arisen in response to this part of the Core Strategy include comments in relation to the Settlement Hierarchy (including both supports for the overall approach and representations concerning the rationale and the inclusion/non inclusion of particular settlements within the hierarchy) and issues in relation to the detailed policy wording of Policy SP1. Other than checking any Map inconsistencies, there are no recommended changes arising from these comments.

Recommendations

Development Plan Panel is requested to:

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

1.0 Purpose of this Report

- 1.1 Within the context of the Core Strategy Initial Report of Consultation (6th June), the purpose of this report is to review consultation responses in relation to Spatial

Policy 1. Appendix 1 attached, summarises the representors, 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 28th February to 12th April 2012. Consistent with the LDF regulations, this is a targeted stage of consultation, with emphasis upon requesting responses in relation to the "soundness" of the plan. Within this context, the consultation material comprised of a range of documents, which were subsequently made available on line or as paper copies, including:

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

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

3.0 Main Issues

3.1 The key issues which have arisen in response to this part of the Core Strategy include comments in relation to the Settlement Hierarchy (including both supports for the overall approach and representations concerning the rationale and the inclusion/non inclusion of particular settlements within the hierarchy) and issues in relation to the detailed policy wording of Policy SP1. Other than checking any Map inconsistencies, there are no recommended changes arising from these comments.

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, 10th February 2012). This concluded that equality, diversity, cohesion and integration issues had been embedded as part of the plan's preparation. For information and comment, the Screening assessment has also been made available as part of the supporting material for the Publication draft consultation. Within this overall context, it will be necessary to continue to have regard to equality and diversity issues, as part of the ongoing process of preparing the Core Strategy, including considering representations and next steps.

4.3 Council Policies and City Priorities

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

4.4 Resources and value for money

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

4.5 Legal Implications, Access to Information and Call In

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

4.6 Risk Management

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

5. Conclusions

- 5.1 This report provides an overview of the issues raised in relation to Policy SP1 of the Publication Draft Core Strategy. Following consideration of representations received, other than checking for Map inconsistencies, there are no changes arising.

6. Recommendations

6.1 Development Plan Panel is requested to:

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

7. Background documents¹

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.

¹ 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

SPATIAL POLICY 1: LOCATION OF DEVELOPMENT

Representor/Agent	Representor Comments	LCC Initial Response	Action
(0057) Hallam Land Management Ltd, Ashdale Land and Property Company Ltd (via Barton Willmore Planning Partnership-Northern)	Support for the Policy, the approach to housing growth through the settlement hierarchy.	Support welcome	No change
(0420) Airebank Developments, Muse Developments (via White Young Green Planning)	General Support for Policy	Support welcome	No change
(5543) DPP	Broad support for the overall spatial vision and development strategy and spatial policies. The overall principles of Spatial Policy 1 are consistent with national policy as contained within the NPPF. The Policy is justified and supported.	Support Welcome	No change
(0057) Templegate Developments (via Barton Willmore Planning Partnership-Northern)	General support for the level of housing growth development within settlements. This in turn is supportive of regeneration/development proposals within the Aire Valley (such as Temple Green and Skelton). However, concern that there are inconsistencies between the maps throughout the document, specifically Map 3 and Maps 5 and 6. The Aire Valley Leeds (AVL) is identified as a “regeneration priority area” within SP4. Map 6 shows land owned by Templegate Development to the eastern side of the M1 motorway; this land	Support welcome, correct any Map inconsistencies. The focus of SP1 (v), is to set out an overarching approach to economic/employment development. Integral to the spatial development strategy, the City Centre and Aire Valley are key strategic locations for economic and housing growth. The term “strategic locations”, is not however intended to refer to ‘Strategic Sites’ for housing. Given the nature of the housing growth issues in Leeds and the strategy which has been developed in response to these issues (and reflected in SP1 (i), strategic housing sites have not been identified. It is considered that the inclusion of the word “housing” in (v) b, when read in the context of ‘strategic locations’, could be	Change to correct any Map inconsistencies.

	<p>should correctly be shown as forming part of the main urban area on Map 3.</p> <p>Map 3 should be changed to, extend the main urban area beyond the M1 Motorway to incorporate land owned by Templegate Developments (to be consistent with Map 6).</p> <p>For consistency between SP1 and SP5 it is recommended that part v) is amended to read as follows: “(v) To promote economic prosperity, job retention and opportunities for housing growth: a. In existing established locations for industry and warehousing land and premises, b. In key strategic* locations for job and <i>housing</i> growth including the City Centre and Aire Valley (as shown in the Key Diagram).”</p>	<p>potentially confused with the term ‘strategic sites’. As a consequence, it is not considered appropriate to amend (v) b to include the word “housing”.</p>	
<p>(5835) Persimmon Homes</p>	<p>Comments on (v) regarding the City Centre & Aire Valley Leeds, employment growth.</p> <p>Note that (v) identifies key locations for employment growth but concern that Core Strategy doesn't identify strategic housing locations. The lack of this means that the plan is not effective and unsound in not reflecting the NPPF. Support therefore for the inclusion of strategic sites in this policy. Noted that this will require an update of the SEA and be undertaken in line with selective Green Belt review.</p> <p>Within this context, support the promotion of several Persimmon owned sites, currently included within the SHLAA (Land North of Garforth, & in South Leeds, as a sustainable extension to Morley.</p>	<p>The NPPF refers to the ‘local plan’ allocation of sites. Within this overall context the City Council is preparing a Core Strategy and Site Allocations DPD and does not consider it necessary to identify strategic sites. The Core Strategy is planning for 70,000 dwellings and it is not anticipated that any individual site will be so large as to warrant justification as a strategic location. The approach of the Core Strategy is for the distribution of sites, in sustainable locations, as part of the settlement hierarchy as set out in Policies SP6 and SP7.</p>	<p>No change</p>

	Support for the selective greenbelt review.		
(5867) C/o Hileys Solicitors (via LDP Planning)	<p>Support the settlement hierarchy in Table 1.</p> <p>Concern that there are significant variations in housing delivery targets between settlements in the same category and significant constraints to the delivery of development within some settlements.</p> <p>Morley earmarked for 2000 - 3500 new dwellings but constrained due to M62 on S and SW and by M621 on N and NW. Few sites identified within existing boundary so GB review needed to deliver development. Concern over coalescence between Morley, Gildersome, East Ardsley and Leeds. Further development might prevent GB function from stopping settlement merging.</p> <p>Wetherby significantly constrained as North and West boundaries not in Leeds, east has A1. Therefore only south development which is constrained by major trunk roads, areas of flood risk and topography. This could also lead to coalescence with Linton and Collingham - question delivery of 500 - 1000 units in this settlement.</p> <p>Rothwell bounded by protected Greenpace due to amenity value.</p> <p>Otley Town Centre is disjointed from residential area and expansion will not respect the existing unit or provide housing in sustainable locations close to the town commercial centre.</p> <p>Otley and Guiseley/Rawdon/Yeadon are constrained by topography and high</p>	<p>Support for the Settlement Hierarchy is welcomed.</p> <p>SP1 does not set specific housing delivery targets for individual settlements. Within the context of the Housing Requirement set out in SP6, Policy SP7 sets out the approach to the Distribution of Housing Land and Allocations. This is quantified at a settlement level (rather than for individual settlements), with the broad distribution and quantum's for growth by Housing Market Characteristic Area. This is intended to provide an indication of the overall scale and distribution of development, drawing upon information as part of the Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment. As indicated in the Core Strategy, detailed allocations will be set out as part of the Site Allocations DPD, where detailed assessments and consideration of phasing will be made. Within this context, it is not considered that the settlement hierarchy is a constraint to development in the formative years of the plan but a positive tool to identify a range of opportunities in a variety of locations, consistent with an overall strategy.</p>	<p>No change.</p> <p>No change.</p>

	<p>ecological and amenity value. Surrounded by SSSIs, local nature reserves, sites of ecological or geological interest and Leeds Nature Areas. Close to airport which could lead to poor amenity levels.</p> <p>Therefore Garforth optimum location for significant retail and residential growth/expansion. Benefits from two railway stations, direct bus access to Leeds, near M1 and A63 to provide direct access on the national road network. Not constrained by areas of high visual ecological or geological value. Development can be near the town centre and town centre can expand. Therefore need to progress sites in the short term.</p> <p>Support direct new development to major settlements such as Garforth.</p> <p>Feel there is a need for key locations for suitable extensions to come forward in short term due to economic pressures and need to meeting housing requirement.</p> <p>Hierarchy is considered to unnecessarily constrain the delivery of sufficient sites in the formative years of the plan period, preventing the CS from achieving strategic targets.</p>	<p>The Core Strategy already supports significant new housing development in Garforth.</p>	<p>No change.</p>
(0060) Highways Agency	<p>Support for the Policy approach to base growth on the existing pattern of settlements and the existing settlement hierarchy to ensure that development takes place in the most sustainable locations. These principles are welcomed by the Agency as building on the transport infrastructure in existing settlements is seen as offering the most cost-effective opportunities for delivering sustainable</p>	<p>Support welcomed</p>	<p>No change</p>

	<p>transport solutions, minimising increased car use and thereby also minimising adverse traffic impacts on the SRN.</p> <p>The approach of previously developed land first, then infill sites and lastly urban extensions should enable the best use to be made of existing transport infrastructure and services before investing in new infrastructure and services.</p>		
(0099) English Heritage	Support for the Policy in seeking to preserve and enhance the elements of the district which make it unique and distinctive, criteria ii in supporting the reuse of existing buildings and iii for development should respect and enhance the local character and identity of the places where they are proposed.	Support welcomed	No change
(0806) Aviva Life & Pensions (UK), and The Crown Estate (via Indigo Planning)	Welcome the commitment to focussing retail (and associated) development within the City Centre area where the Crown Point Retail Park (CPRP) is located.	Support welcomed	No change
(1780) Montpellier Estates	We welcome the Publication Draft Core Strategy and taken as whole we are very supportive of the policies and text. We are particularly supportive of the 'city centre first' approach and the strong references to the settlement hierarchy throughout the document.	Support welcomed	No change
(5689) Aspinall Verdi	Supportive of City Centre first approach and the strong references to the settlement hierarchy throughout the document.	Support welcomed	No change
(4388) Pegasus Planning Group	Strongly support (i) which identifies that the Major Settlements will deliver significant amounts of development. The Major Settlements, and particularly Garforth, have potential, through urban extensions, to deliver a significant proportion of the identified growth in a sustainable way utilising and strengthening existing public	Support welcomed	No change

	transport links and local services.		
(5942) North Yorkshire County Council	<p>Broad support for the document.</p> <p>Note that major settlements have been proposed for Wetherby, Otley and Garforth yet there is no recognition of the affects this would have on the cross boundary road network; the A58/A661, A659 and the A63. We would also like to see the recognition of the need for partnership working in relation to this.</p> <p>We would support 4.1.12 and 4.1.13.</p>	<p>Support welcomed</p> <p>The City Council is working with neighbouring authorities and other key agencies as part of existing and emerging Duty to Co-operate arrangements.</p> <p>Support welcomed</p>	No change
(5034) British Library (via Drivers Jonas Deloitte)	<p>Support in relation to bullet point (v), in particular promotion of economic prosperity, job retention and opportunities for growth in existing established locations for industry, warehousing land and premises. British Library wish to retain their site for its current purpose and continue to redevelop and update its facilities in line with emerging operational requirements.</p>	Support welcomed	No change
(1982) Sport England	<p>Welcome inclusion of (vi) which infers recognition of the sporting infrastructure. We would recommend the council makes this explicit by adding sport into the definition of GI in the glossary section.</p>	Support welcomed	Changes previously considered by the DPP on 7 th August to include the word "sport" in the main Core Strategy text at para. 5.5.1.
(1933) Metro	<p>The settlement hierarchy concept is supported. This approach generally focuses development on the existing transport network. Policies within the strategy, such as encouraging higher density developments on transport corridors, are welcomed as this makes best use of the existing public transport infrastructure.</p> <p>The Core Strategy has only identified very broad locations for development across the</p>	<p>Support for Settlement Hierarchy welcomed.</p> <p>It is accepted that more detailed assessments will be made as part of the preparation of the Site Allocations DPD.</p>	<p>No change</p> <p>No change.</p>

	<p>Leeds City Council area. Metro considers the broad spatial distribution of development to be reasonable. As site specific details have not been provided at this stage, further infrastructure requirements will need to be identified as the Site Allocation DPD is produced.</p> <p>Support for the City Centre and principal towns as locations for employment. Further consideration needs to be given to cross boundary movements. This needs to be addressed as we anticipate that to fulfil the economic growth aspirations, Leeds will be to some extent reliant on 'inward' commuting from the surrounding districts.</p> <p>(ii) Clarification needed - Metro supports the principle of the settlement hierarchy and the sequential approach to prioritising sites. However, the policy needs to be flexible enough to ensure that development would be permitted in windfall sites such as on land around new rail stations and other high frequency public transport corridors.</p> <p>(iv) Metro support the basic principle of the policy but the wording needs to be amended to promote development around public transport hubs as well as in locations that are accessible by public transport.</p> <p>(vi) policy strengthening required - The policy talks about the role of new and existing infrastructure in delivering economic growth; this wording should be amended to include the role new infrastructure has in 'accelerating' economic growth.</p> <p>(viii) Support. A review of the Green Belt is</p>	<p>Support welcomed, in relation to cross boundary movements, the City Council is working with neighbouring authorities and other key agencies (including Metro and the Highways Agency) as part of existing and emerging Duty to Co-operate arrangements.</p> <p>Core Strategy Policies SP6 & SP7 set out the overall scale and distribution of housing development. As set out in (ii), the approach is intended to help guide the location of development. The approach is sufficiently flexible to allow for windfall development in sustainable locations consistent with the overall strategy.</p> <p>The City Centre is at the centre of the District's transport network and is highly accessible by a variety of transport modes, public transport accessibility is therefore integral to the approach.</p> <p>Through the preparation of the Infrastructure Delivery Plan and Section 6 of the Core Strategy (Implementation & Delivery), it is recognised that infrastructure has a key role to play in stimulating and supporting development and in accelerating economic growth.</p> <p>Support welcomed</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>
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	supported subject to sites being subject to rigorous accessibility assessments including identifying the infrastructure requirements for the sites to ensure they are accessible by public transport, walking and cycling.		
(4816) Hammerson UK Properties Ltd (via Barton Willmore)	<p>Supports for the identification of the City Centre at the head of the settlement hierarchy and the list of Major Settlements and Smaller Settlements.</p> <p>Whilst supporting the overall thrust of the policy, criterion (iv). should be strengthened in line with the NPPF (paragraph 24) to 'require' rather than 'prioritise' main town centre uses to be located within the City Centre and the Town Centres across the district. criterion (v). should be expanded to specifically identify the City Centre as a key area within which to promote economic prosperity, job retention and opportunities for growth.</p>	<p>Support welcomed.</p> <p>The NPPF para. 24 refers to the sequential test in relation to planning applications – rather than Development Plans, in describing the application of the sequential test in requiring applications to for main town centre uses to town centres, edge of centres & then out of centre (subject to the availability of suitable sites).</p> <p>(v) is not intended to apply exclusively to the City Centre but to reflect key strategic opportunities across the District.</p>	<p>No change.</p> <p>No change</p> <p>No change.</p>
(5723) Arcadia Group (via Montagu Evans LLP)	<p>Support the preference for development of sites within the Main Urban Area.</p> <p>Suggest that for clarity, the policy may benefit by being split into two parts, within the second part being an additional criteria to read,</p> <p>(i) To concentrate the majority of development within urban areas...regard to settlement's size, function and sustainability.</p> <p>(ii) The largest amount of development will be located within the Main Urban Area.</p>	<p>Support welcomed</p> <p>Whilst the suggestion is noted, it is felt that the wording is sufficiently clear as drafted.</p>	<p>No change.</p> <p>No change.</p>
(5889) ASDA Stores Limited (via Osborne Clarke)	<p>General support for policy.</p> <p>ASDA support that Leeds City Centre and the town centres across the district will be the priority for new office, retail, service,</p>	<p>Support welcomed.</p>	<p>No change.</p>

	<p>leisure and cultural facilities. In particular, ASDA recognise that investment in the City is required to ensure that the City maintains its role as a regional centre.</p> <p>ASDA recognise that there is a need to retain a portfolio of employment sites but considers that sufficient flexibility should be provided in policies to allow the development of sites for a wide range of employment generating uses in certain circumstances.</p>		
(2663) Miller Strategic Land (via Spawforths),	<p>Broadly supportive of the spatial approach and the settlement hierarchy as indicated in Table 1 of the Core Strategy.</p> <p>In distributing development the future growth of Leeds as the Engine for Growth of Yorkshire and Humber must be balanced. It is important that there is sufficient provision of housing supply for Leeds and that this is linked with the longer term economic development of the City. Broad support for the Policy but concern that (ii) conflicts with the NPPF, which only encourages the effective use of land by reusing, land that has been previously developed. This approach is not a “brownfield first” policy or a sequential approach to land allocation or release. Therefore, the sequential approach to land allocation must not be set within the Core Strategy and, greenfield sites in sustainable locations will be suitable for development in the short term. The new parameter for new housing land is deliverability and that the prioritisation approach in (ii) of Spatial Policy 1 be deleted.</p>	<p>Support welcomed</p> <p>SP1 is concerned with the identification of sites and not phasing and is Core Principles set out in para. 17 of the NPPF.</p>	<p>No change.</p> <p>No change.</p>
(5039) Signet Planning	The Policy sets out the strategy to guide the location of development across the	Support welcomed for overall approach.	No change

	<p>Authority. The correct approach is being taken in ensuring the majority of development is being directed to the urban areas. Importantly, the role of smaller settlements in delivering development has been recognised as many of these are in highly sustainable locations and provide a good range of services and facilities. It is also recognised that an appropriate balance of brownfield and greenfield development will be sought which will be vital in ensuring that land will not be released from the Green Belt unnecessarily.</p> <p>However, whilst the NPPF encourages the development of land of lesser environmental value and PDL, it does not advocate a 'brownfield first' policy. The development of greenfield sites will be necessary during the life of the Core Strategy to enable the Council to meet its housing targets. It is recommended that the priority that has been given to PDL is deleted since this will create difficulties to achieve the proposed housing delivery targets.</p>	<p>SP1 is concerned with the identification of sites and not phasing and is Core Principles set out in para. 17 of the NPPF.</p>	<p>No change.</p>
<p>(5892) Sterling Capitol Park, Leeds Ltd (via Peacock and Smith Ltd)</p>	<p>Support for the identification of the area around Capitol Park as an important location for job growth due to its accessibility to the main highway and public transport network and its close links to Morley.</p> <p>Support for the identification of Morley as a Major Settlement as well as a Regeneration Priority Area (along with the remainder of South Leeds). It is noted that Morley will deliver between 2,000 to 3,500 new homes over the plan period and consider this to benefit the existing and</p>	<p>Support welcomed.</p>	<p>No change</p>

	expanding employment areas whilst supporting Morley town centre.		
(5719) Scarborough Development Group (via RED Property Services)	Support that Thorpe Park falls within the Main Urban Area. Given scale of uses on TP, it could be acknowledged as supporting Cross Gates town centre and surrounding communities with supporting explanatory text. Support the policy as it retains emphasis on employment land within the MUA. Suggested that acknowledgement could be made to significance of major developments/allocations e.g. Thorpe Park.	The policy is not intended to make specific references to sites. Thorpe Park is however identified on the Key Diagram as a strategic location for job growth.	No change.
(5884) McGregor Brothers Ltd (via West Waddy ADP)	<p>Support for the role of 'Smaller Settlements', contributing to the development needs, with the scale of growth having regard to the settlement size, function and sustainability.</p> <p>(ii) needs to be reworded to state 'Previously developed land and buildings within or adjoining the settlement'.</p> <p>Support for selective green belt review (viii).</p> <p>Paragraphs 4.1.13 & 4.1.14 should be reworded to make it clear that provided there is a reasonable range of services, within a smaller settlement, new housing development will not be inappropriate even if 'key services' are not present and it would not be viable to expect development to address such deficiencies.</p>	<p>Support welcomed</p> <p>The focus of (ii) is to promote, the use of land <i>within</i>. Opportunities for sites for development, will need to be considered as part of the Site Allocations DPD/selective Green Belt review process</p> <p>Support welcomed</p> <p>The provision of a sufficient level of services, both existing and new, is a key component of the sustainability of development proposals. It is not considered unreasonable that development proposals should make a contribution to provision, where necessary.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>
(5017) S.W Fraser - Cannon Hall Estate (via Smiths Gore)	The identification of settlement types and the general approach of the policy is supported in principle but need to ensure that the policy has the flexibility required during the Plan period. Need to consider	<p>General support welcome.</p> <p>Through the growth targets set out as part of the Core Strategy, Leeds is seeking to plan positively for growth. A selective green belt review is integral to the preparation of the</p>	<p>No change.</p> <p>No change.</p>

	<p>the potential deletion of land from the green belt, view that there are several sites within the main urban area which do not comply with the Green Belt purposes as set out in the NPPF. The Council has failed to meet its housing delivery targets in recent years and therefore needs to plan positively for growth as advocated in the NPPF.</p> <p>Horsforth is identified as part of the Main Urban Area. There are several sites within the Main Urban Area within client's ownership that we consider suitable for residential development. These sites include: _Land at Fraser Avenue, Horsforth _Land south of Lee Lane West, Horsforth _Land at Calverley Lane, Horsforth.</p>	Site Allocations DPD.	
(5681) AR Briggs and Co, Meadowside Holdings Ltd, The Diocese of Ripon and Leeds, The Hatfeild Estate, The Bramham Park Estate, Lady Elizabeth Hastings Estate Charity, The Ledston Estate (via Carter Jonas)	<p>Broad support for Policy.</p> <p>Whilst the policy suggests that development should respect and enhance a local area, it is considered that it needs to consider an area's ability or capacity to accommodate development. The policy should also look favourably and positively support development proposals which increase the sustainability of settlements.</p>	<p>Support welcomed</p> <p>Through the preparation of the Site Allocations DPD, detailed sustainability assessments will be undertaken of sites and any infrastructure requirements identified.</p>	<p>No change.</p> <p>No change.</p>
(5034) Evans Homes No. 2 Ltd (via Drivers Jonas Deloitte)	<p>Support identification of major settlements as the location for a significant amount of development. This promotes sustainable development which will be supported by existing facilities and infrastructure.</p> <p>Objection to (ii). The identification of sites for development should be objectively assessed against the merits of their wider sustainability credentials, rather than the use of a simplistic ranking approach based on land type. A full review of green belt</p>	<p>Support for the identification of Major Settlements welcomed.</p> <p>The overall policy approach of SP1, is considered by the City Council to reflect the Core Principles of the NPPF. In addition, through the preparation of the Site Allocations DPD, detailed sustainability assessments will be undertaken of sites and any infrastructure requirements identified. Within this overall context, the Core Strategy will be subject to ongoing</p>	<p>No change.</p> <p>No change.</p>

	<p>should be undertaken in tandem with Core Strategy. For consistency and compliance with the NPPF, this will ensure that settlement policy is informed by the review,</p>	<p>monitoring.</p>	
<p>(5649) Beterspot Limited (BBB) (via Robert Halstead Chartered Surveyor)</p>	<p>Broad support for the policy.</p> <p>Need to revise wording to make it clear that in the 'smaller settlements' category, not all such smaller settlements function at the same level. Some of the listed smaller settlements function at a higher level than others. There is a case for a greater degree of sophistication in the Core Strategy in relation to smaller settlements as some have the ability to support greater levels of future development than others. It is recognised that within (i), the scale of growth for each smaller settlement would have regard to size, function and sustainability, however it is suggested that it is necessary to go further and identify, within the Plan, the main differing types of smaller settlement. View that the larger of the smaller settlements, such as Tingley/West Ardsley should be identified as such within the Core Strategy.</p> <p>Table1 at para 4.1.10 page 20, in general the table is supported however it is considered that the 'smaller settlements' section of the table is too wide and that there is a good case for sub dividing the smaller settlements category to reflect the fact that some of the listed smaller settlements are significantly larger in scale and type than others. Tingley/West Ardsley settlement is considerably larger in scale and type than Micklefield. Certain of the settlements listed in the 'smaller settlements' category of Table 1 are of a larger scale with a greater level of facilities</p>	<p>Support welcomed.</p> <p>The City Council's evidence base in relation to population size and the range of existing facilities has helped to inform the identification of Smaller Settlements. Within this context, the Core Strategy does not rule out some level of development in smaller settlements, through windfall and as allocations through the preparation of the Site Allocations DPD.</p> <p>Support for Table 1 welcomed.</p> <p>The City Council's evidence base in relation to population size and the range of existing facilities has helped to inform the identification of Smaller Settlements. Within this context, the Core Strategy does not rule out some level of development in smaller settlements, through windfall and as allocations through the preparation of the Site Allocations DPD. In addition, the Key Diagram, identifies a number of opportunities for housing development.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>

	and accessibility which supports a proposal to sub-divide the category into two types. The sub-division would add a greater meaning to the last sentence of the commentary in 4.1.13.		
(5672) MFS Land Ltd (via Mosaic Town Planning)	<p>Smaller Settlements, which includes Bramhope, will “contribute to development needs, with the scale of growth having regard to the settlement’s size, function and sustainability.” The inclusion of this criteria is supported as it will help to ensure that settlements such as Bramhope are prioritised over smaller and less sustainable settlements in the Outer North West sub-area such as Pool-in-Wharfedale.</p> <p>While it is natural for the most sustainable locations to be the principal location for growth, there is some inconsistency with The Yorkshire and Humber Regional Spatial Strategy (RSS; 2008) in the selection of settlements for particular categories. For example, RSS has a list of Principal Towns which are stated to be the main local focus for housing. The equivalent in the Leeds Core Strategy is Major Settlements. However, of these Major Settlements, only Wetherby is included as a Principal Town in the RSS. Therefore, according to RSS, settlements such as Otley should not necessarily be prioritised over ‘smaller settlements’ such as Bramhope. While RSS is due to be abolished, it still provides a useful and justified approach.</p> <p>An urban extension of Otley would require Green Belt release of land which is of landscape value. In addition, development in this area would have significant flood</p>	<p>Support for Small Settlement category welcomed.</p> <p>The Core Strategy position is not inconsistent with the RSS. Whilst the RSS identified Wetherby as a ‘principle town’, further work undertaken as part of the Core Strategy, has incorporated this settlement within the Major Settlement category. These settlements have been defined on the basis of population size and the roles of individual settlements. The Core Strategy therefore refines the RSS approach at a District wide level.</p> <p>Within the context of the overall Core Strategy approach, Policy SP10 sets out the parameters for a selective Green Belt review, which is necessary to deliver the housing growth requirement. Specific locations for review and potential urban</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>

	<p>risk. As PAS land has previously been identified as being suitable for future development, its release would be preferable to the release of Green Belt land such as around Otley.</p> <p>Smaller settlements should not be sterilised at the cost of the Core Strategy's approach. An element of growth will be required elsewhere to ensure vibrant and cohesive communities, able to support local services and also with sufficient affordable housing to cater for local need.</p> <p>It is proposed that there should be specific prioritisation of PAS sites within Policy SP1 focused on the location of future development. It is inconsistent for PAS sites not to be referred to within this policy given that they were originally identified in order to provide land for longer term development need and are the most appropriate and sustainable greenfield sites for significant future development.</p>	<p>extensions, is a matter for the Site Allocations DPD process. As part of this process a technical and sustainability assessment of sites will be undertaken.</p> <p>It is not intended that the approach of SP1 (and the Core Strategy taken as a whole) should 'sterilise' smaller settlements. A key purpose of SP1 and related Policies, is to deliver growth within the context of the settlement hierarchy.</p> <p>The approach of SP1, is to set out an overarching policy to direct the broad location of development. The future role of individual PAS sites is a detailed matter for the Site Allocations DPD, as reflected in paras. 4.8.6 & 4.8.7 of the Core Strategy.</p>	<p>No change.</p> <p>No change.</p>
(0092) Home Builders Federation	<p>The approach of the Policy to concentrate the majority of development within the Main Urban Area (MUA) is unsound as it is unjustified and ineffective. The Core Strategy is very unclear as to what proportion of this development might entail peripheral green field or Green Belt release. It would be helpful if the CS clarified what proportion of the development within the MUA is on green field and/or Green Belt. The Core Strategy needs to acknowledge that the Council's Strategic Housing Land Availability Assessment (SHLAA) identifies the majority of the future housing land supply comprises of greenfield sites which are deemed to be sustainable, and which lie</p>	<p>The Core Strategy approach to focus regeneration and growth upon the settlement hierarchy and the details of SP6 and SP7, in terms of the scale and distribution of housing growth, is considered to be consistent with the Core Principles of the NPPF and is therefore sound. Policy SP7, provides an indication of the distribution of growth via the settlement hierarchy and via Housing Market Characteristic Areas. Within this overall context, the Core Strategy acknowledges that greenfield and green belt land will be required, to meet the housing requirement, over the plan period.</p>	<p>No change.</p>

	<p>adjacent to the Main Urban Area, Major Settlements, and smaller settlements elsewhere. To be effective, the Core Strategy needs to acknowledge this. It is unclear, therefore, whether the prescription in SP1 for development in the MUA to be on PDL is justified.</p> <p>Concern that the sequential priorities set out in SP1 (ii), are not consistent with the NPPF which 'encourages the development of land of lesser environmental value'. Whilst the Council may wish to secure the majority of its future housing supply on previously developed land (PDL), the development of greenfield sites will be necessary. Reference to the priority to be given to PDL is deleted and that the test and the wording of SP1 is amended to refer to locating development "in and adjoining the MUA and Major Settlements".</p> <p>Concern that (ii) is unclear in respect of the difference between the priority accorded to (a) the development of PDL within the settlement; and (b) development of infill within the settlement.</p> <p>Whilst there is support for the commitment to a Green Belt Review, concern that the approach advocated is unsound, as it is contrary to national policy.</p>	<p>The approach is considered to be consistent with the NPPF, see above.</p> <p>The point is addressed as part of the City Council's responses to Policy SP10 (Green Belt). The Core Strategy approach is consistent with the NPPF (para. 84) and is not therefore considered to be unsound.</p>	<p>No change.</p> <p>No change.</p>
(0106) Aberford Parish Council	Considers that SP1 (& SP6), within the context of the NPPF, should be further strengthened regarding the preference to develop brownfield and regeneration sites and a brownfield target should be included in the Core Strategy.	SP1 (ii) a, gives a priority to the use of previously developed land and buildings. This is also reflected in SP6 ii.	No change.
(0112) Boston Spa Parish Council		A target for previously developed land is included within Policy H1.	No change.
(5871) Mr Tony Blackmore	Comments that the NPPF states that appropriate targets can be set for developing brownfield land. These targets	A target for previously developed land is included within Policy H1.	No change.

	should be stated in the Core Strategy.		
(5864) Mr Andrew Hepworth	Concern that any further development on greenfield and greenbelt land within the former borough of Morley is unsustainable.	These concerns are noted, the sustainability of individual sites will be considered as part of the preparation of the Site Allocations DPD. An important priority for the Core Strategy, is to maintain and enhance local character and distinctiveness, whilst planning for major regeneration and growth. In broad terms development in Morley is sustainable in meeting the needs of the area, which has good connections to central Leeds and employment opportunities across West Yorkshire and beyond.	No change.
(0420) Caddick Developments, Leeds Trinity University College, Cornforth & Sons, D Westwood & Son (via White Young Green Planning.	Concern that the policy should incorporate a commitment to a strategic, rather than a selective green belt review. Concern that the approach will lead to confusion and uncertainty. SP1 should recognise that there are suitable sites beyond the main urban area, such as rural villages which are sustainable.	The Core Strategy approach is consistent with the NPPF (para. 84) and is not therefore considered to be unsound. An important priority for the Core Strategy, is to maintain and enhance local character and distinctiveness, whilst planning for major regeneration and growth. Within this overall context, a selective green belt review, linked to the settlement hierarchy is considered to be appropriate.	No change.
(5121) Directions Planning (on behalf of Otley Town Partnership & Mr & Mrs Haigh)	Support for the policy and welcome the positive stance it takes for establishing future growth across the district. In particular, support reference to a green belt review. Concern whether (ii) is appropriate in light of the NPPF. There may be instances where sustainable extensions or greenfield sites within settlements need to be delivered before previously developed land, particularly if the brownfield sites prove to be undeliverable in the short term. This reality should be referred to in the policy to ensure there is an appropriate mechanism to maintain a land supply of deliverable sites.	Support for selective Green Belt review welcomed. The Core Strategy recognises that in places, larger sites will need to come through earlier, in order for all of the site to be delivered within the plan period. However, it is not consistent with the approach of the NPPF to allow uncontrolled greenfield development, to the detriment of the settlement hierarchy and priorities for previously developed land.	No change. No change.
(0420) White Young Green Planning	Settlement hierarchy approach also needs to make reference to the opportunity to bring forward sites which enable regeneration of PDL and that are in locations, or can be made, sustainable.	The settlement hierarchy is a key focus to delivery regeneration and growth across the district. PDL potential may exist outside of the settlement hierarch and such opportunities need to be considered on their merits and in relation to sustainability considerations. The potential at	No change.

	<p>Support at (v) which recognises that opportunities for growth, job retention and economic prosperity are provided via existing locations for industry. Suggest that opportunity for regeneration identified at Thorp Arch Estate within the key diagram should be referenced within the written statement under regeneration.</p>	<p>Thorp Arch has been acknowledged in para. 4.6.17 and on the Key Diagram, within the overall context of the distribution of Housing Land and Allocations (SP7).</p>	
<p>(0420) Harrow Estates (via White Young Green Planning)</p>	<p>Reference to Main Urban Area (Map 3) should include all white land that is clearly part of the urban conurbation and avoid confusion caused by the UDP designation that appeared after adoption in 2001.</p> <p>SP1 should recognise that this broad spatial framework should include specific reference to the opportunity to bring forward sites which enable the regeneration of PDL and that are in locations which are, or can be made sustainable. In line with NPPF advice, the CS should recognise the opportunity that the reuse of housing of underutilised or redundant employment sites provide a good source of PDL. This point is applicable to Policy H1, where there should be reference to the reuse of PDL.</p>	<p>It is unclear what confusion is caused by Map 3. This Map is included for illustrative purposes and is not intended to reflect site specifics and at the scale used, it is not possible to replicate the detail of the UDP Proposals Map. Detailed site issues relating to housing, will be considered as part of the Site Allocations DPD.</p> <p>The focus of the Core Strategy is upon achieving urban regeneration and growth through the settlement hierarchy. Should opportunities exist elsewhere, these will need to be considered on their merits and in relation to sustainability considerations.</p>	<p>No change.</p> <p>No change.</p>
<p>(5883) Linton land Owners (via Ian Bath Planning)</p>	<p>Chapter 4 of the Core Strategy seeks to direct the majority of growth to sites within the urban area. It is clear that to achieve required housing numbers sustainable “Greenfield” and potentially “green belt” land will be required as part of the delivery of the Core Strategy. The relevant paragraphs of this section should therefore be revised to acknowledge the above which is consistent with NPPF guidance.</p> <p>With regard to, Linton consideration should be given to whether given their proximity</p>	<p>The Core Strategy acknowledges that greenfield sites and a selective green belt review, will be necessary to meet the housing requirement and for this to be considered in detail, through the preparation of a Site Allocations DPD. This overall approach is considered to be consistent with national guidance. Advice set out as part of SP7 (i) is to concentrate development upon the settlement hierarchy but excludes windfall.</p>	<p>No change.</p>

	the two settlements of Linton and Collingham should be viewed as a single “smaller settlement” in respect of Table 1: Identification of Settlement Types.		
(1091) Quod (for Land Securities/Evans of Leeds)	<p>The importance of focusing growth, development and investment in 'Priority' locations to address social and economic inequality, is omitted within Spatial Policy 1. Criteria (v) of the Policy deals with economic prosperity, job retention and opportunities for growth, which are key to the regeneration of the 'Priority' areas, and as such specific reference should be made to maximising opportunities within Priority Regeneration Areas.</p> <p>Spatial Policy 1 (i) should be updated to acknowledge that the majority of growth will be within, and as extensions to, the Main Urban Area to satisfy the full housing need, and that such land may comprise (in addition to brownfield land) land selectively and appropriately released from the Green Belt, as well as greenfield land, which may be a more sustainable location than greenfield sites.</p>	<p>The approach of SP1, is to set out an overarching policy to direct the broad location of development and is not intended to cover more detailed aspects set out in subsequent policies. The importance of the Aire Valley as a major strategic opportunity for growth is reflected in (v). It is not considered necessary to list the remaining Regeneration Priority Programme Areas as this would duplicate the focus of SP4.</p> <p>The purpose of the policy is not to set out the specific quantum's of growth (as this is covered in SP6 & SP7) but to set out an overarching policy to direct the broad location of development.</p>	<p>No change.</p> <p>No change.</p>
(1186) T G M F Emsley (via ID Planning) (5671) Edmund Thornhill Thornhill Estates, Consortium of Housebuilders, ELE Northern Quadrant Consortium, Barratt David Wilson, Homes, Great North Developments Ltd c/o Evans Property Group (via ID Planning)	<p>Object to the reference in para. 4.1.4 which seeks to direct the majority of growth to sites within the urban area. Urban extensions will be required to deliver housing growth in the District and therefore para. 4.1.4 should be amended to reflect this.</p> <p>It is proposed that para. 4.1.4 is reworded as follows: “...the majority of growth is focused within and adjoining the Main Urban ___Area and Major Settlements,.....” The proposed amendment to this wording is justified and will enable the Core</p>	As specified in Policy SP7, Table 2, the City Centre and Main Urban Area accounts for the majority of housing growth within the urban area, this reflects current commitments and future opportunities. Within this overall context, SP7 also acknowledges that urban extensions, across the district will also be required.	No change.

<p>(5895) Barratt David Wilson Homes Yorkshire Homes, (1938) Redrow Homes, (Yorkshire) Ltd (5671) Redrows Homes (Yorkshire) Ltd, Robert Ogden Partnership, Ltd, Housebuilder Consortium, Wortlea Estates (via ID Planning) 0480 Warner, Kebbell, Redrow, Barratt Leeds, Chatford, Keyland, Taylor Wimpey, Mirfield, Barrett York, Taylor Wimpey and Ashdale, Miller (via Dacre Son & Hartley)</p>	<p>Strategy to be effective, as it accurately reflects the Council's evidence base which identifies that sites within urban areas cannot deliver sufficient dwellings to meet the requirement for the plan period as acknowledged at paragraphs 4.1.11 and 4.1.12, where it is stated that urban extensions will be required. Indeed other locations will be required as well.</p> <p>The Council cannot state within Spatial Policy 1 that the majority of development will be concentrated within urban areas, as this does not correlate with the housing land supply that has been identified for the plan period. Spatial Policy 1 should reflect the evidence base from the SHLAA. Even the wording of paragraph 4.6.15 only goes so far to suggest the SHLAA identified a 'substantial quantity of previously developed housing land in urban areas', not that previously developed sites comprise the majority of identified available, suitable and viable housing sites. On this basis, it is evident the wording of part (i) of Spatial Policy 1 cannot deliver the housing growth for the District as worded.</p> <p>The policy should therefore be amended to state that the majority of development will be concentrated within and adjacent to the Main Urban Area and the Major Settlements. This wording would be consistent with the Council's evidence base set out in the SHLAA and will ensure the housing needs of the District can be met.</p> <p>Spatial Policy 1 also advises at part (v) b. that key strategic locations for job growth will be identified including the City Centre and Aire Valley. The Council has not</p>	<p>The NPPF refers to the 'local plan' allocation of sites. Within this overall context the City Council is preparing a Core Strategy and Site Allocations DPD and does not consider it necessary to identify strategic sites. The Core Strategy is</p>	<p>No change.</p>
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	<p>identified any key strategic locations for housing growth. Strategic housing locations should be identified. This is a requirement of the NPPF which requires Councils at paragraph 47 to 'identify key sites which are critical to the delivery of the housing strategy over the plan period.' The Council should therefore identify strategic employment and housing locations, particularly given the amount of land that is likely to be required outside the Main Urban Area and Major Settlements to meet the identified requirement. This should also include consideration of enlarged or new settlements. Such an approach should recognise that new facilities and infrastructure can be provided to ensure enlarged settlements can be sustainable and that the settlement hierarchy as set out in Table 1 Map 4 and Map 13 should be flexible to allow for the change in status of settlements derived from enlargement with appropriate infrastructure.</p> <p>Support for the reference (viii) within this policy to the need to undertake a selective review of the Green Belt.</p>	<p>planning for 70,000 dwellings and it is not anticipated that any individual site will be so large as to warrant justification as a strategic location. The approach of the Core Strategy is for the distribution of sites, in sustainable locations, as part of the settlement hierarchy as set out in Policies SP6 and SP7. In terms of employment, the Key Diagram, also identifies a number of strategic opportunities for job growth.</p> <p>Support welcomed.</p>	<p>No change.</p>
<p>(1930) Lawrence Walker</p>	<p>Guiseley, Yeadon, Rawdon and Otley should not be identified as Major Settlements. A further tier of within the settlement hierarchy should be added to more effectively represent the differences between areas such as Garforth, Rothwell and Morley which are of a very different character to Guiseley, Yeadon, Rawdon and Otley, which require greater protection and different policies with regards to new development. The amount of development envisaged for these areas would adversely affect the local character and identity of Guiseley, Yeadon, Rawdon and Otley.</p>	<p>It is accepted that Rawdon, Guiseley & Yeadon, have their own identities and characteristics. They do however make up a contiguous urban area, with the population and range of functions consistent with the role of Major settlements. It is not considered therefore that a further tier of the settlement hierarchy should be introduced.</p>	<p>No change.</p>

<p>(5872) Mr. Martin Gostling</p>	<p>Considers that Table 1 (Settlement Hierarchy) is unsound as unjustified to consider Rawdon/Guiseley/Yeadon as a single settlement. Each are distinct with own identity and own independent centres with own character. Residents of the villages/towns consider them to be independent and not one settlement - recently have been calls to have a Rawdon Parish Council vs. Rawdon/Guiseley/Yeadon Parish Council.</p> <p>The 3 settlements stretch along A65 and this means no central location serving area and nor is there any location capable to do so. The A65 is over congested and hinders travel between the three town/villages. This is another reason why they can't be considered one settlement. The character of each town/village would be eroded if considered a single settlement. This is especially true for Rawdon as the A65 divides it from Yeadon. Consequently, consider that Guiseley, Yeadon & Rawdon should be considered as 3 small settlements or villages. Rawdon should not be included in the major settlement definition.</p>	<p>It is accepted that Rawdon, Guisley & Yeadon, have their own identities and characteristics. They do however make up a contiguous urban area, with the population and range of functions consistent with the role of Major settlements.</p>	<p>No change.</p>
<p>(5879) Mr Martin Fox (5880) Mrs Lisa Fox</p>	<p>Concern that the categorisation of Barwick in Elmet as a "smaller settlement" (and grouped with larger settlements/towns such as Boston Spa), has been made on the basis of population size and without no account of character and heritage of a village. The settlement should be classified as village/rural. Concern that this classification opens up the possibility of removing Green Belt as part of the review of Green Belt and thereby allowing major housing developments on the rural countryside that surrounds Barwick. and</p>	<p>Comments regarding the character and heritage of Barwick in Elmet is noted. An important priority for the Core Strategy, is to maintain and enhance local character and distinctiveness, whilst planning for major regeneration and growth. Barwick in Elmet has been identified as a small settlement based upon population size and local facilities and the nature of future development (in relation to local character and distinctiveness) will be considered in more detail as part of the Site Allocations DPD process.</p>	<p>No change.</p>

	openness if allowed to develop. Considers that development in the settlement should be limited to infill and reflect local character.		
(1998) West Properties Ltd	The Kirkstall Road Renaissance Area should be recognised with Spatial Policy 1, and the supporting text as a focus for new development which maximises existing brownfield regeneration opportunities in a highly accessible location.	This opportunity is noted but the approach of SP1, is to set out an overarching policy to direct the broad strategic location of development and is not intended to cover more specific proposals.	No change.
(2656) CPRE Yorkshire & Humber	<p>CPRE is concerned that Spatial Policy 1 Location of Development is unsound as it is not consistent with National Policy.</p> <p>Concern that the policy is confusing and contradictory. With regard to (i), the statement 'appropriate balance', may lead a developer to believe that a 50-50 option is acceptable.</p> <p>The NPPF clearly states that a preference should be given to Brownfield land. However, (ii) of states that priority will be given to applications on Brownfield sites above other sites and therefore contradicts itself as well as the NPPF.</p>	<p>The details of specific sites and their overall composition, in relation to an 'appropriate balance', is a matter for the Site Allocations DPD. A key emphasis of the Core Strategy is to support urban regeneration in existing settlements, whilst recognising that there will be a need for greenfield release in appropriate locations, consistent with the overall strategy.</p> <p>The NPPF (para.) makes reference to 'encouraging the effective use of land..' ii of SP1 sets out an overall priority for the location of land for development, with a preference given to PDL</p>	<p>No change.</p> <p>No change.</p>
(3368) Mr & Mrs R Michael Dawson	There is too much emphasis placed on greenfield sites rather than brownfield sites. The brownfield sites should be developed first.	A key emphasis of the Core Strategy is to support urban regeneration in existing settlements, whilst recognising that there will be a need for greenfield release in appropriate locations, consistent with the overall strategy.	No change.
(0046) Environment Agency	No reference is made in the Policy to the need to apply the flood risk sequential approach to the location of (all forms of) development as required by the NPPF therefore is not in conformity with national planning policy.	This importance of this point is noted but is covered in Policy EN 5.	No change.
(5121) Directions Planning (on behalf of Otley Town Partnership	Comments in relation to the impact of the policy upon Otley and object to the policy as currently worded.		

<p>& Mr & Mrs Haigh)</p>	<p>Within the context of (i) and ii there are a number of reasons why development of a 'significant scale' is not necessarily appropriate for Otley, physical constraints, including flood risk, nature designations, administrative boundaries and topography physically prohibit growth. The criteria need to be amended to state that the intended approach and appropriate level of growth is subject to further assessment and consideration.</p> <p>It is not considered that the hierarchy set out under (i) is appropriate, as it could result in the redevelopment of important brownfield sites within Otley that should instead be retained for their current use due to future demand for employment land. Concern that a number of key employment sites have already been lost and further sites may be lost in the future that would further erode and undermine local employment opportunities. Concern that (v) does not provide sufficient protection of such sites and that key sites should be identified for protection and that for allocations for new development in Otley, consist of both employment and residential development. The policy should also recognise that a range of employment sites are needed.</p> <p>Considers that (viii) will also need to be reviewed in light of the NPPF, as it requires local authorities to assess the impact of a Green Belt review, including beyond the outer boundary of the Green Belt.</p>	<p>The consideration of the overall scale of development, in relation to specific locations, is a matter for the Site Allocations DPD, in relation to the scale and distribution of housing growth, set out in policies SP6 & SP7. In considering allocations, site and sustainability appraisals of sites will be undertaken.</p> <p>The application of the policy will need to be considered in relation to site proposals through the Site Allocations DPD. In relation to the protection of employment land from alternative forms of development. Policy EC3 sets out the policy approach to 'safeguarding existing employment land and industrial areas.</p> <p>This is a detailed matter that will need to be considered as part of the site assessments, to be made as part of the Site Allocations DPD process.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>
<p>(5869) Briony Spandler (5870) Mrs Susan Kelly</p>	<p>Concerned about land marked as The Rawdon Trust being put forward for development of any kind. The land in</p>	<p>Concerns noted, the merits of this site and allocation, will need to be considered as part of the Site Allocations DPD process.</p>	<p>No change.</p>

	Rawdon and surrounding fields known as 'The Billing' at the heart of the local community and is a safe and unique have for all locals to use at all times.		