

Report of the Director of City Development

Report to: Development Plan Panel

Date: 26th September 2012

Subject: LDF Core Strategy – Publication Draft, Analysis of Consultation Responses: Housing Policies H1 (Phasing), H2 (Development on non-allocated sites), H3 (Density), H4 (Mix) and H8 (Independent Living)

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 Tables in the Appendices 1a, 2a, 3a, 4a and 5a suggest how the City Council should respond. Where changes to the policies are suggested Appendices 1b, 2b and 3b illustrate how the text of Policies H1, H2 and H3 would need to be altered in response to comments. There are no suggested changes to Policies H4 and H8.
2. It is not considered that there are any issues significant enough to justify major changes.

Recommendations

Development Plan Panel is requested to:

- i). Endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1a, 1b, 2a, 2b, 3a, 3b, 4a and 8a to the report) for presentation to Executive Board for approval.

1.0 Purpose of this Report

1.1 Within the context of the Core Strategy Initial Report of Consultation (6th June), the purpose of this report is to review consultation responses in relation to Policies H1, H2, H3, H4 and H8 of the housing chapter. The appendices attached, summarise 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 **Policy H1** sets out an approach to phase the release of housing land, with criteria to help place the most sustainable sites in the early phases. The following issues were raised:

- i) Phasing according to Previously Developed Land (PDL) targets should not be a constraint on development
- ii) The windfall allowance should not feature in phasing
- iii) The city centre should be excluded from phasing
- iv) Whether exceptions to phasing are acceptable or should be widened
- v) The clarity and soundness of the PDL target criteria in the final paragraph of the policy

3.2 **Policy H2** sets the criteria to consider planning applications for housing development on non-allocated sites, in other words on "windfall" sites. The main points raised include:

- i) How enforceable is the infrastructure capacity clause
- ii) Is the criterion about sites meeting accessibility standards too onerous and prescriptive
- iii) Revising the definition of “Greenfield” to include private gardens in accordance with the NPPF
- iv) Whether the clause on protecting spaces for their use and character is too restrictive, too lax or not clearly enough worded
- v) Whether the Greenspace clause is clear and supported by robust evidence
- vi) Is an additional employment clause necessary

3.3 **Policy H3** sets minimum density standards for housing development in different geographical areas of Leeds. The main points raised include:

- i) Whether the density levels are too high
- ii) If specialist housing should be treated exceptionally
- iii) Whether the policy is too restrictive and should simply accept any density that suits the character of the area
- iv) Compliance with national policy

3.4 **Policy H4** expects developments to provide an appropriate mix of house types and sizes. The main points raised include:

- i) The targets in Table H4 are too prescriptive
- ii) Control of dwelling size/type will impact on development viability
- iii) The Policy lacks flexibility
- iv) Compliance with national policy
- v) Housing market influence on dwelling size and type
- vi) The role of specialist housing

3.5 **Policy H8** expects larger housing developments to contribute to supporting needs for independent living. It also contains locational criteria expecting sheltered housing schemes to have good access to local facilities. The main points raised include:

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 about Policies H1 – H4 and H8. None of the issues are considered significant enough to justify any major changes. The remaining issues warrant only minor changes or no changes at all.

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 1a, 1b, 2a, 2b, 3a, 3b, 4a and 5a to the report) for presentation to Executive Board for approval.

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 1a

Core Strategy Publication Draft - Analysis of Consultation Responses

Policy H1: Managed Release of Housing Sites

Representors	Issue and Suggested Changes	LCC Opinion	LCC Action
Phased release based on PDL targets as a constraint to development			
<p>Redrow Homes (Yorkshire) Ltd (1938), Spawforths (2663), Evans Homes No. 2 Ltd via Drivers Jonas Deloitte (5034), Signet Planning (5039), Beterspot Ltd via Robert Halstead Chartered Surevior (5649), Bramham Park Estate, Ledston Estate, Lady Elizabeth Hastings Estate Charity, Hatfield Estate, Diocese of Ripon and Leeds, Meadowside Holdings, AR Briggs & Co via Carter Jonas (5681), Home Builders Federation (0092), Barratt David Wilson Homes Yorkshire Homes (5895), Templegate Developments, Ashdale Land and Property Company Ltd, Hallam Land</p>	<p>Policy H1 is contrary to the NPPF because it seeks to hold back Greenfield housing site release if LCC PDL targets are not met. The thrust of the NPPF is to ensure sufficiency of housing supply through provision of a 5 year (+ 5% or +20%) of deliverable sites. If the policy is constraining delivery then it is likely to be judged inappropriate at an appeal situation (paragraph 48). The NPPF also emphasises the need for plan policies to be flexible (paragraph 21) to accommodate needs not anticipated in the plan to allow a rapid response to changes in economic circumstances.</p> <p>The NPPF only states that development of PDL may be “encouraged” (para 17) and says “Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.”(para 111).</p> <p>PDL targets have no foundation in national guidance and should be deleted (5681)</p> <p>Paragraph 4.6.7 (explanatory text for Strategic Policy SP6) sets out a phased approach to housing provision, with numbers increasing after the first 5 years. This is stated to be “because the current economic climate has impacted on a range of factors, which have in turn frustrated recent housing delivery”. A phasing policy should aim to bring forward housing to meet needs rather than hold it back (5672).</p>	<p>Whilst PPS3 paragraph 62 endorsed managed delivery of housing land to address PDL trajectory targets, the NPPF merely encourages its use (para 17) and says local authorities may set a local PDL target (para 111).</p> <p>The NPPF also promotes a number of principles as set out in paragraph 17, bullets 1, 5, 6, 7, 8, and 11 that recognise the importance:</p> <ul style="list-style-type: none"> - of a positive vision for an area shaped by local people, - of the need to promote the vitality of urban areas, protecting Green Belt and countryside, - of reuse of existing resources, including conversion of existing buildings - of conserving the natural environment, preferring land of lesser environmental value where consistent with other NPPF policy - of encouraging the re-use of PDL - of managing patterns of growth to make the fullest use of public transport, walking and cycling <p>The Core Strategy echoes these principles with objectives to make best use of land and premises in urban sustainable locations and prioritising PDL. Re-use of PDL is also a key strand of Policy SP1. It is consequently necessary for Policy H1 to translate the preference for PDL into the consideration of phased release of housing. The three criteria in the final paragraph of Policy H1 are positively worded, so that</p>	<p>No change</p>

<p>Management Ltd via Barton Willmore Planning (0057), MFS Land Ltd via Mosaic Town Planning (5672)</p>		<p>provided at least one applies further phases of housing can be released.</p> <p>Also, it is clear from the wording of paragraph 5.2.2 of the supporting text that the City Council is seeking a balanced approach that achieves both a sustainable pattern of development with a focus on urban and regeneration areas and to phase the release of allocations to ensure there is always a 5 year supply of housing land..</p>	
<p>Spawforths (2663), Pegasus Planning Group (4388), Directions Planning (5121)</p>	<p>Policy H1 release mechanism should hinge upon the definition of deliverability set out in NPPF footnote 11 on page 12. Deliverable sites should come forward alongside or prior to previously developed sites in order to maintain the housing supply and achieve the housing requirement. A PDL target should not impede this.</p>		
<p>Redrow Homes (Yorkshire) Ltd (1938), Spawforths (2663), Signet Planning (5039), Betterspot Ltd via Robert Halstead Chartered Surevyor (5649), Edward Thornhill Estates, TGMF Emsley, Barratt David Wilson Homes, Great North Developments, Redrow Homes, Robert ogden Partnership, East Leeds Extension Northern Quadrant Consortium, Housebuilders Consortium, Wortlea Estates, Great North Developments c/o Evans via ID Planning (5671), Home Builders Federation (0092), Barratt David Wilson Homes Yorkshire Homes (5895)</p>	<p>A PDL target cannot be part of the release mechanism of Policy H1. The purpose of Policy H1 should be phasing to ensure sufficiency of housing supply in sustainable locations. Inclusion of the PDL target makes the policy confusing and lacking rationale.</p>		

DPP (5543) Pegasus Planning Group (4388)	Is there evidence to justify the PDL targets of 65% and 55%? Query whether the 20,000 dwellings in outstanding planning permissions contributed to the setting of the PDL target	The PDL targets are based upon a realistic palette of SHLAA sites which are capable of satisfying the housing requirement and the strategic policy criteria of Policies SP1 and SP6. The dwelling delivery numbers and rates are those agreed in the SHLAA which may not necessarily include the 20,000 dwellings with outstanding planning permission referred to in paragraph 4.6.13 of the Core Strategy. The targets are realistic. They are lower than PDL percentage achievements in Leeds over the last 10 years, but that is because a greater amount of greenfield land is needed to satisfy the housing requirement.	No change
Morley Town Council (4825)	Based on performance over many years, the 65% first five-year LDF brownfield target for housing land supply is unreasonably low, the 55% for later years even more so. An overall target of 75% would be modest in the light of recent brownfield achievements of more than 90% and should be fortified by the upward re-assessment of windfall potential encouraged in NPPF.		
Renew (5105)	The policy to maintain development of previously developed land is sound however, it is questionable whether adoption of a previously developed land target of 65% in the first five years can be achieved, or whether it could be compromised by financial viability issues.		
Signet Planning (5039),	Policy H1 should be recast to assess the suitability of sites for inclusion in the LDF Allocations Document, rather than control phased release	Policies SP6 and SP7 already provide criteria and locational targets to guide the Site Allocations DPD in identifying sites.	No change
McGregor Brothers Ltd (5884)	Location on Previously Developed Land should feature as an additional criterion in the first paragraph.	The preference for PDL already features in the criteria of Policy SP6 for helping site allocations plans to identify sites. Policy H1 includes PDL targets which will influence how the sites are phased in the Site Allocations DPD in order to achieve the targets. As such, a PDL criterion in Policy H1 is unnecessary	No change
DPP (5543)	The geographical distribution according to Policy SP5 should apply throughout the plan period, not just the 1 st 5 years	Agree.	Minor Change. Reword the second sentence of Policy H1 to clarify that the geographical distribution applies throughout the plan period
Leeds Civic Trust (0062)	In site release priorities v) add "existing and proposed" before "green infrastructure"	Agree	Minor Change. Add "existing and proposed" before "green infrastructure" in criterion v)
Redrow Homes (Yorkshire) Ltd (1938), Edward Thornhill Estates, TGMF	There should be 3 phases: 2012/2013 – 2017/2018, 2018/2019 – 2024/2025, 2025/2026 – 2029/2030	It is not necessary for the Core Strategy to prescribe phase periods. Policy H1 allows new phases to be brought forward when needed.	No change

<p>Emsley, Barratt David Wilson Homes, Great North Developments, Redrow Homes, Robert Ogden Partnership, East Leeds Extension Northern Quadrant Consortium, Housebuilders Consortium, Wortlea Estates, Great North Developments c/o Evans via ID Planning (5671), Barratt David Wilson Homes Yorkshire Homes (5895)</p>			
<p>Redrow Homes (Yorkshire) Ltd (1938), Edward Thornhill Estates, TGMF Emsley, Barratt David Wilson Homes, Great North Developments, Redrow Homes, Robert Ogden Partnership, East Leeds Extension Northern Quadrant Consortium, Housebuilders Consortium, Wortlea Estates, Great North Developments c/o Evans via ID Planning (5671), Barratt David Wilson Homes Yorkshire Homes (5895)</p>	<p>LCC should make the Site Allocations DPD Preferred Approach available for the Core Strategy Examination in order that the phasing criteria of Policy H1 can be tested and shown to be realistic</p>	<p>This will depend upon timing, but the City Council accepts that the housing distribution and phasing policy could be better understood if site allocation options are available.</p>	<p>No change</p>
<p>Windfall</p>			

<p>MFS Land Ltd via Mosaic Town Planning (5672), Bramham Park Estate, Ledston Estate, Lady Elizabeth Hastings Estate Charity, Hatfield Estate, Diocese of Ripon and Leeds, Meadowside Holdings, AR Briggs & Co via Carter Jonas (5681)</p>	<p>The windfall allowance of 500 dwellings per annum in paragraph 5.2.2 is not justified by evidence. No account is taken of “windfall leakage” – ie the percentage of permissions that do not materialise</p>	<p>The windfall allowance is based upon rates of actual historic completions, so there is no need for a leakage rate which might be necessary if rates of historic permissions had been used.</p>	<p>No change</p>
<p>Templegate Developments, Ashdale Land and Property Company Ltd, Hallam Land Management Ltd via Barton Willmore Planning (0057)</p>	<p>Windfall should not be accounted for in the release of housing land. Delete paragraph 5.2.2. and all references to windfall.</p>	<p>The NPPF (para 48) is supportive of the use of windfall allowances.</p>	<p>No change</p>
<p>City Centre</p>			
<p>Redrow Homes (Yorkshire) Ltd (1938), Edward Thornhill Estates, TGMF Emsley, Barratt David Wilson Homes, Great North Developments, Redrow Homes, Robert Ogden Partnership, East Leeds Extension Northern Quadrant Consortium, Housebuilders Consortium, Wortlea Estates, Great North Developments c/o Evans via ID Planning (5671), Barratt David</p>	<p>The City Centre should be excluded from the phasing. It is too large and disparate in terms of market and residential product; it is in essence a separate and independent market in terms of product and location to the rest of the District.</p>	<p>The city centre is a distinctive Housing Market Characteristic Area (HMCA) but it contributes to meeting Leeds housing requirement like all the other HMCAs. It is necessary for city centre housing sites to be identified and form part of the phasing.</p>	<p>No change</p>

Wilson Homes Yorkshire Homes (5895)			
Redrow Homes (Yorkshire) Ltd (1938), Edward Thornhill Estates, TGMF Emsley, Barratt David Wilson Homes, Great North Developments, Redrow Homes, Robert Ogden Partnership, East Leeds Extension Northern Quadrant Consortium, Housebuilders Consortium, Wortlea Estates, Great North Developments c/o Evans via ID Planning (5671), Barratt David Wilson Homes Yorkshire Homes (5895)	In the event that sites within the City Centre do not deliver 572 dwellings by the end of each year (31 March), applications on sites outside the City Centre in the next phase of development will be considered favourably until the shortfall has been met.		
Exceptions to Phasing			
Redrow Homes (Yorkshire) Ltd (1938), Edward Thornhill Estates, TGMF Emsley, Barratt David Wilson Homes, Great North Developments, Redrow Homes, Robert Ogden Partnership, East Leeds Extension Northern Quadrant Consortium, Housebuilders	Provision of other housing benefits such as affordable housing should be added as a reason for allowing sites to be released early.	The “special circumstances” outlined in Policy H1 are deliberately limited to assisting provision of housing development and infrastructure in Regeneration Priority Areas.	No change

Consortium, Wortlea Estates, Great North Developments c/o Evans via ID Planning (5671), Barratt David Wilson Homes Yorkshire Homes (5895)			
Bramham Park Estate, Ledston Estate, Lady Elizabeth Hastings Estate Charity, Hatfield Estate, Diocese of Ripon and Leeds, Meadowside Holdings, AR Briggs & Co via Carter Jonas (5681)	Given the onus within the NPPF to work in collaboration with the development industry and to have regard to market trends we would suggest that the policy includes a reference to market indicators for the release of green field sites.	It is not clear what is meant by “market indicators” for the release of greenfield sites. Policy H1 needs to ensure a sufficiency of supply of deliverable sites and the City Council is concerned that this should not lead to land-banking of greenfield sites that are released but not developed. A market indicator factor would add an unnecessary dimension of complexity to the policy.	No change
DPP (5543)	The special early release clause for regeneration areas should apply to all locations	There needs to be a public benefit to justify early release. Investment in regeneration areas is considered to provide public benefit; investment in other areas would not.	No change
McCarthy & Stone (Developments) Ltd (1935).	McCarthy and Stone has special locational criteria for its housing developments designed for elderly people. Specialist housing for the elderly should be excluded from Policy H1	Policy H1’s existing criteria will favour the type of urban accessible sites that McCarthy and Stone favour for its housing for the elderly.	No change
Directions Planning (5121)	Neighbourhood Plans should be able to override district wide phasing	It is necessary for Neighbourhood Plans to be in general conformity with the Core Strategy which would not allow them to contradict district-wide phasing.	No change
Directions Planning (5121), Bramham Park Estate, Ledston Estate, Lady Elizabeth Hastings Estate Charity, Hatfield Estate, Diocese of Ripon and Leeds, Meadowside Holdings,	The policy should not allow sites to be advanced early that deliver regeneration benefits. This would promote “backdoor” planning, involving deals outside of the development plan system. It could also lead to more appeals. The wording “In special circumstances,...” is vague and should be deleted.	Inserting the exceptions criteria into the policy is a transparent means of helping to ensure probity in the taking of planning decisions.	No change

AR Briggs & Co via Carter Jonas (5681)	This approach is contradictory to planning principles which require that development proposals should mitigate their own effects, but not address existing shortcomings or investment shortfalls in alternative schemes.		
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Final Paragraph of Policy H1

<p>Redrow Homes (Yorkshire) Ltd (1938), Spawforths (2663), Walton & Co (5510), Edward Thornhill Estates, TGMF Emsley, Barratt David Wilson Homes, Great North Developments, Redrow Homes, Robert ogden Partnership, East Leeds Extension Northern Quadrant Consortium, Housebuilders Consortium, Wortlea Estates, Great North Developments c/o Evans via ID Planning (5671), MFS Land Ltd via Mosaic Town Planning (5672), Bramham Park Estate, Ledston Estate, Lady Elizabeth Hastings Estate Charity, Hatfield Estate, Diocese of Ripon and Leeds, Meadowside Holdings, AR Briggs & Co via</p>	<p>An additional buffer of 5% or 20% should be incorporated into the 5 year supply reference in criterion iii).</p>	<p>The NPPF is clear that 5 year supplies should have, "...an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20%..."</p> <p>As Leeds cannot be certain that it will be 5% authority for the full plan period, wording of Policy H1 should reflect the possibility of a buffer of 5% or 20% being applicable, depending upon the circumstances of the period.</p>	<p>Minor change. Add "(plus appropriate NPPF buffer)" after "Where a five year supply..." in the first line of the last paragraph of Policy H1.</p>
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Carter Jonas (5681), Barratt David Wilson Homes Yorkshire Homes (5895)			
Leeds Civic Trust (0062)	The phrases in the criteria of the last paragraph could encourage the release of unnecessary greenfield sites if there are no safeguards to guarantee delivery of available PDL. Developers can dictate whether PDL is deliverable or not and are therefore in a position to reduce the five year supply. Developers may argue that, because development on brownfield sites is not viable (because of the depressed housing market keeping prices too low to cover site preparation costs, for example) a five year supply is not available, thus justifying release of further greenfield sites. In these circumstances approvals on further releases of greenfield sites must be linked to delivery of PDL which has been included in the 5 year supply figures. Excepting UDP allocations greenfield sites should not be released while there are brownfield sites available.	Agree. Policy H1 has criteria to consider performance against PDL targets. The Core Strategy's PDL targets and its whole focus on urban regeneration will be undermined if landowners and/or housebuilders are able to use viability as a reason to release more sites. Whilst it is accepted that in the current economic climate, many brownfield sites may not be viable, it will be important to ensure that released greenfield sites are not land banked on spurious reasons of viability.	Minor change. Add clarification that the City Council will interpret the NPPF definition of deliverable sites to include land-banked greenfield sites which are viable for development.
Micklefield Parish Council (0122)	The last three sub clauses listed in Policy H1 appear to be worded in a way that gives the opposite meaning to what is logically intended from the previous text. The three sub clauses are worded in the positive, which means that the Policy as written is unsound. The last three sub clauses should be amended, so that they are worded in the negative: THE RELEASE OF FURTHER PHASES OF HOUSING LAND MAY BE CONSIDERED IF IT IS FOUND THAT EITHER: (I) DELIVERY ON PDL IN THE PAST YEAR HAS NOT MET THE TARGET; (II) DELIVERY ON PDL IS NOT EXPECTED TO MEET THE TARGET FOR THE NEXT FIVE YEARS; OR (III) A SUFFICIENT NUMBER OF SITES (EQUIVALENT TO THE FIVE YEAR SUPPLY FIGURE MINUS THE WINDFALL ALLOWANCE) ARE NOT REASONABLY CAPABLE OF BEING DEVELOPED.	The final paragraph is reasonably clear and deliberately worded in the positive to accord with the NPPF. Minor change to clarify the intention of the policy..	Minor change Replace "may be" with "will only be" to provide more certainty

Templegate Developments, Ashdale Land and Property Company Ltd, Hallam Land Management Ltd via Barton Willmore Planning (0057)	Criterion iii) of the final paragraph of Policy H1 is confusing and should be clarified		
UDP Housing Allocations			
Alastair Watson (0043), Graham George (5914), Michael Littlewood (5917)	Concerned about the statement in paragraph 5.2.3 that the UDP housing allocations will not be subject to phasing. The remaining UDP allocated housing sites should be subject to sustainability assessment to ensure that only those in sustainable locations are carried forward. Those sites such as East of Otley, that the UDP Review inspector concluded had sustainability issues, should not be released until their sustainability is improved	The UDP allocated housing sites are too far advanced through the planning process to be reviewed now, and have already been subject to thorough assessment through the UDP Review Examination process.	No change
Redrow Homes (Yorkshire) Ltd (1938)	Phase 1 releases should include all existing deliverable UDPR Allocations and suitable UDPR Safeguarded (PAS) sites.	Paragraph 5.2.3 clarifies that UDP housing allocations will not be subject to phasing. PAS sites will need to be assessed for their inclusion and phasing in site allocations plans.	No change
Miscellaneous			
Highways Agency (0060)	In addition to comments on the scale of allocations to some of the District's sub-areas made separately in relation to Spatial Policy 7 Distribution of Housing Land and the Key Diagram, there will be detailed comments from the Agency on a site-by-site basis when the Site Allocations DPD is brought forward for consultation.	Noted	No change
Pegasus Planning Group (4388)	Support recognition of need to bring forward large sites early in the plan period	Support welcomed.	No change
		Typing errors in paragraphs 5.2.3 and 5.2.3	Minor change. References to "Policy P1" should be changed to "Policy H1"

Appendix 1b: Changes to Policy H1

a) Housing

- 5.2.1 In seeking to respond to the challenges of population growth and housing needs, the delivery of these objectives during current economic and market conditions is a considerable task. As emphasised throughout the Core Strategy, housing delivery in sustainable locations, which respects local character and distinctiveness, maximises opportunities to recycle previously developed land, whilst minimising greenfield and Green Belt release is a priority. Plan monitoring, review and a degree of realism and flexibility will be necessary to achieve these ambitions.
- 5.2.2 Within this framework and in support of Spatial Policies 6, 7 and 10, Policy H1 describes the need for phasing to achieve the aims of a sustainable pattern of development, with focus on the Main Urban Area and regeneration of areas within it. The policy explains that the phased release of allocations will ensure that there is always a 5 year supply of housing land. When determining the five year supply, the windfall allowance of 500 units per annum will be deducted from the total number of units needing to be identified. This aligns with SP6 which seeks to identify 66,000 out of the 74,000 gross units required.
- 5.2.3 In providing a basis for housing supply in the early years of the plan (the first 5 years), there are a number of sites which benefit from a planning permission and in addition there are housing allocations released as part of the UDP (phases 2 and 3). These sites are not regarded as being subject to phasing as part of Policy ~~H1 P4~~ *H1 P4*, as they are regarded as currently available for development. Only sites which do not have an extant planning permission (for housing) or allocation, will be identified as new allocations and phased, through LDF allocations documents (Site Allocations DPD and Aire Valley Area Action Plan).
- 5.2.4 In reflecting the district's strong historical performance in the delivery of previously developed land (PDL), Policy ~~H1 P4~~ *H1 P4* identifies a target of 65% (taken from the Regional Spatial Strategy "The Yorkshire and Humber Plan" 2008). According to the amount of deliverable PDL land identified in the SHLAA, 65% presents a realistic target for the first 5 years of the Plan. Beyond this period, although sources of PDL supply are still likely to come forward, more greenfield land as part of the overall balance, will be needed to sustain the housing supply, consequently the target drops to 55%.
- 5.2.5 Recognising the relatively long lead in time and technical issues associated with bringing forward larger sites for residential development, which will often necessitate the need for phasing and the provision of infrastructure, consideration will be given to opportunities to bring such sites forward for development, as part of earlier phases, where this is appropriate and consistent with the overall strategy.
- 5.2.6 In seeking to meet housing need and to help support the viability of housing delivery, there may also be opportunities for sites to be brought forward, in advance of their particular phasing where appropriate. Examples could include where there are opportunities through early release, to provide higher levels of Affordable Housing through off site contributions or the use of City Council assets

(within regeneration areas) as a basis to 'pair' with greenfield sites in private ownership

5.2.6b Deliverable sites for the purposes of this policy will include released greenfield sites which are capable of delivering dwellings within 5 years taking account of the cost and time needed to deliver any necessary infrastructure or remediation.

POLICY H1: MANAGED RELEASE OF SITES

LDF Allocation Documents will phase the release of allocations according to the following criteria in order to ensure sufficiency of supply, geographical distribution in accordance with Spatial Policy 7, and achievement of a previously developed land target of 65% for the first 5 years and 55% thereafter. ~~Subsequent phases (after the first 5 years of the Plan)~~ *Subject to these considerations, phases with the earliest release* should be made up of sites which best address the following criteria:

- i. Location in regeneration areas,
- ii. Locations which have the best public transport accessibility,
- iii. Locations with the best accessibility to local services,
- iv. Locations with least impact on Green Belt objectives,
- v. Sites with least negative and most positive impacts on *existing and proposed* green infrastructure, green corridors, green space and nature conservation

Consideration will be given to bringing forward large sites, of more than 750 dwellings, to facilitate, early delivery in the Plan period.

In special circumstances, allocated sites may be permitted to be released in advance of their phasing outlined above, so long as the permitted site delivers infrastructure and housing investment that is needed within Regeneration Priority Areas. In such cases, suitable mechanisms will be agreed to ensure that delivery within the Regeneration Priority Area occurs either before, or in conjunction with the delivery of the permitted site.

Where a five year supply (*plus appropriate NPPF buffer*) of deliverable housing sites cannot be demonstrated through annual monitoring, consideration will be made to release the subsequent phase or phases of sites to help address the shortfall. ~~The~~ *Any* release of further phases of housing land ~~may~~ *will only* be considered if it is found that either:

- i) Delivery on PDL in the past year has met the target;
- ii) Delivery on PDL is expected to meet the target for the next five years; or
- iii) A sufficient number of sites (equivalent to the five year supply figure minus the windfall allowance) are reasonably capable of being developed.

Core Strategy Publication Draft - Analysis of Consultation Responses

Policy H2: New Housing Development on Non-Allocated Sites

Representors	Issue and Suggested Changes	LCC Opinion	LCC Action
General Comments			
D Westwood & Son via WYG (0420)	Generally supportive of policy.	Support welcomed	No change
Home Builders Federation (0092)	<p>The policy is unsound as it is not positively prepared and is unjustified. It lacks rationale. The existence of this policy suggests that the Council has little faith in its strategy of identifying a sufficiency of housing land as required by the NPPF.</p> <p>The inclusion of Policy H2 confirms our doubts about the achievability of the policies in respect of containing the majority of development within the MUA in the first phase of the plan, and the priority to be attached to PDL. It is not a positive planning policy but one that seeks to insulate the Council from the unrealism of its adherence to concentrating development in the MUA and on PDL.</p> <p>The policy should be deleted.</p>	<p>LCC policy toward windfall development has moved from one of embargo against all greenfield development to one of acceptance of greenfield development with provisos to protect land with intrinsic qualities as set out in Policy H2. These qualities of land are recognised in the NPPF.</p> <p>Whilst Policies SP6 and SP7 will ensure that a sufficient quantum of housing land will be identified to meet needs, Policy H2 is likely to be less restrictive on windfall development than policy applied in recent years upon which Leeds' windfall allowance is predicated.</p>	No change
Banks Development (5036)	<p>Policy H2 is too restrictive to assist in early delivery of non-allocated sites. It undermines the overall objectives of the Core Strategy and in particular the assumed provision of windfall housing. It should be more in line with the presumption in favour of sustainable development found in NPPF.</p> <p>SUGGESTED CHANGE Priorities early release of PAS sites in advance of the site allocation DPD</p>		
Directions Planning (5121)	This policy needs to be reviewed in light of NPPF.	The policy is not incompatible with the NPPF	No change
Infrastructure Capacity Clause			
Leeds Civic Trust (0062)	Permissions for housing have previously been given that have exceeded infrastructure capacity. What will be the tests	The NPPF makes clear in paragraph 173 that identified housing sites should not be subject to such a scale of	No change

	<p>applied to measure capacity and ensure that this policy is meaningful and properly applied in future?</p> <p>Amend policy so that proposed development only acceptable if it can be <i>demonstrated</i> that there is sufficient infrastructure capacity.</p>	<p>obligations and policy burdens that viability is threatened. But at the same time paragraph 177 states that it is important to be reasonably certain that planned infrastructure will be delivered in a timely fashion.</p> <p>The city council will need to make a judgement on the sufficiency of infrastructure and the information submitted to support proposed development. Sufficiency of infrastructure does not need to be demonstrated by the applicant in every housing application, but can be examined in more depth if necessary for particular applications that raise concerns about sufficiency of infrastructure.</p>	
Accessibility Clause			
<p>Cornforth & Sons via WYG (0420)</p>	<p>Paragraph 5.4.3 states that the accessibility standards set out in Table 2 at Appendix 2 are based on the RSS evidence base. However, they take no account of the settlement hierarchy described in Table 1 of the Core Strategy and simply apply the same 15 minute service criteria to the whole of the Leeds District for developments of more than 5 dwellings. In contrast, the RSS applies its accessibility standard in accordance with the settlement hierarchy i.e. developments in the main urban areas have a higher standard applied than those in more outlying areas.</p> <p>The accessibility standards should be based on those set out at Tables 13.8 and 13.9 in the RSS utilising the same hierarchical approach, with the more onerous standards applied in the main urban areas reducing to more appropriate standards for the villages/rural settlements.</p> <p>CS paragraph 4.1.13 concerning the Settlement Hierarchy suggests that it may be possible to support development in smaller settlements within current levels of service, and this should also be reflected in Table 2.</p>	<p>It is considered that the most appropriate interpretation of the accessibility standards of the RSS is that the standards applying to Regional Cities would apply throughout the Leeds District, not just to the urban areas. Likewise the standards applying to rural areas would apply to rural areas on a regional scale – ie the large tracts of countryside found in the predominantly rural authorities of the region.</p> <p>In Leeds, for new employment/social infrastructure uses it is appropriate to have slightly easier standards for smaller settlements and rural areas to help support the rural economy and enable facilities to be provided that help serve existing rural communities.</p> <p>Because new housing development in Leeds is needed to meet the population growth of the city as a whole, it is appropriate to channel it to locations that are sustainable, particularly in terms of transport. Hence, it is appropriate to apply a single accessibility standard across the district.</p>	<p>No change</p>
<p>Banks Development (5036)</p>	<p>The accessibility standards are too prescriptive.</p>	<p>The accessibility standards need to be clear what is required and insertion of words, “seek” or “aim” would cloud the purpose of the standards. For housing development, they are no stricter in terms of adherence than the RSS standards which applied to all developments. In fact the Core Strategy standard may</p>	<p>Minor Change already agreed by Development Plan Panel of 2/7/12 with the addition of “<i>or a 5 minute walk to a bus</i>”</p>
<p>DPP (5543)</p>	<p>Too prescriptive and does not allow for a reasonable level of flexibility. We would suggest that after the word ‘should’ a word such as ‘seek’ or ‘aim’ should be inserted, at the very least.</p>		

Harrow Estates via WYG (0420)	Policy H2 makes strict adherence to the accessibility standards a prerequisite – see notes re Appendix 2.	be less strict in applying only to developments of 5 or more dwellings. In terms of the level of the standards these are generally no more onerous than those that apply to the urban areas of the Region in RSS.	<i>stop offering a direct service at a 15 min frequency.”</i>
McGregor Brothers Ltd via West Waddy ADP (5884)	<p>Policy H2 on New Housing Development on Non Allocated Sites states that ‘for developments of 5 or more dwellings the location should accord with the accessibility standards in Table 2 of Appendix 2.’ The criteria given in appendix 2 are cumulative and must all be met. One of the important objectives of new development in smaller settlements should be to maintain local services. However, under the criteria if a site is close to local services but is not within a 20 minute walk of primary health care, housing development would be unacceptable.</p> <p>Recent NHS reforms include the removal of practice boundaries - meaning that patients will have the right to register with the GP of their choice regardless of distance, which is a further argument why this accessibility standard is not appropriate.</p> <p>The policy is therefore too inflexible and likely to result in housing development being refused from sustainable locations, where it would actually help to support local services.</p> <p>THE ACCESSIBILITY STANDARDS IN APPENDIX 2 SHOULD BE AMENDED TO PROVIDE MORE FLEXIBILITY, IN PARTICULAR RECOGNISING THAT HOUSING DEVELOPMENT COULD BE STILL IN A SUSTAINABLE LOCATION IF IT DOES NOT MEET ALL OF THE ACCESSIBILITY STANDARDS. SUCH DEVELOPMENT WILL BE DESIRABLE IN SOME INSTANCES TO MEET LOCAL HOUSING NEED AND TO PROVIDE ADDITIONAL CUSTOM TO LOCAL SERVICES TO ENABLE THEM TO REMAIN COMMERCIALY VIABLE.</p>	<p>It is agreed that the standard for accessibility of housing developments to Primary Health / Education is onerous as a 20minute walk only. In considering responses to Policy T2, Development Plan Panel of 2/7/12 agreed to the addition of “<i>or a 5 minute walk to a bus stop offering a direct service at a 15 min frequency.</i>”</p>	
Greenfield Land Definition			
Leeds Civic Trust (0062)	Greenfield land needs further defining in the Glossary to include gardens and other private spaces not used by the public and therefore not falling under the definition of “□reenspace”. Amend definition of “greenfield” land in the glossary to include private gardens and grounds.	Agree. The Glossary needs updating to reflect the NPPF	Add “but can also include private residential gardens” after “...forestry, or parks”

Intrinsic Value Clause			
English Heritage (0099)	We support the requirement that greenfield land should not be developed if it has intrinsic value as amenity open space or makes a contribution to the visual, historic and/or spatial character of the area. This will help to ensure that open areas which contribute to the character of the District are not lost.	Support welcomed	No change
Leeds Civic Trust (0062)	The sub-paragraph a) in the policy is too loose as it only prevents development if the land has both intrinsic value and is important to the character of the area, rather than either/or Alter para. A) to read “.....nature conservation, OR makes a valuable contribution”etc	Agree. There may be cases where it would be appropriate to resist development that would detract from either amenity, recreational or nature conservation value OR from the visual, historic or spatial character of an area	Minor change. After “...nature conservation” replace “and” with “or”
Banks Development (5036)	A proposal might be refused where the site is considered to make a “special contribution to the visual or spatial character” of the area. This could be applied to any site which is not overtly derelict. The policy is too restrictive.	The qualities that part a) of Policy H2 are seeking to protect are valid ones. They are supported by the Core Planning Principles of the NPPF (para 17) including recognition of “the intrinsic character and beauty of the countryside” (bullet 5), “contribute to conserving and enhancing the natural environment...” (bullet7), recognition “...that some open land can perform many functions (such as for wildlife, recreation...)” (bullet 9), “conserve heritage assets in a manner appropriate to their significance...” (bullet 10) and “...support local strategies to improve health...”. By seeking to protect these valid qualities from development it is inevitable that some level of restriction will be necessary, but this is not overly restrictive.	No change
DPP (5543)	Criterion a) the words and terms utilised in this criteria are too vague to allow the formation of judgement as to whether planning permission is reasonably likely to be permitted e.g. such phrases as ‘valuable contribution’, ‘spatial character’ and ‘intrinsic value’ are all too vague. This criterion needs to be amended.	The factors for consideration cannot be couched in measurable and quantifiable tests because they will largely be matters of judgement on a case by case basis informed by visual appearance and knowledge of past and current usage.	No change
Boston Spa Parish Council (0112)	No reference is made to the requirements of the Localism Act for local communities to define protected green space areas in Neighbourhood Plans. Add to clause a) “or if it has been designated as a protected green area in the relevant Neighbourhod Plan”	The policy refers to land use in generic terms. If land is designated in an adopted Neighbourhood Plan as a protected green area it would clearly have the intrinsic value referred to in the policy. The same would go for all other designations of land of environmental value which do not need to be listed in Policy H2 to be protected.	No change
Friends of Allerton Grange (5857)	Policy H2 needs to be in conformity with NPPF Para74: Don't build on existing open/greenspace unless a) assessment taken to show surplus b) loss from development would	The wording and intention of Policy H2 is in general conformity with the NPPF in seeking to protect acknowledged qualities of land that are threatened by	No change

	<p>improve quality or quantity in suitable location c) development provides for another sport/rec provision which outweighs loss.</p> <p>It also needs to conform to Para 77: Local green space designation only appropriate where a) green space close to community serves b) where area demonstrably special to local community and holds local significance c) green area is local in character and not an extensive tract of land</p> <p>SUGGEST THAT THE POLICY H2 (A) IS REWORDED AS FOLLOWS- “IN ADDITION GREENFIELD LAND: A) SHOULD NOT BE DEVELOPED IF IT HAS INTRINSIC VALUE AS AMENITY SPACE OR FOR RECREATION (INCLUDING AS A PLAYING FIELD) OR FOR NATURE CONSERVATION, AND MAKES A VALUABLE CONTRIBUTION TO THE VISUAL AND/OR SPECIAL CHARACTER OF AN AREA “</p>	<p>development. The suggested wording is unnecessary as a playing field would obviously fall within the definition of greenfield land with intrinsic value for recreation.</p>	
Designated Greenspace Clause			
Sport England (1982)	For the reasons detailed under our comments on policy G3, the Open Space and Recreation Assessment is not sufficiently robust and up to date to allow decisions to be made on whether sports facilities are genuinely surplus to requirements. Reliant on this evidence would be unsound.	As per LCC response to Sport England’s comments on Policy G3, the City Council considers the Assessment to be fit for purpose. Therefore, it is appropriate to use it as a test of sufficiency of open space used for sport and recreation.	No change
The Diocese of Ripon and Leeds, AR Briggs & Co, Ledston Estate, Meadowside Holdings, Bramham Park Estate, Lady Elizabeth Hastings Charity Estate, Hatfield Estate via Carter Jonas (5681)	This policy supports housing development on non-allocated sites. We would suggest that the latter part of the policy should be clarified as it seems to relate to designated/allocated greenspace.	There is no contradiction. The policy concerns development on land that is not allocated for housing. Part b) of the policy concerns land designated as green space. In the Leeds UDP allocations are used for land being set aside for future development, like housing or employment. A range of other land designations are made, concerning a range of existing land qualities. Land would not be “allocated” for Greenspace.	No change
Add wording to protect employment sites			
Directions Planning (5121)	The loss of key employment sites and the decrease in the number of local employment opportunities is of real concern to Otley. It is necessary to ensure that key employment sites and a range of employment sites are	<p>Paragraph 22 of the NPPF urges against policies which seek the long term protection of employment sites.</p> <p>The Core Strategy relies upon Policy EC3 to help protect</p>	No change

	<p>safeguarded in order to protect local employment opportunities. This will ensure the town remains viable and sustainable as an independent settlement and growth does not simply turn it into a dormitory town.</p> <p>Propose stronger wording in favour of safeguarding existing employment sites and also a range of employment sites in Policy H2 and other appropriate Policies in the Core Strategy.</p>	<p>employment sites. There is therefore no need for a clause about protecting employment land in Policy H2 which could do no more than duplicate the provisions of Policy EC3.</p>	
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Appendix 2b: Text of Policy H2

5.2.7 Policy H2 is needed to enable housing developments to be permitted on land that was too small to allocate or becomes available unexpectedly. It concerns the principle of housing development rather than details which may be controlled through other policies. For example, development of a residential garden for housing would depend on how much the garden contributes to the visual and spatial character of an area, not on the quality of design which is the domain of Policies P9 and P10.

POLICY H2: NEW HOUSING DEVELOPMENT ON NON ALLOCATED SITES

New housing development will be acceptable in principle on non-allocated land, providing that:

- i) The number of dwellings does not exceed the capacity of transport, educational and health infrastructure, as existing or provided as a condition of development.
- ii) For developments of 5 or more dwellings the location should accord with the accessibility standards in Table 2 of Appendix 2
- iii) Green Belt policy is satisfied for sites in the Green Belt

In addition, greenfield land:

- a) Should not be developed if it has intrinsic value as amenity space or for recreation or for nature conservation, ~~and~~ *or* makes a valuable contribution to the visual, historic and/or spatial character of an area, or
- b) May be developed if it concerns a piece of designated greenspace found to be surplus to requirements by the Open Space, Sport & Recreation Assessment (PPG17Audit).

Appendix 3a

Core Strategy Publication Draft - Analysis of Consultation Responses Policy H3: Density of Residential Development

Representors	Comments	LCC Response	LCC Change																					
1186 ID Planning for TGMF Emsley 5671 ID Planning for Barratt David Wilson Homes, Great North Development, Edmund Thornhill Thornhill Estate, ELE Northern Quadrant Consortium, Wortlea Estates, Redrows Homes Yorkshire Ltd, Housebuilder Consortium, Robert Ogden Partnership Ltd, 1938 Redrow Homes (Yorkshire) Ltd	<p>Too high in policy. Suggest a range of densities;</p> <ul style="list-style-type: none"> i) City Centre and fringe 60 units/ha ii) Other urban areas 35-60 units/ha iii) Fringe urban areas 30-35 units/ha iv) Smaller Settlements 25-30 units/ha <p>Too difficult to meet proposed levels in CSPD as the Residential Design Guide combined with the Street Design Guide place too many requests for private amenity space, dwelling separation, bin storage, turning circles, footpaths on either side, etc, making it difficult to deliver at densities above 35dph.</p> <p>NPPF removed density requirements</p>	<p>The Density levels used in Policy H3 are based off the density levels used in the Strategic Housing Land Availability Assessment, which is one of the main pieces of evidence regarding future housing land supply.</p> <p>The SHLAA also takes into account that not all of the site will be developable – and applies the standard multiplier to only part of the site, based on site size and location:</p> <p>Above 2 ha, it is assumed only 75% of the total site area would be developable leaving 25% for roads, open space and other facilities. Between 0.4 & 2ha, it is assumed only 90% would be developable. Below 0.4ha (city centre only) it is assumed all of the site would be developable.</p> <p>The proposed densities as compared to the SHLAA are outlined in the table:</p> <table style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>SHLAA</th> <th>CSPD</th> </tr> <tr> <th>SHLAA Zones</th> <th>Density</th> <th>Density</th> </tr> </thead> <tbody> <tr> <td>City Centre</td> <td>350</td> <td>65</td> </tr> <tr> <td>Edge of City Centre</td> <td>60</td> <td>65</td> </tr> <tr> <td>Other urban areas</td> <td>40</td> <td>40</td> </tr> <tr> <td>Edge of urban areas</td> <td>35</td> <td>35</td> </tr> <tr> <td>Rural/Smaller Settlement</td> <td>30</td> <td>30</td> </tr> </tbody> </table>		SHLAA	CSPD	SHLAA Zones	Density	Density	City Centre	350	65	Edge of City Centre	60	65	Other urban areas	40	40	Edge of urban areas	35	35	Rural/Smaller Settlement	30	30	No change
	SHLAA	CSPD																						
SHLAA Zones	Density	Density																						
City Centre	350	65																						
Edge of City Centre	60	65																						
Other urban areas	40	40																						
Edge of urban areas	35	35																						
Rural/Smaller Settlement	30	30																						
0065 Oulton Civic Society,	Density levels for settlements are too high.																							
5121 Directions Planning	Too high as not been justified. Feel past developments of high rises, etc did not allow for quality open space. Need for lower density to enable family housing as higher density does not provide quality living space.	The evidence base supports the use of a density policy to guide development. The densities used in the SHLAA were based on long term trends of actual developments in Leeds, with the lower end of ranges chosen to reflect the onset of the housing market crash in 2008-09. The policy allows for other considerations to be made which will affect the density, to ensure that the most efficient																						

		use of land is achieved whilst also considering other factors.	
2956 Cllr Thomas Leadley	Should be average densities not minimum.	At a general level minimum densities are needed to help ensure that most housing land is used efficiently and the housing requirement is met. The use of average densities would raise practical issues including whether extremes may be acceptable if balanced out by each other, what timescales and what geographical areas to use for measurement.	No change
5105 Renew, 0420 White Young Green for Harrow Estates	Will the 60 units/ha for City Centre enable lower density family housing with integral greenspace and amenity? Conflicts with SP3 need to deliver family housing in City Centre	The SHLAA used a density rate of 350 dwellings/ha for sites which did not have a planning permission. Sites where there was a planning permission in place used the figures identified in the permission. The SHLAA 2011 identifies that there is capacity for 11,500 units in the area of the City Centre not overlapped by the Aire Valley Leeds AAP area, and over 16,000 in the whole of the city centre. The Core Strategy sets a conservative expectation of 10,200 dwellings to be delivered in the whole of the city centre during the plan period. It is considered that 65 dwellings per hectare is a reasonable minimum density for the city centre and fringe that could deliver family housing. Virtually all dwellings built within the city centre over the last 15 years have been flats with only a handful of houses built. One means of attracting families will be to build larger flats with amenity spaces and supporting facilities. The densities of larger flats with amenity space can be expected to be considerably in excess of 65dph. But even if developments of entirely houses are built, according to CABE, terraced housing can normally be expected at a density of 60-80 dwellings per hectare. It is reasonable to assume that a city centre fringe location would major in terraced houses. It is also reasonable to expect that most city centre or fringe locations would comprise of a mix of houses and flats. Hence, it is not considered likely that the 65dph minima for the city centre and fringe areas would constrain the provision of family housing.	No change
1935 McCarthy & Stone Developments Ltd	Do not think that the development they deliver (C2 specialist units) should be subject to density requirements as their development seeks to deliver more than just housing units – i.e. communal space, etc.	The delivery of specialist housing is part of the overall housing need calculation (household formation). Therefore the delivery of C3 housing units, be it for seniors or students, is part of the overall housing strategy. This would mean that C3 developments will be subject to Policy H3 in the same way as all other housing development is. However, residential institutions (C2 specialist	Minor change. Clarify in supporting text that all forms of housing development (including specialist development)

		<p>units) which do not comprise of individual dwellings, will be excluded.</p> <p>The policy already identifies that if there are overriding reasons concerning townscape, character, design or highway capacity than these will be taken into consideration.</p>	<p>will be subject to Policy H3.</p> <p>Add new sentence to end of 5.2.8: The density policy will apply to all forms of housing development, including specialist housing, but not residential institutions (Class C2).</p>
Character should be used, not density			
2663 Spawforths for Spawforths and Miller Strategic Land	Density should reflect character of areas – therefore higher density levels could be in all of the areas or in none of the areas, depending on the character. Policy approach based on character would be more suitable and less onerous.	<p>The density bands intrinsically reflect the character of areas. Hence the highest density in the City Centre reflects the historic urban form of the area and the lowest densities in smaller settlements reflect their generally lower intensity of land use.</p> <p>Nevertheless, the policy H3 and the text in 5.2.8 makes clear that townscape, character, design or highway capacity can be overriding factors.</p> <p>If the policy were to be based on character alone there is a danger that land will not be used efficiently. Low density estates of the past might simply be replicated for the sake of townscape conformity, rather than good quality design. If land is not used efficiently, more land in the countryside will be required for development.</p> <p>No evidence or justification that the density of rural communities or smaller settlements should be determined on merit whereas other areas wouldn't. Current policy enables all applications to be delivered on merit but to seek to meet density rates.</p>	No change.
874 Barwick-in-Elmet & Scholes Neighbourhood Development Plan Steering Group; 0111 Barwick in Elmet & Scholes Parish Council, 0112 Boston Spa Parish Council,	<p>Contradicts Spatial Policy One and paragraph 1.8 and 2.13 to respect local character, community identity and the environment.</p> <p>Think rural communities and small settlements density should be determined on merit having regard to the existing surrounding neighbourhood – which are compatible with exception reasons described in paragraph 5.2.8.</p>		
5681 Carter Jonas for Lady Elizabeth Hastings Estate Charity, The Bramham Park Estate, Meadowside Holdings, Ltd, AR Briggs and Co, the Ledston Estate, The Diocese of Ripon and Leeds, The Hatfield Estate	Policy is too negative and instead factors such as townscape, character, design and amenity considerations should inform density and not an arbitrary figure		

0480 Dacre Son and Hartley for Warner, Miller, Chatford, Keyland, Taylor Wimpey, Redrow, Kebbell, Taylor Wimpey and Ashdale, Barratt Leeds, Barratt York, Mirfield,	Current wording is restrictive and inflexible as the rates are not realistically deliverable.		
0420 White Young Green for Harrow Estates	Too prescriptive – should be assessed site by site.		
Support for Policy			
5867 LDP Planning c/o Hileys Solicitors	Support indicative policies and the requirement to consider other material factors which provides basis to negotiate lower densities.	Support welcomed	No change
0099 English Heritage	Support reference that densities might be varied having regard to townscape or character and that special consideration will be given to Conservation Areas.		
0420 D Westwood & Son (via White Young Green Planning)	Support proposed density, particularly for smaller settlements.		
Does not comply with NPPF			
5036 Banks Development, 5543 DPP	At odds with NPPF and character in areas. Minimum densities established in past does not mean that creates sustainable development or provide for housing needs.	The NPPF Core Planning Principals state need to actively manage patterns of growth to make fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.	No change.
5681 Carter Jonas for Lady Elizabeth Hastings Estate Charity, The Bramham Park Estate, Meadowside	No basis in NPPF to specify particular densities and specific densities now removed from national guidance.	Paragraph 47 bullet 5 says local authorities should “...set out their own approach to housing density to reflect local circumstances”. Also, paragraph 58 bullet 3 expects development policies to “...optimise the potential of the site to accommodate development...”	

Holdings, Ltd, AR Briggs and Co, the Ledston Estate, The Diocese of Ripon and Leeds, The Hatfield Estate		<p>Policy H3 supports this through ensuring that land is used efficiently whilst making allowances for townscape, character, design or highway capacity.</p> <p>Therefore it is considered that the policy of setting minimum density levels with specified exceptions accords with the NPPF by not unduly constricting development of housing to satisfy Leeds' housing needs and still making efficient use of land.</p> <p>The need to deliver density levels also accords with Policy H4, and SP7. Policy H4 helps set out a housing mix whilst Policy SP7 identifies a broad spatial distribution. Policy SP6 sets the housing level and Policy H3 seeks to ensure that development is delivered in a sustainable manner.</p>	
0480 Dacre Son and Hartley for Warner, Miller, Chatford, Keyland, Taylor Wimpey, Redrow, Kebbell, Taylor Wimpey and Ashdale, Barratt Leeds, Barratt York, Mirfield,	Give more recognition to NPPF which no longer has minimum density requirement.		
Other			
4825 Morley Town Council	Suggest is unsound and need to recalculate other housing supply policies.	Would need more information as to comment as to why the policy is unsound.	No change

Appendix 3b: Text of Policy H3

Housing Density

5.2.8 A minimum density policy is needed for Leeds to ensure sustainable housing development. This means efficient use of land in order to avoid more green field land being developed than is necessary and in order to achieve a higher populations in proximity to centres. Lower density schemes will be accepted in exceptional circumstances relating to townscape and character. Exceptional townscape reasons for lower densities will need to consider quality of townscape character including recognition through conservation area character statements, neighbourhood design statements and other published assessments. For clarity, 'urban areas' within Policy H3 includes both the Leeds main urban area as well as major settlements, and 'smaller settlements' includes sites within and adjacent to them. For all other areas, no minimum density applies because other housing Policies only allow for a small amount of housing development in these areas. *The density policy will apply to all forms of housing development, including specialist housing, but not residential institutions (Class C2).*

POLICY H3: DENSITY OF RESIDENTIAL DEVELOPMENT

Housing development in Leeds should meet or exceed the following densities unless there are overriding reasons concerning townscape, character, design or highway capacity:

- i) City Centre and fringe* - 65 dwellings per hectare
- ii) Other urban areas - 40 dwellings per hectare
- iii) Fringe urban areas - 35 dwellings per hectare
- iv) Smaller settlements - 30 dwellings per hectare

Special consideration will be given to the prevailing character and appearance in Conservation Areas.

* fringe is defined as up to 500m from the boundary

Appendix 4a

Core Strategy Publication Draft - Analysis of Consultation Responses Policy H4: Housing Mix

Representors	Comments	LCC Response	LCC Change
Targets			
Ashdale Land & property Company Ltd, Northern Hallam Land Management Ltd (via Barton Willmore Planning Partnership-Northern (0057)	Table H4 (preferred housing mix) sets out minimum and maximum percentages as well as an overall target for different types and sizes. The table should be deleted, and the policy should refer to meeting the assessed needs of the market as well as site specific characteristics. Object to the policy.	<p>The intention of Policy H4 to plan for new housing developments to deliver an appropriate mix of housing is legitimate in terms of the NPPF and the objectives of the Core Strategy.</p> <p>The NPPF (para 50) asks local authorities to plan for a mix of housing based on demographic trends, market trends and community needs in order to deliver a wide choice of high quality homes, creating sustainable, inclusive and mixed communities. They are expected to "...identify the size, type, tenure and range of housing required in particular locations, reflecting local demand..."</p>	No change
0057 Templegate Developments (via Barton Willmore Planning Partnership-Northern)	The density as set out in Table 4 (Housing Mix) should be more flexibly applied, with indicative ranges, rather than "targets" for each dwelling type	<p>The Core Strategy has an objective (No. 9) to "...plan for a sufficient mix, tenure and type of housing to meet a range of community needs..." A mix of housing in terms of tenure, type and size to reflect local needs also forms one of the housing growth principles set out in paragraph 4.6.2. These principles were established in the summer of 2011 through a series of consultation workshops with the housing development industry and community stakeholders.</p>	
5105 Renew	Support Table H4, and the requirement for local housing needs/market assessment. It is important that the assessments combine housing needs and housing market assessment.	<p>The Policy does not require the mix of housing of new development to adhere to the percentages in Table H4. The table provides a long term benchmark for the minimum, maximum and target mix of different types and sizes of new housing, based on evidence of trends of provision, existing mix, population forecasts and survey preferences.</p>	
Viability			
0420 Harrow Estates (via WYG Planning)	The prescriptive nature of policy and additional financial burden needs to be considered in terms of financial viability.	The policy is not prescriptive; it asks for an appropriate mix of dwelling types and sizes to address needs but also to reflect the nature of the development and character of the	No change

0420 Harrow Estates (via WYG Planning)	Housing mix in H4 fails to take into account the market viability and deliverability of sites in the present economic climate. Over reliance on delivering 1 and 2 bed unit targets - and by a degree, flats, at the present time, we believe is counter productive	<p>location. In the case of larger developments that exceed the thresholds, developers are invited to submit their own assessment of local housing needs. Housebuilders typically undertake market research to make sure they are building houses that people want to buy, so it will not be onerous to share their findings to influence the conclusion of what an appropriate mix for the development should be.</p> <p>The lack of prescription means that Policy H4 will have negligible impact on viability of development.</p> <p>There is not over-reliance on 1 and 2 bed flats. The table percentages are not prescriptive, and in any case the minimum for flats is only 10% and there is no minimum expectation at all for 1 bedroom flats. The percentages correlate closely with SHMA evidence on dwelling preferences.</p>	
Flexibility			
2663 Spawforths 2663 Miller Strategic Land (via Spawforths)	The Core Strategy should not dictate the housing mix across the District. The Core Strategy should achieve this through identifying the level of provision and the broad distribution of new housing. is both unnecessary and inflexible to seek to control the housing mix, since it would mean the housing market would be unable to adjust to market movements	The policy is not prescriptive; it asks for an appropriate mix of dwelling types and sizes to address needs but also to reflect the nature of the development and character of the location. In the case of larger developments that exceed the thresholds, developers are invited to submit their own assessment of local housing needs. Housebuilders always undertake market research to make sure they are building houses that people want to buy, so it will not be onerous to share their findings to influence the conclusion of what an appropriate mix for the development should be.	No change
5543 DPP	The CS approach of a one set of targets fits all, particularly given the size and diversity of the District, is inappropriate, need for the policy to be more precise.		
Unsound Policy			
Barratt David Homes, Great North Developments, Wortlea Estates, Edmund Thornhill Estates, ELE Northern Quadrant Consortium, Redrow Homes (Yorkshire) Ltd, Robert Ogden	It is considered that Policy H4 is unsound in relation to the 50 dwelling threshold on sites in or adjoining smaller settlements. We are not opposed to a housing mix policy in the Core Strategy as long as it is based on evidence of type and size appropriate to the area in which it is developed. The market generally dictates what houses are required on a site and the type and size mix will vary over the life of the plan period. The SHMA will need to be updated to reflect changing demands over the plan	The requirement for developments above thresholds to provide local housing need assessments is not excessively onerous. Housebuilders typically undertake market research to make sure they are building houses that people want to buy, so it will not be onerous to share their findings to influence the conclusion of what an appropriate mix for the development should be. The lower threshold of 50 dwellings for smaller settlements is appropriate because the needs of and the impact on the local community is likely to be more pronounced than the impact on Major Settlements	No change

Partnership Ltd, Consortium of Housebuilders, Great North Developments Ltd c/o Evans Property, Gr Wilson Homes, Great North Developmet via ID Planning (5671)	period.	and the Main Urban Area. It is important for Smaller Settlements that the local housing needs to be addressed by schemes of 50+ dwellings are properly examined.	
5543 DPP	Threshold for a Housing Needs Assessment is high and that few developers will be affected by this part of the policy but nevertheless the NPPF at paragraph 50 makes it clear that it is for the local planning authority to identify the size, type tenure and range of housing that is required in a particular location	Policy H4 is sound. The NPPF (para 50) asks local authorities to plan for a mix of housing based on demographic trends, market trends and community needs in order to deliver a wide choice of high quality homes, creating sustainable, inclusive and mixed communities. They are expected to "...identify the size, type, tenure and range of housing required in particular locations, reflecting local demand...". The policy is not prescriptive. The percentages of Table H4 are based on SHMA evidence.	
Cllr Thomas Leadley	Unsound	It would not be appropriate for the Core Strategy set out detailed guidance on what a Housing Needs Assessment for the local area should include. Typically, an assessment would start with marketing information, possibly bolstered by the results of any local survey or focus group work.	
2663 Spawforths 2663 Miller Strategic Land (via Spawforths)	Concerned that for large schemes a Housing Needs Assessment will need to be produced. However there is no guidance within the Core Strategy of what this entails. This lack of information on implementation of the policy renders this unsound. The requirement for a Housing Needs Assessment should be removed.	Table H4 is intended to endure for the plan period, but it is expected that the SHMA will be updated. Depending on any degree of divergence, new SHMA findings will either be treated as additional material considerations or cause to review the plan.	
5543 DPP	No need to provide an additional study unless the developers disagree with the Councils assessment of need. Consider that the policy is not consistent with national policy and has not been positively prepared and object to this policy.		
AR Briggs and Co, Ledston Estate, Bramham Park Estate, Lady Elizabeth Hastings Estate Charity, Meadowside Holdings Ltd, Hatfield Estate, The Diocese of Ripon and Leeds via Carter Jonas (5681), Barratt David Wilson Homes Yorkshire	NPPF supports the provision of an appropriate mix of housing as supported by the SHMA and other evidence. There appears to be no provision within the policy and justification to ensure that SHMA is reviewed regularly this undertaken. Whilst the SHMA is one source it is important to have regard to market signals and intelligence to reflect housing demand as well as any locally generated specific need.		

Homes (5895)			
C/o Hileys Solicitors via LDP Planning (5867)	Requirement to submit a housing needs assessment at application stage is considered to be onerous and serve little value. Large sites will provide a mix of housing in keeping with the character of the local area and attractive to the market. Support the aim of the policy but not need for HNA.		
5884 McGregor Brothers Ltd (via West Waddy ADP)	The need to be provide a HNA would impose an onerous requirement on developers, as would require extensive research and questionnaires relating to the whole development and is contrary to NPPF, para 50. Policy should be amended to make it clear that LCC will provide details of housing needs in particular localities so that developers can ensure that these needs are addressed in their development proposals.		
Redrow Homes (Yorkshire) Ltd (1938)	The SHMA will need to be updated to reflect changing demands over the plan period. We are not opposed to the proposed preferred housing mix in Table H4 as it is flexible enough to allow a minimum and maximum outside of an overall preferred target.		
Number of Bedrooms			
Harrow Estates via WYG (0420)	Over reliance on delivering 1 and 2 bed unit targets and flats, at the present time is counter productive	There is not over-reliance on 1 and 2 bed flats. The table percentages are not prescriptive, and in any case the minimum for flats is only 10% and there is no minimum expectation at all for 1 bedroom flats. The percentages correlate closely with SHMA evidence on dwelling preferences.	No change
Housing Type			
5543 DPP	Agree with providing a range and choice of dwellings on a site. However there is no market at present for flatted developments, even having a 10% min contribution is unreasonable if no demand.	Policy H4 is not prescriptive about imposing the percentage minima, maxima or targets on individual developments. The table provides a long term benchmark only.	No change
5105 Renew	Some developers are considering provision of dwelling forms that are neither traditional houses, nor traditional flats. How will these be assessed.	If some kind of hybrid dwelling becomes the norm, this would need to be factored in Leeds' Annual Monitoring Reports and should be treated as a material consideration	No change

		until policy is reviewed.	
2527 Leeds Residential Property Forum(via Bury and Walker solicitors)	Policy simply categorises properties in terms of one bed and upwards and therefore is unsound.	It is not clear from the comment how the objector thinks the policy mix should be influenced through policy.	No change
Specialist Housing			
Ashdale Land & property Company Ltd Northern Hallam Land Management Ltd (via Barton Willmore Planning Partnership-Northern (0057)	As it is covered by another Policy reference to the need to provide for 'Independent Living' should be deleted within Policy H4.	The Council is conscious of the importance of catering for the needs of the elderly population which is forecast to grow substantially during the plan period. It is important that the needs of this group is addressed, particularly by major housing developments, and that cross reference is made to Policy H8	No change
Harrow Estates via WYG (04200	Reference to independent living in H4 and H8 needs to be clarified to provide certainty to developers.		
1935 McCarthy & Stone (Developments) Ltd	Standard unit sizes and prescribed density is impractical and undesired, and would recommend that specialist housing for the elderly be exempt from this policy. Townscape and design considerations should prevail over prescriptive standards. Specialist housing for the elderly is well designed to house small households (mostly 1 bed), with many residents	Policy H4 does not prescribe unit sizes and density.	No change
1935 McCarthy & Stone (Developments) Ltd	The NPPF highlights the need to '... create sustainable, inclusive and mixed communities. Local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community...such as...older people'. The NPPF expects authorities to 'identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period' which 'meets household and population projections, taking account of migration and demographic change' and 'addresses the need for all types of housing', including housing for 'older people'.	The SHMA 2011 assesses the need for older person households in Leeds indicating that there will be a substantial growth in older person households (65+) and particularly those over 85 years during the plan period. The cross reference to Policy H8 is therefore appropriate	No change
2527 Leeds	No reference to shared housing. This is a particular	Policy H4 concerns provision of new housing through	No change

Residential Property Forum (via Bury & Walker Solicitors)	type of accommodation which is already widely in use in the City and there needs to be proper planning going forward to enable the quantity to be expanded. A Policy which fails to do this cannot be sound.	conversion or new build. The current new-build housing market is dominated by housing built for sale. The City Council would not want to introduce policy that seeks to control the mix of private rented and owner occupied housing because it will be beyond the ability of most developers to deliver, and too prescriptive to impose.	
5036 Banks Development	No reference to need for Executive housing as a specialist housing type. It has been demonstrated that by planning for executive housing local authorities can increase economic activity in their area because they attract entrepreneurial individuals who will set up businesses and create employment.	Executive housing is a marketing label rather than a type of specialist housing.	No change
Renew (5105)	Growth in single person households may include a proportion with a family housing need ie separated parents with joint custody, or death of a spouse.	Comment noted	No change

Appendix 5a

Core Strategy Publication Draft - Analysis of Consultation Responses Policy H8: Housing for Independent Living

Representors	Comments	LCC Response	LCC Change
General Policy Soundness			
<p>Taylor Wimpey, Kebbell, Chatford, Taylor Wimpey, Ashdale, Warner, Redrow, Barrett York, Keyland, Mirfield, Barratt Leeds, Miller (via Dacre Son & Hartley (0480), 1186 T G M F Emsley, TGMF Emsley, Edmund Thornhill Estates, Redwrows Homes (Yorkshire) Ltd, Consortium of Housebuilders, Barratt David Wilson Homes, Great North Developments, Wortlea Estates, Robert Ogden Partnership Ltd, Housebuilder Consortium, Great North Developments Ltd c/o Evans Property Gr, ELE Northern Quadrant Consortium, Barratt David Wilson Homes Yorkshire Homes via ID Planning (5895)</p>	<p>We object to this policy in the manner in which it has been written. The policy as written is vague and ambiguous. It is considered that Policy H8 is unsound. It is not based on a robust evidence base and therefore fails the 'justified' soundness test.</p>	<p>The SHMA 2011 assesses the need for older person households in Leeds indicating that there will be a substantial growth in older person households (65+) and particularly those over 85 years during the plan period. It is therefore right that the Core Strategy contains policy to help deliver new housing designed to meet the needs of this population group.</p> <p>The policy wording expects larger developments to make a contribution to meeting needs for older person households. This is reasonable in the context of evidence of increasing housing needs. The open nature of the requirement, rather than being considered vague or ambiguous, provides flexibility and scope for negotiation on what type of contribution should be made.</p>	<p>No change</p>
The contribution expected from large developments			
<p>T G M F Emsley, TGMF Emsley, Edmund Thornhill Estates, Redwrows Homes (Yorkshire) Ltd, Consortium of House-builders, Barratt David Wilson Homes, Great</p>	<p>There is no justification for including a trigger of 50 dwellings in which to pursue a contribution or on site development of housing for independent living. The policy as written is vague and ambiguous.</p>	<p>A threshold of 50 dwellings is reasonable for a city the size of Leeds with a housing requirement of 70,000 dwellings. A sufficient number of housing developments would be subject to the policy to enable a reasonable contribution to be made.</p> <p>The threshold of 15 used in West Lancashire</p>	<p>No change</p>

<p>North Developments, Wortlea Estates, Robert Ogden Partnership Ltd, Housebuilder Consortium, Great North Developments Ltd c/o Evans Property Gr, ELE Northern Quadrant Consortium, Barratt David Wilson Homes Yorkshire Homes via ID Planning (5895) (1186)</p>		<p>would be more appropriate for a rural authority with fewer large housing schemes.</p> <p>Overall, it is considered that Policy H8 is sufficiently positive towards provision of housing for older people. It urges larger housing developments to make appropriate contributions and it expects LDF allocation plans to identify suitable land.</p>	
<p>1935 McCarthy & Stone (Developments) Ltd</p>	<p>Welcome inclusion of policy H8. However the need as identified in the SHMA has not been properly taken into account within the policy wording. Concerned that the policy does not sufficiently focus on elderly housing, but instead restricts itself to making generic references to all types of housing. Suggest inclusion of the following: 'This Strategy supports in principle, the provision of a range of accommodation by specialist private sector developers and housing organisations which will be specifically designed to support the needs of an ageing population'.</p> <p>In addition, the Council could consider promoting the development of specialist housing for the elderly even further by setting a defined requirement within the Core Strategy as for example set by West Lancashire Core Strategy ie the Council will expect that at least 20% of units within residential developments of 15 or more dwellings should be designed specifically to accommodate the elderly, except in cases where it is clearly inappropriate to do so'.</p>		
<p>Policy advice on suitable locations for older persons accommodation</p>			
<p>1935 McCarthy & Stone (Developments) Ltd</p>	<p>Within Appendix One an overview (as set out in Prof M Ball) of private sheltered schemes and the benefits they can provide to the elderly be provided. In light of the multiple benefits that owner occupied private sheltered housing for the elderly provides for residents and the wider community, and the increasing 'need' for this type of specialist accommodation, suggested that the following policy also be introduced that supports the delivery of</p>	<p>It is considered that the second paragraph of Policy H8 provides for the kind of locational preferences suggested in the wording advanced by McCarthy & Stone. The City Council considers that the level of public transport accessibility expected for all non-allocated housing developments through Policy H2 will be sufficient for those schemes aimed at older people. Policy</p>	<p>No change</p>

	<p>specialised accommodation for older people, such as sheltered housing. 'Development proposals for accommodation designed specifically for the elderly will be encouraged provided that they are accessible by public transport or a reasonable walking distance to community facilities such as shops, medical services, places of worship and public space. '</p> <p>Specialised housing for the elderly often greatly enhances the sustainability of businesses in nearby town and local centres and provides many benefits to include communal facilities and specific features within the apartments designed to meet the particular needs of the elderly. Extra Care (Assisted Living) aimed at enabling independent living for the "frail elderly", persons typically aged 80 and over. Extra Care accommodation possesses a number of 'enhanced facilities' in terms of the communal facilities available and provides a higher level of care when compared to private retirement housing.</p>	<p>H8 also expects good access either to a town/local centre or a range of local community facilities.</p> <p>Policy H8 goes further by expecting LDF allocations documents to seek to identify suitable land for housing for elderly or disabled people.</p>	
Need for Independent Living			
Renew (5105)	<p>It is worth noting that a large proportion of over 65's will be able to live independently without additional support or adaptations to their housing. Many will be mobile, may still be working and able to accommodate their needs in mainstream housing. Some with people staying 'younger' longer, then the need for specific housing may diminish. Some housing schemes may be encouraged to provide for households seeking to 'downsize' as their children leave home. It is more likely that specific sheltered or extra care housing will be needed more for the growing number of over 85 year olds, and possibly the 75 – 85 year olds</p>	<p>The essential point that the housing needs for elderly people are growing is acknowledged in paragraph 5.2.29 of the Core Strategy</p>	No change