

# Core Strategy

Leeds Local Development Framework



Development Plan Document  
Report of Consultation on Issues and Alternative Options  
September 2008

# CORE STRATEGY

## REPORT OF CONSULTATION ON ISSUES AND ALTERNATIVE OPTIONS

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## 1. INTRODUCTION

This report details the findings from a programme of consultation that took place between 23<sup>rd</sup> October and 4<sup>th</sup> December 2007 on the Core Strategy Issues and Alternative Options. A very brief overview of the overall consultation responses is provided in Section 2 below. Section 3 'Methods of Consultation' provides a background to the consultation programme and methods of engagement. A schedule is included of the consultation events and meetings held. Section 4: 'Consultation Responses' contains a summary and statistical analysis of the feedback, broken down into the various types of questionnaire and event. Section 5 explains the 'Next Steps' of how the preparation of the Core Strategy will progress.

It is considered that this report provides a fair and accurate representation of comments, but comments from individuals have necessarily been summarised. It should be noted that officers work from both these summaries, and from the much more detailed comments submitted, in order to move forwards to the next stage of the Core Strategy. It should also be noted that this report does not contain Leeds City Council's responses to representations submitted, as these are being prepared as part of the Preferred Options stage of the Core Strategy.

A short non-technical summary of this report is also available as a separate document.

## 2. SUMMARY OF CONSULTATION RESPONSES

### Climate Change

The majority wanted all new development to be designed according to sustainable construction principles, and to have a challenging target for renewable energy, reducing emissions, and adapting to climate change. There were concerns over how this would impact on the viability of developments. Many people had very strong feelings about not building homes in high flood risk areas, including the developers' consortium (as this would encourage building on greenfield land instead). Some argued that flood areas should be left undeveloped to provide greenspace.

### Environment

A very high majority supported increasing the quantity of greenspace by requiring new development to provide it, building on poor quality greenspace in favour of improving quality elsewhere, and protecting and enhancing natural habitats.

A very high majority wanted to protect the built heritage and character across Leeds, rather than only in designated areas, and agreed that creative and distinctive design should be encouraged in appropriate locations. However, protection of historic environments must be properly justified as they can be combined with new, innovatively designed development to create distinctive places. Several respondents suggested that designs should also promote eco-friendliness, in terms of use of energy and materials, biodiversity, and local use.

### Waste

It was felt that more needs to be done to minimise waste at its source, e.g. reducing packaging and not providing plastic bags (particularly by supermarkets). More could also be done to help individual households recycle. Most people felt waste facilities should be in commercial/industrial areas, with support also for small-scale facilities in residential and rural areas e.g. for recycling.

### Regeneration

A majority supported the current approach to identifying regeneration areas: i.e. high levels of deprivation; poor health; poor education; poor conditions of housing and environment; high crime; high unemployment; areas with little private investment; and areas already designated for regeneration. Few new criteria were suggested. These were: a lack of greenspace; vacancy rates; areas with student or refugee communities; and areas with poor access to public transport.

Many new regeneration areas were suggested: Pudsey; Otley; Headingley; Woodhouse; Holt Park; Guiseley; Micklefield; Kippax; Allerton Bywater; Barnbow (Vickers) site; Crossgates; rural communities, Kirkstall to Horsforth; Bramley; Kirkstall Road; Leeds/Bradford Corridor; Chapeltown; Harehills; Sheepscar; and Belle Isle

### **Housing**

A majority favoured concentrating new housing in the urban area, although housebuilders believed building on greenfield land is necessary to address the need for housing. Some respondents felt there is no room for further housing within urban areas. Other respondents suggested that new greenfield housing development could provide new quality greenspace.

Most would accept higher housing densities, particularly in the city centre, town centres and at other transport nodes, but less so on the edge of the city centre. A widely shared response is that there are too many apartments and additional family housing is needed. Generally, housebuilders think that the Council should not set out the sizes or mix of dwellings. Any control over housing mix would need regular review.

There was support for all proposed methods of increasing affordable housing, including higher targets, lower thresholds, village exception sites and land release. However, housebuilders questioned the robustness of the Council's evidence on the housing market, and that viability of development must not be harmed.

A majority of 'tick box' respondents preferred extension of Cottingley Springs for Gypsy and Traveller accommodation needs. However, most of those making written comments preferred either smaller sites, or listening to the preferences of Gypsies and Travellers themselves (who also favour smaller sites).

### **Employment**

An equal response was given to whether sites for employment need to be widely distributed to be locally accessible or concentrated in areas favoured by business. Most felt that both options would be required due to the different types of employment.

A high majority favoured protection of the best employment sites, protection of sites for certain employment uses, use of agreements to provide affordable business premises, and use of agreements to secure local training and recruitment. Developers did consider that the market needed flexibility, and that policies which required such agreement across all sites would be contrary to government guidance.

A high majority felt that rural areas need to be treated separately from urban areas. However, some respondents were concerned that development of rural employment should not be at the expense of greenfield land.

### **Town Centres**

A majority supported the existing hierarchy: i.e. the city centre; town and district centres; and local centres. Interest groups also proposed that LCC should support local shops and assist shopping parades to be viable. It was noted that there needs to be a distinction between town and district centre, and that more detail needs to be provided as to their role and opportunities. Retailers considered the hierarchy should acknowledge the role of existing, accessible, out-of-centre locations, plus locations that could be well served by a choice of means of transport. There also needs to be a recognition that some centres are on the District's boundary and can fulfil a service role for areas outside Leeds, and vice versa.

There were a great many suggestions as to locations for new centres or changes in the designation of centres across the District. Developers also suggested that local centres suitable for expansion or intensification should also be identified.

Most agreed with options to intensify or expand particular town centres, although there were doubts over the expansion of Kirkstall and Otley. However, this is likely due to confusion that this would involve developing on greenfield sites, which is not what was intended by the Council. Additional centres were also proposed for intensification or expansion, and it was commented that the potential expansion of Leeds City Centre should be identified.

Most favoured keeping the existing out-of-town shopping centres (Colton, Owlcotes, White Rose, and Killingbeck) as they are, rather than integrating them into the community. Diversification should only be allowed if linked to better public transport, for housing, or for smaller and local businesses. However, developers and retailers promoted diversification and expansion. In particular, the owners of White Rose considered it could be part of wider regeneration in south Leeds.

### **Community Facilities**

The majority said that major cultural facilities should be in the city centre, edge of city centre, and outside of the city centre but highly accessible by public transport. It was noted that different types of facility will have different requirements, so location will depend on factors such as use, land area, and access requirements. It was also noted that in reality many people will travel by car so sites would need good motorway access.

There was great support for all the options to improve health and well being, including providing greenspace, improved public sports facilities, cycling and walking routes, allotments, and an accessible network of health facilities. Particular points included that activity should be built into daily routine, and that improvements in public transport and associated reduction in car use are essential in order to help improve health. Encouraging local food production would reduce traffic and environmental impact.

There was a great majority of support for all the education proposals; schools and colleges to make their facilities available for wider community use; locating schools where they are most accessible to the communities they serve (particularly so that children can walk to school); and encouraging the location of new further education provision within the city centre and town and district centres.

### **Transport**

There was high support for park and ride, particularly on high volume traffic corridors and where close to rail stations, and where the whole journey cannot be completed by public transport. There was high support for more local rail stations, although with better integration of transport modes and bus priority measures needed. There was widespread support for car free areas, parking management, safe and accessible walking and cycle routes, travel plans, and low emission zones. Only a third were in favour of road user charging. Generally, it was felt that all these measures need to be brought together to be effective.

The majority preferred that Leeds Bradford Airport should expand to serve those living and working within and beyond the Region, rather than only within it. However, many also noted that they did not want any expansion, and that the question should have allowed for this option. This was mainly because of the increased level of emissions from expansion and its subsequent impact on climate change, and the poor location. Overall, if expansion were to go ahead, the great majority would only want this if mitigation measures were put in place for noise, and if public transport was improved, including a rail link. Those in favour of expansion commented that the airport is important to the local and wider economy; it does have a valuable role for short-haul flights; and that if people use Leeds Bradford it cuts down travel to other airports.

### **Scenarios for the Overall Future Development of Leeds**

There was greatest support for Scenario 2 'Compact City', as it allows concentration on areas with good public transport, and will also reduce the need to travel and the need to extend the urban area outwards. The second favourite was Scenario 4 'New Urban Neighbourhoods', as it would ensure development is spread across Leeds in a more sustainable manner, would provide enhanced communities and would reduce commuting. Developers generally favoured Scenario 3 'Dispersed Development Hubs' as it provides more choice of locations, and greenfield land which is easier to develop. Alternatively, there were many suggestions of further combinations including methods for phasing, generally from Scenario 2 into Scenario 4.

Generally it was considered that in order to be assessed the scenarios need a better evidence base including how the required housing and employment figures could fit into them. This includes more information about the potential need for development on greenfield land, including greenspace within existing urban areas. There also needs to be more clarity about regeneration in the 'Leeds Bradford corridor'.

### **General Comments**

The Core Strategy should be more spatial and specific to Leeds, and recognised as a series of places. It should also pay more consideration to the strategies of neighbouring authorities and the role of nearby towns and cities. A number of developers or agents promoted specific sites for development.

Teenagers considered that scenarios 3 or 4 was best, that new housing should be built on brownfield land, and there should be a mix of house types with more needing to be affordable. There should be excellent public transport with facilities located where everyone can get to them.

## **3. METHODS OF CONSULTATION**

Leeds City Council is preparing the Core Strategy for Leeds to set out the vision for the future development of the District. The Core Strategy is a spatial plan which will at a strategic level show the location and type of land use change over the next 20 years. Drawing upon the Unitary Development Plan, the Vision for Leeds, and a series of related strategies and drivers for change, the Core Strategy needs to set out a strategic land use and spatial planning framework for Leeds.

Informal consultation on the Plan has already taken place in 2006 through a 'Towards a Key Issues and Options Paper'. Residents, businesses, community groups, agencies, and other stakeholders had the opportunity to comment.

These initial consultation comments were used to help prepare the City Council's 'Alternative Issues and Options' document. Consultation on the Preferred Options took place for a statutory six week period from the 23<sup>rd</sup> October to 4<sup>th</sup> December 2007. During this period residents and other stakeholders across the Leeds District were given a number of opportunities to express their views.

Opportunities to present views were made available by the following means:

1. The Core Strategy Issues and Alternative Options document, the Sustainability Appraisal Report and other supporting documents were made available for inspection and comment at the Council's Development Enquiry Centre at Leonardo Buildings, Rossington Street and at the Central Library. The documents were also made available at all local libraries and One Stop Centres across the Leeds District.
2. The documents were published on the Council's website at [www.leeds.gov.uk/ldf](http://www.leeds.gov.uk/ldf). Comments on the documents could be submitted by accessing the downloadable questionnaire at the same web address.
3. People could also telephone 0113 247 8075 or email [ldf@leeds.gov.uk](mailto:ldf@leeds.gov.uk) to obtain a copy of the documents.

4. A series of public exhibitions and consultation events where people could 'drop in' were held in twelve locations across the District (at least one in each inner and outer wedge), plus one in the city centre. These events were held on the following dates at:

Venue	Date	Time	Attendees
Morley Town Hall	29th October	11am - 2pm	20
Moor Allerton Library	30th October	4 - 6.45pm	3
Garforth Library	31st October	1 - 5pm	16
Wetherby Library	1st November	11am - 2pm	19
Pudsey Leisure Centre	2nd November	11am - 2pm	25
Merrion Centre	5th November	11am - 2pm	132
Aireborough Leisure Centre, Guiseley	6th November	4 - 7pm	41
Harehills Place Community Centre	7th November	11am - 2pm	4
Netto, Oldfield Lane, Wortley	8th November	11am - 2pm	25
Dewsbury Road Library, Beeston	9th November	11am - 2pm	6
Headingley Library	13th November	4 - 6.45pm	15
White Rose Shopping Centre	14th November	11am - 2pm	36
Crossgates Shopping Centre	17th November	10.30 - 1pm	77
<b>TOTAL</b>			<b>419</b>

At these events large scale display boards and a non-technical summary document were available for inspection and comment, including additional leaflets and questionnaires for completion. Staff from the City Council's City Development Directorate were on hand to explain and discuss the different options.

Direct contact was made with stakeholders including Leeds residents, community groups, key consultees, and businesses. These groups and individuals were notified of the Core Strategy consultation and given the opportunity to make comments and made aware of the opportunity to do so via the following channels:

- Formal advertisement in:
  - Yorkshire Evening Post 18<sup>th</sup> October 2007
  - Yorkshire Post 18<sup>th</sup> October
  - Leeds Weekly News 18th October
  - Morley Observer and Advertiser 17<sup>th</sup> October
  - Wharfedale and Airedale Observer (including Ilkley Gazette) 18th October
  - Wetherby News 19th October
- Statutory consultees and key stakeholders sent full information packs.
- Advance briefing was given to elected members via distribution of consultation material.
- Documents and notification of consultation events sent to all Leeds Libraries and One Stop centres.
- Information about the consultation events was made available on the Council's website.
- Consultation material was made available at events.
- Article in 'About Leeds', the Council's civic newspaper, and sent to all households in Leeds in the September 2007 edition.
- Large scale plans were displayed at the Development Enquiry Centre.
- Banners to advertise event venues on the day were erected to advertise the daily events.
- Leeds Older People's Forum newsletter and website at the end of September.
- Forwarded consultation material to Equality Unit for email circulation to all contacts for rarely heard groups.
- Tailored questionnaires for Morley High School.

In addition to the above methods of advance notification of consultation, officers attended the following forums and partnership meetings:

<b>Meeting</b>	<b>Date</b>
Leeds Housing Partnership Forum	4th September
Keeping an Eye on Leeds Environment Forum (Leeds Voice), Civic Hall	2nd October, 7-9pm
Leeds Gypsy and Traveller meeting	17th October
Forum for the Future conference, WY Playhouse	19th October, 10am - 4pm
Area Committees Drop-in	1st November, 6 - 8pm
Farnley & Wortley Neighbourhood Forum, Wortley	6th November, 7pm
Leeds Youth Council, Civic Hall	14th November, 5 - 7pm
Leeds Local Access Forum, Civic Hall	20th November, 6.30pm

In particular, the comments from the Forum for the Future event and the Youth Council workshop are recorded in Sections 3.3 and 3.4 below.

Residents and stakeholders were offered a number of ways in which they could feed back their views, or receive information or further advice about the proposals:

- By completing a questionnaire that was available at all of the drop-in sessions mentioned above, at the City Council's Development Enquiry Centre, at libraries and One-Stop centres across the District, by requesting a copy via telephone or email, or in a downloadable or interactive on-line version on the Council website.
- By writing in additional comments via letter or email.
- By speaking to staff at the exhibitions.

## 4. CONSULTATION RESPONSES

This section outlines the main responses and feedback from the main questionnaire, the different workshop sessions, the Forum for the Future Event, and the young people questionnaires.

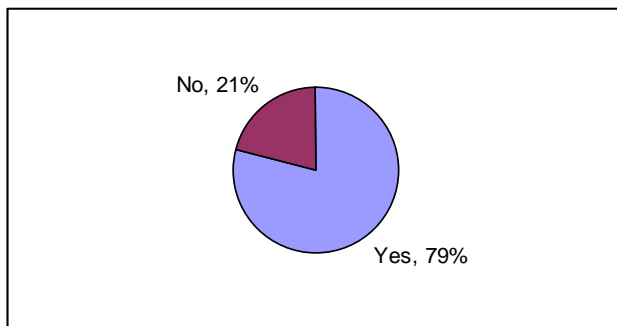
### 4.1 QUESTIONNAIRE RESPONSES

This section sets out the results from the 385 questionnaires and related letters which responded to the Issues and Alternative Options consultation document (see Appendix 1 for a copy of the questionnaire). A summary is given of the comments made in relation to each question, many of which were in-depth and showed great awareness of the issues and challenges involved. The statistical analysis is based upon the questionnaires received during the statutory consultation period that answered at least one question. Not all respondents answered every question so the number of responses varies between each question (N.B. percentages may not add up to 100 due to rounding up or down). The main Sustainability Appraisal comments are also included, and for some questions there is also a very brief outline of the relevant policy considerations.

Comments which were not directly based on the questionnaire format have generally been reported alongside the question to which they most closely relate. The remaining miscellaneous comments have also been reported at the end of section 4.1, including those promoting the development of specific sites.

#### 1. Do you agree with these strategic Aims and Objectives?

<b>Yes</b>	158 (37 comments)	79%
<b>No</b>	42 (38 comments)	21%
<b>TOTAL</b>	<b>200</b>	



#### Consultation Responses

##### General

- The CS should be more spatial and specific to Leeds. The Aims and Objectives identify Leeds as one place; it should be recognised as a series of places set within the City Region context.
- Greater recognition of rural areas (needs and economic viability).
- The Themes diagram (pg 14) is misleading and should delete the two-way arrows and only leave the arrows linking each of the themes to the CS.
- Whilst narrowing the gap is mentioned amongst the aims, it should also be a guiding factor in the aim of developing Leeds as a competitive European city. This needs to be done in ways that do not increase the gap in equalities. Similarly, economic success must be promoted in ways that do not damage the environment.
- Parish Council - The term 'sustainable' should have been defined.

##### Sustainability/Climate Change

- Comments ranged including assessing climatic risks to major infrastructure developments, not building in floodplains, and the design of buildings. There was particular interest in securing local resources (food, energy) and meeting local needs.

### Natural Environment/Greenspace

- For consistency with RSS Policy ENV15 refer to greenspace infrastructure rather than greenspace.
- Allocate large greenspace areas which form a demonstrable part of the CS spatial vision e.g. River Aire Corridors, Wykebeck Corridor, and Meanwood Ridge.
- Some request preservation of Green Belt land, whilst developers request inclusion of reference to review of GB.

### Built Environment

- A number highlighted absence of sufficient reference to the distinctive identity and cultural assets of Leeds District. Need conformity with PPG15 'Enhancement of Historic Environment'.
- The vision should promote architectural heritage as does Leeds's European competitors.
- Amend first bullet point to "protect, enhance and manage the environment *in order to reinforce the distinct identity of Leeds.*"

### Transport

- Many commented on the need for a better public transport system and stronger wording for transport objectives e.g. provision of modern, easy to use and affordable system to service all areas of substantial residential or work accommodation to provide natural choice for residents.
- The objectives should be more explicit in desirability of jobs and homes being located in close proximity.
- Whilst recognising the above, there was also support for much improved road infrastructure.

### Economy

- Greater reference to relationship between Leeds and the wider regional context.
- Ensure employment land allocations reflect economic needs of the city. Greater emphasis should be given to identify suitable industrial sites e.g. light engineering and waste management.
- The objectives should include specific reference to need to create and maintain an appropriate environment for existing businesses to remain, and expand, as well as facilitating new development.

### Housing

- Housing delivery and affordability are national and regional priorities so should be made more explicit in the objectives. Strengthen link to RSS Proposed Changes. A separate objective is needed for housing (GOYH).
- A number of individuals queried the need for the number of new homes proposed.

#### *Private Sector interests:*

- Replicated GOYH request for separate objective on housing. An inadequate emphasis on new housing development and its role in future planning, regeneration and development of Leeds.
- Many felt that for a successful City Region more houses should be provided in Leeds to respond to the influx of people associated with new economic development. These new homes should be in the right location to house the new workers. As such a new objective should recognise the role of housing in the District in driving economic development, and in reducing commuting.
- The housing objective should include the provision of a range of dwellings for all housing needs and to enhance the deliverability of affordable housing.
- There were many references to the need for Green Belt review, and to identify and initiate appropriate scaled extensions to urban area and other settlements.

### **Sustainability Appraisal**

There were no alternative options for the Aims and Objectives, so it is not relevant to make the SA comparison.

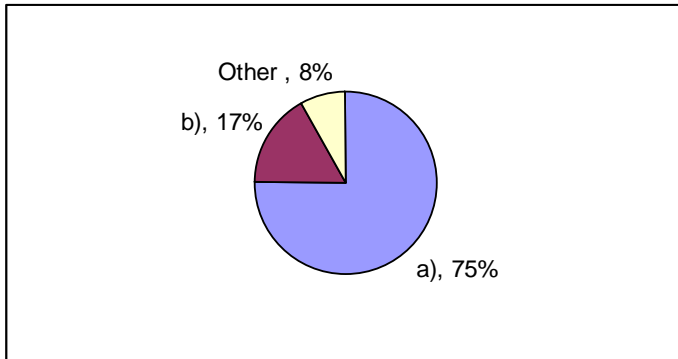
### **National and Regional Policy**

It is not relevant to draw policy comparison between options, although need to assess whether any changes needed to aims and objectives in light of new policy emerging since Reg 25 or any omissions not included or reflected adequately 25 e.g. adopted RSS; and PPS1 supplement.

**2. The Core Strategy needs to continue to develop policies to adapt and mitigate climate change. Which of the following approaches should be included in the Core Strategy?**

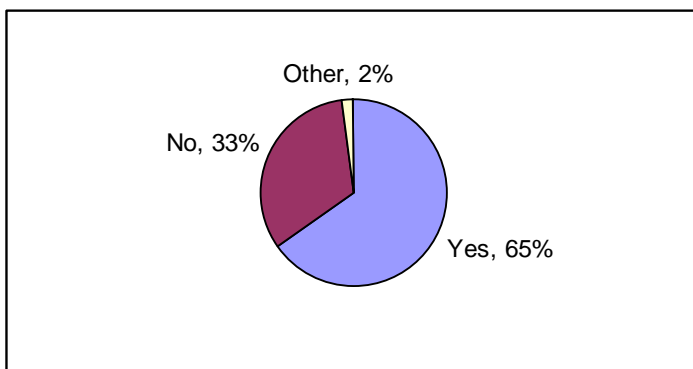
- a) Require all new development to be designed according to sustainable construction principles, or,**
- b) Require only major development to be designed according to sustainable construction principles.**

<b>a)</b>	176	75%
<b>b)</b>	40	17%
<b>Other</b>	19	8%
<b>TOTAL</b>	<b>235</b>	



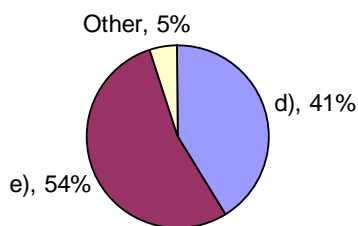
- c) Seek developer contributions in order to fund the 'retro-fitting' of sustainable construction measures to existing housing stock.**

<b>Yes</b>	144 (0 comments)	65%
<b>No</b>	73 (6 comments)	33%
<b>Other</b>	4	2%
<b>TOTAL</b>	<b>221</b>	



- d) Require an increasing percentage of the energy needs of the building to come from on-site renewable energy generation; at least 10% up until 2010, at least 15% up until 2015, and at least 20% thereafter, or,**
- e) Set a more challenging target for renewable energy.**

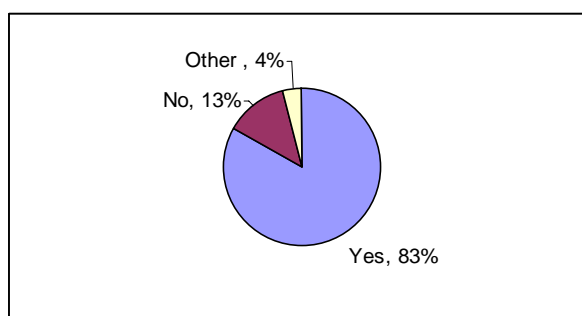
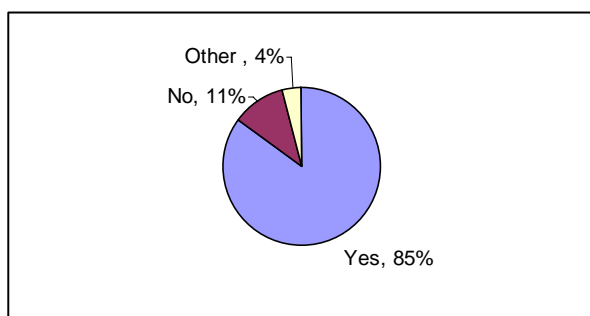
<b>d)</b>	92 (6 comments)	41%
<b>e)</b>	120 (3 comments)	54%
<b>Other</b>	11	5%
<b>TOTAL</b>	<b>223</b>	



**f) Set targets for reducing the carbon emissions from new development.**

**g) Set targets for climate change adaptation. To include, surface water drainage (from new development), promoting 'green roofs' and encouraging landscape and planting schemes that make provision for higher outside temperatures.**

	f)			g)	
<b>Yes</b>	200 (5 comments)	85%		<b>Yes</b>	187 (6 comments) 83%
<b>No</b>	22 (1 comment)	11%		<b>No</b>	30 (1 comment) 13%
<b>Other</b>	7	4%		<b>Other</b>	9 4%
<b>TOTAL</b>	<b>229</b>			<b>TOTAL</b>	<b>226</b>



Other general comments	85
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### Consultation Responses

Options a) and b): There was an overwhelming majority in favour of option a). Comments raised included concerns about ensuring that the standards are not set so high as to effect viability.

Option c): The majority of respondents were in favour of this option. Comments against included: requests for more details, concerns about financial and physical viability (particularly in listed buildings), and the Leeds Civic Trust queried why developers of new stock should pay to improve old. The HBF stated that it was contrary to Circular 05/05 whereby contributions must be directly related to the proposed development.

Options d) and e): There was a small majority in favour of option e) (setting a more challenging requirement for on-site renewable energy generation). Developers and the HBF want the Council to prove that a % RE requirement is viable and state % should be no more onerous than the Code for Sustainable Homes. The HBF also objects to the requirement for any RE provision in new development because it believes that microgeneration will do very little to reduce carbon emissions, and because new technologies are in their infancy and so should not be required. English Heritage is supportive of the principle but does not want it to compromise listed building and Conservation Area designations. The YHA is supportive of the increasing percentage as it is consistent with RSS. The GOYH states that Leeds needs to consider how it can achieve the RSS targets for grid-connected RE. Microgeneration is important too but will not achieve the targets.

Option f): There was an overwhelming majority in favour of option f). Those not in favour consisted of developers who did not want anything more onerous than the Code for Sustainable Homes requires.

Option g): There was an overwhelming majority in favour of option g) setting targets for climate change adaptation, such as green roofs. This included support from developers. Developers want proposals to accord with advice from BRE. There is also a need to deal with the effects of more heavily concentrated rainfall and the need for more shelter from the sun and relief from the heat during increasing hot spells. The Woodland Trust would like to see consideration of the need to enable wildlife to adapt to climate change. Essential adaptive strategies to help give ancient woodland a sustainable future are outlined in 'Space for Nature', including expanding and buffering existing ancient woodland.

#### General

- The Sustainable Appraisal Summary treated greenhouse gas emissions as synonymous with CO2 which is not the case. The Core Strategy should encourage the reduction of all atmospheric pollutants, whether they have a specific effect on global warming or affect public health more directly in the lower atmosphere.
- Promotion of innovation is also a means of helping Leeds to cope with increases in environmental uncertainty, e.g. extreme weather events and increases in the costs or shortages of key materials such as fuel oil, certain building materials etc.

#### **Sustainability Appraisal**

All the options scored relatively well in the Sustainability Appraisal. The SA showed that it was slightly more beneficial to apply sustainable construction principles to all development rather than just major development.

#### **National and Regional Policy**

The PPS1 Supplement on Climate Change is the most recent and relevant policy guidance.

Options a) and b) are not consistent with the Supplement, which states that any local requirement for sustainable buildings should focus on part of a local authority's area or site-specific opportunities. Therefore it is not appropriate to require sustainable construction across the whole of the District.

Option c) will be consistent with the PPS1 Supplement only if the LPA can show that the additional requirement for a contribution to pay for retro-fitting does not cause development to become unviable. The introduction of a Community Infrastructure Levy could mean that this option cannot be progressed and the LPA would then need to stake a claim for funding to pay for retro-fitting from the infrastructure pot.

Options d) and e): The Supplement supports options d) and e) because it states that the Core Strategy should set out a target percentage of the energy supply of new development to be secured from decentralised and renewable or low-carbon energy sources, however it adds that LPAs should do this where it is viable. The Council will therefore need to show that it is viable to require the suggested percentages and this may be harder to do for option e) because it is suggesting a higher percentage.

Option f) needs to be worked up in more detail to say specifically what level of carbon reduction should be applied. It could potentially conflict with PPS1 in the same way as options a) and b) however this will depend on the way that it is implemented. There is more scope for flexibility within this option to allow the developer to determine the means of CO2 reduction.

Option g) is supported and encouraged by the PPS1 Supplement.

**3. The Core Strategy needs to ensure that new development does not further worsen flood risk. This should be undertaken by:**

**Either:**

**a) Preventing residential development in all of the zone 3 high flood risk areas\* regardless of regeneration objectives (this would include some of the built-up area).**

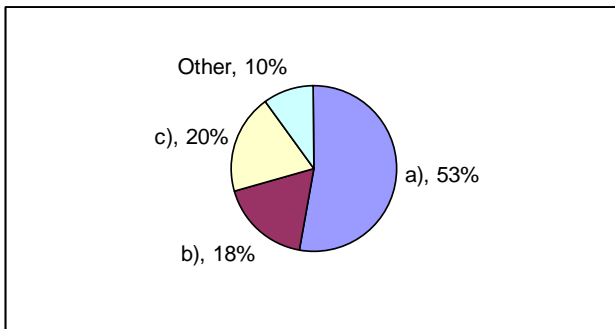
**Or:**

**b) Preventing residential development in just the highest risk parts of the zone 3 high flood risk areas\* (these areas are known as 3a11 and include some of the built up area).**

**Or:**

**c) Allowing residential development in any of the zone 3 high flood risk area providing it helps fulfil regeneration objectives and measures are in place to mitigate the effects of flooding.**

<b>a)</b>	126 (34 comments)	53%
<b>b)</b>	42 (15 comments)	18%
<b>c)</b>	48 (23 comments)	20%
<b>Other</b>	23	10%
<b>TOTAL</b>	<b>239</b>	



**Consultation Responses**

The strongest response was in favour of no more residential development in zone 3a. This included the developers’ consortium and the majority of the Parish Councils along the River Wharfe. Many people had very strong feelings about not building homes in high flood risk areas. Some respondents, including Natural England argued that areas which flood should be left undeveloped and can then provide a Green Infrastructure resource. Other responses were more or less equally split between the other options.

The Environment Agency have stated that they expect to see a sequential test used to help determine the Preferred Options and are concerned that the options presented in Q3 focus on residential development, however all development under zones 2 and 3 must be sequentially tested. Additionally, the Sustainability Appraisal assessment of this question does not include the city centre and the EA stated that the implications of city centre housing development should be considered by the SA. A sequential test has not been completed for the city centre. They also commented that in the SA the implications of allowing residential development in zone 3 should be assessed as having a double negative score under both Objective 4 and 14. This is due to the uncertainty related to long term flood risk in light of climate change.

**Sustainability Appraisal**

Sustainability appraisal of the options under Question 3 emphasise how flood risk management requires very careful balancing between avoiding housing development in high flood risk areas and finding sufficient land to accommodate the required housing numbers. It was not conclusive in choosing a clear direction but helped to raise awareness of the implications of each choice.

**National and Regional Policy**

Option a) to prevent residential development in all of the zone 3 high flood risk areas is entirely consistent with the guidance in PPS25 which states that LPAs should avoid locating people's homes in areas of flood risk. However, given that there is a requirement in the RSS for Leeds to find sufficient land to accommodate 4,300 homes per year till 2016, if Leeds were to choose option a) it could mean that there is a need to consider some of the Green Belt land in order to provide enough housing land. RSS accepts the need for a Green Belt Review but there may be conflicts with PPG2 Green Belts which states that the essential characteristic of Green Belts is their permanence and once the extent of Green Belt has been defined it should only be altered in exceptional circumstances. The question is therefore whether the need to avoid flood risk areas warrants sufficient exceptional circumstances to alter the Green Belt boundary?

Option b) reflects the sequential approach required by PPS25 as there is a higher probability of flooding in zone 3a/ii areas, although in order to fully comply with PPS25 it will be necessary to carry out a sequential test on the whole District in order to demonstrate that the RSS housing land requirement cannot be wholly accommodated in zone 1 areas (as identified in the Leeds Strategic Flood Risk Assessment). Zone 3a/ii involves a smaller area of land than zone 3a and therefore is less likely to necessitate removal of land from the Green Belt.

PPS25 sets out that Option c) would be a last resort which the Council would only consider if the sequential test shows that, for sound planning reasons, it is not possible to meet the RSS housing land requirement in zone 1 and/or zone 2 areas.

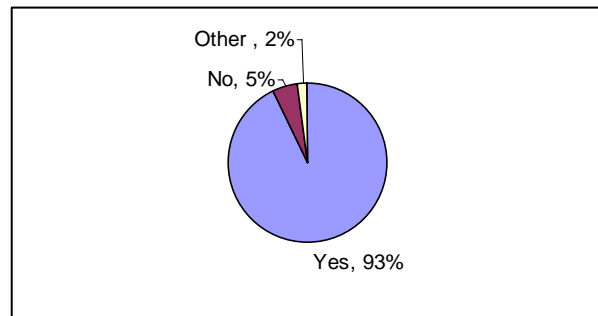
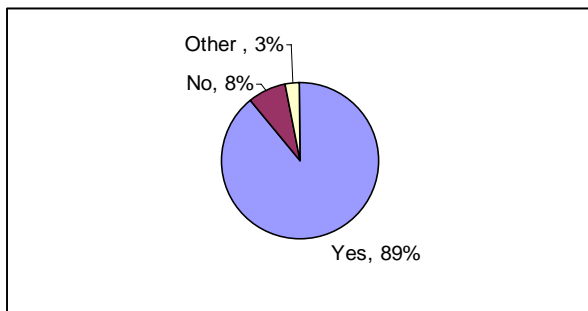
**Other Policy**

The proposed options are intended to help determine the location of future development in the District in the context of river flooding. Surface water flooding is also an issue in the Leeds District and the Core Strategy needs to consider the introduction of policies to help ensure that increased development does not lead to an increase in the speed of surface water run off. Such policies are recommended in the Leeds SFRA and include a requirement for the use of porous materials in hard landscaping, an increase in tree planting and green areas, the use of Sustainable Drainage Systems (SuDS) and the removal of permitted development rights in areas where it is shown that further development would exacerbate flood risk.

**4. The Core Strategy needs to ensure that economic growth is achieved, whilst protecting and enhancing the natural environment. This should be undertaken by:**

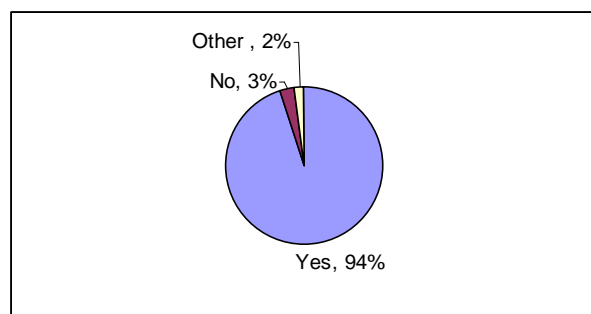
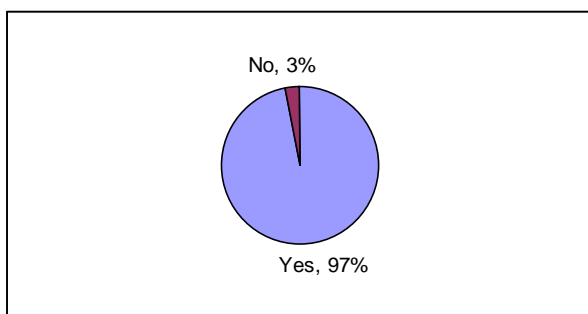
- a) **Increasing the quantity of greenspace, by requiring all new development to provide it,**
- b) **Reviewing the quantity of greenspace, to identify where it is not needed and could be used for alternative uses (including housing), to provide funds to improve the quality of other greenspaces,**

	a)			b)	
<b>Yes</b>	203 (4 comments)	89%	<b>Yes</b>	205 (115 comments)	93%
<b>No</b>	18 (2 comments)	8%	<b>No</b>	10 (2 comments)	5%
<b>Other</b>	7	3%	<b>Other</b>	5	2 %
<b>TOTAL</b>	<b>228</b>		<b>TOTAL</b>	<b>220</b>	



- c) **Protecting and enhancing natural habitats, and Identifying and mapping opportunities for habitat creation and restoration,**
- d) **Protecting areas of special landscape quality.**

	c)			d)	
<b>Yes</b>	222 (3 comments)	97%	<b>Yes</b>	212 (2 comments)	94%
<b>No</b>	6 (0 comments)	3%	<b>No</b>	6 (0 comments)	3%
<b>Other</b>	1	<1%	<b>Other</b>	5	2%
<b>TOTAL</b>	<b>229</b>		<b>TOTAL</b>	<b>225</b>	



Other general comments	92
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**Consultation Responses**

**Option a)** An overwhelming majority of respondents supported this option for requiring new development to provide greenspace. Some respondents said that this question should not be asked until the Greenspace Audit results are available.

**Option b)** An overwhelming majority of respondents supported sacrificing poor quality greenspace in favour of improving quality elsewhere. However, the Yorkshire Wildlife Trust were concerned as this may be appropriate in certain circumstances, but there is a need to recognise the importance of increasing the quantity of greenspace for biodiversity reasons, in particular to

integrate existing isolated reserves and to create wildlife corridors. Greenspace also plays an important role in alleviating flood risk, as well as other valuable 'ecosystem services', for example reducing air pollution.

Option c) An overwhelming majority of respondents supported protecting and enhancing natural habitats and identifying and mapping new opportunities for habitat creation and restoration. Caddick Developments asked for regeneration to be weighed in the balance. The Woodland Trust welcomed the aim to protect ancient woodland, although would also like to see ancient and veteran trees given strong protection. They have developed a Woodland Access Standard which recommends the maximum distance from areas of woodland that every person should live, and would like to see it included in the Core Strategy. They also thought priorities should be identified for the protection and enhancement of greenspace and biodiversity so that policies do not remain aspirational.

Option d) An overwhelming majority of respondents supported the protection of Special Landscape Areas. Developers have referred to advice in PPS7 about avoiding blanket designations.

#### General

- The PCT considered that there should be a policy of protecting the areas of small green spaces in the city that make a difference to quality of life in neighbourhoods.
- The Yorkshire Wildlife Trust considered the Leeds Biodiversity Action Plan should have been used in a strategic context to inform the approach to greenspace and biodiversity in the Core Strategy options.

#### **Sustainability Appraisal**

Option a) The sustainability appraisal shows that there are many positive impacts generated from a policy that makes new greenspace a requirement of new development and overwhelmingly supports it.

Option b) In terms of whether the Council should review existing greenspaces to identify opportunities to develop poor quality or poorly used spaces in order to contribute to improving the quality of other greenspaces, the results were overwhelmingly in favour of reducing quantity to allow an improvement in quality. However, to ensure that reducing the quantity of greenspace did not impact on the ability to help with urban cooling and reducing surface water run off, it will be necessary to promote those species that cope well with climate change and help provide shading. Greenspaces which also provide flood water storage should not be sacrificed.

Option c) In terms of habitat creation and protection, this option scored well in the SA. It was recommended that qualifying criteria should be drawn up to help decide which sites required protection (e.g. presence of a protected species).

Option d) Scored well in SA.

#### **National and Regional Policy**

Option a) and Option b) PPG17 supports option a). Option b) would need to be informed by the PPG17 audit, also PPG17 highlights that whilst greenspace may be adequate at present, it may be needed in the future and therefore it should be protected in order to meet future needs. Option b) may therefore be in conflict with PPG17.

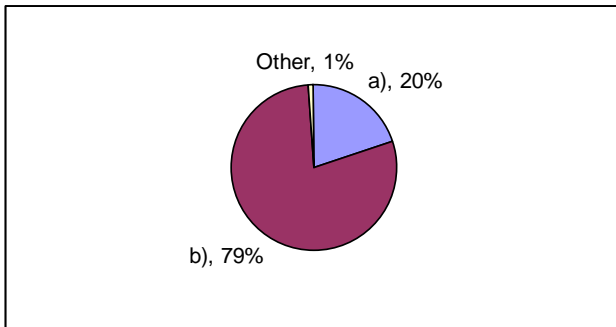
Option c) PPS9 'Biodiversity and Geological Conservation' states that LDFs should include policies for the restoration or creation of new priority habitats. The Core Strategy is a higher level document in which it is probably sufficient to just include a commitment to this objective. The actual detailed mapping is more suited to the Environment DPD. PPS9 also recommends acknowledging the hierarchy of international, national, regional and local designations. It may be appropriate to do this in the Core Strategy and to clarify the status of such designations.

Option d) PPS7 gives advice on local landscape designations and states that they should only be maintained, or, exceptionally, extended where it can be shown that criteria-based planning policies cannot provide the necessary protection. The policy should state what it is that requires protection and why. It should be based on a robust assessment of the qualities of the landscape concerned.

**5. The Core Strategy needs to make the most of its built environment and enhance the quality of places. This should be undertaken by:**

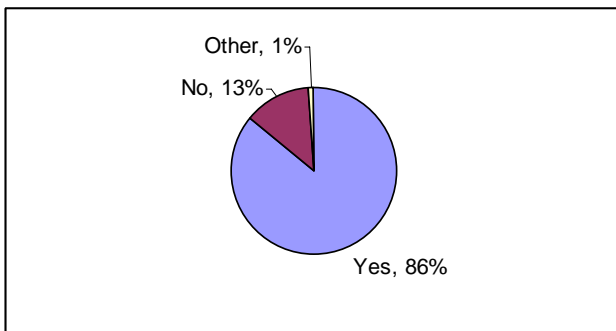
- a) Identifying, protecting, and promoting heritage and the distinctive positive character of different areas, in either,**
- i. Designated historic environments, or,**
  - ii. Throughout the District.**

<b>i.</b>	46 (3 comments)	20%
<b>ii.</b>	182 (5 comments)	79%
<b>Other</b>	3	1%
<b>TOTAL</b>	<b>231</b>	



**b) Encouraging creative, distinctive and innovative design in appropriate locations.**

<b>Yes</b>	186 (22 comments)	86%
<b>No</b>	28 (7 comments)	13%
<b>Other</b>	3	1%
<b>TOTAL</b>	<b>217</b>	



Other general comments	52
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### **Consultation Responses**

In terms of quantitative preferences, an overwhelming majority of respondents favoured identification/protection/promotion of heritage/character across Leeds rather than in designated areas. Similarly, a very strong majority agreed that the Core Strategy should encourage creative, distinctive and innovative design in appropriate locations.

Option a): respondents considered that although designations are important, there are other aspects of the historic environment which need to be identified, protected and enhanced. These can include 20<sup>th</sup> century buildings and sites of commercial and industrial historical interest. The Council should be conscious of the lack of resources to deal with existing conservation designations properly e.g. most of Leeds' conservation areas do not have up to date appraisals and management plans. Planning control in designated areas should not be weakened.

Unnecessary constraints shouldn't be placed on development, and protection of historic environments must be properly justified with reference to PPG15 and procedures in the planning acts. Historic environments can be combined with new creatively and innovatively designed development to create distinctive places. Flexible re-use of historic land and buildings should be allowed in line with PPG15, for example in estates such as Parlington and Harewood and universities and hospitals. 'Preserving' is the wrong approach, whereas 'conserving' is more positive because it allows for development which is sympathetic to and enhances valued historic environments. Features such as paving, ginnels, bridges and rights of way should be maintained. Otley medieval bridge needs protection from heavy traffic.

Option b): Many respondents make the point that development should be appropriate or sympathetic to context, particularly in locations which are regarded as distinctive. Design should take account of local features at all scales. Several respondents were concerned about the lack of specificity. Creativity, innovation and distinction are too subjective and judging what is 'an appropriate location' will be a matter of opinion.

Several respondents suggested that designs should also promote eco-friendliness, in terms of use of energy and materials, biodiversity and local use. Several respondents noted the need for consultation with local communities over appropriateness of design and location, and maintained that practical, durable and classic designs are needed rather than fashionable designs that date quickly and may not be so functional.

#### Other General Comments

- Acknowledge value of local character appraisals and Neighbourhood Design Statements. Designs need to be justified through Design and Access Statements.
- Recognise the value of public art and sculpture in new development.
- Advertising (illuminated signs etc) is becoming increasingly intrusive and detracting from environments.
- Enlarge Leeds' conservation areas.
- More important to put design principles into practice.
- Neighbourhood design statements should be promoted.
- As the bulk of the building stock already exists there should be greater reference to how this stock can be made more environmentally resilient. There should be specific guidance on what principles will be used to encourage the retention and reuse of buildings (a range of SPDs should also back this up).

#### **Sustainability Appraisal**

The sustainability appraisal did not identify a great deal of difference between the impacts of the two choices. In terms of economic impacts it was noted that option a) may encourage the development of specialist types of construction and therefore boost that industry. However, option b) may result in too much restriction on the needs of modern firms, for example by limiting layout/space. It depends on how much of the building is to be preserved and how much re-use will constrict economic development. It was also noted that the historic environment may be a constraining factor on the efficient use of derelict sites (for example, it can reduce the height that is allowed for a tall building). This point applies to both options but is amplified under option b) because it applies throughout the District.

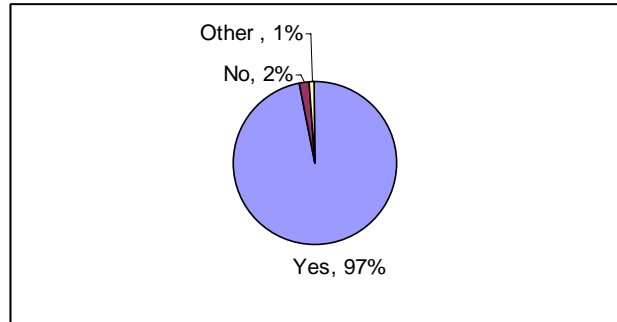
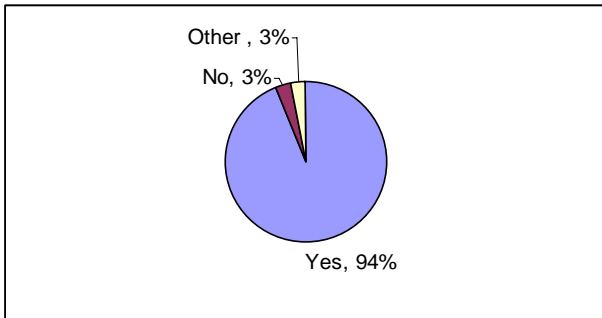
#### **Other Policies**

The white paper "Heritage Protection for the 21<sup>st</sup> Century" (DCMS 2007) supports identification of locally important elements of historic environment, including Local Lists, and protection through LDF policy.

**6. Leeds needs to minimise the amount of waste arising. This should be undertaken by:**

- a) Encouraging the treatment of waste at the highest possible level of the waste hierarchy,
- b) Encouraging the processing of waste to add value and avoid landfill.

	a)			b)	
<b>Yes</b>	180 (2 comments)	94%	<b>Yes</b>	203 (9 comments)	97%
<b>No</b>	6 (1 comment)	3%	<b>No</b>	4 (0 comments)	2%
<b>Other</b>	5	3%	<b>Other</b>	3	1 %
<b>TOTAL</b>	<b>191</b>		<b>TOTAL</b>	<b>210</b>	



Other general comments	68
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**Consultation Responses**

- A number of respondents were against incineration as a method of waste disposal, with concerns raised over safety, and a number preferring alternative technologies because they are more sustainable. However, a number were in support of waste incineration as a means to generate heat and power.
- There were a number of comments that more needs to be done to minimise waste arisings at source, e.g. reducing packaging and not providing plastic bags (particularly by supermarkets). More could also be done to help recycling on a domestic scale. There should be more encouragement of recycling industries and their products. A waste tax could be introduced.
- Better infrastructure and methods are needed to deal with waste minimisation and different waste streams, including space for recycle bins as part of developments. There should be a 'feedback loop' within the waste system.
- English Heritage stated that greater emphasis should be placed on reusing existing buildings as it is more sustainable than demolishing and redeveloping cleared sites.
- The NHS stated that appropriate arrangements need to be in place regarding hospital waste.
- A Parish Council commented that small district incinerators are highly controversial and not an ideal solution. There should be more focus on recycling and the list of recyclable materials by suppliers to the community. Much more could be done in waste separation and recycling but not by cutting down on waste collection. More attention by local councils to fly tipping and tidying up local areas.

**Sustainability Appraisal**

Locating waste management facilities in accessible commercial/industrial areas is the best option environmentally. Waste management facilities are a useful educational resource and strategic facilities can incorporate an educational facility. Provision of waste management facilities is also good for a growing economy and helps provide more jobs.

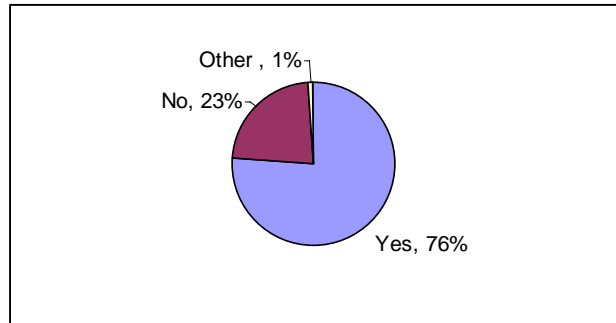
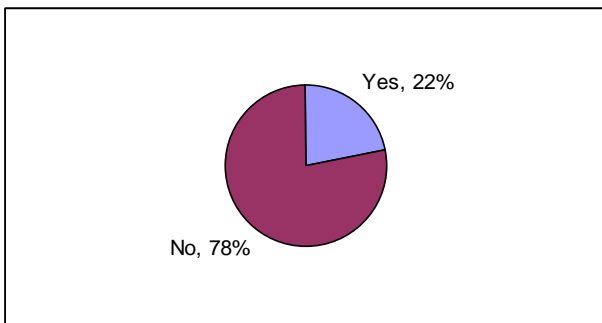
**National and Regional Policy**

National guidance in PPS10 'Waste' emphasises the need for local planning authorities to plan for appropriate waste management facilities.

**7. It is likely that Leeds will need to identify a range of locations (depending on their type and scale) for waste management facilities. Where should such facilities be located?**

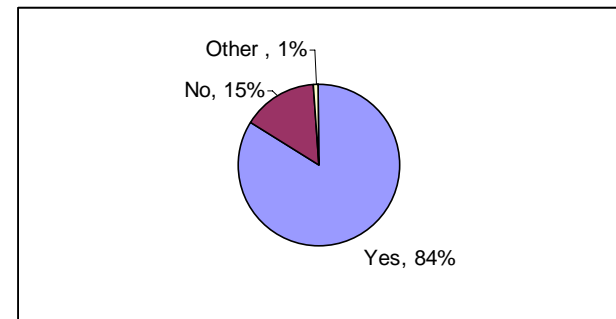
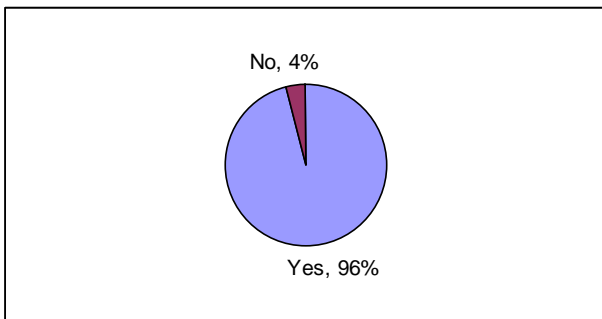
**a) Within existing residential areas and town and district centres,**

	<b>a) Major facilities</b>			<b>a) Small-scale facilities</b>	
<b>Yes</b>	40	22%	<b>Yes</b>	148	76%
<b>No</b>	142	78%	<b>No</b>	46	23%
<b>Other</b>	-	-	<b>Other</b>	2	1 %
<b>TOTAL</b>	<b>182</b>		<b>TOTAL</b>	<b>196</b>	



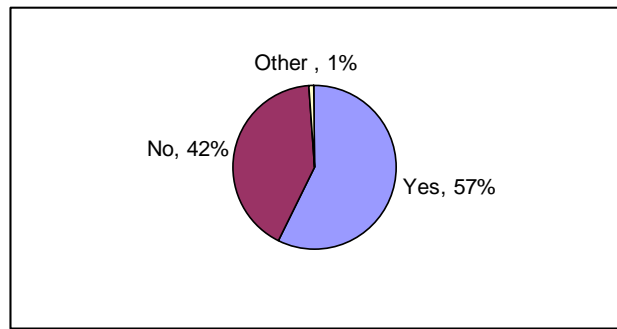
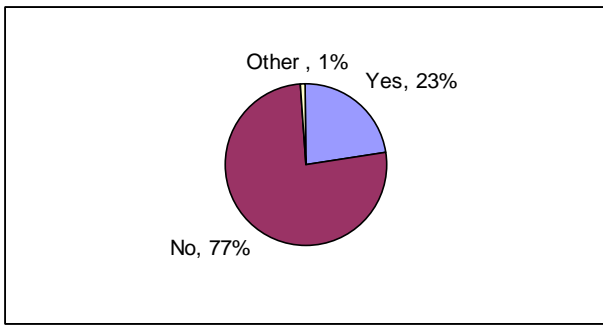
**b) In accessible commercial / industrial areas,**

	<b>b) Major facilities</b>			<b>b) Small-scale facilities</b>	
<b>Yes</b>	201	96%	<b>Yes</b>	154	84%
<b>No</b>	8	4%	<b>No</b>	27	15%
<b>Other</b>	1		<b>Other</b>	2	1 %
<b>TOTAL</b>	<b>210</b>		<b>TOTAL</b>	<b>183</b>	



**c) In accessible countryside / rural locations.**

	<b>c) Major facilities</b>			<b>c) Small-scale facilities</b>	
<b>Yes</b>	40	23%	<b>Yes</b>	106	57%
<b>No</b>	134	77%	<b>No</b>	78	42%
<b>Other</b>	1	1%	<b>Other</b>	1	1 %
<b>TOTAL</b>	<b>175</b>		<b>TOTAL</b>	<b>185</b>	



Other general comments	65
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### Consultation Responses

A number of respondents commented that there needs to be a hierarchy framework of provision, through a range of facilities located across the district. This is caveated by the need to protect the countryside. A number alternatively felt that waste facilities should be co-located in industrial/commercial areas.

Waste streams need to be separated at source, and smaller more specialist facilities need to be located across the District to enable easy recycling for households. Increase the number of household waste sorting sites. There was difference of opinion as to whether these localised centres should treat and process the waste or simply collect it.

One resident considered that the waste strategy needs to show the spatial and environmental expression of waste, with spatial guidance on all stages in the waste chain:

- Reuse of buildings, space for siting materials recovery facilities, etc.
- Recycling points; where possible minimising the need to travel to them. These should include localised sites in residential areas/retail centres and municipal sites.
- A strategy for the provision of more localised CHP is needed, both in new developments but if possible in suitable existing areas.
- The Core Strategy should cover all waste streams not just 'municipal waste'. Trade waste can be a more problematic issue. In addition, a high proportion of waste comes from demolished buildings.
- Waste water will also need specific consideration. Of necessity the spatial expression of a total waste strategy will cross the MD boundary.

### Sustainability Appraisal

Locating waste management facilities in accessible commercial/industrial areas is the best option environmentally. There were no locational differences for the economic or social objectives, although it was noted that there is a public perception that waste management facilities might not be safe and this could lead to stress and concern amongst those that live close by.

### National and Regional Policy

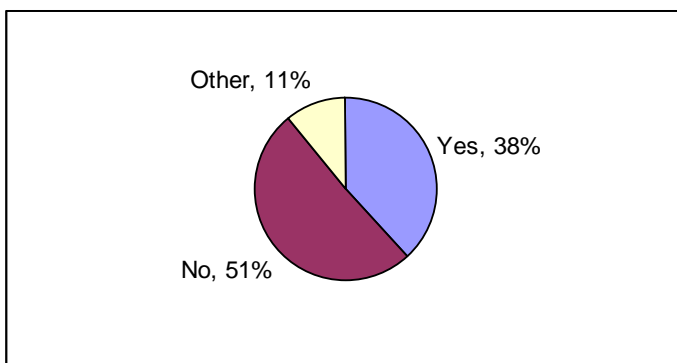
National guidance in PPS10 'Waste' emphasises the need for local planning authorities to plan for appropriate waste management facilities.

**8. The following criteria have been used to identify where regeneration is a priority:**

- Overall issues of deprivation,
- Low levels of opportunity, aspiration, and educational attainment,
- Poor condition of housing,
- Poor health,
- Limited choice in housing type, mix, and tenure,
- Poor environment,
- Anti-social behaviour and crime,
- Unemployment higher than the Leeds average,
- Urban areas with poor physical links to surrounding communities and the city centre,
- Areas as identified within the Unitary Development Plan Review (2006),
- Lack of private investor interest,
- Contains large areas of derelict/contaminated land.

**Do you think there are any additional criteria, which should be used to identify regeneration priority areas?**

<b>Yes</b>	72 (58 comments)	38%
<b>No</b>	97 (11 comments)	51%
<b>Other</b>	20	11%
<b>TOTAL</b>	<b>189</b>	



**Consultation Responses**

**General**

- Clarification sought as to whether an area would have to meet just one or several of the criteria to justify regeneration priority area status and whether this would restrict development areas which meet fewer of the criteria.
- The criteria should not be interpreted as prescriptive and that flexibility should be adopted to reflect site specific circumstances.
- GOYH referred to the need to accommodate RSS housing figures and that LCC should identify adequate and sufficient housing land supply for plan period.
- South Area Management expressed a view that the criteria are very negatively based assessments for carrying out regeneration. To be more positive, should include level of community support for regeneration (especially where demolition involved), including willingness to consider loss of greenspace for improved quality; what potential an area has for regeneration; and the level of political support.

**Suggestions for additional criteria include**

- Quality of the built environment, e.g. number of historic buildings at risk.
- Availability of greenspace (areas with poor access to greenspace/protected playing pitches/children's play areas/natural environment).
- Areas with potential to provide family housing/priority to resolving limited choice of housing.
- Areas with demographic imbalances e.g. Headingley/Hyde Park and that provide for needs of elderly and disabled.

- Areas with higher concentrations of asylum seekers, refugees and migrant workers e.g. LS12, LS7 and LS8.
- Towns and areas on the fringe of the city requiring protection and regeneration e.g. Otley and Guiseley.
- Areas with high proportion of vacant properties.
- Areas with poor access to public transport, including rural areas.
- Areas around railway stations e.g. Headingley and Morley.
- Areas with poor services and infrastructure.
- Create links between well performing areas towards more affluent north Leeds, e.g. city centre through Armley to Kirkstall.
- Specifically that regeneration should be focused in the worst 10% Super Output Areas.
- There needs to be a consideration of bottom-up regeneration.

### **Sustainability Appraisal**

Question 8 was not subject to the SA as it has been carried over from the UDP.

### **National and Regional Policy**

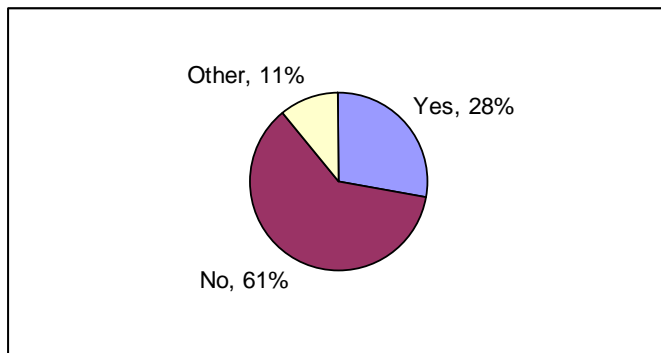
Not relevant to draw policy comparisons as no options provided in Question 8, although need to assess whether any changes required in light of new policy emerging since Reg.25 or any omissions not included or reflected adequately at Reg.25 e.g. Adopted RSS.

**9. Regeneration areas are designated at the following locations:**

1. **East and South East Leeds (EASEL)**
2. **Aire Valley Leeds**
3. **West Leeds Gateway**
4. **Beeston and Holbeck**

**Bearing in mind the criteria for identifying regeneration areas as listed above, are there any other areas, which should be identified as a regeneration priority?**

<b>Yes</b>	46 (34 comments)	28%
<b>No</b>	100 (13 comments)	61%
<b>Other</b>	18	11%
<b>TOTAL</b>	<b>164</b>	



**Consultation Responses**

Former villages and Urban Centres

- Pudsey; Otley; Headingley; Woodhouse; Holt Park.

Outer Areas

- Weston Lane estate, Otley; Otley area; Guiseley; Micklefield; Kippax; Allerton Bywater; Barnbow (Vickers) site, Crossgates.
- All the regeneration money seems to be aimed at central Leeds and not outlying postcodes. Greater focus on regeneration of rural communities that are increasingly becoming commuter settlements with little or no community spirit or facilities.

Inner North West

- Area of Housing Mix; west Kirkstall to Horsforth.

Inner/Outer West

- Bramley.
- Kirkstall Road Renaissance Area.
- WLGAAP extended to incorporate Leeds/Bradford Corridor area as endorsed by RSS.

Inner East/North East

- Chapeltown; Harehills; Sheepscar.

South

- Belle Isle.

General comments from South Area Management

- Recommend replacing Beeston Hill (i.e. not Beeston) and Holbeck with the 'South Leeds Regeneration Area' to include central Middleton and Elland Road area and corridor leading to Churwell/Morley. This was supported by a second representor.
- Do not accept that Beeston Hill and Holbeck regeneration area is concentrated on housing and design led activities. It needs a comprehensive approach with a land use framework covering various issues linked to delivering sustainable communities. Shortly producing Regeneration Plans which are not exclusively housing or design led.

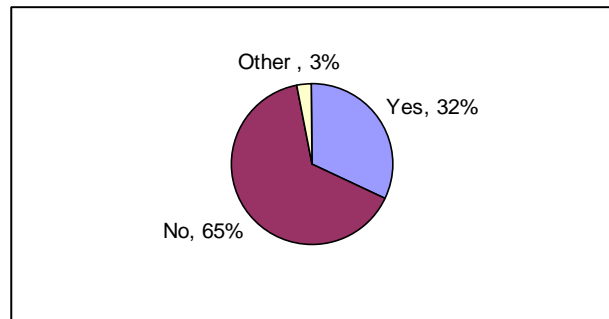
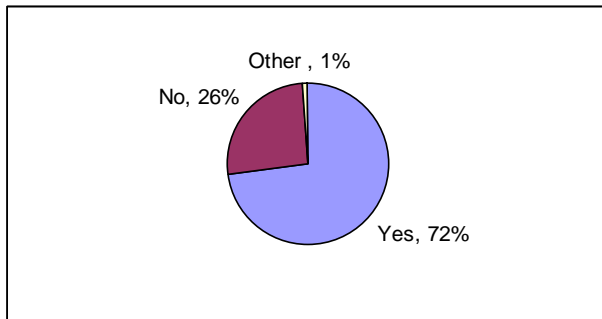
**Sustainability Appraisal**

Question 9 was not subject to the SA as it has been carried over from the UDP.

**10. Which option on Greenfield sites do you agree with?**

- a) *Greenfield sites on the edge of urban areas should be held back from development until such time as the supply of housing from brownfield site development is insufficient to meet the housing requirement. This will mean intensifying the rate of development in urban areas with higher densities, and building on surplus greenspace and employment land,*
- b) *Strategies should be developed for the early release of greenfield sites in the most sustainable locations in order to better meet needs for houses (as opposed to flats) and affordable dwellings. All sites would have to have sufficient levels of public transport and other necessary community infrastructure and meet high standards of sustainable design and construction.*

	a)			b)	
<b>Yes</b>	153 (9 comments)	72%	<b>Yes</b>	64 (13 comments)	32%
<b>No</b>	56 (7 comments)	26%	<b>No</b>	129 (5 comments)	65%
<b>Other</b>	3	1%	<b>Other</b>	5	3%
<b>TOTAL</b>	<b>212</b>		<b>TOTAL</b>	<b>198</b>	



Other general comments	95
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**Consultation Responses**

Housebuilders, landowners and developers favour 10b. This is with the exception of city centre developer, Reland who consider that Leeds' current policy approach favouring urban brownfield development will not deliver the quantity, quality and mix of housing which Leeds needs. Option 10a will harm urban areas through town cramming and loss of open space and employment land. Greenfield development is needed including PAS and greenbelt releases. New East Leeds Consortium supported bringing forwards greenfield sites as part of a cohesive strategy which balances brownfield delivery, regeneration, and overall supply requirements.

Interests concerned about urban amenity (residents and interest groups). Not necessarily advocating greenfield releases, these people point out the harm from more intensive urban development. Urban open space is already inadequate and needs more protection for health and recreation. Historic character is under threat from high density development. Garden development should be curtailed. The A65 road corridor is full.

Interests wanting to protect greenfield land (residents and interest groups). For some, greenfield land should be protected at all costs. Others see greenfield development as the last resort only.

Interests seeking selective protection and harnessing development for improvement (residents and interest groups). Generally wanting to minimise greenfield and greenbelt development, these people suggest that some greenfield land is already degraded and of low value and could be identified for development. Some see opportunities to harness development of greenfield land to secure other benefits, for example compensatory green infrastructure with new high quality areas of recreational open space.

## General

- The Woodland Trust noted the high-quality of some habitats on brown field land and the risk of developing brownfield land purely because of its technical designation and not considering its value to people and wildlife.
- One resident mentioned the Core Strategy's lack of certainty of the role of Wakefield and Bradford in the sub-regional housing context, and there needs to be inter-authority discussion.
- Developers felt there should not be a blanket policy across Leeds, as land to be released should be dependent on local circumstances.
- Persimmon Homes and Barratt Leeds considered that the Core Strategy ignored the emerging RSS targets, which is contrary to PPS12 para 4.19 and the PINS 'LDFS Lessons Learnt Examining DPDs'. It should positively address the issue of delivering the quantum of housing and the potential locations where this can be achieved. The quantum of the current supply is open to question, particularly due to the reliance on windfalls.

## **Sustainability Appraisal**

Economic: Option a) has a negative impact on employment land take, whilst Option b) is neutral.

Social: Option b) is positive for provision of affordable housing, but Option a) scores better in terms of regenerating inner city areas.

Environmental: Option a) scores best.

## **National and Regional Policy**

Both options accord with national policy in PPS3. Option a) has more natural alignment with PPS1, by expecting local policies to reduce energy use and emissions by encouraging patterns of development which reduce the need to travel by private car.

Option a) concurs more closely with RSS. The YH policies favour regeneration of the conurbations (YH1), reversal of population drift to rural areas (Spatial Vision 1), higher density development (YH2) and focussing most housing growth on the cities (YH5) and first priority to use of brownfield land (YH8).

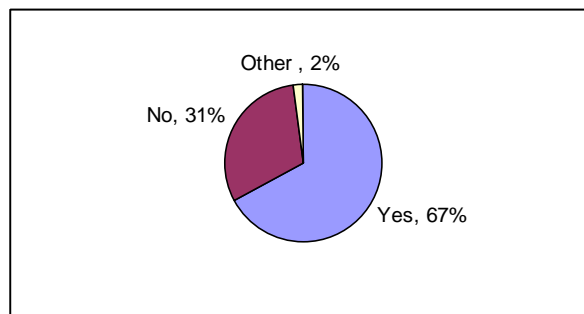
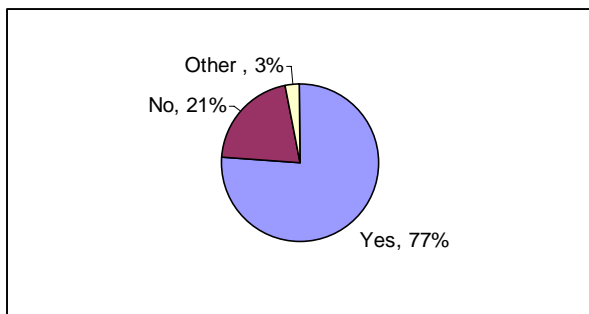
## **Other Policy**

Leeds' Strategic Housing Market Assessment survey shows preferences for a wider range of dwelling types and sizes than is currently being built. It shows a need for 1889 affordable dwellings per year.

**11. The supply of good quality affordable housing in Leeds needs to be increased. Should this be through:**

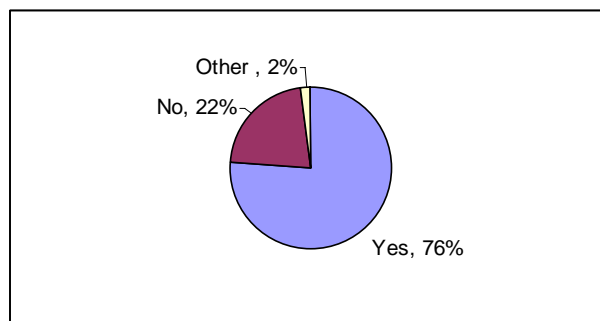
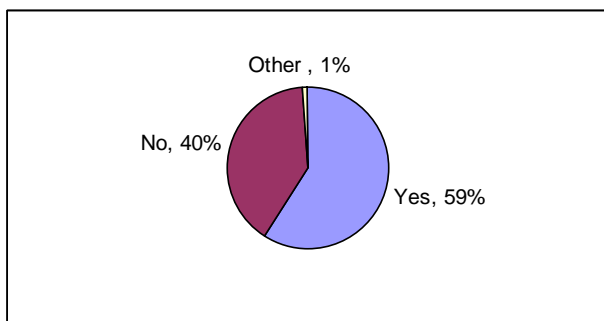
- a) Increasing the proportion of affordable housing that we seek on development sites,
- b) Lowering the site size threshold for seeking affordable housing,

	a)			b)	
<b>Yes</b>	153 (1 comment)	77%	<b>Yes</b>	123 (0 comments)	67%
<b>No</b>	41 (4 comments)	21%	<b>No</b>	57 (2 comments)	31%
<b>Other</b>	6	3%	<b>Other</b>	4	2%
<b>TOTAL</b>	<b>200</b>		<b>TOTAL</b>	<b>184</b>	



- c) Allocating small-scale land in and on the edge of villages for affordable housing where necessary,
- d) Exploring the possibility for public sector land disposal for affordable housing.

	c)			d)	
<b>Yes</b>	113 (4 comments)	59%	<b>Yes</b>	149 (7 comments)	76%
<b>No</b>	76 (3 comments)	40%	<b>No</b>	44 (1 comment)	22%
<b>Other</b>	1	1%	<b>Other</b>	3	2%
<b>TOTAL</b>	<b>190</b>		<b>TOTAL</b>	<b>196</b>	



Other general comments	80
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**Consultation Responses**

Option a): The general response from housebuilders was that increased affordable housing should only be sought where there is an up-to-date and robust assessment of need, and be subject to negotiation including site circumstances and viability. They considered that the Leeds Strategic Housing Market Assessment did not follow national good practice guidance so is unsound as evidence, and the 15-25% target band of the UDP should be retained. Others including the YHA thought that an increase would be consistent with the 30-39% indicative target for Leeds in the RSS. LCC's performance in negotiating affordable housing should be examined.

Option b): Housebuilders generally thought that reduced thresholds should to be justified by evidence of need. The recent reduction in the national threshold from 25 to 15 units needs time to 'bed down'. One respondent felt a flexible threshold would be better, with each site judged on

its merits. Others thought that the threshold should be reduced because developers have avoided provision by adjusting dwelling numbers/floorspace. It was proposed that a one unit threshold should be considered linked to a tariff system.

Option c): Identification of affordable housing sites on the edge of villages should be conditional - only where sites have access to public transport, only where need exists, and only for local people. Creeping urbanisation and harm to the integrity and environment of villages need to be avoided. The scale of development needs to respect the size of villages. Green belt land should be avoided. Also consider allotments and market gardens.

Option d): No playing fields should be used as public sector land for affordable housing development. Affordable housing can be increased through greater development of market housing. Larger greenfield sites should help significantly. An 'eco town' would help.

#### General comments

- Affordable housing should be clearly defined.
- A planned approach to overall housing delivery which recognises that allocations should be made available for early release, can also deliver affordable housing rather than an increase in the proportion sought.
- There are particular needs to provide rural affordable housing and affordable houses rather than flats.
- Housebuilders suggested that the viability of development is critical. Higher targets and lower thresholds will be counter-productive if they merely render development unviable. Lower land prices will lead to overall housing supply being restricted because landowners will not sell their land
- Affordable housing should be well integrated and for all members of the community.
- Self-build and 'co-housing' should be considered.
- The affordability of Headingley deserves special attention due to the erosion of the stock of affordable housing by the growth of student accommodation. The Headingley Development Trust should be considered to reclaim housing occupied by students for affordable occupation.

#### **Sustainability Appraisal**

Economic: Neither option had significant economic impacts.

Social: There is little difference between the four options in terms of social impacts. For impact on educational and housing market disparities, options a), b) and c) are very positive for helping to create mixed communities such that school intakes should be more socially mixed. However, option d) could have less positive effects because council land tends to be located in areas of deprivation and lower educational achievement.

Environmental: Most of the options have neutral or no significant effects. The exception is option c) which has a number of potential negatives in terms of greenfield land-take, unsustainable travel, and impact on the landscape. All options are positive for local housing needs being met locally.

Conclusion: All options are generally positive although option d) has some social negatives and Option c) some environmental negatives.

#### **National and Regional Policy**

All options accord with national and regional guidance, providing that evidence is available to demonstrate need for affordable housing. PPS3 sets an additional test of rural exception sites providing affordable housing for people who have local connections, as well as promoting mixed communities.

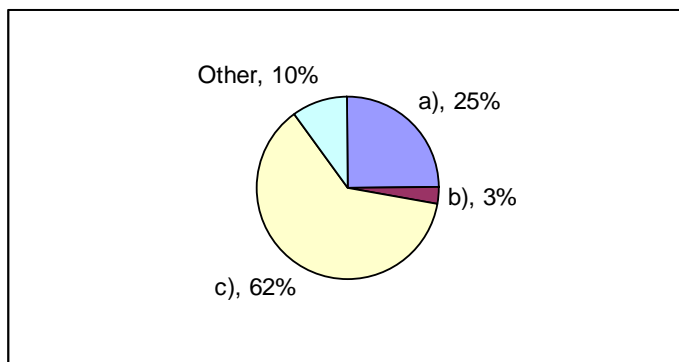
#### **Other Policy**

Leeds CC is programmed to produce a new Affordable Housing SPD in 2008/09 which will link in with the Core Strategy.

**12. Leeds must provide new accommodation for Gypsies and Travellers. Should this be through:**

- a) A variety of small sites spread around the city close to existing communities, services and infrastructure, or,
- b) On a large site on the fringe of the City, or,
- c) Extension of the existing site at Cottingley Springs.

a)	47 (13 comments)	25%
b)	5 (2 comments)	3%
c)	119 (20 comments)	62%
Other	20	10%
<b>TOTAL</b>	<b>191</b>	



Other general comments	8
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**Consultation Responses**

Of the 55 comments received, the majority favour small sites, favour no particular option, or suggest that Gypsies and Travellers themselves should be asked.

Small sites - They are needed to reverse the ongoing exclusion of this group; that they are better for providing access to health and education services; that small sites would not over-stretch infrastructure and services; and that small sites are the only fair option in terms of human rights and to accord with recommendations of the recent Joseph Rowntree report. Some offer conditional support for the small site option that the sites will need to be adequately resourced and managed by LCC, that surrounding areas must be kept litter free, a small criminal minority dealt with and that the potential environmental impact is taken into account in choosing locations.

Large fringe city site - There was little explicit support. One person favoured this option providing the Gypsies and Travellers are asked, and questions the need for proximity to the strategic road network. A Parish Council suggested two or three sites like Cottingley Springs but only following consultation with Gypsies and Travellers themselves.

Cottingley Springs - Around a quarter of the comments favour extension at Cottingley Springs. Reasons are that it is better to control one site rather than many where local communities may be upset; 'not in my back yard'; that services and infrastructure could be vastly improved; or that concentration of peer pressure will encourage responsible tenants. One city councillor stated he does not accept that we must provide such sites, as neighbouring authorities do not provide them.

**Sustainability Appraisal**

Economic: There is no evidence of any effects on the economy or jobs at the existing site at Cottingley Springs, however, if sites do result in negative effects then providing a number of small sites spread around is more likely to dilute them.

Social: All these options are generally positive in terms of social SA Objectives. This is because official sites cause less problems than illegal encampments and provide Gypsies and Travellers with stability and proper provision of services such as clean running water, waste collection, and electricity. Option a) scores the most positives, particularly in terms of health and education benefits by ensuring that Gypsies and Travellers live close to the facilities that they need, such as

schools, health care and shops. It was also noted that option a) should help encourage integration between Gypsies and Travellers and settled communities whereas options b) and c) keep them as distinctly separate.

Environmental: Most of the environmental impact cannot be decided until specific locations are identified for options a) and b). There are potentially negative scores for the impacts of a Gypsy and Traveller site on landscape quality, local distinctiveness and historic environment.

Conclusion: Strong social benefits are derived from choosing option a). There may however be negative environmental impacts which will need to be identified and mitigated for once specific locations are identified.

### **National and Regional Policy**

National policy is set out in Circular 1/2006 'Planning for Gypsy and Traveller Caravan Sites.' It expects Gypsy and Traveller accommodation needs to be dealt with in the same way as needs for housing. The Circular requires the number of pitches set out in the RSS to be addressed by allocations in a DPD. The Core Strategy must provide guidance for where sites will be allocated in the DPD and for dealing with planning applications. Guidance criteria must be fair, reasonable and realistic and not place undue constraints on development of Gypsy and Traveller sites. Sites must be suitable and have a realistic prospect of being delivered. Transitional advice is given that where there is demonstrable need, including evidence of unauthorised encampments or early evidence from a Gypsy and Traveller Accommodation Assessment (GTAA), local authorities should address the need in their DPDs.

RSS Policy H5 sets the indicative numbers of pitches for the Yorkshire and Humber sub-regions, with 86 pitches apportioned to West Yorkshire. It expects local authorities to complete GTAAs by July 2008 and that LDFs should ensure adequate provision of sites.

### **Other Policy**

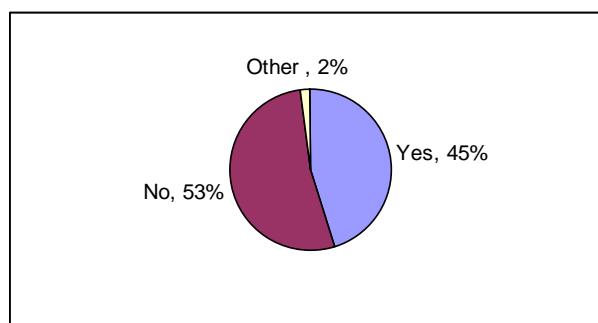
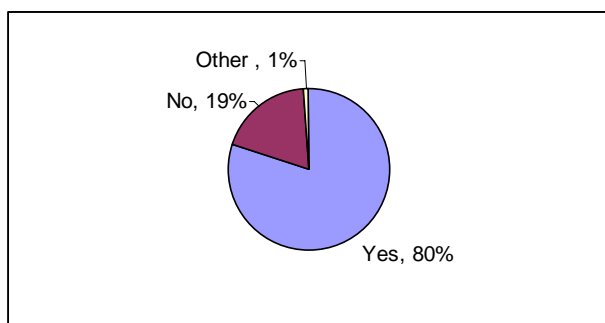
West Yorkshire local authorities commissioned a GTAA for completion in summer 2008.

Local authorities need to have regard to their statutory duties, including those in respect of homelessness under Part VII of the Housing Act 1996 and to their obligations under the Race Relations Act 1976 as amended by the Race Relations (Amendment) Act 2000.

**13. The Leeds Housing Market Assessment reveals a need for a wider range of housing sizes and types than is currently being built. How should Leeds ensure that a wider variety of housing sizes and types are provided?**

- a) A planning policy to control housing mix for all developments where appropriate,
- b) Allocating sites specifically for this purpose in suburban and rural areas appropriate for house building.

	a)			b)	
Yes	169 (8 comments)	80%	Yes	83 (5 comments)	45%
No	40 (1 comment)	19%	No	98 (10 comments)	53%
Other	2	1%	Other	3	2%
<b>TOTAL</b>	<b>211</b>		<b>TOTAL</b>	<b>184</b>	



Other general comments	68
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**Consultation Responses**

**Option a):** Generally, housebuilders think that the public sector should not dictate sizes, mix or specification of market dwellings as these are choices for private individuals to make on the basis of income and personal circumstances. Control of size and mix will reduce the supply of housing and exclude some households from decent housing, worsening the affordability crisis. The lack of flexibility, lack of evidence and failure to consider alternatives would be contrary to paragraph 4.24 iv, vii and ix of PPS12 and paragraph 11 of PPS3.

Some housebuilders suggested that the objective to broaden housing mix should be retained but with policy to 'encourage' rather than 'require'. The emphasis should also be to take account of site circumstances in deciding the housing mix, e.g. local community, local services, employment etc. The policy needs to take account of public transport service levels and accessibility, e.g. low density housing allowable where transport accessibility is not so good.

Other housebuilders suggest master-planning and development brief work should guide housing mix and creation of sustainable communities particularly for larger strategic land releases.

Any control over housing mix needs regular review with development partners to give responsiveness to changes in the market. Some housebuilders felt that control of mix would only be needed for windfall sites as allocations are likely to be developed with dwellings appropriate to site surroundings and location. One community forum recommended that flats should be limited to 10% of major developments.

**Option b):** This is favoured by housebuilders because the Leeds Housing Market Assessment shows that around half of households expecting to move and newly forming households prefer the outer suburbs as a location to live. These locations are appropriate for family housing because they have the open space, schools and community facilities.

On the contrary, some residents and Parish Councils felt that greenfield site development in affluent areas has not helped address affordability problems. Rural areas should be avoided because green belt will be eroded. Why can allocations not be in other areas?

## General

- A widely shared response is that there are too many apartments and additional family housing is needed.
- A number of responses from residents and Parish Councils thought there are too many large executive houses in villages.
- It is also noted that Headingley has lost family housing from its housing mix through the growth of HMOs.
- The notion that mixed communities are desirable is not contested. A vibrant city needs mixed communities which foster a democratic spirit. Policy should recognise that a range of housing in a range of areas is needed in line with the housing market assessment. This must include rural areas.
- Self-build, co-housing and live-work units should be considered in the housing mix.
- Houses should be built with space for appropriate extensions (pre-approved but not built) to allow for flexibility as families grow.

## **Sustainability Appraisal**

Economic: neither option has any significant economic impacts.

Social: Both options are likely to be positive in terms of quality/disparity of housing, although there is a level of doubt over whether option b) on its own would deliver. In terms of social inclusion and cohesion, option a) is preferable as it is likely to provide more opportunity for occupiers of new housing to mix with existing communities.

Environmental: Option b) has potentially negative impacts in terms of greenfield land take, transport by vehicles and CO2 emissions, and impact on the landscape.

Conclusion: Overall, option a) scores better in having positives for social inclusion and cohesion and no negatives. Option b) has a number of environmental negatives.

## **National and Regional Policy**

PPS3 contains strategic housing and planning policy objectives to create sustainable, inclusive, mixed communities and to deliver a mix of housing for a wide variety of households in all areas, both urban and rural. Paragraph 24 advises on planning control over housing mix, and draws a division in the level of control that can be applied between large strategic sites and smaller sites, and expecting controls to relate to evidence of household need:

“In planning at site level, Local Planning Authorities should ensure that the proposed mix of housing on large strategic sites reflects the proportions of households that require market or affordable housing and achieves a mix of households as well as a mix of tenure and price. For smaller sites, the mix of housing should contribute to the creation of mixed communities having regard to the proportions of households that require market or affordable housing and the existing mix of housing in the locality.”

## **Other Policy**

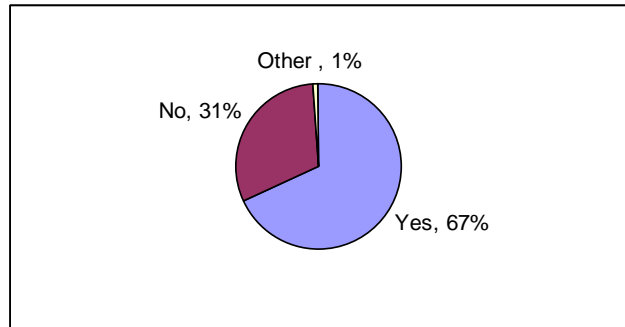
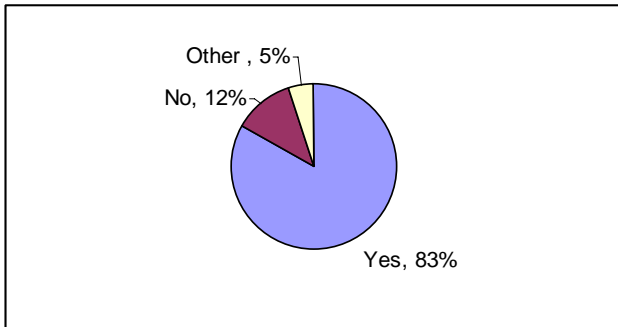
The City Council is preparing to introduce informal policy guidance to help control the housing mix of development sites. Background work explored evidence of housing mix in terms of i) existing stock, ii) historic trends of housing supply excluding the city centre, iii) household projections and iv) preferences expressed in the survey undertaken for the Leeds SHMA.

These do not give a conclusive steer on housing mix. Essentially, two of the indicators would favour provision of larger proportions of flats and smaller sized dwellings; the existing stock in Leeds is made up of 80% houses and household projections forecast growth predominantly of single person households. The other two indicators would favour provision of larger proportions of houses and larger dwellings; actual provision of new dwellings over the last 10 years has become increasingly dominated by flats; and preferences of moving/forming households are for a broader range of dwelling types and sizes than are being developed.

**14. Leeds needs to provide higher housing densities in order to both meet housing targets and to create sustainable communities. In particular, should the highest densities be promoted at the following locations:**

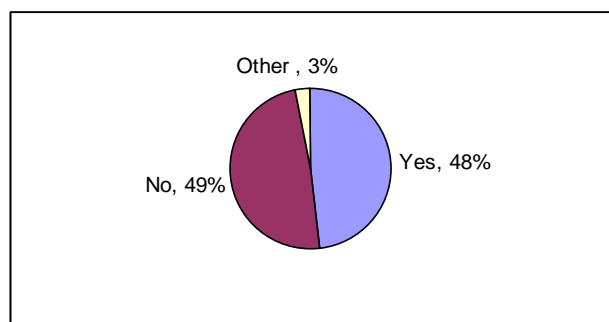
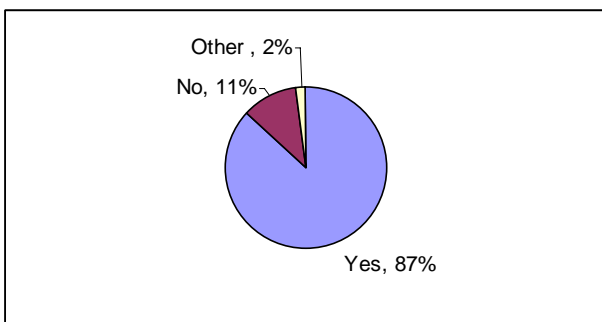
- a) In the City Centre,
- b) In town and district centres,

	a)			b)	
<b>Yes</b>	195 (10 comments)	83%	<b>Yes</b>	136 (2 comments)	67%
<b>No</b>	27 (7 comments)	12%	<b>No</b>	68 (4 comments)	31%
<b>Other</b>	12	5%	<b>Other</b>	2	1%
<b>TOTAL</b>	<b>234</b>		<b>TOTAL</b>	<b>206</b>	



- c) On public transport nodes (such as railway stations),
- d) On edge of City Centre locations.

	c)			d)	
<b>Yes</b>	184 (5 comments)	87%	<b>Yes</b>	95 (18 comments)	48%
<b>No</b>	24 (2 comments)	11%	<b>No</b>	97 (10 comments)	49%
<b>Other</b>	4	2%	<b>Other</b>	5	3%
<b>TOTAL</b>	<b>212</b>		<b>TOTAL</b>	<b>197</b>	



Other general comments	20
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**Consultation Responses**

In terms of quantitative responses, the strong majority of respondents were in favour of higher density housing development in the city centre, town centres and at public transport nodes. However, opinion on higher densities at edge of city centre locations was equally split. Metro proposed an accessibility audit to assess the viability of public transport to serve new development. One person considered that public transport in Leeds is not good enough to support higher densities.

Options a) and b):

*Support*

A number of respondents made the point that higher densities should be supported in the city centre and town/district centres as they have excellent access to employment, services, facilities, public transport and are therefore highly sustainable. A related point is the ability of higher density development to help revitalise city and town centres by bringing underused floorspace back into use, e.g. Living over the Shop (LOTS) initiatives.

*Conditional support*

However, a significant number of respondents thought that higher densities should not be allowed at the expense of loss of character of surrounding areas. Higher densities should only be supported with the caveat that the density must be capable of fitting within the local character and context and have facilities, particularly open/green space but also employment, schools, shops and health facilities. Also, not all town centres will be suitable for higher density development. A housebuilder made the point that higher density development should not be required where the market demand does not exist to deliver such development.

Respondents mentioned a range of other factors for consideration in developing housing at higher densities: topography, net developable area, space about dwellings standards, stand-off distances, buffer zones, landscaping and trees, and sufficiency of parking and access for deliveries and services.

*Objection*

A number of respondents felt that higher densities would generate an undesirable legacy for future generations, with average densities already too high for human health and wellbeing. Over-concentration of higher density housing needs to be avoided (there is already oversupply and under-occupation of flats in the city centre), and higher densities squeeze out the potential for houses. More support is needed to develop and sustain communities in the city centre rather than just buildings which end up empty or as second homes. Land in the city centre and edge of city centre should be reserved for employment, shopping and leisure development, not for housing. An alternative point was that there is no need for policy to set minimum densities for the city centre as high densities are being achieved anyway.

*Other solutions*

A number of housebuilders made the point that higher density housing development is the wrong solution because Leeds needs more houses rather than flats as noted in paras 4.34 and 4.49 of the Issues and Alternative Options stage and recognised in Leeds' SHMA. Lower densities (relative to city centre densities) would be more appropriate across the District and accord with Scenarios 3 and 4. Therefore the first sentence of Q14 should not be reflected in the Core Strategy. Whilst higher densities might be appropriate for the city centre, a more flexible approach should be adopted elsewhere. Some local centres and smaller settlements in the outer suburbs should be included for higher density development which would help meet needs identified in the Leeds SHMA. The Core Strategy should set out a range of densities for different areas of Leeds. It should recognise there may be instances where densities below 30 dph are appropriate and justified.

Option c): Some respondents saw good links to public transport as essential for higher density development. It was considered that not simply good links, but good transport corridors, should be identified as suitable locations.

Option d): Landowners suggested Kirkstall Road and New Wortley in close proximity of the rest of the city centre as suitable locations for higher density development, alongside Kidacre St, within the city centre. A contrasting comment is that the public transport accessibility is not good enough at the edges of the city centre to support higher housing densities. Barrett Northern suggested edge of city centre locations provide opportunity for higher density family housing, but not in the same category as the highest densities. A transition between centres and suburbs is valuable, so densities should be limited in edge of centre locations.

**Sustainability Appraisal**

There is very little difference in impacts between the options. They are all positive in terms of reducing pressure for greenfield development but could have negative impacts in terms of greenspace provision and impact on the appearance of areas of distinctive character and historic buildings.

**National and Regional Policy**

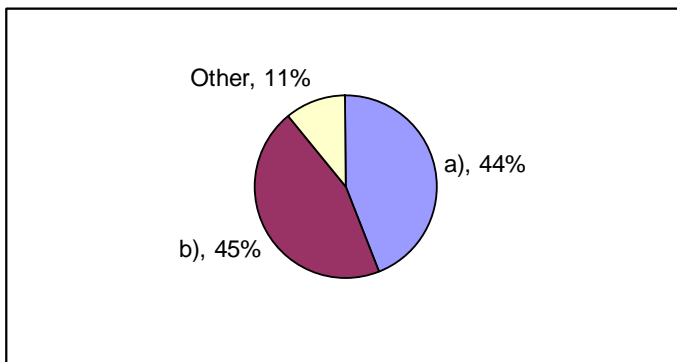
PPS3 paragraph 16 notes the importance of new development integrating with neighbouring buildings and the local area generally in terms of scale, density, layout and access.

Paragraphs 46 and 47 set a national minimum density of 30 dwellings per hectare but suggest that Local Planning Authorities should develop more detailed housing density policies. Factors to be considered are i) spatial vision and strategy including housing demand/need and the availability of suitable land in the area, ii) capacity of infrastructure, services and facilities such as open space, iii) efficient use of land and climate change, iv) accessibility, particularly public transport accessibility, v) the characteristics of the area, vi) the desirability of achieving high quality, well-designed housing having regard to the need to design development to respect its context.

**15. Which location do you think is most important for industry, manufacturing, warehousing and distribution?**

- a) *A wide range of sites across Leeds, easily accessible to local people by a variety of transport methods, or,*
- b) *A smaller number of large, strategic sites, with good transport connections, attractive to the market, and capable of providing a modern and efficient operating environment.*

<b>a)</b>	97 (28 comments)	44%
<b>b)</b>	98 (18 comments)	45%
<b>Other</b>	23	11%
<b>TOTAL</b>	<b>218</b>	



**Consultation Responses**

Overall options a) and b) both gained about equal responses in favour. Respondents did state that the answer depends on the type of employment use, its impact on residential surroundings, and its workforce / distribution needs. Bearing this in mind, the majority of respondents who made comments considered that both options would be required.

Those in favour of option a) centred around the need for increased localisation including the needs of small local businesses; benefits of local employment; reductions in travel and congestion as there would be less commuting; better access for local communities and disadvantaged populations; and more local economic activity. In particular, a reduction in travel distances through this option will be vital as Leeds is forced to move towards a low-carbon economy. This option is suited to rural areas, and would help stop outlying towns becoming dormitory towns. Many historic areas already have this mix of small-scale industry, and should be preserved. It was felt nodal transport connections need improving before option b) can work, and that such large sites are created without local reference or any beneficial impact on local communities.

Points made regarding Option b) were the need for excellent public transport links if this option was pursued, and also that sites should have direct motorway access, and the potential for canal use.

Developers primarily required locational flexibility, particularly in respect of offices. It was noted that as the Leeds employment land review identifies an oversupply of employment land within Leeds, there is therefore the opportunity to remove the 'bad neighbour' uses from residential areas. This could then be used for housing to meet targets. Specific sites were identified as having the potential for strategic employment sites, including as part of eco-towns.

The Environment Agency considered that industrial development should be maintained in the existing industrial areas, supported by infrastructure improvements. The Highways Agency would not support any policy that would generate significant amounts of additional traffic on the strategic route network, and therefore option a) would distribute traffic generation, although this is dependent on the individual locations of the sites. Leeds Teaching Hospitals considered that the

aim to provide a healthy and pleasant city environment would suggest locating industrial concerns in defined areas. It also mentioned the need to consider the public sector as a major employer within the city. The Assembly is encouraged that the Core Strategy is in line with regional policy in that it clearly emphasises that new office proposals should be guided to the City Centre, and that the pattern and scale of provision of allocated employment land should be determined by local employment land reviews.

### **Sustainability Appraisal**

Economic: Option a) performs best against Objective 1 because better local accessibility to the labour force will create conditions to improve disparities in the labour market. Option b) performs better against Objective 2 because this is allowing for businesses to locate where market preference is strongest around good transport routes.

Social: Neither option has much impact apart from on Objective 8 where option a) has a positive effect because the proximity of workplaces to neighbourhoods provides greater opportunity for the socially excluded to get into work and thereby become better integrated into society.

Environmental: Many of the impacts will depend on precisely which sites are developed. Option a) scores better in terms of meeting local employment needs locally, but worse in terms of the impact of pollution and the effect of development on distinctive and historic townscape. Option b) scores less well in terms of pressure for greenfield development and impacts on biodiversity and landscape quality.

Conclusion: The options are fairly balanced. Option a) is slightly better in social terms and meeting needs locally. Option b) is better in terms of economic growth.

### **National and Regional Policy**

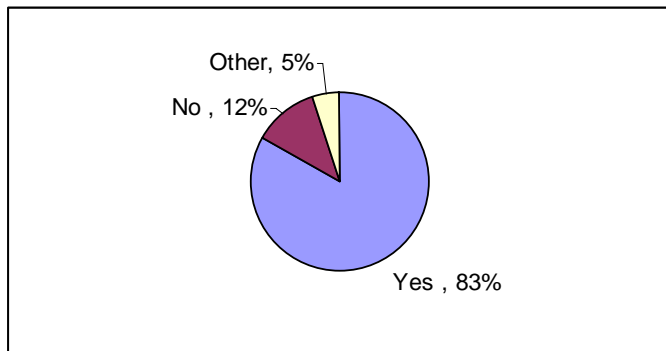
RSS Policy E3 requires that the pattern and scale of provision of allocated employment land should be determined by local employment land reviews (Proposed Changes reinforces this requirement). Policy E2 and E3 require that new office proposals are guided to the City Centre (unchanged by Proposed Changes).

### **Other Policy**

See Leeds Employment Land Review.

**16. Should a selection of the best existing employment sites and buildings within Leeds District be protected for employment use?**

<b>Yes</b>	168 (32 comments)	83%
<b>No</b>	24 (8 comments)	12%
<b>Other</b>	10	5%
<b>TOTAL</b>	<b>202</b>	



**Consultation Responses**

The great majority were in favour of protecting employment sites, although the answer does depend on how the 'best' sites are identified. There may also need to be some limit on how long they are to be protected. A number of respondents were in favour of encouraging mixed-use and small-scale employment on all employment sites and other sites.

Those in favour were primarily because of the need to resist the rising value of land for housing, and because it would reduce commuting. In particular, respondents wanted employment that meets local needs and supports small industries. Where sites are allowed to be redeveloped for other purposes, this should only be if existing businesses can relocate within the same community. It was felt that based on changing global markets it is highly possible that it will be strategically necessary to re-establish some industries in the UK, so there is the need to reserve brownfield sites for this.

Those against considered that each site should be considered independently, that it should be demand led, or that if buildings are no longer required for employment use, they (or the site) should be reused. Based on the Leeds Employment Land Review, where there are brownfield or degraded greenfield sites with adequate public transport, consideration should be given for using some for housing.

Developers mentioned specific sites that should be retained or developed. Their main requirement was for flexibility to reflect evolving market requirements, emerging regional policy, and because there is an exiting overprovision. The potential for a site to change from an employment use to another use will depend on the individual circumstances and the need to maintain a level of supply in the light of up to date evidence. Some of the 'best' employment locations may also be the 'best' for other uses, such as housing. A protection policy is too blunt an instrument to respond to changing circumstances. One point in favour was because employment rates need to be protected to enhance Leeds' role as regional capital.

The Assembly was encouraged that the emerging AVL AAP proposes to de-allocate 100-125 ha of employment land (including land identified for offices), but is still concerned that Skelton Business Park would accommodate 102,000 sq m of office development. Yorkshire Water required the most realistic forecast of future land uses in order to provide the necessary level of infrastructure, and Metro stated that the highest trip generating uses should be in the most accessible locations.

### **Sustainability Appraisal**

Economic: Option a) is much more positive than b), as b) would become more negative over time as sites and land is developed for other uses generating a shortage of space for business and employment growth.

Social: There would be no impacts in terms of health, education and crime, with the impacts on social inclusion and cohesion being balanced out.

Environmental: Redevelopment of sites achievable through option b) provides opportunity for certain improvements such as remediation of contaminated land and buildings designed to higher sustainability standards, designed to minimise waste and designed to improve the appearance of the landscape. These effects become positive over time, as initial negative impacts on construction waste and energy used for redevelopment are outweighed. There are no other significant impacts from the options, or the impacts would depend on the nature of development.

Conclusion: Option a) is very positive in terms of economic objectives and generally neutral for social and environmental objectives. Option b) is negative in terms of economic objectives but scores better in terms of certain environmental objectives.

### **National and Regional Policy**

RSS Policy E5 sets out that LPAs can offer special protection to designated employment sites in certain circumstances. Table 11.2 sets out the potential annual job growth from 2006 - 2021 by different land uses, which in Leeds for Industry (B1b/B1c/B2) is forecasted at 2,180 and for Storage/Distribution (B8) is 440. Table 11.3 shows a potential need for 390 ha (net) of storage and distribution sites compared to the 730 allocated in 2006. However, this figure is guidance rather than a requirement, if an alternative figure can be shown by the local evidence base.

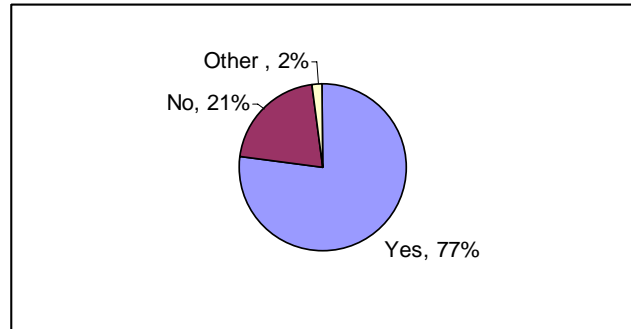
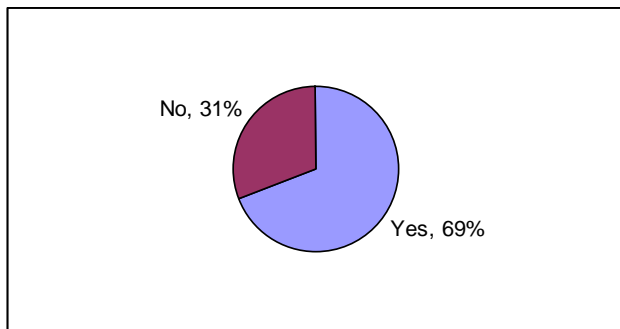
### **Other Policy**

See Employment Land Review.

**17. In planning for future economic opportunities in Leeds, is there a need to make some employment land only available for the following specialised uses?**

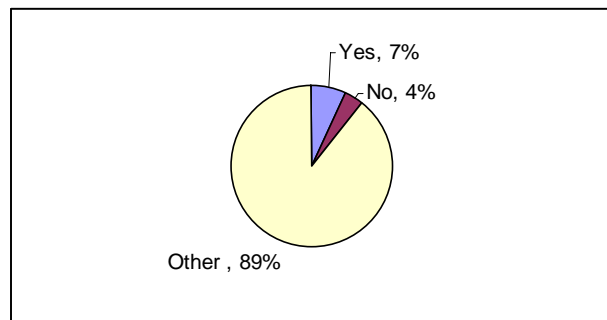
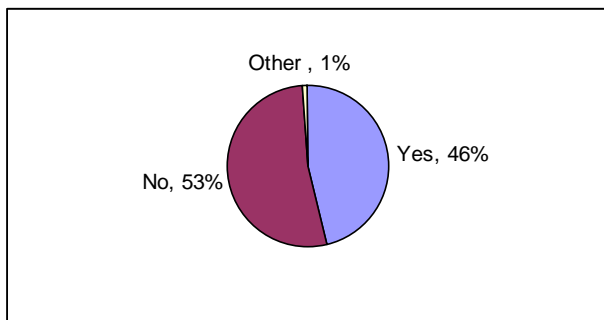
- a) *Research and Development / innovative / science industries,*
- b) *Industries connected to rail / waterways infrastructure,*

	a)			b)	
<b>Yes</b>	119 (10 comments)	69%	<b>Yes</b>	135 (1 comment)	77%
<b>No</b>	53 (1 comment)	31%	<b>No</b>	37 (1 comment)	21%
<b>Other</b>	-	-	<b>Other</b>	3	2%
<b>TOTAL</b>	<b>172</b>		<b>TOTAL</b>	<b>175</b>	



- c) *Media / creative industries,*
- d) *Other.*

	c)			d)	
<b>Yes</b>	75 (2 comments)	46%	<b>Yes</b>	4 (3 comments)	7%
<b>No</b>	86 (1 comment)	53%	<b>No</b>	2 (1 comment)	4%
<b>Other</b>	1	1%	<b>Other</b>	51	89%
<b>TOTAL</b>	<b>162</b>		<b>TOTAL</b>	<b>57</b>	



**Consultation Responses**

There was majority support for a) and b), with c) have equal numbers of those in favour and those against. It was queried as to what grounds were used to identify these particular industries.

Those generally in favour felt in order to compete at the highest European level of investment for business Leeds needs to have a wide portfolio of sites including some dedicated to particular business sectors. The grouping of R&D in science parks engenders growth and creates kudos nationally and internationally as well as providing graduate employment, important for Leeds with its large student population. Additionally, there is the scope to consider small towns for development as specialised centres. Infrastructure for b) is fixed so these sites need to be protected.

Respondents against thought there should be flexibility to accommodate future change and innovation, otherwise there is the danger of losing opportunities if policy is too prescriptive. All

employment should have equal opportunities at each protected site. Alternatively, it was felt that high tech industry and R&D poses little conflict with residential uses so sites should all be mixed use. Options a) and c) are also to some extent footloose.

It was felt variously that the policy should more specifically favour the following industries: bio-technology, medical instrument/drug manufacture, products that require a high degree of integration between research and manufacturing, low-carbon industries, sustainable living research, manufacturing (possibly only small-scale), market gardens, crafts/artisan scale production, food production, textiles, green industries e.g. recycling, and jobs to combat climate change.

### **Sustainability Appraisal**

Economic: In terms of provision of employment and reducing disparities in the labour market, it was considered that options a) and c) would be positive by providing good quality jobs. In terms of impact on the economy generally, all options are considered very positive, by ensuring land is available for economic growth sectors.

Social: All options could be positive for the objective of education if opportunities to provide training are taken.

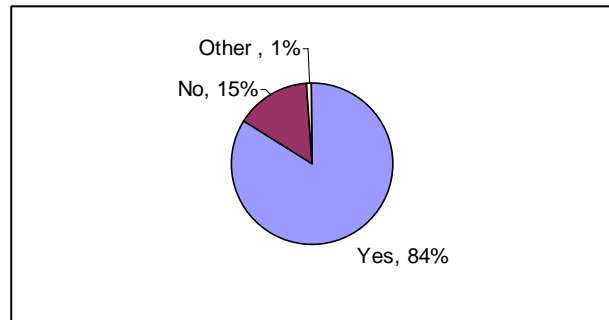
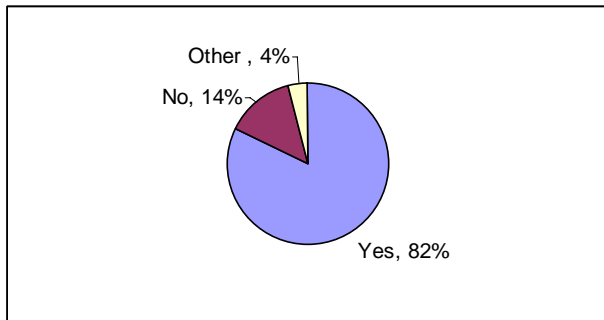
Environmental: The options have varied and complex impacts. The impact on provision of greenspace could be negative if greenfield land is built on, or positive if greenspaces are provided in new development. In terms of minimising use of greenfield land and impact on the landscape, option b) could be negative in the long run as its land take increases. Biodiversity could be destroyed or enhanced by all the options depending upon the circumstances of each case. In terms of impact on CO2 emissions and sustainable travel a) is positive because research can push boundaries of environmental science and travel technologies and b) is positive as an opportunity to transport goods by sustainable modes. In terms of meeting local needs locally, option a) could be positive as improved R&D and creative industries are likely to allow services to be accessed in Leeds that were previously only available in London and the South East.

Conclusion: All the options would have generally positive or neutral impacts. Only option b) has a potentially negative impact in terms of land take in the long term which could increase pressure on greenfield land. The positive effects are balanced between the three options.

**18. Leeds needs to encourage a diverse and robust economy. Which of the following measures should be used to help accomplish this?**

- a) Using planning agreements to require the provision of a proportion of low cost business space in new employment developments,
- b) Using planning agreements to encourage new developments to train and recruit a proportion of local new labour market entrants.

	a)			b)	
Yes	155 (7 comments)	82%	Yes	153 (22 comments)	84%
No	26 (0 comments)	14%	No	28 (8 comments)	15%
Other	7	4%	Other	2	1%
<b>TOTAL</b>	<b>188</b>		<b>TOTAL</b>	<b>183</b>	



**Consultation Responses**

The great majority of respondents supported both these measures. However, the comments received were generally not in favour. This was because such blanket planning agreements are contrary to Circular 05/2005 (developer contributions) as they should only be sought where it is reasonable and directly relevant to the development. For instance, high quality office development in the city centre would not necessarily be the most appropriate location for the provision of low cost business space. Each development proposal should be considered on its own individual merits. It is also not practical to require new developments to train and recruit a proportion of new local labour market entrants. This appears to be reliant on the fact that all new developments will be linked to a single defined occupier, which for instance would not be case in terms of speculative high quality office development in the City Centre. It was felt that it would place an unreasonable burden on developers and businesses and could preclude development. The point was also made that if sites are designated for business use then land costs will be lowered anyway and will automatically provide more low-cost business space.

Respondents in favour were primarily because low cost premises are vital to the survival of small businesses, and these measures would encourage further entrepreneurship and stimulate the regional economy. Small local business start ups are being pushed out or prevented from expanding due to rising rents, and if rents are too high no new industries will be sustainable. It could also help prevent land banking, and prevent larger firms setting up in Leeds then bringing in its own non-local labour force. It was, however, also queried how these measures would be policed, and that the public sector should be included in apprenticeship schemes.

A general comment was made that it is difficult to reconcile the two positions of improving access to employment opportunities including training, with continuing to develop growth areas such as the 'knowledge based economy', because much of the employment attracted to Leeds has required skills not offered by some of the City's citizens and it is not clear how this position will be changed.

It was also not felt to be clear what role Wakefield and Bradford could play in growing the area's business services contribution to the sub-region's economy, and how these will change through LDF policies.

**Sustainability Appraisal**

Economic: Both options are very positive in promoting economic growth, employment and reducing disparities.

Social: The objective to improve education would be very positively affected by option b), and the objectives to improve social cohesion would be positively affected by both options, particularly option b). Better community cohesion may be a long term benefit of this.

Environmental: Only the objective to promote local availability of goods and services is affected positively by both options, with other objectives unaffected.

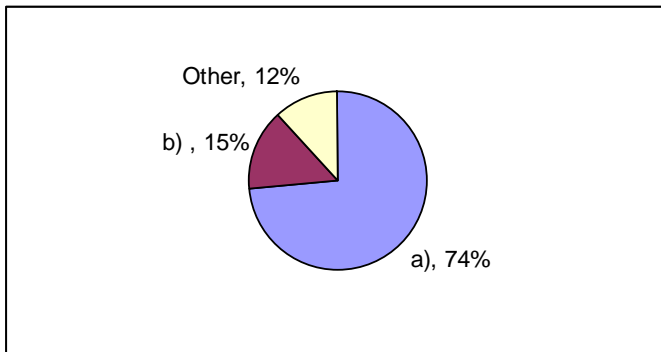
**Other Policy**

Developer Contributions Circular 05/2005.

**19. Rural employment. Do you think that:**

- a) Certain rural parts of Leeds should be treated as self-contained priority areas for rural employment, including promoting and safeguarding of existing employment land and premises, or,**
- b) Rural areas should be considered an integral part of the Leeds economy with no special exceptions to promote and retain rural employment?**

<b>a)</b>	147 (14 comments)	74%
<b>b)</b>	29 (4 comments)	15%
<b>Other</b>	24	12%
<b>TOTAL</b>	<b>200</b>	



**Consultation Responses**

Although it was noted that rural areas are integral to the city's economy, the great majority of responses and comments preferred option a). This was because rural areas/towns/communities have different issues and needs to the more urban area of Leeds, and need to retain their identity, sense of community, and role in serving their rural hinterlands (including those outside the Leeds District). In addition, a key point was that local employment would be more sustainable as it would reduce the need to commute, through encouraging diversity and employment opportunity.

While supporting option a), one developer considered that the Core Strategy needs to make more of the distinction between urban and rural areas, alongside increased support for PPS7 principles. Although rural areas are into the economy of Leeds as a whole, rural employment is quite distinct in nature and character to jobs found within urban areas, and they are not all linked to the urban economy, e.g. garden centres, farm shops, and leisure activities such as fishing.

Respondents proposed that the key to integration is to support farms to provide for local daily needs of the population of Leeds. Rural areas should provide employment in market gardening, farming, renewable energy, and sustainable forestry, for local consumption. The agricultural service industry should be promoted. Policy should include the scope to diversify from traditional rural employment to more modern forms, e.g. in modified farm buildings.

Some respondents said that existing employment land should be safeguarded, but not expanded, especially into greenfield land. It was recognised that rural communities need protection from the pressure of developers buying sites/buildings for redevelopment for houses. It was also proposed that all new houses in rural areas should be work-live units. In order to implement this self-contained policy, rural areas would need to be carefully defined.

**Sustainability Appraisal**

**Economic:** Option a) scores positively for both employment growth/disparities and economic growth as it gives more freedom to business development in rural areas. Option b) is negative as it may prevent development or retention of rural business such as offices. The benefits of a) may be partially offset by those people disadvantaged in the labour market finding it difficult to reach out-of-town rural locations.

Social: Both options are neutral for most of the social objectives, with option a) considered positive for social inclusion, because business employment can assist this.

Environmental: the impact of both options is varied and complex. Option a) is very positive in terms of meeting employment needs locally and potentially positive in avoiding development in the city centre and Aire Valley areas prone to flood risk. It is negative in terms of pressure on greenfield land and impact on the landscape (worsening over time) and in terms of sustainable transport and emissions because of travel needed to remoter locations. The impact on distinctive townscape character and historic townscape depends upon the nature of building and sensitivity of location. Option b) is positive for avoiding pressure on greenfield land, but negative in terms of meeting employment needs locally. It is neutral for the other objectives.

Conclusion: Overall, option a) scores better particularly in terms of the economic objectives and in terms of the social and environmental objectives concerned with social inclusion and local employment locally. However, it may have negatives in terms of impact on greenfield land, landscape and car transport and emissions. Option b) is negative in terms of economic objectives, but largely neutral for social and environmental objectives.

### **National and Regional Policy**

See PPS7.

A key spatial priority identified in Policy YH1 of the RSS is to "support Principal Towns and Local Service Centres as hubs for the rural and coastal economy and community and social infrastructure and encourage diversification of the rural economy." Policy E7 is specifically concerned with the rural economy, and aims to diversify and strengthen it by facilitating the development of rural industries, businesses and enterprises.

### **Other Policy**

Yorkshire and Humber Assembly's document 'Scrutiny 12 - The Rural Economy' (2008) says cannot have 'one size fits all' policies for urban and rural areas. Recommends Yorkshire Forward to develop strategy to engage with rural areas within city regions.

**20. Hierarchy of centres. Which hierarchy of centres should the Core Strategy adopt?**

a) *The following hierarchy:*

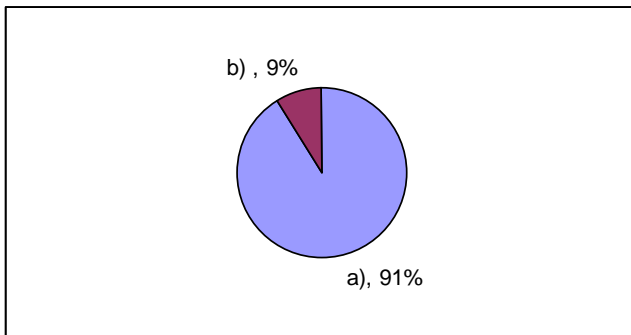
- *The City Centre – for major shopping, leisure and office development,*
- *Principal Town and District Centres – for shops, supermarkets and a range of non-retail services (such as banks, libraries, restaurants, offices and estate agents),*
- *Local Centres – for a basic range of facilities for local needs,*
- *Neighbourhood shops.*

Or,

b) *A different hierarchy or network. Please suggest an alternative hierarchy or network.*

c) *If you think there are any other town and district centres, or local centres, which are not listed in the Issues and Alternative Options document, please list them below.*

<b>a)</b>	181 (13 comments)	91%
<b>b)</b>	18 (17 comments)	9%
<b>TOTAL</b>	<b>199</b>	



<b>c) and other general comments</b>	37
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**Consultation Responses**

The great majority of respondents supported leaving the hierarchy as established. Interest groups also proposed that LCC should support local shops and assist shopping parades to be viable. Residents were primarily concerned with the protection and promotion of local facilities, and showed a level of support for inverting the hierarchy accordingly, although how this would work in practice was not explained further.

Other proposed networks included adding centres such as Owlcotes, and dispersal of offices in order for more walk to work journeys and less traffic congestion. A resident considered that the objective to develop a ‘walkable city’ needs to be more explicitly linked to the spatial distribution of local centres and neighbourhood shopping. There was a proposal to have principal town and district centres on different levels in the hierarchy, although the implications of this was not elaborated. One developer supported the hierarchy but stated that it should also not prohibit the development of one-off sites as appropriate.

M&S considered the hierarchy should acknowledge the role of existing, accessible, out-of-centre locations, plus locations that could be well served by a choice of means of transport. This would more closely reflect paragraph 2.44 of PPS6. In addition, the word ‘basic’ should be removed from the description of local centres, as it is misleading as it may be necessary to provide a range of provision to meet different customer requirements in respect of choice, quality and price. M&S also queried why the word ‘principal’ had been used in the context of town and district centres as it implies an additional hierarchy.

One resident noted that there needs to be explicit recognition that some centres are on the District’s boundary and can fulfil a service role for areas outside Leeds. Similarly, the roles of

centres such as Bradford, Harrogate and Castleford are not discussed although they are probably used by Leeds citizens living near the Leeds District's boundary.

The Assembly considered that the Core Strategy needs to distinguish between Principal Towns and District Centres. The RSS Proposed Changes to Policy YH6 now suggests LDFs may exceptionally include other Principal Towns to those identified in Draft RSS (2005) provided that they are consistent with the Plan's core approach and meet set criteria including to reflect local circumstances and evidence. The Assembly would therefore anticipate LCC identifying a number of District Centres which should be evidenced in terms of their potential role, opportunities, type of development to be distributed to them and their relationship with the wider settlement hierarchy.

LCC Area Management stated that uniquely amongst the main city authorities Leeds CC has decided to put its own money into turning round the economy of its declining town and district centres, and this should be a key part of the Core Strategy rather than a peripheral note.

The Theatres Trust noted that facilities for major leisure and entertainment use should be located wherever is most suitable which may not necessarily be in the city centre. Additionally a balanced leisure scene would provide custom outside of normal working/shopping hours.

Locations for new centres or changes in the designation of centres:

Residents and interest groups proposed Bramhope (LC); Aireborough; The Green in Guiseley; Boston Spa (LC); Upper Wortley centre (around the Netto store) (LC); Old Farnley and New Farnley (LCs); Yeadon/Guiseley station housing development (LC); and Yeadon High Street. It was also queried as to why Street Lane in Roundhay is not a TC as it has two supermarkets, banks etc, and similarly Farsley is included as a TC in the Town and District Centre funding stream and is of a similar size to some of the other TCs listed. Other centres should be identified in areas of increased population/building, or based around rail access. There needs to be close liaison with Bradford city centre. A Councillor commented that Woodsley Road should be a TC so that if future funding were to become available the area would be eligible to receive investment.

Developers supported the proposed town and local centres designations, and additionally proposed Colton as a DC, and Stanningley Bottom to expand to a DC as it is equidistant from Pudsey and Farsley and has a rising residential population. The Core Strategy should identify new centres allocated in AAPs, e.g. York Road at Richmond Hill (EASEL). M&S will be improving the store at Moortown as an anchor to the centre, so supports its elevation to a TC.

**Sustainability Appraisal**

Economic: There are clear economic benefits resulting from adopting a hierarchical approach to centres. It helps ensure their vitality and viability by providing a focal point for activity. This also helps to ensure that the associated jobs are provided in the most accessible locations.

Social: A hierarchy of centres helps facilitate community participation by ensuring that the civic buildings are located in the most accessible locations. They also provide a focal point where different people come together and are therefore positive in terms of community cohesion.

Environmental: Option a) results in many positive environmental impacts; it is an efficient use of land, it reduces journeys by ensuring that everything is in one place, it enables us to plan better for waste recycling, it helps maintain the character and distinctiveness of an area and it helps ensure that buildings in historic centres remain in a viable use.

Conclusion: Leeds should adopt a hierarchy of centres in order to ensure a sustainable future for the district.

**National and Regional Policy**

Option a) reflects approach of PPS6.

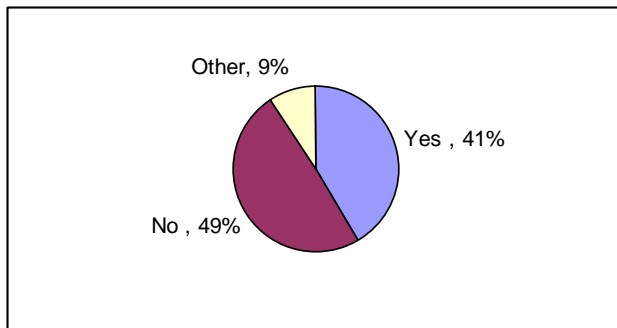
The RSS Proposed Changes replaces 'regional centres' with 'regional cities'; 'sub-regional centres' with 'sub regional cities and towns'; and 'principal service centres' with 'principal towns'. This terminology should be reflected in the Core Strategy.

**21. The following criteria have been used to identify which town and district centres have the potential for expansion:**

- *physical potential for wider expansion or infill,*
- *the potential for regeneration (including level of Leeds City Council ownership) with appropriate positive interventions,*
- *good public transport connections,*
- *sufficiency of car parking (existing and possible),*
- *existing success and market demand, and,*
- *additional constraints, e.g. presence of conservation areas and listed buildings.*

**Are there any other criteria which should be used to determine the centres for expansion? If Yes, please state which.**

<b>Yes</b>	69 (53 comments)	41%
<b>No</b>	83 (2 comments)	49%
<b>Other</b>	18	9%
<b>TOTAL</b>	<b>170</b>	



### **Consultation Responses**

A number of additional criteria were suggested, with residents and interest groups suggesting similar themes, although it was also suggested that further expansion is not sustainable and may not be necessary to maintain/improve quality of life.

#### Transport

- Elaborate c) to include train links, the percentage of additional possible rail journeys into the city centre, and the distance from the city centre. The criteria should address congestion levels, and any limitations to solving congestion.
- Elaborate d), whereby some residents wanted more parking within this criteria, whereas some wanted it to include the potential for transport demand measures, or expansion only to be if there was less parking in order to encourage a transport modal shift. Terms such as 'sufficiency' and 'good' need to be more clearly defined within the criteria, i.e. how is this judged? It was also felt that the LTP2 and bus strategy fails to address good public transport connections, i.e. c) and d).

#### Facilities and Services

The access to, number of, and impact on medical facilities / school places / police services etc, was suggested, as was the impact on existing traders, shopping mix, and other centres. This links to issues of the mix, type, and usage of existing provision, and the potential to attract a balanced community.

#### Other

Suggested criteria which were not already covered in the CS included:

- current levels of employment and future opportunities.
- compatibility with existing plans.
- proximity to attractions, other centres, employment, and out of town facilities.

- maintain character, protect surrounding area from development creep, sufficient brownfield sites (not greenfield).
- existence of accessible greenspace/countryside.

Retailers welcomed that the criteria do not only focus on existing characteristics but also future opportunity for growth. They also considered that the criteria should include where there are known operator requirements to address deficiencies and/or meet the needs of local communities through provision of new facilities or the expansion/remodelling of existing facilities. One retailer thought that the Council should not limit the centres in which growth is possible, with growth and demand located where they can best meet community needs.

Developers required more clarity within the criteria, particularly 'good public transport' as this depends on specifics and peripherality of area. Other suggestions were the presence of underutilised greenspace, links to strategic road network, and the need for additional facilities to serve a local catchment area. Policies should encourage retail development of an appropriate scale in local centres which are suitable for an increasing community. The development of nearby sites and the associated additional need and demand could support expansion/intensification.

The potential expansion of Leeds City Centre should be identified. This is to meet the economic objectives of the growth and development of Leeds as a 'Regional Centre' and provide added value by offering a choice of sites and opportunities for growth and urban renaissance.

The Environment Agency stated that centres which would need sequential testing are Hunslet, Kirkstall, Meanwood, Otley, and Rothwell. English Heritage welcomed that impact on historic assets is included as a criteria (although it is not necessarily a 'constraint').

A number of specific elaborations were suggested in regards to the matrix of centres in the Appendix of the Background Paper.

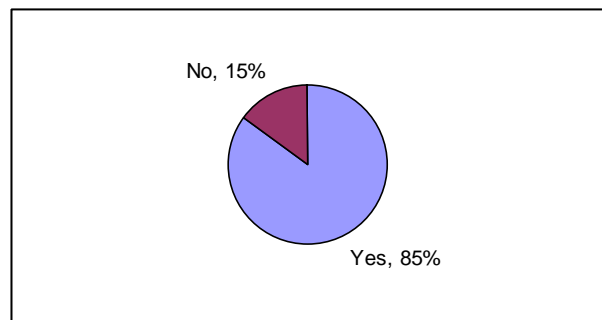
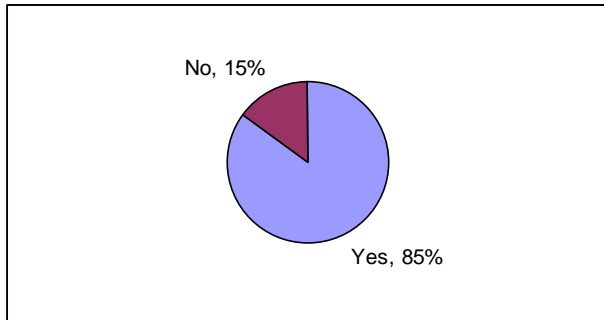
### **Sustainability Appraisal**

This question was not assessed.

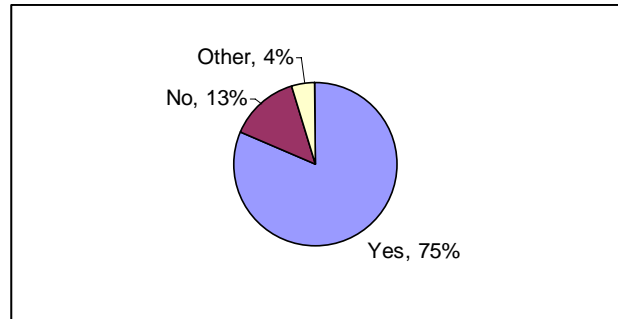
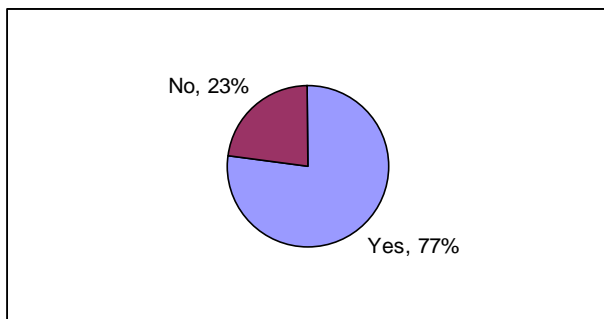
**22. Leeds City Council is committed to maintaining and enhancing the viability and vitality of all its town and district centres across the District. Some of the centres have potential for growth. Leeds City Council has identified that:**

**a) The following centres have the ability to intensify their use within existing boundaries:**

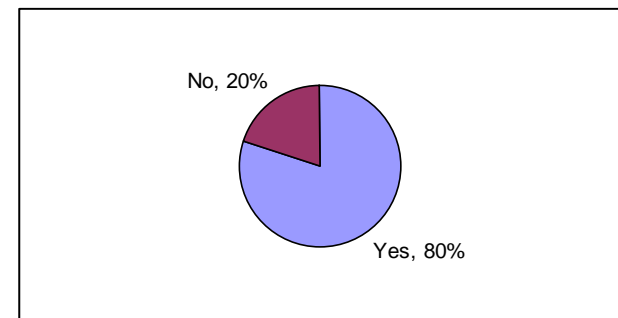
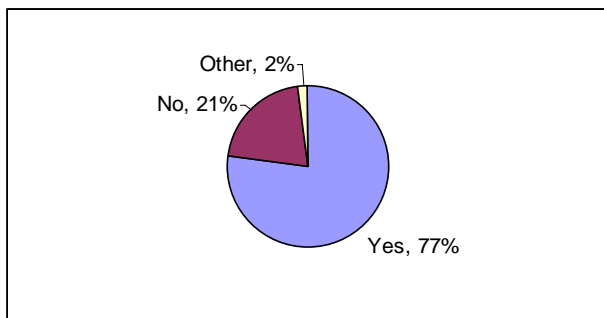
	Armley			Bramley	
<b>Yes</b>	51	85%	<b>Yes</b>	50	85%
<b>No</b>	9	15%	<b>No</b>	9	15%
<b>TOTAL</b>	<b>60</b>		<b>TOTAL</b>	<b>59</b>	



	Cross Gates			Dewsbury Road	
<b>Yes</b>	54	77%	<b>Yes</b>	42	75%
<b>No</b>	16	23%	<b>No</b>	12	13%
<b>Other</b>	-	-	<b>Other</b>	2	4%
<b>TOTAL</b>	<b>70</b>		<b>TOTAL</b>	<b>56</b>	

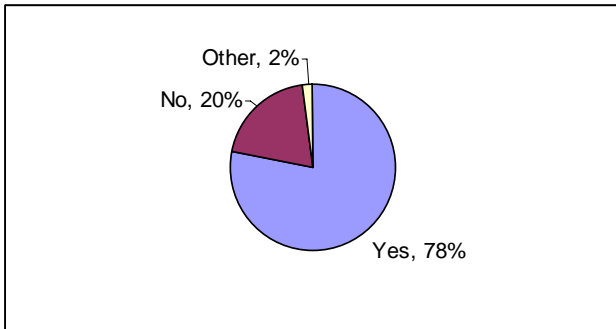
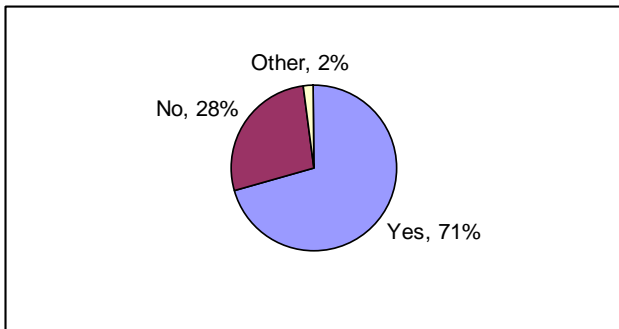


	Garforth			Halton	
<b>Yes</b>	51	77%	<b>Yes</b>	48	80%
<b>No</b>	14	21%	<b>No</b>	12	20%
<b>Other</b>	1	2%	<b>Other</b>	-	-
<b>TOTAL</b>	<b>66</b>		<b>TOTAL</b>	<b>60</b>	



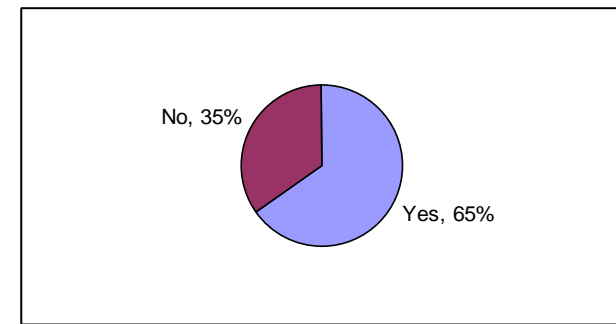
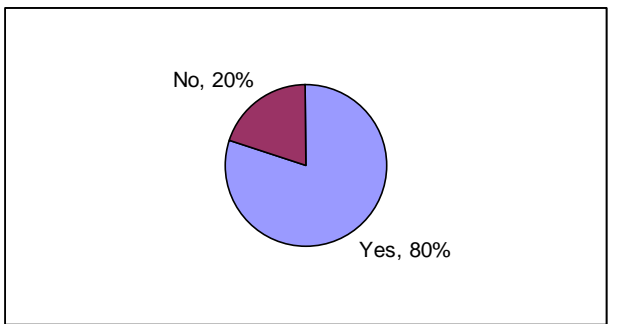
Harehills Lane		
Yes	46	71%
No	18	28%
Other	1	2%
<b>TOTAL</b>	<b>65</b>	

Holt Park		
Yes	46	78%
No	12	20%
Other	1	2%
<b>TOTAL</b>	<b>59</b>	



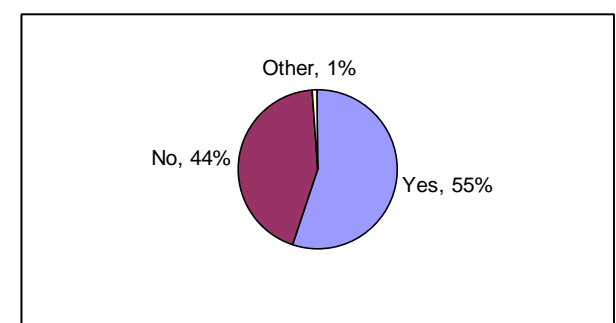
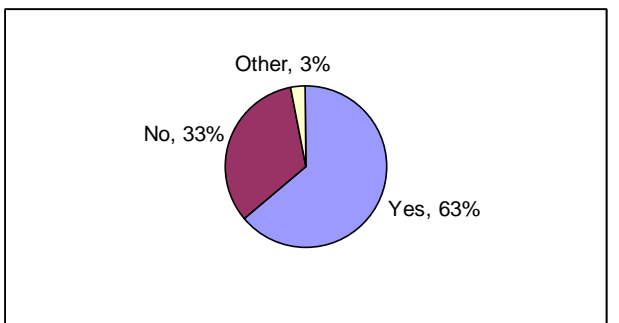
Hunslet		
Yes	49	80%
No	12	20%
<b>TOTAL</b>	<b>61</b>	

Kirkstall		
Yes	47	65%
No	25	35%
<b>TOTAL</b>	<b>72</b>	

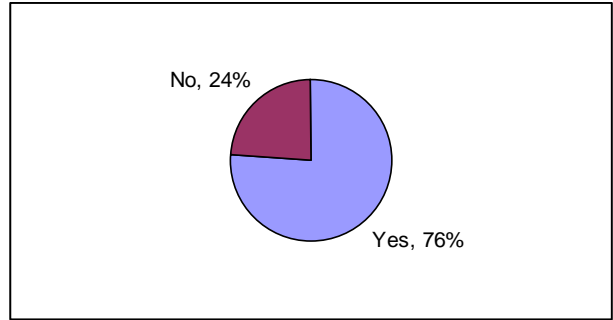
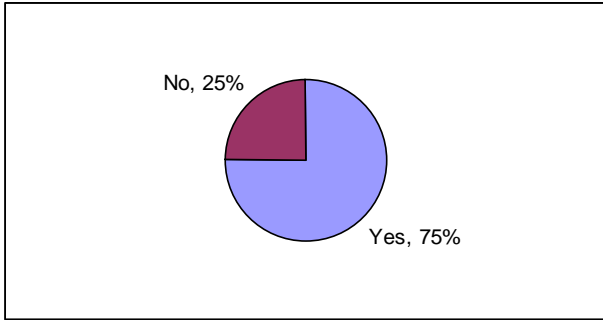


Meanwood		
Yes	40	63%
No	21	33%
Other	2	3%
<b>TOTAL</b>	<b>63</b>	

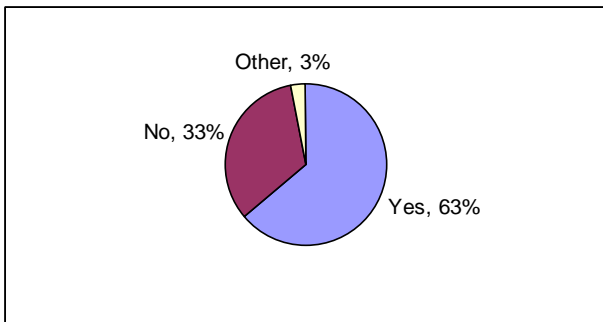
Otley		
Yes	74 (3 comments)	55%
No	60	44%
Other	1	1%
<b>TOTAL</b>	<b>135</b>	



Rothwell			Seacroft		
Yes	43	75%	Yes	51	76%
No	14 (1 comment)	25%	No	16	24%
<b>TOTAL</b>	<b>57</b>		<b>TOTAL</b>	<b>67</b>	



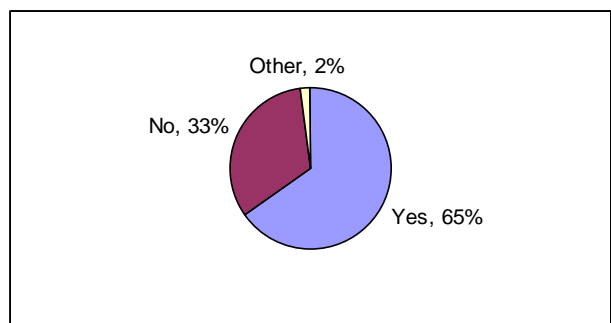
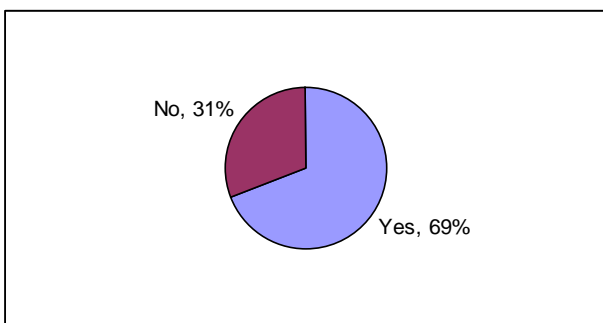
Yeadon		
Yes	43	63%
No	39 (1 comment)	33%
Other	1	3%
<b>TOTAL</b>	<b>83</b>	



Other comments	55
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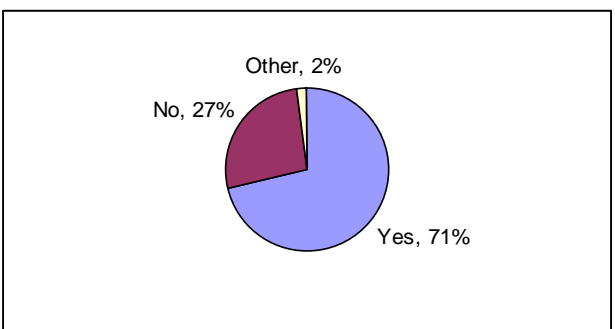
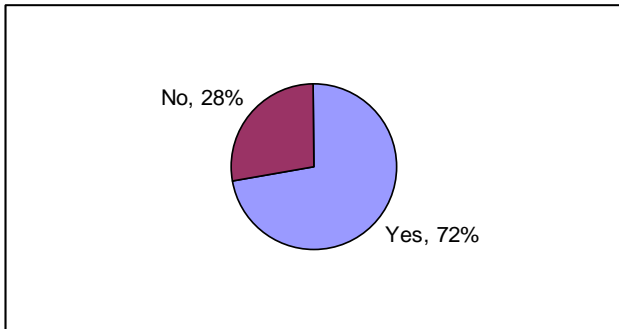
**b) The following centres have the ability to intensify their use within existing boundaries and expand beyond their existing boundaries:**

Dewsbury Road			Garforth		
Yes	37	69%	Yes	39 (1 comment)	65%
No	17	31%	No	20	33%
Other	-	-	Other	1	2%
<b>TOTAL</b>	<b>54</b>		<b>TOTAL</b>	<b>60</b>	



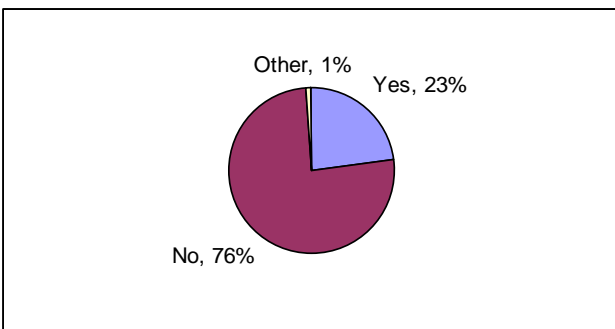
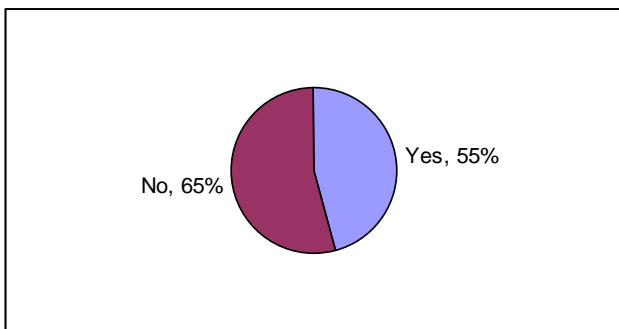
Harehills Lane		
Yes	39	72%
No	15	28%
Other	-	-
<b>TOTAL</b>	<b>54</b>	

Hunslet		
Yes	39	71%
No	15	27%
Other	1	2%
<b>TOTAL</b>	<b>55</b>	

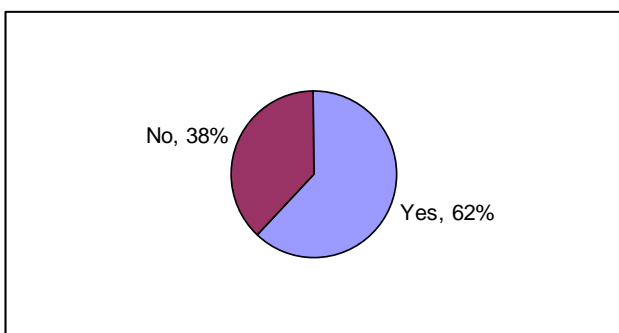


Kirkstall		
Yes	34	55%
No	28	65%
Other	-	-
<b>TOTAL</b>	<b>62</b>	

Otley		
Yes	31 (3 comments)	23%
No	102	76%
Other	2	1%
<b>TOTAL</b>	<b>135</b>	



Seacroft		
Yes	41(1 comment)	62%
No	25	38%
<b>TOTAL</b>	<b>66</b>	



Other comments	43
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## **Consultation Responses**

### Intensify

Residents were both in favour and against specific town centres identified for intensification. Additional centres proposed were: Guiseley; Pudsey as is on rail network; Bramhope; Arthington; Pool; Wetherby; Morley; Colton; Thorpe Park; Beeston; Middleton; Belle Isle; Compton Road; Headingley Arndale Centre (in need of regeneration); Chapel Allerton; Horsforth Town Street; and Woodsley Road (Woodhouse Street).

Disagreement was primarily with Otley because of its poor transport connections, congestion, and public transport capacity issues (a new bridge or bypass is required), and with Guiseley, Yeadon, and Rawdon because of congestion, infrastructure pressure, and impact on the semi-rural character. This is, however, in part likely due to the proportionally high levels of responses from residents in these areas as opposed to elsewhere in the District. One respondent commented that as Bramley has recently gained planning permission to expand outside the existing boundary, it is in the wrong category.

Developers considered that Guiseley should be included within this category, as should the city centre (particularly the western rim to include Kirkstall Road Renaissance Area). Also, development of the former Vickers Factory would support the intensification of Cross Gates. M&S considered that Moortown Corner should be included for intensification potential, as M&S are at an advanced stage of proposals for an extension, with land assembled to facilitate this.

Interest groups proposed that intensification should be based on existing rail links, that it must take into account congestion, and that Wetherby should be within this category. Groups in Otley both agreed and disagreed that Otley has capacity and infrastructure to accept growth within the town. Groups considered that more detailed documents should be drawn up in consultation with communities in order to determine this point.

### Expand

Over 75% of residents disagreed with the expansion of Otley. It is likely, however, that this was caused due to some confusion that the proposed expansion of the centre would involve developing on greenfield sites, which is not what was intended by the Council. Particular points raised were that Otley doesn't have good enough public transport connections, or sufficient car parking, and should only extend if a bypass/bridge is built. Excessive expansion would ruin Otley's tourism potential.

Other points raised by residents and interest groups are that centres such as Headingley must not be left to wither, and that no centres should be expanded unless on a rail link. Additional centres proposed for expansion were: Wetherby; Moortown; Morley; Beeston; Middleton; Belle Isle; Meanwood; Bramley; Boston Spa, and Seacroft. The recent planning permission in Bramley to expand outside the existing boundary was also referred to.

Developers made three additional proposals for expansion. As Rothwell currently suffers from a lack of family housing, it should be expanded to support a more sustainable community. There is an opportunity for the expansion of employment or residential development in the Parlington Estate to the north of Garforth. Finally, Stanningley Bottom is well placed to provide increased sustainable residential development, with an improved retail offer. Another developer agreed with all centres identified as long as expansion does not inhibit local provision in nearby regeneration areas. Asda encouraged the Council to allow growth in out-of-centre locations where it can meet wider sustainability, economic, and social objectives, including meeting local needs and promoting competitiveness.

Metro stated that expansions must be sustainable, e.g. careful consideration given to the level of parking to be provided. Another agency considered that provision of a public transport hub should be considered if centres expand/intensify.

### Other

As the CS is the first document to formally identify LCs, developers also suggested that LCs suitable for expansion or intensification should also be identified in a similar manner to TCs. This would be to serve expanding communities, and in recognition of the increased RSS target.

LCC Area Management West commented on the Town and District Centres Background Paper (Appendix B) and proposed specific updates and wording for Armley, Bramley, Farsley, and Pudsey.

### **Sustainability Appraisal**

Economic: Option a) performs better than b) against the objective to tackle disparities in the labour market because centres are more easily accessible to all, including the economically disadvantaged. Growth at centres in deprived areas could have particularly positive effects. Option b) performs better against the objective for general economic growth because it offers more choice and less restriction on business location. Growth at centres without congestion and with good public transport infrastructure would be particularly positive.

Social: Option a) scores better than b) against several of the social objectives, particularly those where facilities would be more accessible to all, and those concerning social inclusion and cohesion. Particular centres that could have positive impacts from growth include: Hunslet, Harehills Corner, Bramley, Dewsbury Rd, Armley, Crossgates, Harehills La, Seacroft, Middleton and Kirkstall.

Environmental: Option a) scores better than b) on most of the environmental objectives, particularly avoiding development of greenfield land, sustainable travel and reduced CO2 emissions, meeting local needs locally, and reducing the impact of pollution. Wetherby and Kirkstall have high flood risk areas within the defined town centres which could pose problems for certain types of growth, and a number of centres have greater sensitivities in terms of townscape and extensive historic character.

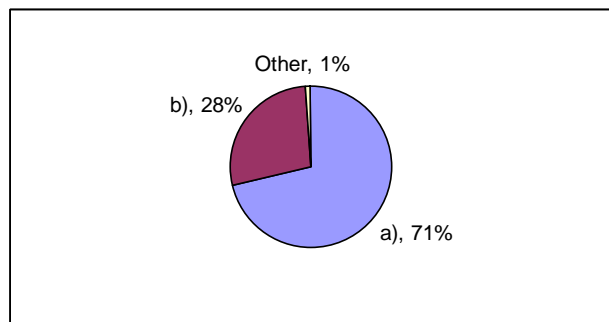
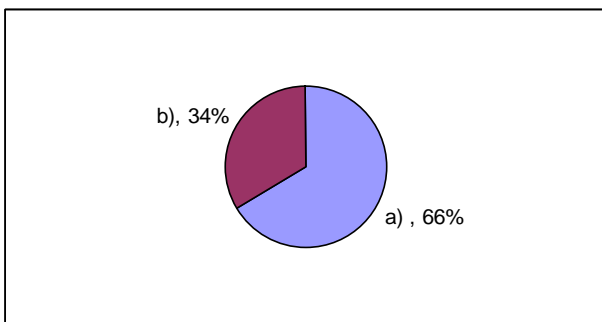
Conclusion: Option a) to identify centres for growth is generally the most positive, particularly for social and environmental objectives.

**23. National planning policy does not support expansion of existing out of town centre shopping centres, particularly for retail uses. So, should:**

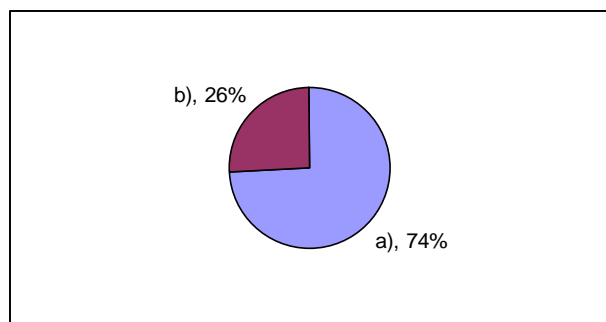
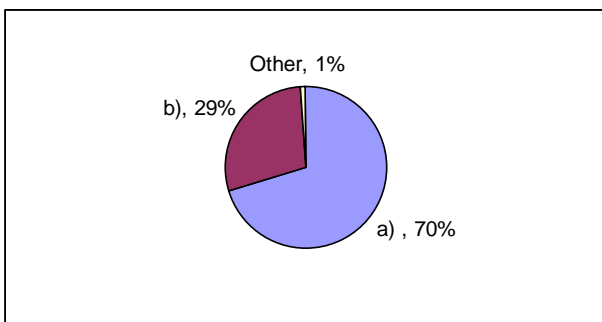
- Owlcotes (Pudsey) ,
- White Rose (Morley),
- Colton,
- Killingbeck,

- a) be contained as they are, or,  
 b) within the context of their potential impact on traditional centres and the City Centre, could they be encouraged to diversify their function and integrate into the surrounding communities?

	Owlcotes			White Rose	
a)	90	66%	a)	95	71%
b)	46	34%	b)	37 (1 comment)	28%
Other	-	-	Other	1	1%
<b>TOTAL</b>	<b>136</b>		<b>TOTAL</b>	<b>133</b>	



	Colton			Killingbeck	
a)	88	70%	a)	92	74%
b)	37	29%	b)	33 (1 comment)	26%
Other	1	1%	Other	-	-
<b>TOTAL</b>	<b>126</b>		<b>TOTAL</b>	<b>125</b>	



Other comments	53
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**Consultation Responses**

Some residents wanted this to be left to the market to decide, others wanted no diversification in order to concentrate on smaller scale localised retail development, and others wanted diversification but only if linked to a transport modal shift with better public transport. Diversification into a functioning local centre should only be to allow housing, or smaller, local, and more varied businesses. It was noted that Crown Point and Thorpe Arch are also out of town centres.

Developers and retailers promoted diversification and expansion:

- Asda proposed that the Council should take a flexible and permissive approach to the location of retail growth in order to meet the very significant level of housing and population growth.
- Land Securities and Evans Property Group consider that as part of a regeneration strategy for

the whole of south Leeds, including future investment and job creation, the White Rose area could become an economic and enhanced public transport hub. This is especially relevant in the context of the potential for a new urban neighbourhood in south Leeds, as set out in CS Scenario 4. It should be designated as a principal town centre but with any additional retail floorspace contingent upon the delivery of other development and regeneration objectives. Allowing for diversification and integration with surrounding areas at the White Rose centre would bring a wider offer to the local community and a number of benefits in line with para 2.51 of PPS6. In line with para 2.16 of PPS6 they recommend a criteria-based approach in the Core Strategy which prioritises and safeguards existing centres but also sets out the circumstances by which expansion of out-of centre shopping facilities could occur.

- M&S also referenced PPS6, whereby although Para 2.14 makes clear that the development of new, or the expansion of existing, out-of-centre regional or sub-regional shopping centres is 'unlikely' to meet Government's town centre policies, it does not seek to prevent all new development at such centres, where there are needs that would otherwise remain unmet. It is inappropriate not to plan positively for the evolution of out-of-centre shopping centres, where change would diversify their role and enable them to better meet the needs of their surrounding local communities and, in so doing, complement other existing centres. It will also be necessary for retailers and existing occupiers of out-of-town shopping centres to remodel their stores in order to meet changing customer needs.
- Regent Retail Parks Partnership seek the inclusion of the Junction 1 (M621) Retail Park within the list of major out of centre shopping centres in Leeds. It is well established, accessible by a choice of means of transport, and provides a wide range of retail facilities. It performs as a linked trip destination and has a key role within the shopping hierarchy of Leeds serving the shopping needs of the immediate and surrounding area, which should be recognised within the Core Strategy. It should be encouraged to diversify its function and integrate into the surrounding community.

Metro considered Moor Allerton Centre, Seacroft, Crown Point Retail Park, and the A65 Retail Park (particularly the cinema site) should be added to the list of Out of Town Centre Shopping Centres. The Highways Agency in principle supported diversifying, as by better accommodating for the needs of the local communities, the improved functioning of these shopping centres could potentially reduce vehicular traffic on the wider road network. But the policy must not attract additional trips to these centres, but seek to transform them from out of town centres to local centres serving new or enhanced communities. Other interest groups thought there is the potential for a rail link and transport interchange at White Rose. Again, any diversification should promote smaller businesses, and truly meet local community needs, although without reducing the function of existing town and local centres. It was considered that if public transport was enhanced, alongside reduced parking/parking charges, the redundant parking could be used for new residential or commercial development to create more viable centres.

### **Sustainability Appraisal**

**Economic:** Option b) could be a serious threat to the vibrancy of the city centre and town and district centres; Option a) performs much better.

**Social:** There were not considered to be any particularly significant impacts on social sustainability appraisal objectives.

**Environmental:** Option a) does not have any particular impact on environmental sustainability appraisal objectives. However, option b) has a number of negative impacts and potential negative impacts. Public transport serving out-of-town centres is not likely to be as good as at existing town centres (several of which also have a rail station) therefore it could encourage private car use if existing town centres decline as a result of option b). This in turn would increase greenhouse gas emissions. Additionally, existing historic town centres could decline in the face of competition from out-of-centre centres and this could lead to historic buildings becoming empty and derelict.

**Conclusion:** Economic and environmental sustainability appraisal objectives indicate that all four of the out-of-centre centres should be contained as they are.

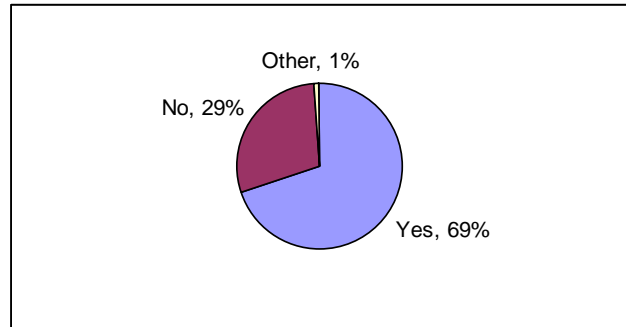
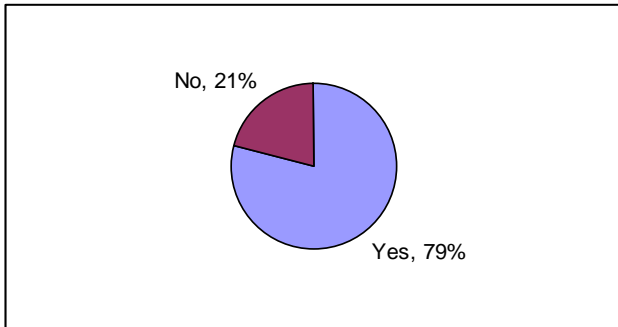
### **National and Regional Policy**

See PPS6.

**24. Leeds needs to develop major cultural and leisure facilities. Where should these be located?**

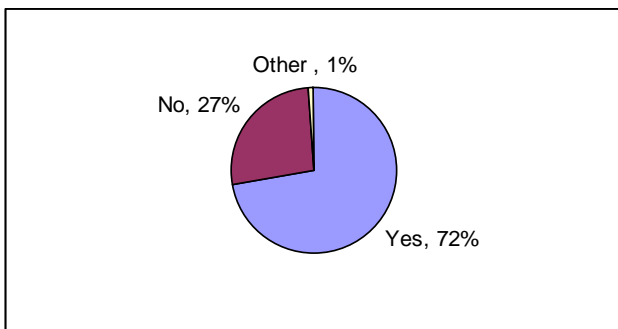
- a) *Within the City Centre,*
- b) *Adjacent to the City Centre,*

	a)			b)	
<b>Yes</b>	146 (6 comments)	79%	<b>Yes</b>	106	69%
<b>No</b>	39	21%	<b>No</b>	45	29%
<b>Other</b>	-	-	<b>Other</b>	2	1%
<b>TOTAL</b>	<b>185</b>		<b>TOTAL</b>	<b>153</b>	



**c) *Outside the City Centre but in locations highly accessible by public transport.***

	c)	
<b>Yes</b>	127( 1 comment)	72%
<b>No</b>	47	27%
<b>Other</b>	2	1%
<b>TOTAL</b>	<b>176</b>	



Other comments	70
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**Consultation Responses**

The majority of respondents answered 'yes' to all three locations, with sustainable accessibility being crucial. It was widely noted that different types of facility will have different requirements, so location will depend on factors such as use, land area, access requirements etc.

Residents were both for and against the principle of the need for these types of facilities. There was support for facilities to be in the city centre, but also that the city centre is not always accessible and so relevant facilities e.g. leisure centres should be near the people they serve. Out of centre locations should include links to the national public transport network. The river frontage could be maximised.

Developers noted that the policy should include attractions that might be developed or extended which depend on specific geographic characteristics, or build upon an existing attractions, such as Harewood House. A specific site for major cultural and leisure facilities including a country park aspect was proposed at Parlington as it's already identified under Policy LT5B/3 of the UDP. This could be either as a stand alone development or part of a wider residential and employment development.

Agencies and interest groups noted that distant town centres must not be forgotten, e.g. there are no cinemas in Otley, although the only places accessible from some communities is the city centre. It was also stated that any location will require good motorway access as facilities they will attract people from outside the city, who in reality will travel by car even though this may be unsustainable. It was considered that flexibility in location is essential to attract outside investment. Leeds Teaching Hospitals Trust considers some facilities could be used for health use on a session basis, which could mean better access for patients and avoid dedicated under-utilised healthcare facilities.

The Theatres Trust requested that theatres are included in the list of cultural facilities, and would like policies to protect existing, and encourage new, theatre provision. Such facilities should also be added to the list of suitable recipients for planning obligations. Leeds Metropolitan University considers that so the location of student populations and education facilities should be a priority consideration, as students both contribute, and benefit from, such facilities. CANPLAN (Chapel Allerton) would like the Council to consider the existing grassroots innovations arising from the suburbs which result in new forms of cultural activities (e.g. Café Scientifique, Seven Arts Centre). Encouraging the diversity of the suburbs in this way could help to make Leeds a competitive European city in line with the Aims and Objectives.

The PCT commented that the city centre and town and local centres should not just comprise shops and places to eat, but also space for families and older people to sit, eat and play.

### **Sustainability Appraisal**

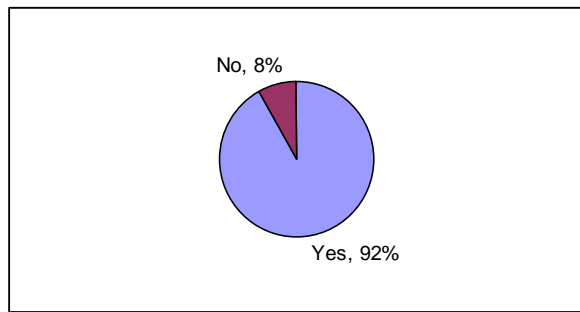
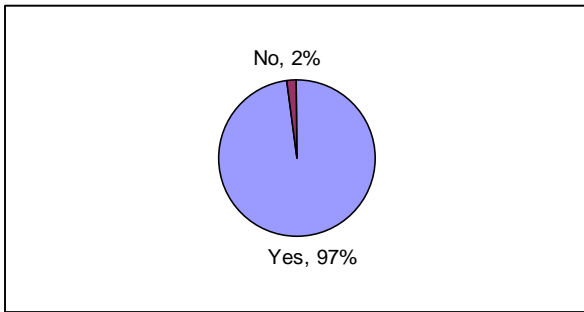
Sustainability appraisal results indicate that option a) is the best. It helps the city centre to remain vibrant, it maximises accessibility to cultural, leisure and recreational activities, it promotes efficient balanced development, and it encourages the use of public transport as the city centre is well-serviced and this in turn reduces greenhouse gas emissions.

**25. Leeds needs to maximise opportunities for people to improve their health and well being. How should this be undertaken?**

**a) Provision of a green infrastructure throughout the District,**

**b) Improved provision of public sports halls and leisure centres,**

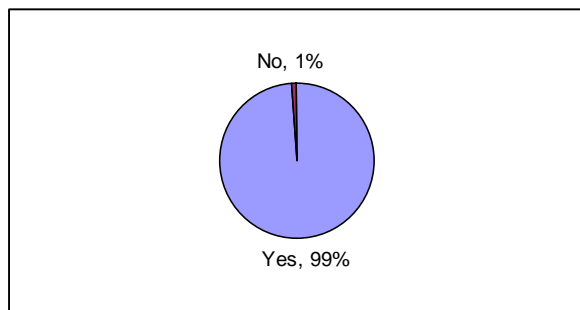
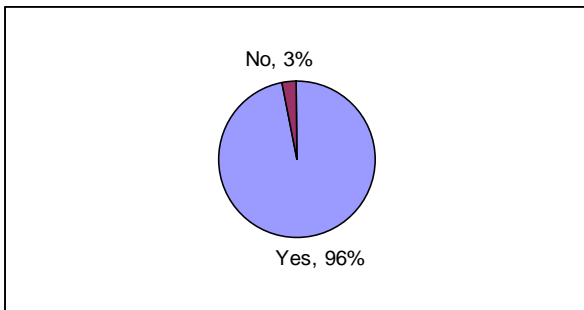
a)			b)		
Yes	204 (1 comment)	97%	Yes	189 (3 comments)	92%
No	5	2%	No	16 (1 comment)	8%
Other	1	<1%	Other	-	-
<b>TOTAL</b>	<b>210</b>		<b>TOTAL</b>	<b>205</b>	



**c) Provision of safe, car free routes for cycling and walking,**

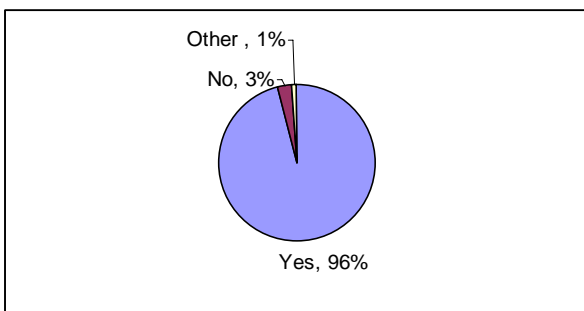
**d) Retain and where possible increase the provision of allotments.**

c)			d)		
Yes	211	96%	Yes	213 (14 comments)	99%
No	7	3%	No	2 (1 comment)	1%
Other	1	<1%	Other	-	-
<b>TOTAL</b>	<b>219</b>		<b>TOTAL</b>	<b>215</b>	



**e) Ensure provision of an accessible network of health facilities.**

e)		
Yes	202 (1 comment)	96%
No	6 (1 comment)	3%
Other	2	1%
<b>TOTAL</b>	<b>210</b>	



### **Consultation Responses**

All parties overwhelmingly supported all the options in order to improve health and well being, and particularly in areas known to have poor health and poor access to recreation facilities. Green spaces and green infrastructure should be strongly protected, both for its amenity and its ecological value. Particular points included that the right of way network should be referred to as part of green infrastructure, and should be improved and extended rather than just maintained, and that demand for allotments is not currently met. Activity should be built into daily routine, rather than only at leisure centres, with local facilities required. Improvements in public transport and associated reduction in car use are essential in order to help improve health. Encouraging local food production would reduce traffic and provide healthier food.

Cycling provision needs improvements, with proposals that it should be integral in all major developments, have routes separate from the highway, and have better secure cycle parking. As well as cycling and walking, there needs to be better provision for different groups, such as young people, people with disabilities, equestrian activities, older people, and city centre users.

Specific ideas included widening the use of schools for leisure/community use, having increased partnership with the private sector, support tree planting programmes, and support and develop existing facilities rather than build new ones. A resident commented that the Core Strategy should include specific policies relating to noise and lighting as these are two aspects of public health that could be improved with support from spatial policies and strategies (they are included as pollutants in the Sustainability Appraisal but not in the Core Strategy itself).

Developers proposed two specific sites for countryside recreational pursuits; near to Garforth, and the development of appropriate uses in the green belt adjoining the Aire Valley. It was also proposed that where allotments do fall into disrepair, they should be redeveloped. There was a concern that proposals need to be realistic and deliverable, especially where proposals rely on private landowners.

Leeds Teaching Hospitals stated that access to community healthcare facilities needs to consider hospital provision, because as more care shifts to local settings hospitals will become more specialised, and this may mean additional travel from some parts of the city.

The PCT commented that provision for new schools, health care, leisure and community facilities should not be driven by the availability of cheap land but must be focussed in the worst 10% SOAs in order to narrow the gap.

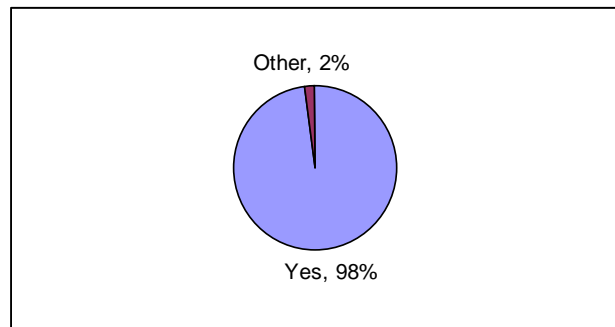
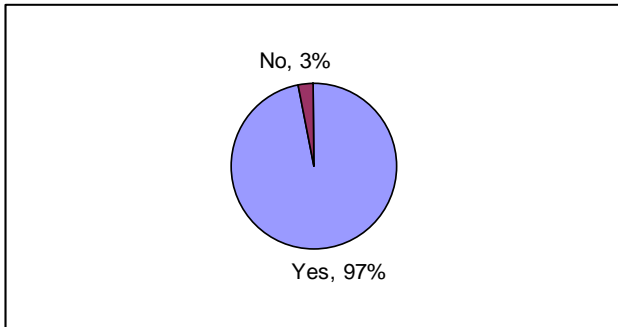
### **Sustainability Appraisal**

Generally all of these options scored well against economic, social and environmental sustainability appraisal objectives. Only the sustainability appraisal objective about minimising pressure on greenfield land and using brownfield land for development had negative scores, for option a) and d). Protecting green infrastructure and increasing the provision of allotments could reduce the amount of brownfield land available for development and therefore increase pressure for development in the green belt in order to accommodate the required housing numbers. This could be mitigated for by building at higher densities.

**26. Leeds needs to support the provision of high quality education by:**

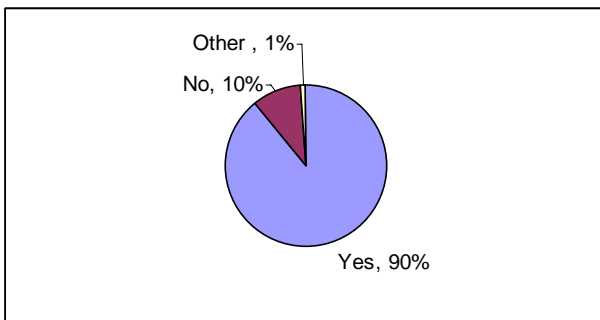
- a) Encouraging schools and colleges to make their facilities available for wider community use,
- b) Locating schools where they are most accessible to the communities they serve,

a)			b)		
Yes	198 (2 comments)	97%	Yes	201 (2 comments)	98%
No	6	3%	No	1	<1%
Other	-	-	Other	4	2%
<b>TOTAL</b>	<b>204</b>		<b>TOTAL</b>	<b>206</b>	



- c) Encouraging the location of new further education provision within the city centre and town and district centres.

c)		
Yes	173 (1 comment)	90%
No	19	10%
Other	1	1%
<b>TOTAL</b>	<b>193</b>	



Other comments	49
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**Consultation Responses**

There was a great majority of support for all the proposals.

Option a: Facilities need to be more affordable and not PFI. PFI should include stricter controls over timings and costs of community access. LCC should encourage local providers (including individual schools). School buildings should be given to the community when no longer needed rather than sold/built on. However, widening community use should only be if the spare capacity is available in the opinion of the school and teachers, and should not diminish the primary objective of school use. Additionally, some FE activities should be the preserve of commercial enterprises or private clubs.

Option b): A few respondents commented that fossil fuel use would be reduced if children went to school locally, and particularly if they walked to school. There should therefore be no freedom of choice of school if it would involve car journeys, with distance and ability to walk there being selection criteria.

Option c): The city centre and fringe need vastly improved schools in order to persuade families to live there. The main comments were that greater dispersal of FE provision is desirable as there is already a high concentration in city centre, and that outlying areas are marginalised due to transport and cost implications. Provision should be local. Leeds Metropolitan University stated that provision should be encouraged in all existing and accessible locations, not just the city centre. Buildings should be fit for purpose, and should be redeveloped where this is not the case. For this reason policies should not protect higher education sites.

Other comments were that FE is sufficient so existing schools should be improved, and that school buildings should be part of the townscape, rather than isolated in large sites. Community café societies also provide a wider educational and cultural provision and social innovation, than more formal FE provision.

### **Sustainability Appraisal**

All three options scored well against economic, social and environmental sustainability appraisal objectives and no negative impacts were identified. This supports the need for high quality education as an integral part of creating sustainable communities.

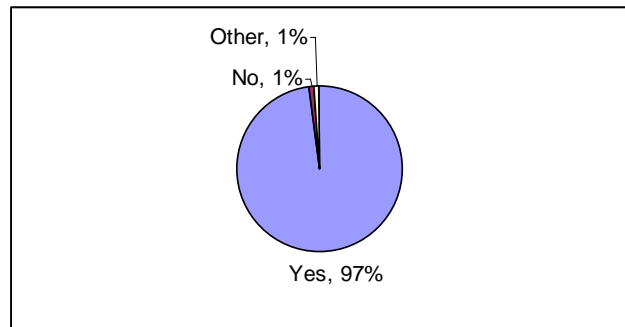
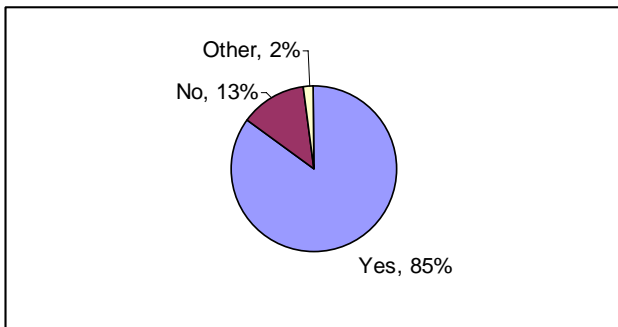
### **Other Policy**

Schools policy, school admissions policy.

**27. Leeds wants to provide greater choice in travel options open to people in order to encourage the use of the most sustainable forms of transport. Which of the following measures do you think would be most effective?**

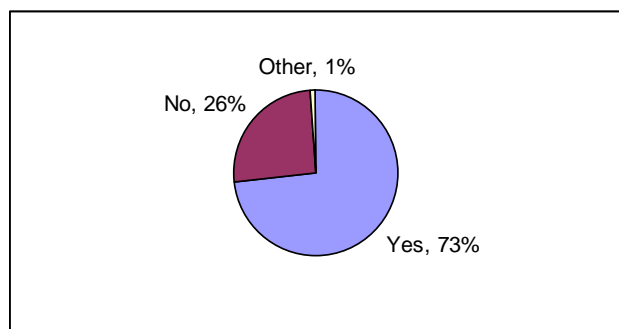
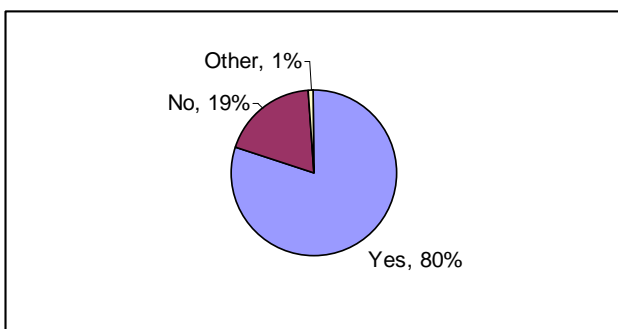
- a) *Park and Ride,*
- b) *High quality public transport systems,*

	a)			b)	
<b>Yes</b>	163 (4 comments)	85%	<b>Yes</b>	213 (4 comments)	97%
<b>No</b>	25 (1 comment)	13%	<b>No</b>	3	1%
<b>Other</b>	4	2%	<b>Other</b>	3	1%
<b>TOTAL</b>	<b>192</b>		<b>TOTAL</b>	<b>219</b>	



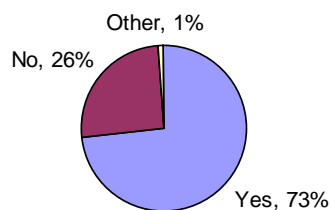
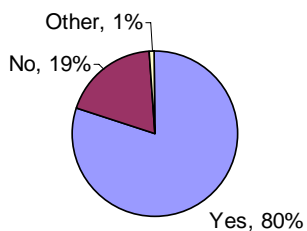
- c) *Car free or limited access areas e.g. pedestrianisation and Home Zones,*
- d) *Car parking management and controls,*

	c)			d)	
<b>Yes</b>	153	80%	<b>Yes</b>	127 (1 comment)	73%
<b>No</b>	36	19%	<b>No</b>	46	26%
<b>Other</b>	2	1%	<b>Other</b>	2	1%
<b>TOTAL</b>	<b>191</b>		<b>TOTAL</b>	<b>175</b>	



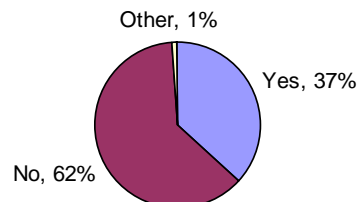
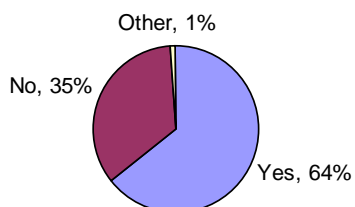
- e) *Safe and accessible walking and cycle routes,*
- f) *Business and school travel plans to ensure sustainable transport patterns in existing and new developments,*

	e)			f)	
<b>Yes</b>	202 (1 comment)	80%	<b>Yes</b>	172 (1 comment)	73%
<b>No</b>	7	19%	<b>No</b>	13	26%
<b>Other</b>	4	1%	<b>Other</b>	4	1%
<b>TOTAL</b>	<b>213</b>		<b>TOTAL</b>	<b>189</b>	



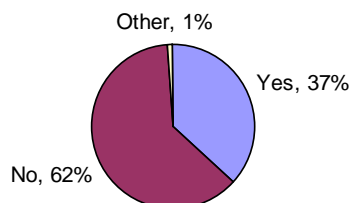
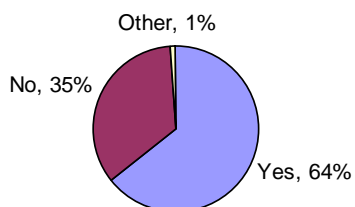
**g) Effective traffic management to give priority to high occupancy vehicles,  
h) Demand management measures such as road user charging,**

	<b>g)</b>		<b>h)</b>	
<b>Yes</b>	117 (2 comments)	64%	70	37%
<b>No</b>	64	35%	117	62%
<b>Other</b>	2	1%	2	1%
<b>TOTAL</b>	<b>183</b>		<b>189</b>	



**i) Low emission zones to improve air quality e.g. for the City Centre,  
j) More local rail stations.**

	<b>i)</b>		<b>j)</b>	
<b>Yes</b>	129 (1 comment)	64%	200 (2 comments)	37%
<b>No</b>	53	35%	8	62%
<b>Other</b>	1	1%	2	1%
<b>TOTAL</b>	<b>183</b>		<b>210</b>	



Other comments	94
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## **Consultation Responses**

### Option a)

There was high support for park and ride, particularly on high volume traffic corridors and where close to rail stations, and where the whole journey cannot be completed by public transport. It could be tied in with major developments to make it financially viable. Metro in particular would support it where associated with increased rail capacity or bus where there is a positive cost benefit ratio, and consider it should also be linked to better control of city centre car parking.

Other points were:

- One person proposed Station Top Otley, a Parish Council proposed sites to the north and east of the ring road as per York.
- Needs to be linked to quality public transport.
- Once people have driven so far they will just carry on, limited capacity of proposals.
- Should be provided all along routes not just at urban edge.
- Motorcycle provision should also be promoted as less polluting and takes up less space.

### Option b)

Again a high response in favour. Comments were:

- NGT system and tram train network has potential though significant developer contributions required, rail/tram node based on principal centres and cheap fares rather than road pricing, not in private ownership, not bus and should be cheap clean and have priority at rush hours. Deregulated so little control.
- Reopen disused rail lines and open new ones.
- New rail stations suggested at Horsforth Woodside, Ardsley, East Leeds, Kirkstall, and White Rose, all with Park and Ride. Also Apperley Bridge, Otley and Pool.
- Need to take account of developments on the Leeds/Selby/E. Coast line.
- Supertram could be replaced with BRT with extension to Tingley and Park and Ride.
- Better integration of transport modes and bus priority measures needed.
- Public transport prices also need controlling.

Option c) had a fairly strong level of support though a degree of disagreement.

Option d) was generally in favour though a degree of dissent. Metro in particular are in favour of reduced supply and pricing. One respondent points to the need for transport plans.

Option e) had very strong support. Will need a business plan for future use and maintenance, should be a top priority and linked to public transport stops and stations. Cycle routes need to be separate from traffic. Should also link with Greenspace and recreation areas.

Option f) had strong support. Ramblers consider should connect greenspaces and recreational areas as well as work and home. Need to be properly implemented and monitored.

Option g) had general support but also a fair degree of dissent. Metro was the main supporter as benefits to cost and efficiency of public transport, needs rigid enforcement to be effective. One person proposed bus lanes should be converted to high occupancy vehicle lanes.

Option h) was generally a negative response but with over a third in favour. Metro commented that substantial investment is also needed in public transport. Other comments were that it won't work, is a cost to the economy, and there is enough tax already.

Option i) had a significant support but a degree of dissension. Metro commented that improved public transport and restraint of car is needed. Also an electric NGT will benefit air quality.

Option j) had almost total support.

### General Comments

- A resident commented that there is no sense of where other major employment centres are and, consequently, what scale of transport improvements might be necessary. Also, some spatial infrastructure to support development of the City could reasonably be located outside the MD boundary, e.g. Whitwood freight terminal. A City Region perspective somewhere in the Core Strategy would be able to cover this.
- One investor was keen to ensure that there is no blanket requirement for developer contributions towards transport infrastructure.
- Scenario 4 should include prerequisite in favour of siting new development near to rail stations.
- Need to integrate all these measures.
- New rail links to the north and east including better rail provision particularly from Harrogate and Ilkley (which links to increased numbers of student commuting), plus better rail provision

would reduce need for airport expansion. Need to take account of wider rail and other transport network decisions and opportunities for new rail stations.

- Decentralise employer units i.e. City Council.
- Make better use of the Ring Road and arterial routes.
- Parlington and North Newhold could be developed using existing and improved public transport.
- Metro considered it worthwhile to re-iterate the Objectives of the Leeds City Region Transport Vision in this section, e.g. "Delivering this LDF will support the wider objectives of the city region for the economy, health, education, social inclusion initiatives and the environment by:
  - Meeting the movement needs of the city region, its residents, its workers and its visitors,
  - Supporting growth and delivering agglomeration and other wider economic benefits,
  - Facilitating sustainable development; and,
  - Making best use of the transport assets in the city region."
- New radial roads should be built in advance to serve new developments.
- Better provision for pedestrians needed.
- People need to be attracted away from their cars not forced out of them. Banning high emission vehicles does not discourage commuting to and from the city.
- More goods should be moved by rail to reduce HGV numbers.
- Enforcement needs to be better.
- Hospitals can be difficult to access by public transport for both patients and staff.
- Hopper buses to serve estates away from main routes.
- Restrict hours of travel to the city centre.
- Integrate various transport operators.
- More homezones and 20mph zones.
- Improved bus links and a pro-active approach to car sharing schemes.
- Provide a comprehensive fully mapped out cycling route with more cycle tracks between towns and villages.
- Maintenance of the road network is a major concern.
- Improve connections from rural to urban areas by public transport.

### **Sustainability Appraisal**

**Economic:** Generally all options have positive impacts because they improve accessibility to jobs, shops, and services. Car user charging should not be selected as an option on its own because if introduced without providing other alternative means of travel, it could penalise those in rural areas and could affect those with marginal businesses sensitive to changing patterns. A similar point was noted for option d), in that if car parking restrictions are too tight without alternative measures it could affect the customer base of vulnerable businesses.

**Social:** Generally positive for all the options. Public transport in itself can help bring people together and home zones and pedestrianised areas provide space for communal uses/ events. It was noted that option h) road user charging could penalise those who live in rural areas or with poor public transport and therefore are reliant on the car. Option h) should therefore be introduced alongside other options such as option a) park and ride and option j) more local rail stations.

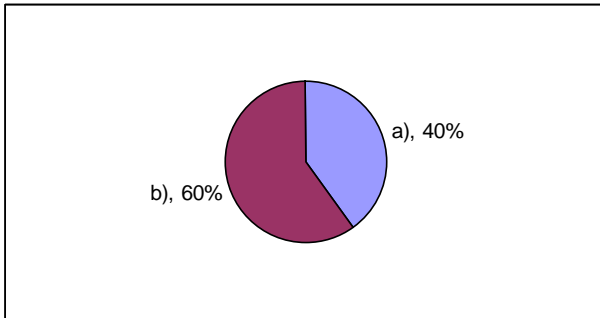
**Environmental:** The options proposed tend to have few significant impacts on environmental sustainability appraisal objectives, however they do help reduce vehicle emissions and reduce air and noise pollution by reducing the use of the private car. There was a concern that there may be a local rise in air pollution at park and ride sites but this is offset by the general traffic reduction, especially in the inner city residential areas. An implication of this may be to ensure that park and ride facilities are located on the edge of the urban area and not too closely integrated into existing communities. A specific concern regarding option d) on restricting car parking spaces, is that it could encourage the paving over of front gardens to provide off-street parking spaces. This would have a negative impact on the quality and distinctiveness of the built environment and managing flood risk as it would increase the speed of surface water run off and exacerbate flash flooding.

**Conclusion:** The options work synergistically together so that option d) car parking controls and option h) road user charging need to be introduced at the same time as the other options to ensure that alternative forms of travel are provided, otherwise they result in negative impacts. Park and ride facilities should be located on the edge of urban areas and should use porous surfaces (to avoid increased surface run off).

**28. Leeds should allow Leeds Bradford Airport to expand to accommodate the air travel needs of either:**

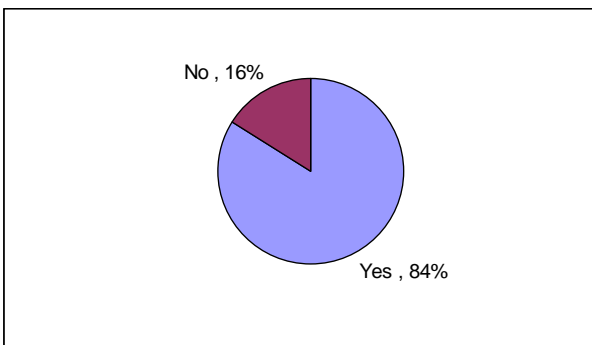
- a) *Those living and working in the City Region,*
- Or,
- b) *Those living and working both in and beyond the City Region.*

a)	67 (1 comment)	40%
b)	101 (1 comment)	60%
<b>TOTAL</b>	<b>168</b>	



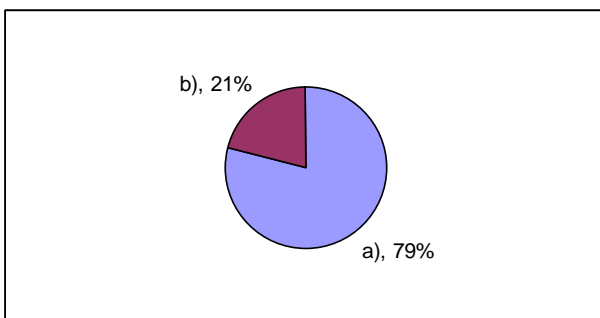
**c) Allow Airport expansion only if supported by improved surface access by public transport,**

Yes	153 (1 comment)	84%
No	29	16%
<b>TOTAL</b>	<b>182</b>	



**d) Allow Airport expansion only if supported by measures to mitigate the effects of aircraft noise.**

a)	140 (1 comment)	79%
b)	38 (2 comments)	21%
<b>TOTAL</b>	<b>178</b>	

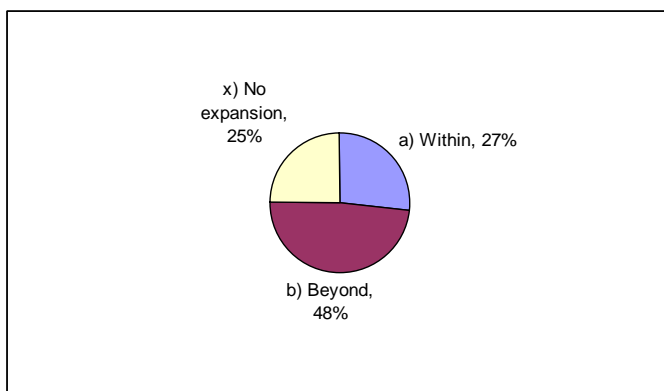


Other comments	90
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### Consultation Responses

Responses 'ticked' for questions a) or b) showed that nearly two thirds of respondents considered that the airport should expand to serve those living and working both in and beyond the City Region. However, in the 'other comments' section many respondents commented that the question was too leading and should have included an option for the airport not to expand, with 51 respondents explicitly stating they wanted no expansion. Taking this into account (and discounting the a) or b) response in the instances where respondents also stated there should be no expansion), the statistics shown above are markedly different. The table below shows that only half consider that the airport should expand to serve those beyond the City Region, with a quarter wanting no expansion at all. This should, however, be treated with caution considering that had the 'no expansion' option been a 'valid' choice then overall responses may have been different.

<b>a) Within</b>	56	27%
<b>b) Beyond</b>	97	48%
<b>x) No expansion</b>	51	25%
<b>TOTAL</b>	<b>218</b>	



A similar point is that analysis shows that the majority of those respondents who answered negatively regarding options c) and d) did so because they wished to see no expansion, rather than because they feel no mitigation for expansion is required. Overall, if airport expansion were to go ahead, the overwhelming majority would only want this if mitigation measures were put in place for noise, and if public transport was improved.

The main reason for this opposition to expansion was due to the level of pollution/emissions it would bring and its subsequent impact on climate change. It was also noted that this climate change impact would conflict with the main policy aims elsewhere in the Core Strategy. Concerns were also raised around various other issues; that it is a restricted site due to a poor runway alignment; the proximity of residential areas and the need to maintain their semi-rural character; its green belt location which would be harmed by expansion and also by necessary transport infrastructure; and that it would not in any case be possible to provide suitable transport infrastructure and so local roads would become more dangerous and congested. Additionally, airport expansion was felt by some to be an issue for national debate rather than a local one.

Other points querying expansion were that it should be based on evidence, or based on business needs rather than tourism, and that facilitating more people to leave the city through holidays abroad is not an economic benefit to Leeds. It was posed that the airport should have no night flights, and that plans should consider the long term impact of high oil prices as this will reduce the number of air passengers so expansion would in any case be unviable in the long term. Airport expansion should only be allowed if supported by measures to mitigate the effects of aircraft air pollution, spending should be prioritised towards better rail and bus provision rather than on airport expansion and links to airport, and there should be mitigatory spending on local facilities in nearby communities if the airport expands.

Metro considered that the airport's Surface Access Strategy outlines the access requirements to facilitate the airport's expansion and highlights the need for significant improvements to public transport access. WYLTP2 recognises the need to "develop a strategic transport network that is fit for purpose" to cater for trips to the airport. Metro is currently undertaking a study into the feasibility of introducing tram-train technology into the Leeds City Region, including specifically considering the potential for a tram-train link to the airport.

Concerns around access were that it needs a rail link from the north (via the Bramhope tunnel) and the south (by an extension from Horsforth on the Leeds to Harrogate line). Alternatively, this line could be converted to be a tram-train. Better roads were mentioned, as was better bus access (and a shuttle bus service) from various locations including local communities. Some felt freight expansion should be dependent on a link to the rail network as local roads wouldn't cope with this, and should be enforced by selective lorry bans for town and village centres. It was also noted that if any airport expansion also included expansion of car parking, this would negate the effect of any improved public transport access on the level of road traffic.

Comments in favour of expansion of the airport to accommodate those both in and beyond the City Region were because if Leeds wants to become an international, vibrant city it must be directly accessible from all parts of the world for business and tourism, and airport expansion is critical to the growth of the city especially if we seek to 'go up a league'. Similar comments were that the airport is important to the local and wider economy; it is accepted it is a resource which needs be used when there are no other options to travel; that it does have a valuable role for short-haul flights and as a feeder airport, and that if people use Leeds Bradford it cuts down travel to other airports. Yorkshire Forwards recognised that successful city regions need successful airports, and whilst Leeds Bradford International Airport provides a range of air services that have expanded rapidly in recent years, it still has the potential for substantial growth particularly in comparison to other city region airports such as Bristol or Newcastle. YF therefore suggested the expansion of the airport, as long as its surface access is improved. This is in line with Regional Economic Strategy Objective 5b (i), which seeks to "improve public transport access from the region to Leeds/Bradford, Robin Hood, Manchester and Humberside Ports."

The Highways Agency recognised that the airport is a key driver in improving economic performance in the region, but expansion would most certainly generate additional vehicular trips from within the region and beyond so the Council would have to demonstrate how any additional trip generation would be reduced, and how surface access would be substantially improved by sustainable modes of transport. Other airports including Robin Hood (Doncaster/Sheffield), Manchester Finningley, and Teesside airports also have the potential to serve a significant proportion of those living and working within the Leeds City Region, even though there are accessibility issues at present. Consequently it would not be appropriate to consider any of these airports in isolation.

Final other comments were that the most modern air craft are quieter and more efficient and greener, but carriers should be penalised on empty seats. One respondent also queried that as who uses the airport can't be controlled, how can the Council plan for ether a) or b)? The Government Office referenced ODPM Circular 01/2003 regarding safeguarding requirements for applications connected with aviation use.

### **Sustainability Appraisal**

**Economic:** Expansion brings positive impacts for the economic success of Leeds and job creation in a wide range of jobs. There is a direct correlation between the greater the expansion and the more Leeds can be economically competitive. Consequently, option b) scores more positively.

**Social:** Expansion of the airport increases accessibility to other cities and cultures. Option b) spreads the benefit even further across the region.

**Environmental:** Both options will increase air travel and therefore increase greenhouse gas emissions. Option b) increases air travel even greater than option a) and therefore it results in major negative scores. However, it was noted that technological advances may allow aircraft to be 'cleaner' in the future. There was also a concern that if option b) requires an increase in the runway this could increase surface water run-off and exacerbate flash flooding. This could be

mitigated for if it is possible to use porous materials for the construction of the runway. Option b) will increase the number of journeys to and from the airport and this in itself exacerbates negative impacts.

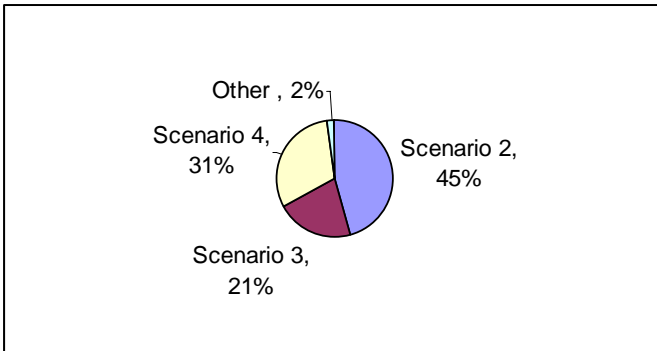
Conclusion: There is a conflict, as expansion of the airport to serve beyond the Leeds City Region has strong economic positive impacts, but also has strong environmental negative impacts. However, advances in technology may allow negative impacts to be mitigated for, such as 'cleaner', quieter aeroplanes and use of porous materials for runways. A specific concern regarding the airport's location is that it is poorly served by public transport (no rail link) and has a number of residential communities living close by. Consequently, expansion will increase the number of journeys to and from the airport with impacts due to increased congestion, noise and pollution. The core strategy therefore considers two further options for mitigation of the bad effects of airport expansion (i.e. only if with improved surface access by public transport, and/or with measures to mitigate the effects of aircraft noise). The sustainability appraisal of the two options showed that impacts are generally neutral or positive. However there were concerns about the impact of a new road/rail line on wildlife habitats and landscape quality.

**29.**

a) Given that Scenario 1 'Base Line/Business as Usual', will continue to provide development needs in the near future, what development form should the City take in the future?

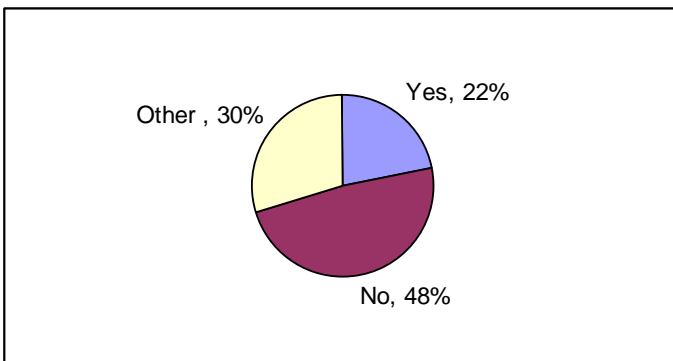
- Scenario 2 'The Compact City',
- Scenario 3 'Dispersed Development Hubs',
- Scenario 4 'New Urban Neighbourhoods'.

<b>Scenario 2</b>	100 (8 comments)	45%
<b>Scenario 3</b>	46 (11 comments)	21%
<b>Scenario 4</b>	69 (3 comments)	31%
<b>Other</b>	5	2%
<b>TOTAL</b>	<b>220</b>	



b) Are there any other Scenario options, which you feel should be considered?

<b>Yes</b>	32 (31 comments)	22%
<b>No</b>	69 (6 comments)	48%
<b>Other</b>	43	30%
<b>TOTAL</b>	<b>144</b>	



**Consultation Responses**

Scenario 2: The YHA commented that scenario 2 has the potential to deliver the RSS Core Approach. It allows concentration on areas with good public transport and will also reduce the need to travel but needs combining with Scenario 4 to provide the necessary growth. A contrary view was that there is no evidence that the necessary level of public transport investment is achievable. It was considered that this scenario would not deliver the range and mix of house types and sizes needed as highlighted by the Housing Market Assessment, and would over-rely on windfalls. It would not result in sufficient land being brought forward and would also result in the loss of character of many neighbourhoods including their greenspace. This scenario concentrates growth in a very restricted area and views Leeds as a primarily a single centred place fed by radial routes. This is a historic view of the City that cannot continue without it being overwhelmed by congestion and providing inadequate amenity for residents.

Scenario 3: Developers generally favoured this scenario as it imposes less constraints on their activity. One developer favoured a scenario which balances growth between key regeneration areas within the main urban area, and dispersed growth within the outer areas of the city communities beyond the urban edge. This would counteract the negative effect of the higher densities within the city and would allow the outer satellite communities to grow. This also allows development of both green and brownfield land which could be in sustainable locations, and would provide choice of location radiating from centres. However, the YHA considered that it does not have the potential to deliver the RSS Core Approach, and other comments were that this scenario is unsustainable and is unacceptable due to the resultant urban sprawl. It limits future development to the PAS sites, some of which are not in the most sustainable locations.

Scenario 4: This would ensure development is spread across Leeds including south Leeds and the M62 corridor. It was considered by some to be the only option which would meet demand in a rational and sustainable manner. It would provide healthy communities and be sustainable, and would reduce commuting pressures. The effect of the new neighbourhoods could be to create viable centres to complement the City Centre and reduce the current disproportionate concentration on the City Centre and its immediate environs. As these new neighbourhoods develop they have the potential to deliver the climate change agenda by creating a sufficient mass of new development sites in close proximity and timescale that the deliverability of neighbourhood renewable schemes is capable of realisation. In selecting new neighbourhoods, the starting point should be the ability to assemble a package of sites which are already covered by existing designations and adding to them to provide a complete framework. The YHA commented that scenario 4 has the potential to deliver the RSS Core Approach. However, some developers considered this scenario would not provide the choice needed as development would be concentrated onto a few areas. Other comments were that it would be supported without the East Leeds Extension, that it should exclude north Leeds as this doesn't require regeneration, that Micklefield should be in scenario 4 due to good rail links, and that the scenario will involve drastic action to improve transport links, particularly to the south western parts of the District. It was also noted that this scenario would be most in need of contingency planning and monitoring as development of any new centre on this scale is likely to take many years and past experience shows that it is difficult to sustain the delivery of any public policy over decades unless a critical mass can be developed over a matter of 10 years or so.

Other scenarios:

- Elements of Scenario 3 such as current allocations and PAS sites in or adjacent to sustainable settlements should also be included as part of the package within Scenario 4
- PAS land should be left till urban areas have been developed.
- PAS should be developed to provide choice.
- 2 and 3 could be combined and provide a growth area based on Vickers site and Cross Gates.
- 2 and 4 should be combined as 3 is not appropriate, however 4 will need good quality public transport.
- 2 with east orientated elements of 3 and 4.
- 2 with no A660 corridor growth but new urban development in Aire Valley, Micklefield and Kippax served by A1, A63 corridor based on eco building and millennium village.
- Combine 1 and 4 and release greenspace to make up shortage of brownfield.
- Scenario with new urban neighbourhoods in the green belt with good public transport. Should be less emphasis on Leeds as a centre for growth and more on the growth of other centres to reduce travel to Leeds.
- Scenario with wedges of land centred on good public transport both in the city and outside.
- A different scenario based on a rail node city linking city centre, airport, fast commuter train to Garforth, Rothwell (Woodlesford station), Morley, and Pudsey nodes. All to be linked by frequent circular bus centre.
- A new town outside Leeds would be better, could be near Wetherby.
- More agricultural use of green belt coupled with Scenario 4 plus eco villages to integrate housing, jobs, rural skills and low impact building.
- Minimal growth should be a scenario. A growth in housing is not sustainable.
- Further land beyond the PAS sites and into the green belt will be necessary to be brought forward for the longer term (post 10 years) development requirements.

### General Comments:

It was stated by a number of respondents that the scenarios need a better evidence base with quantification in order to be assessed. This includes reference to the proposed RSS housing figures, and robust assumptions on scenarios' capacity and delivery capabilities. There is a lack of information about the scale of new housing development required and the scale of urban capacity, and hence the potential requirement for development on greenfield land, including greenspace within existing urban areas.

Developers considered that the current supply does not reach the new RSS targets. There is too much reliance on flats as a proportion of all housing, and a number of schemes with permission will not be built. Therefore, so early delivery of phase 2 and 3 sites is required. The Council should permit the development of unallocated greenfield sites within the main urban area; deliver the phased release of PAS sites; identify the most appropriate location for an eco-town; and undertake a green belt review. Some developers considered the overall impression to be of protecting the status quo with insufficient emphasis on the need to accommodate the major change of Leeds' role in the regional strategy.

The EA was unclear as to why scenarios 1 to 3 had been developed with close reference to the revised UDP as PPS12 requires plans to be prepared in light of the evidence base. The EA also stated that it was not clear what relationship exists between the questions in Section 4 and the alternative scenarios in Section 5, and considered that more emphasis should have been placed on assessing the scenarios, including in the Sustainability Assessment. The Yorkshire Wildlife Trust also considered the Sustainability Appraisal to be superficial, and that there was not enough evidence to justify the conclusion that scenarios will have no significant impacts.

The LCC School Organisation team considered that all the scenarios were equal from a school organisation perspective, although enough money needs to be raised through S106 agreements for additional places at schools. New schools are slow to start and this must be taken in to consideration with children having to travel to an alternative school in the area, however models which disperse children too far may make funding difficult. It is easier to expand existing schools than create new schools (i.e. scenario 2), and a higher number of smaller schools is not as cost effective as for fewer larger developments (scenario 3). Linkages to existing schools and networks need careful consideration as there are few in the rim at present.

It was noted that the RSS identifies the Leeds Bradford corridor as a regeneration area but says nothing about the scale and form of regeneration, so this needs to be addressed more clearly within the scenarios. For instance, there could be an expanded development hub at New Pudsey, or a 'new urban neighbourhood' in Farnley and Wortley ward, or a compact city/intensification strategy of land use in regeneration sites. The glossary of terms also needs a description of the 'Leeds Bradford corridor'.

Other points raised were that:

- Scenarios need to be subjected to contingency planning and phasing principles. Whichever blend of scenario elements is used, care will have to be taken on budgeting, risk analysis and triggers for review, and ensure that any additional social and transport infrastructure can be forthcoming when needed.
- High densities could impact adversely on historic environment.
- There is a need to ensure that mature brownfield land containing established habitats is not inadvertently destroyed, for such sites are frequently high in biodiversity. Low grade farmland should be selected instead in these situations, as it typically has low biodiversity or amenity potential.
- Should focus on enhancement of the countryside.
- Expansion should be of a scale that supports improved infrastructure.
- Review of green belt may be needed to cope with increased numbers.
- Should develop greenfield sites where they meet other sustainability criteria.
- Retain greenspace and green belt and concentrate on existing urban areas.
- Favour development on periphery of urban area to allow development of choice of housing.

- Full provision of light rail and allied community building, also brownfield development and social housing, also discourage speculative building.
- Satellite towns and villages should remain as separate.
- Area to north of the Chevin should be protected and developed for leisure with Otley being developed to serve this, tourism and with good green credentials.
- More needs to be provided for locally.

## **Sustainability Appraisal**

### Economic:

- Scenario 2 may lead to housing uses squeezing out employment uses- which could reduce job opportunities and economic investment. This would increase in the long term as housing pressure increases. This could be mitigated against by including policies to safeguard employment land.
- Scenario 3 could worsen accessibility to jobs for people living in the rim area as jobs become more dispersed. This could be mitigated against by ensuring provision of improved public transport. Under Scenario 3, businesses would have more choice over location in the short term, but in the long term the congestion would get worse and choke investment. Results in the long term will depend on the level of success of public infrastructure.
- Scenario 4 could boost jobs in the construction industry in the short term as new urban neighbourhoods are developed. Additionally, Scenario 4 could lead to development of office parks on motorway junctions and local employment hubs which could improve accessibility to jobs locally in theory because jobs will be created close to where people live, however there is no guarantee that people living locally would secure the jobs available nearby. People living in the City Centre would have good (physical) accessibility to the jobs in any of the employment hubs and the City Centre. However it was also noted that Scenario 4 could lead to a situation where locating employment out of the City Centre could undermine the City Centre's viability. This would worsen accessibility to jobs in the long term because the City Centre is always going to be the easiest to access by public transport. This could be mitigated against by including policies to control levels of floor space/ quantity of employment within hubs and by ensuring a good provision of public transport infrastructure between hubs and the City Centre.

### Social:

- Scenario 2 has negative scores against health objectives because it could compound conditions that impact on health e.g. air quality and stress, by putting extra pressure on green space and creating denser, closer living conditions. However it may be easier to police and therefore reduce crime. The intense pressure for development in the compact area could mean that cultural and leisure uses are pushed out. Scenario 2 will result in higher density housing and there would be less opportunity for large low density executive type homes and therefore there may be less of a range, however, this helps reduce disparities and may help build confidence in inner city areas. It builds on existing communities and makes it easier to provide community facilities and therefore scores well under objectives on community participation and cohesion.
- Scenario 3 means that more open spaces can be provided in the urban area and this is beneficial to health through space for exercise and mental well being. In terms of quality of housing and reducing housing disparities, Scenario 3 could enable a greater range of sizes to be provided but it could reduce demand for housing in some areas of the city and therefore have a negative impact on regeneration objectives.
- Scenario 4 provides more opportunity for a wider range of choices of house size, style, and tenure, and introduces opportunity for higher standards of energy efficiency. However, strong affordable housing policies will be needed to ensure that a mixed community develops. The police and health providers will need to ensure appropriate allocation of resources to meet the need in the new areas of demand.

### Environmental:

- Scenario 2 is the most efficient use of urban land and does most to minimise pressure on green field land and preserve the rural landscape. It has a number of positive environmental impacts, particularly in terms of reducing the need to travel, reducing the journey length and enabling efficient, comprehensive public transport to be provided. This also helps to reduce greenhouse gas emissions and pollution. However there are some serious negative impacts as it would almost certainly require development in high flood risk areas and coupled with the

reduction in green corridors and greenspaces for urban cooling, scores a major negative in terms of improving Leeds' ability to manage extreme weather conditions and climate change.

- Scenario 3 is almost the converse of the impacts on scenario 2. It increases pressure on greenfield land, impacts on the rural landscape and could hamper regeneration activity in the inner city. It is likely to result in longer journeys and will need a more widespread public transport system (which may have implications in terms of viability). However it should enable us to avoid flood risk areas and provide lots of green spaces for urban cooling.
- Scenario 4 provides an opportunity for development to be built to higher energy efficiency standards and design neighbourhoods based on higher sustainable construction principles than normal. This has particular environmental positive impacts in terms of reducing and managing waste and pollution. On the whole, Scenario 4 avoids flood risk areas, except the Aire Valley and City Centre where a sequential test is required to ensure that housing is not unnecessarily located in the highest flood risk areas. It is unclear how Scenario 4 will impact on travel as it aims to reduce travel by ensuring that peoples needs are met locally within the neighbourhood where they live, however, there could be travel between neighbourhoods and therefore it is important to ensure that the satellites are linked up well with public transport.

Conclusion: Sustainability appraisal of the scenarios was helpful in identifying where scenarios could be improved and where additional policy interventions are required to ensure mitigation against negative impacts. This includes public transport infrastructure (particularly for Scenarios 3 and 4), safeguarding of employment land (for Scenario 2) and affordable housing policies to ensure mixed communities develop (for all Scenarios, particularly Scenario 4 to ensure that hubs do not polarize into wealthy areas and poor areas). However the sustainability appraisal did not show any clear 'winner' in terms of choosing the most sustainable scenario.

## **Other General Questionnaire Comments and Associated Submissions**

There were 58 responses which were not statistically analysed under the question headings as they were miscellaneous. Those which were related to specific questions or themes have been reported within the analysis of these questions. Additional comments are set out below. Many of the comments are from agencies or stakeholder bodies, and a number are from developers or agents promoting development on specific sites.

### **Miscellaneous**

- The YHA felt overall that the Issues and Options document, the options within it and the SA provide a comprehensive review of the issues facing Leeds and how they might be tackled in order to achieve sustainable development.
- The Highways Agency's key concern is to protect the primary role of the Strategic Road Network (SRN) and to ensure its safe and efficient operation. The Agency would therefore have concerns over any policies which could have a material impact on this.
- The Theatres Trust assume there will be an SPD for Planning Obligations to set down clearly what is required of the developer and other funding partners.
- Yorkshire Water commented that infrastructure and demands on water and sewerage resources need to be considered in the long term.
- A resident commented that the Strategy should include consideration of Leeds VCF Sector environment forum's ideas for Leeds Climate Change Strategy and Action Plan, and CABA's 'Building for Health' Action Plan requirements.
- It was felt that there was little sense of what is seen as Leeds' role within the Leeds City Region.
- It was felt that there is a need to give strategic guidance on how to tackle issues of students being a transient population, e.g. taking forwards existing UDP policies.
- The Older People's Strategic Partnership and Development Team stated that currently older people form 20% of Leeds population and all planning needs to take into account this group of citizens. Towns and local centres are heavily used by older people who particularly value and make use of local accessible shopping and other local facilities. Relevant reports were attached to the representation, including 'Older Better, The Leeds Strategy for Healthy and Active Life in Older Age.'
- The National Offender Management Service requested the inclusion of a criteria based policy to deal with a firm prison proposal should it arise during the plan period. The Leeds LDF should acknowledge that HMP Leeds, HMP Wealstun and HMP Wetherby are important community facilities serving local needs and which should generally be protected. In addition, a policy should be included to support the need for expansion where this can be justified. Similarly, along with other community facilities there should be a presumption against the loss of a prison use unless it is demonstrated to be surplus to requirements.
- The Mobile Operators Association considered it important that there remains in place a telecommunications policy within the LDF. Specific policy wording was suggested regarding the siting of masts (see representation for full detail). It included that the expansion of facilities is important whilst at the same time needing to minimise any environmental impacts, and should reduce proliferation of new masts by encouraging mast sharing an location on existing tall structures and buildings.

### **Sustainability Appraisal**

- The EA commented that as the SA report makes no reference to the SEA requirements they were unclear as to how the regulatory requirements to undertake SEA/SA had been carried out. Also, they were consulted on the Scope of the Sustainability Appraisal in September 2006, however they were are uncertain about what stage of the regulations the Sustainability Appraisal report dated October 2007 conform with.
- Natural England considered that overall the Scoping Reports are generally fit for purpose, closely following current Government advice on the structure, content and approach to SA and SEA. The Reports are clearly set out and understandable. Providing the recommendations of the SA/SEA are incorporated into the Core Policies when written they were supportive of the conclusions.

### Consultation

- Horsforth Civic Society complimented the Council on the excellent quality of documentation provided at this stage of consultation. A resident also commented that generally the document is very clear and balanced in the way the issues are set out.
- However, other residents considered that the consultation was very poorly advertised and was not genuine. The questionnaire should have had a freepost address, the online questionnaire was difficult to use, there was not much information available in local press/meetings etc, and there were very few questionnaires sent to Otley library.
- Answers to some of the questions should have been prioritised rather than being able to agree with them all.

### Delivery and Tests of Soundness

- The Government Office stated that implementation and monitoring need working up in the next stage and should be firmly focused on delivery targets and milestones.
- Some developers considered a number of tests of soundness were not met for various questions, primarily inflexibility, not looking at all the alternative options, not being in conformity, and not being consistent with neighbouring DPDs.
- It was also posed that the Strategy risks failing tests of soundness 7, 8 and 9 if not clear discussion with neighbouring authorities in light of new housing figures.

### **Developers or Agents Promoting Sites**

Sites promoted by developers have been reported below, but the detailed information submitted has not been included. It should be noted that in working up the Preferred Options stage of the Core Strategy, the detailed representations are being taken into account. The Core Strategy only allocates strategic sites, so the representations will also be taken into account in the Strategic Housing Land Availability Assessment and subsequent DPDs as appropriate.

<b>Represontor</b>	<b>Agent</b>	<b>Site</b>	<b>Comments</b>
Andrew Ramsden	Spawforths	Bradford Road, East Ardsley (PAS site - UDP Policy N34, Site 17)	Promoted as a strategic site for residential development.
Ashdale Land and Property, Barratt Leeds, Great North Developments, Persimmon Homes, and Wheatley Construction	Peacock & Smith	Manor Farm and Church Lane in Micklefield	Promoted as a strategic site for development.
Barwick Developments	ID Planning	Houghside Road (allocated for housing)	Promoted as a strategic site for mixed-use development.
Graham Johnson	ID Planning	Trip Lane Linton	Promoted as a strategic site for residential development.
Land Securities and Evans Property Group		South Leeds	South Leeds to be identified as a regeneration area and/or new urban neighbourhood. Need certainty for a strategy for south Leeds.
Mrs G Hudson, Mr N Brown and The Stockeld Estate	Peacock & Smith	PAS site at Spofforth Hill	Promoted as a strategic site for development.

New East Leeds Consortium	Persimmon, Taylor Wimpey, Dacre Son & Hartley	East Leeds Extension and Whinmoor	Proposed the early release for development of the East Leeds Extension (ELE). The likely level of deliverable supply from the ELE is also higher than that assumed by the Council.
Persimmon Homes and Barratt Leeds	ID Planning	30.2 ha site at land to the east of Otley (Phase 3 allocation)	Proposed the site for early release for development. Links to the early phasing of the Otley Relief Road.
Persimmon Homes and Taylor Wimpey	Peacock & Smith	Grimes Dyke in Whinmoor (Phase 2)	Promoted as a strategic site for development.
TG & MF Emsley	ID Planning	1.43 ha site at Greenside Farm, west of Yeadon	Promoted for residential or employment or mixed-use development.
The Home Farm Trust	-	Bramley Gardens (adjacent to the Whinmoor Estate) (PAS site)	Promoted as a strategic site for development.
Thomas Fawcett & Sons	Peacock & Smith	Aberford	Promoted for residential development

## 4.2 MORLEY HIGH SCHOOL QUESTIONNAIRE RESPONSES

Further to the Youth Council session a specific questionnaire was requested for Morley High School. This section analyses the results.

### Profile of Respondents (155 in total)

Age	13	-	9	Gender		
	14	-	21	Male	-	64
	15	-	39	Female	-	91
	16	-	45			
	17	-	34			
	18	-	7			

**1. What do you think of the 3 development options described in the 'What's in it for young people' briefing? (Please rank 1 to 3 in order of preference). Can you suggest any other options worth thinking about?**

- The 'cramming' option (Scenario 1) 3<sup>rd</sup>
- The 'spreading' option (Scenario 2) 2<sup>nd</sup>
- The 'green/concentrating' option (Scenario 3) 1<sup>st</sup>

#### Summary of responses to Q.1

- Regeneration of small towns like Morley by improving shopping and leisure facilities.
- Just improve existing buildings and areas instead of building new ones.
- More outdoor sports areas e.g. outdoor skiing/boarding areas.
- Option for first time buyers, so houses aren't as pricey.
- Instead of building across, build up e.g. apartments.
- More transport.

**2. On what sort of land should most of the new housing be built? (Please rank 1-4 in order of preference)**

- Land that's been built on before ('brownfield' land) 1<sup>st</sup>
- Green open land within towns 2<sup>nd</sup>
- Green open land on the edge of towns Joint 3<sup>rd</sup>
- Green belt/countryside outside the towns Joint 3<sup>rd</sup>

**3. How much of the new housing built should be cheap enough for the poorest people to afford?**

- 40% or more 2<sup>nd</sup>
- 30-39% 1<sup>st</sup>
- 29% or less 3<sup>rd</sup>

**4. Should new housing be of all sizes, types and tenures (i.e. to buy, to rent etc) so it meets everyone's needs?**

Yes/No

Yes

**5. New community facilities, like youth clubs, sports centres, libraries etc should only be built where you can easily get to them, e.g. on foot, by bike, bus or train?**

Agree/disagree. Why?

Agree

*Summary of responses to Q.5*

- Easier for people to access.
- People can use them regularly.
- People of all wealth and transport users can get to them.
- Place for young people to go and less anti-social behaviour.
- Used to the maximum with minimum cost to the community.
- Less congestion and pollution.
- No more need building.
- We are fine as we are and it will become full of snobs.

**6. Where there is money for new open space as part of new housing development, how and where should it be spent?**

- **On new open space provided with the new houses** 2<sup>nd</sup>
- **On new open space or sports facilities nearby** 3<sup>rd</sup>
- **On improving existing open space and sports facilities nearby** 1<sup>st</sup>

**7. Which of the following do you think will make the biggest impact on reducing global warming?** (Please rank 1-3 in order of preference)

- **Making new buildings more energy efficient** 2<sup>nd</sup>
- **Incorporating renewable energy production (e.g. via solar panels) into all new major building projects** 1<sup>st</sup>
- **Increasing the number of renewable energy generation schemes (e.g. wind farms)** 3<sup>rd</sup>

**8. Which of the following do you think would encourage more sustainable travel?** (Please rank your top 3 in order of preference)

- **Park and ride** 3<sup>rd</sup>
- **High quality public transport (e.g. trains, buses)** 1<sup>st</sup>
- **Strict controls on car access and parking** Joint 5<sup>th</sup>
- **Safe and accessible walking and cycle routes** 2<sup>nd</sup>
- **High occupancy vehicles lanes on motorways and main roads** 7<sup>th</sup>
- **Road congestion charging (like in central London)** Joint 5<sup>th</sup>
- **More local rail stations** 4<sup>th</sup>

## 4.3 FORUM FOR THE FUTURE EVENT

This event on the 19<sup>th</sup> October 2007 was a full day of presentations and workshop discussions with key local and regional stakeholder agencies, including stakeholders within Leeds City Council. The key speakers were Jonathan Porritt and Hilary Benn MP, alongside Leeds City Council Civic Architect, the Deputy Chief Executive, the Substitute Member for Development, and the Director of City Development. 71 people attended on the day.

The following points are a summary record of the event's various workshop sessions. They have been grouped into general headings based around the scenarios, and the different themes of the Core Strategy.

### Scenarios

- Scenarios 3 and 4 would put pressure on greenbelt?
- Would there be demand for scenario 4?
- Scenario 4 how can we ensure scenario 4 people won't drive to where they live? Concern that new focus points will encourage car journeys?
- Scenario 4 move away from flood risk: impact on development in Aire Valley?
- Scenario 4, disposed, more resilient to city centre and future resource constraint.
- A housing ladder within areas - scenario 4?
- Scenario 4 would have oil /petrol supply problems.
- Scenario 4 talk about population growth.
- Scenario 4 avoids flood risk.
- How robust is Scenario 4 to future risk change in plans?
- Role of city centre in Scenario4?
- Scenario 4 needs good transport links.
- Use Scenario 2 with good transport initially, moving to Scenario 4.
- Scenario 2-4 more attractive to future investment.
- Concentrating development within existing urban area. Should provide jobs close to housing.
- Growth nodes compliment city centre not compete.
- Can still build on existing structure.
- Scenario 5, i.e. scenario 2 and 4.
- Existing AAP's surely set scenarios for core strategy?
- Will LCC test scenarios 1-4 against future scenarios e.g. (resource scarcity, petrol, oil, climate change)?
- Thinking the unthinkable e.g. free public transport for children. Interrelation with other strategies and governance structures. Holland? Quality principal that a 6year old child can cycle.
- Some developers looking at floating homes!
- People better able to comment on 'how' to design to address their issues, not 'chose a scenario'.
- Maintain economic engine of city with decoupling of growth.
- Develop eco towns in regeneration areas.

### Transport and Infrastructure

- Polycentric model is reliant on good transport links. Scenarios predicted on good transport, how can we make decisions without knowing transport info?
- 30% of city land is not built upon i.e. roads etc, therefore tackle transport, free up space.
- Love affair of cars must come to an end - no more development predicated on car.
- Need to strengthen transport improvements.
- Make other transport corridors (A roads) more viable/sustainable. Overhaul trains and buses and bring in to scenarios.
- Transport not just on arteries but around radius.
- Neighbourhoods not isolated as dependant on key city routes.
- Extend free bus services and for young people, not just new roads.

- Public transport can be limiting to disabled persons - facilities are not available to them to move about the city.
- Improve perception of public transport.
- What transport links will be needed in 2050?
- Must ensure sustainable infrastructure - at correct times.
- Easier to expand existing schools than build new ones.
- Future Natural Resources and Waste DPD will consider some aspects. Difficult with deregulated energy.

### Housing Needs

- 25% of city flats are unoccupied yet still more are being built.
- Culture of home ownership - need to consider rental?
- Growth of second homes.
- Demographics of Leeds and what type of housing is needed in the future - retirement Villages?
- Aging population needs to be considered.
- Identity of individual communities e.g. housing ladders.
- Young people mortgage problems.

### Consultation

- Involve residents groups.
- Encourage community groups who could otherwise not engage e.g. learning disabilities, children.
- Planning is holistic, aiming to provide for whole community: targeting different social groups through consultation.
- Inclusively of consultation e.g. children etc.
- Equality needs to be built in to the heart of the document.

### Design and identity

- A city people want to live in and stay in. Hang on to local identities - living in 'parts of Leeds'.
- Village approach to living around city maintained.
- Greener boulevards, European style.
- Spatial expression is only one element of sustainable development, also need to consider quality of design.
- General public find city centre inaccessible.
- Higher densities not wanted in suburban areas.

### Health / young people

- Provide community based facilities for young people.
- Design buildings and places to counter obesity.
- Health impact assessment on scenarios and planning proposals at specific scales.

### Greenspace/Green Belt

- People hold greenspace dear.
- Planners be careful how use green on maps. Is it green or actually paved with a few trees?
- Develop green open space/corridors. Need a better distribution of greenspace of good quality.
- How far prepared to walk to green space?
- Currently not looking at greenbelt.

### Other

- The Core Strategy should set the vision and then bid for resources.
- Don't be criticised for past approaches, plan for success.
- Need to deliver strong policy and incentives.
- Aire Valley – conflict between employment and housing land.
- Linkages with City Centre Strategy SPD?
- Jobs within new urban areas?
- Leeds to have best cultural facilities after London - consider across scenarios.
- Must remember flooding.

## 4.4 YOUTH COUNCIL EVENT

Leeds Youth Council is a democratically elected group of young people who represent the 'Voice of young people in Leeds'. The Council reaches out to approximately 38,000 students, because all Leeds Youth Councillors sit on their School Council or Student Union.

There were six attendees at the two hour session on the 14th November. The workshop was facilitated by Planning Aid, based around the general themes of the Core Strategy questionnaire and focussed on those issues the Youth Council felt to be of most importance.

<b>Place</b>	<b>Good thing</b>	<b>Bad thing</b>
Morley	Quiet, local services.	Too many people, unclean environment, crime, ASB, secondary schools, transport links, too polluted.
Garforth	Feeling of community, shops and facilities, education services, cultural facilities,	Very built up, loss of open spaces, attitude to elderly.
Richmond Hill	Transport links, access to services.	Very built up, crime.
Harehills	Transport links, schools.	Crime, fighting.
Pudsey	Old and new open spaces, market place, park, access to green areas, cultural facilities.	Poor transport, lack of variety in town centre of entertainment uses – lots of pubs.

### *Where should the new houses go in Leeds?*

Good things about lots of new houses:

- Choice of type of housing, e.g. flats, small houses, larger houses.
- More jobs.
- More shops and facilities.
- Better transport links.
- More lively and energetic places.
- More businesses, or existing business grow.

Bad things about lots of new houses:

- More stretched services.
- More pollution including noise pollution.
- Bigger towns.
- Lose community feel.
- Increased crime.
- Less friendly.
- Increased traffic.
- Less greenspace.
- Increased density – houses built closer together.
- Less job opportunities.
- Decrease in property values.
- Increase in people claiming benefits.
- Increased litter.

*Votes for general housing location:*

- Brownfield – 4
- Abstain – 1

- Greenfield – 1
- Employment land – 6
- More density – 1

*Votes on where housing should go once all the brownfield land is built on:*

- Greenfield in built up areas – 1
- Greenfield on the edge of towns – 2
- Some of both – 1

*Responses to the introduction to 4 possible scenarios for future development of Leeds:*

- Morley – needs some more housing and could take up to say 8,000 new houses but not more. More housing could be a way to get better transport links and improvements to schools etc. But any development would need to keep greenspaces within and on the edge of Morley.
- Scenarios 2, 3 and 4 are all extreme. Something in between would be better. Under scenario 4, areas would become very overcrowded. Better to spread out the housing. Would be better if there were more than just 6 areas.
- Or – could build closer to Leeds centre not further out.
- Pudsey – not enough space to grow outwards apart from to the north towards Horsforth.
- May be good to build on the area out towards Wetherby – plenty of space. Maybe an eco-town – where all houses eco-friendly. It was explained this has been considered for Aire Valley where there is a lot of surplus land allocated for employment. Everyone thought eco-towns were a good idea, provided they were planned properly and could last into the future.

### *Core Strategy Themes*

Planning Aid suggested two themes to discuss – climate change and transport. Everyone agreed to these themes.

New developments should provide a % of their own power. % to increase in future.

- All agreed with principle. Shouldn't be just new developments but existing ones too. Should be on a sliding scale, so that bigger developments provide a higher percentage than smaller ones.

Targets for reducing carbon emissions.

- All agreed with principle. Cars could use biofuel.

Targets for “adaptation” e.g. green roofs and planting schemes in urban areas to reduce likelihood of extreme climate change.

- All agreed with principle. Should plan for it now, even if we don't know how likely it is to happen. Better safe than sorry.

Flooding – how much development should happen in flood risk areas?

- If high risk e.g. 1 in 100 years – none. If lower risk e.g. 1 in 1000 years – can build on it but with flood defence measures to prevent flooding. Could build canals in flood risk areas to take floodwaters.

Should Leeds Bradford Airport expand?

- Yes but only if transport links to it are improved.
- Yes but only if noise can be controlled.

Should it be just for Leeds and Bradford or should it serve the region?

- Regional, as more flight choices, easier to get to.

Ways to improve public transport:

- Park and Ride – yes, even better park and cycle.
- High quality public transport systems – yes.
- Car free areas – yes, no, yes with park and ride.
- Car parking control – don't know.
- Electric pool cars - yes.
- Travel plans – yes, no.
- High Occupancy Vehicle Lanes – yes, don't know.
- Congestion charging – yes, no, yes with good quality public transport.
- Low emission zones – yes.

## 4.5 PARK LANE COLLEGE YOUNG PEOPLE WORKSHOPS

Five workshop sessions took place at different lessons at the College, facilitated by Planning Aid. In total student attendance was 52. The workshop was based around the general themes of the Core Strategy questionnaire and focussed on those issues the teenagers felt to be of most importance.

Place	Good thing	Bad thing
Allerton Bywater	Near Castleford.	Too quiet.
Alwoodley	Quiet, nice, little crime, good access.	Affordable housing for 1st time buyers.
Armley	Accessible.	Anti-social behaviour among young people in parks.
Austhorpe	Proximity to countryside/ shops/ housing.	Little to do for young people, fast food outlets and impact on environment i.e. litter.
Barwick	Lovely village.	Poor transport links.
Beeston	Close knit community, good transport, some new facilities e.g. gym, proximity to City Centre and White Rose.	Racism, fighting, no new facilities, poor image especially since London bombings, Divided areas and 'scrotes', very diverse which leads to gang wars in some areas, not a lot to do, street crime.
Belle Isle	Proximity to City Centre and some quiet areas, nothing good.	Some rough areas and vandalism, bad everything, gang warfare.
Boston Spa	Quiet area.	Not enough for young people to do. High cost of houses – affordability issues.
Bradford*	Good shopping, new developments	Anti social behaviour in centre, nothing bad.
Brighouse	Poor transport links to Leeds.	Poor environmental health standards in takeaways and some restaurants.
Burmantofts	Quiet.	Not much to do for students.
Castleford*	Community spirit good.	Not enough to do in Leeds.
Chapel Allerton	Everything's good, facilities and events, it's improving.	Poor balance of shops/demise of local shops, affordability of housing, snobbish and class issues.
Chapelton	Multi cultural community, strong sense of identity through Dance School etc, variety of restaurants.	Poor image/stereotyped as a problem area, limited activities for youth – supposed to be able to use the media centre but use restricted.
Cookridge	Good access to other places.	Anti-social behaviour.
Drighlington	Quiet area.	Too quiet and borders onto some rough areas.
East End Park	Central/ accessible/ good public transport.	Litter and vandalism, fast food outlets and impact on the environment and anti-social behaviour.
Farsley	Community feel and association with local football club.	Rough council estate which needs improvement.
Gildersome	Good location close to amenities such as the Showcase cinema complex.	Community split into 2 halves (working class and middle class) and the two sectors do not mix, high crime rate, expensive houses which prices out many local people.
Gipton	Nothing is good, nice park that is not utilised and could do with improving.	High crime rate, large numbers of empty properties, poor housing, high number of teenage mums, poor environment, ASB (student had been attacked twice).
Guisley	Quiet and peaceful.	Isolated / poor public transport, not much to do for students.

Halifax*	Town centre and good for meeting people.	High crime in some areas.
Halton	Nr Temple Newsam, friendly and close community.	High crime rates.
Headingley	Shops/bars.	Too much student accommodation.
Holt Park	Nice area.	Snobby/poor balance of age ranges i.e. not enough young people.
Lofthouse	Good public transport.	Nothing to do.
Marlborough Grange	Proximity to City Centre.	Congestion.
Meanwood	Parts are nice but there are parts that aren't.	Crime, anti-social behaviour.
Middleton	Nothing is good, public transport.	Poor housing maintenance and poor environment to live in, everything's bad except public transport.
Moortown	Buses, supermarket.	Crime, anti-social behaviour, chavs.
Oulton	Quiet and clean.	Main road and congestion.
Outwood*	New developments, Cosmopolitan, London feel.	Poor timetabling by train to Leeds out of peak times, need more trains carriages.
Pudsey	Quiet.	Not enough to do.
Roundhay	Park, shops, housing, restaurants, proximity to the park, loads to do, central, accessible, good public transport.	Nothing for young people, crime, not much to do for young people, drug culture and anti-social behaviour.
Seacroft	Good transport links.	Near A64 and congestion.
Shadwell	Being able to see the stars/ green spaces i.e. environment.	Anti-social behaviour.
Tyersal	Good public transport.	Crime, anti-social behaviour.
Wakefield*	Shops and restaurants.	Congested.
West Park	Good sense of community and friendly.	Close to areas with crime and anti-social behaviour problems.
Wortley	Good community spirit, easy access to City Centre.	Nuisance behaviour, flooded very badly, not much to do.

\*The people who lived outside Leeds were asked to comment about travel to and from Leeds and impressions of the city.

#### *Pros/Cons of new housing development for an area*

- Lack of affordability for local people rather than 'incomers'. Wherever they are built there needs to be more affordable and preferably council houses.
- The new apartments in the centre were liked but they are too expensive and not built for local people.
- Housing is too expensive for local workers, but appears to be no problem to those on benefits; therefore a percentage of new social housing should be for young local people with employment at affordable prices.
- Eco-housing was liked but an example was given about building them in Beeston where no one can afford them and no one outside Beeston would want to live there.
- Possibly too many houses in too small an area causing poor facilities if no schools built etc. This has happened in one area already with 2 new estates and the High School was closed causing large classes or long travel to school/college.
- Loss of / need to protect the countryside.
- More congestion.
- More crime and rubbish etc, better to make use of and improve what we already have.
- Issue of integration – need to integrate social and private housing better.
- Concern that increasing the number of new homes in an area could make it more desirable and push up prices.

## Scenarios

	Number of votes
<b>Scenario 2</b>	10
<b>Scenario 3</b>	9
<b>Scenario 4</b>	29

- Many felt that they could not decide
- Scenario 2 – some felt this maximised the use of established transport corridors, whilst others thought that it focused growth on expensive areas, which local people could not afford.
- Scenario 2 would cause too much congestion.
- Scenario 3 gives more choice of place and chance to avoid city centre.
- Scenario 4 – some felt that this would provide alternatives to the town centre, whilst others thought it would just encourage similar congestion problems in the suburbs over time – recreating the problems Leeds already has.
- Scenario 4 would yield new communities, but would they be improved?
- Scenario 4 would be a bad idea because the city centre is already too crammed.
- General view to develop away from the town centre as the town centre prices were too expensive.
- ‘Building up not across’.

## Culture and Leisure

- Best location would be adjacent to the City centre with good transport links.
- Need more facilities such as ice skating, a music arena, e.g. Doncaster and Sheffield.
- Cost of such services was raised as an issue.
- Consensus that new facilities should be located on periphery of town centre.
- Elland Road was suggested as an ideal location for a major concert venue/arena.
- Desire to avoid more building in the city centre, with a feeling that it was already congested enough.
- Kirkstall as a possible location i.e. adjacent to the city centre. Others felt this would be too far out. When asked about locating such a facility within the heart of the city one student raised the issue of where to place it.

## Economy

- Too many offices / empty office space.
- Why design fancy office buildings when the money wasted on design could be used to build more houses for local people.

## Health

- All liked greenspaces but only if they are well maintained (rather than just city centre parks maintained), e.g. well lit and safe, and to include all rural greenspaces also.
- Gipton Park used to be well used and liked by the Community, now no lights, thugs, no go in dark, poor ground areas.
- Do not build on greenspaces.
- When brownfield sites are built on, make sure that they are secure for people to move into and do not return the same jobs etc that lived there previously.
- Young people must have something to do in new build areas as part of the new build.

## The Built Environment

- Generally in favour of more pedestrianisation.
- Need for more cycle lanes.
- Need for more crossings.
- Need for more cycle lanes.
- Desire to save our greenspaces – London has more greenspaces than Leeds!

- General feeling that there are enough greenspaces in Leeds and that these spaces need to be protected, improved and enhanced.

### *Education*

- All thought education buildings should be used by communities and more made of them even to be used for 24 hours. They need better security, not just caretakers being responsible and not "open houses". The sessions must be affordable for all.
- Youth clubs could be established in the buildings.
- Following a vote, 13 were in favour and 4 were against the idea of use of schools / colleges for community use. In favour was the potential of Learning Centres, and to maximise the use of buildings which otherwise are stood empty. Concerns against were that the college was full enough already, concerns about sharing facilities and related it to sharing Park Lane College. General consensus that young people would not be keen on using schools for social activities, due to the image of going back into school. There is also the issue of safety and security.

### *Transport*

- More buses, including at night to outer areas. Better bus punctuality, more bus lanes to help this. Better cleanliness.
- Park and ride was welcomed if in the correct place and reasonably priced. Some showed limited enthusiasm for this due to the fact that many don't drive yet.
- An underground system was suggested like Tube/Metro.
- What happened to the trams, they would have been good?
- Free city bus great, but could it not be a bigger bus and go round both ways, as it is a long way back to town from college if you are going for a train.
- Reference to travel prices being too high.
- In favour of more safe pedestrian routes.
- Discussed road pricing and mainly students were against this.
- Parking is far too expensive in the city centre.

## **5. NEXT STEPS**

Responses to the Issues and Alternative Options will be considered and used to help prepare the Preferred Options document, which is anticipated to be published for public consultation in winter 2008/Spring 2009. This is the document that sets out what Leeds City Council considers should be the direction of spatial development for Leeds, although it is still a draft for comment and potential change. There will be a further period of consideration following this consultation before the final proposed Core Strategy is submitted to the Secretary of State later in 2009 alongside another round of public consultation.

As part of this process, a number of stakeholder workshops were undertaken in summer/autumn 2008. These were based on the main issues arising out of the Issues and Alternative Options consultation. They also considered the Sustainability Appraisal, and the policy drivers directing growth and development, including the newly adopted Regional Spatial Strategy (May 2008).

## **6. FURTHER INFORMATION**

Further information about the Core Strategy is available by emailing [LDF@leeds.gov.uk](mailto:LDF@leeds.gov.uk) or by telephoning a member of the Core Strategy Team on 0113 247 8075.

Your details can be put on our consultation database, ensuring that you are automatically notified at each stage of formal consultation.

**APPENDIX 1**

**ISSUES AND ALTERNATIVE OPTIONS QUESTIONNAIRE**

*Shaping The Future... have YOUR say!*

# Leeds Local Development Framework

## Core Strategy

### Issues and Alternative Options

**23<sup>rd</sup> October – 4<sup>th</sup> December 2007**

This questionnaire asks for your views on the Leeds Core Strategy Issues and Alternative Options and gives you the chance to inform the Council's proposals, or suggest alternatives.

It is advised that you read the Core Strategy Issues and Alternative Options summary document or full document, and the Scenario Maps linked with these in order to fully answer this questionnaire.

The Core Strategy is available to view at all libraries and One Stop Centres across the Leeds District, at the Development Enquiry Centre, or online at [www.leeds.gov.uk/ldf](http://www.leeds.gov.uk/ldf) under 'current consultations'. Alternatively email [ldf@leeds.gov.uk](mailto:ldf@leeds.gov.uk) or ring 0113 247 8075 for more information.

- Please continue on a separate sheet if you need more space.
- Consultation forms must include a name and address otherwise your comments will not be taken into account.

Your details

Title.....  
Name.....  
Organisation  
(where relevant).....  
Address.....  
.....  
.....  
Post Code.....  
Telephone/Mobile.....  
Email address  
(optional).....

If the details opposite are for an agent, enter  
the client's details here:

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Your questionnaire needs to be returned by  
5pm on 4<sup>th</sup> December 2007 to:

LDF Consultation (Core Strategy), Planning & Economic Policy,  
2 Rossington Street, Leeds, LS2 8HD

**If you need more space, clearly mark which question you are referring to and continue at the end of the questionnaire or on a separate sheet.**

*Personal information provided as part of a representation cannot be treated as confidential as the Council is obliged to make representations available for public inspection. However, in compliance with the Data Protection Act 1998 the personal information you provide will only be used by the Council for the purposes associated with the LDF consultations*

1. Do you agree with the **strategic Aims and Objectives** ?

Yes No

If No, please indicate why below.

If you feel there are there any additional Aims and Objectives which need to be included, please set these out below: .....

.....  
.....

2. The Core Strategy needs to continue to develop policies to adapt and mitigate **climate change**.

Which of the following approaches should be included in the Core Strategy ?

a) Require all new development to be designed according to sustainable construction principles, or,

a or b?

b) Require only major development to be designed according to sustainable construction principles.

Yes No

c) Seek developer contributions in order to fund the 'retro-fitting' of sustainable construction measures to existing housing stock.

d) Require an increasing percentage of the energy needs of new development to come from on-site renewable energy generation; at least 10% up until 2010, at least 15% up until 2015, and at least 20% thereafter, or,

d or e?

e) Set a more challenging target for renewable energy.

Yes No

f) Set targets for reducing the carbon emissions from new development.

Yes No

g) Set targets for climate change adaptation. To include, surface water drainage (from new development), promoting 'green roofs', and encouraging landscape and planting schemes that make provision for higher outside temperatures.

Comments:.....  
.....  
.....  
.....

3. The Core Strategy needs to ensure that new development does not further worsen **flood risk**.

This should be undertaken by:

Either:

a, b, or c?

a) Preventing residential development in all of the zone 3 high flood risk areas\* regardless of regeneration objectives (this would include some of the built-up area).

Or:

b) Preventing residential development in just the highest risk parts of the zone 3 high flood risk areas\* (these areas are known as 3a<sub>ii</sub> and include some of the built up area).

Or:

c) Allowing residential development in any of the zone 3 high flood risk area providing it helps fulfil regeneration objectives and measures are in place to mitigate the effects of flooding.

\* Details can be found in the Leeds Strategic Flood Risk Assessment

Comments.....  
.....  
.....

4. The Core Strategy needs to ensure that **economic growth** is achieved, whilst protecting and enhancing the **natural environment**. This should be undertaken by the development of green infrastructure, by:

- |   |                          |                          |
|---|--------------------------|--------------------------|
|   | Yes                      | No                       |
| a) Increasing the quantity of greenspace, by requiring new development to provide it,   | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Reviewing the quantity of greenspace, to identify where it is not needed and could be used for alternative uses (including housing), to provide funds to improve the quality of other greenspaces, | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Protecting and enhancing natural habitats, and identifying and mapping opportunities for habitat creation and restoration,   | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Protecting areas of special landscape quality.   | <input type="checkbox"/> | <input type="checkbox"/> |

Comments.....  
 .....

5. The Core Strategy needs to make the most of its **built environment** and enhance the quality of places. This should be undertaken by:

- |  |   |
|--|---|
| a) Identifying, protecting, and promoting heritage and the distinctive positive character of different areas, in either: | <i>i or ii?</i>                                   |
| i. Designated historic environments, or,   | <input type="checkbox"/>                          |
| ii. Throughout the District,   | Yes    No   |
| b) Encouraging creative, distinctive and innovative design in appropriate locations.                                     | <input type="checkbox"/> <input type="checkbox"/> |

Comments.....  
 .....

6. Leeds needs to minimise the amount of **waste** arising. This should be undertaken by:

- |   |                          |                          |
|---|--------------------------|--------------------------|
|   | Yes                      | No                       |
| a) Encouraging the treatment of waste at the highest possible level of the waste hierarchy, | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Encouraging the processing of waste to add value and avoid landfill.                     | <input type="checkbox"/> | <input type="checkbox"/> |

Comments.....  
 .....

7. It is likely that Leeds will need to identify a range of locations (depending on their type and scale) for **waste management facilities**.

Where should such facilities be located?

- |   | <i>Major facilities</i>  |                          | <i>Small-scale facilities</i> |                          |
|---|--------------------------|--------------------------|-------------------------------|--------------------------|
|   | Yes                      | No                       | Yes                           | No                       |
| a) Within existing residential areas and town and district centres, | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>      | <input type="checkbox"/> |
| b) In accessible commercial / industrial areas,                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>      | <input type="checkbox"/> |
| c) In accessible countryside / rural locations.                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>      | <input type="checkbox"/> |

Comments.....  
 .....

8. Criteria used to identify **regeneration priority areas**.

The following criteria have been used to identify areas where regeneration is a priority:

- Overall issues of deprivation (e.g. high level of benefits, low income),
- Low levels of opportunity, aspiration, and educational attainment,
- Poor condition of housing,
- Poor health / lower life expectancy,
- Limited choice in housing type, mix, and tenure,
- Poor environment,
- Anti-social behaviour and crime,
- Unemployment higher than the Leeds average,
- Urban areas with poor physical links to surrounding communities and the City Centre,
- Areas as identified within the Unitary Development Plan Review (2006),
- Lack of private investor interest,
- Contains large areas of derelict/contaminated land.

Do you think there are any additional criteria which should be used to identify regeneration priority areas? Comments: .....	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>

.....  
 .....

**9. Regeneration areas** are designated at the following locations (see Appendix 1 of the full report for a Plan):

- East and South East Leeds (EASEL)
- Aire Valley Leeds
- West Leeds Gateway
- Beeston and Holbeck

Bearing in mind the criteria for identifying regeneration areas as listed in Question 8, are there any other areas, which should be identified as a regeneration priority?

Yes No

Comments: .....

**10. Which option on greenfield sites** do you agree with?:

- a) Greenfield sites on the edge of urban areas should be held back from development until such time as the supply of housing from brownfield site development is insufficient to meet the housing requirement. This will mean intensifying the rate of development in urban areas with higher densities, and building on surplus greenspace and employment land, Yes No
- b) Strategies should be developed for the early release of greenfield sites in the most sustainable locations in order to better meet needs for houses (as opposed to flats) and affordable dwellings. All sites would have to have sufficient levels of public transport and other necessary community infrastructure and meet high standards of sustainable design and construction.

Comments.....

**11. The supply of good quality affordable housing** in Leeds needs to be increased. Should this be through:

- a) Increasing the proportion of affordable housing that we seek on development sites, Yes No
- b) Lowering the site size threshold for seeking affordable housing,
- c) Allocating small-scale land in and on the edge of villages for affordable housing where necessary,
- d) Exploring the possibility for public sector land disposal for affordable housing.

Comments.....

**12. Leeds must provide new accommodation for gypsies and travellers.** Should this be through:

- a) A variety of small sites spread around the city close to existing communities, services and infrastructure, or, a, b, or c?
- b) On a large site on the fringe of the City, or,
- c) Extension of the existing site at Cottingley Springs.

Comments.....

**13. The Leeds Housing Market Assessment reveals a need for a wider range of housing sizes and types** than is currently being built. How should Leeds ensure that a wider variety of housing sizes and types are provided?

- a) A planning policy to control housing mix for all developments where appropriate, Yes No
- b) Allocating sites specifically for this purpose in suburban and rural areas appropriate for house building.

Comments.....

14. Leeds needs to provide **higher housing densities** in order to both meet housing targets and to create sustainable communities. In particular, should the highest densities be promoted at the following locations:

1. In the City Centre,
2. In town and district centres,
3. On public transport nodes (such as railway stations),
4. On edge of City Centre locations.

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

Comments.....  
.....  
.....

15. Which location do you think is most important for **industry, manufacturing, warehousing and distribution**?

- c) A wide range of sites across Leeds, easily accessible to local people by a variety of transport methods, or, *a or b?*
- d) A smaller number of large, strategic sites, with good transport connections, attractive to the market, and capable of providing a modern and efficient operating environment.

Comments.....  
.....

16. Should a selection of the best existing employment sites and buildings within Leeds District be **protected for employment use**?

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>

Comments.....  
.....

17. In planning for **future economic opportunities** in Leeds, is there a need to make some employment land only available for the following specialised uses?

- a) Research and Development / innovative / science industries,
- b) Industries connected to rail / waterways infrastructure,
- c) Media / creative industries.
- d) Other (please state).....

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

Comments.....  
.....

18. Leeds needs to encourage a **diverse and robust economy**.

Which of the following measures should be used to help accomplish this?:

- c) Using planning agreements to require the provision of a proportion of low cost business space in new employment developments, *Yes No*
- d) Using planning agreements to encourage new developments to train and recruit a proportion of local new labour market entrants.

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

Comments.....  
.....

19. **Rural employment.** Do you think that:

- c) Certain rural parts of Leeds should be treated as self-contained priority areas for rural employment, including promoting and safeguarding of existing employment land and premises, or, *a or b?*
- d) Rural areas should be considered an integral part of the Leeds economy with no special exceptions to promote and retain rural employment?

<i>a or b?</i>
<input type="checkbox"/>

Comments.....  
.....

**20. Hierarchy of centres.** Which hierarchy of centres should the Core Strategy adopt?:

a or b?

a) The following hierarchy:

- The City Centre – for major shopping, leisure and office development,
- Principal Town and District Centres – for shops, supermarkets and a range of non-retail services (such as banks, libraries, restaurants, offices and estate agents),
- Local Centres – for a basic range of facilities for local needs,
- Neighbourhood shops.

Or,

b) A different hierarchy or network. Please suggest an alternative hierarchy or network: .....

c) If you think there are any other town and district centres, or local centres, which are not listed in the Issues and Alternative Options document, please list them below: .....

**21.** The following criteria have been used to identify which **town and district centres** have the potential for expansion:

- physical potential for wider expansion or infill,
- the potential for regeneration (including level of Leeds City Council ownership) with appropriate positive interventions,
- good public transport connections,
- sufficiency of car parking (existing and possible),
- existing success and market demand, and,
- additional constraints, e.g. presence of conservation areas and listed buildings.

Yes No

Are there any other criteria which should be used to determine the centres for expansion?

If Yes, please state which: .....

**22.** Leeds City Council is committed to maintaining and enhancing the viability and vitality of all its town and district centres across the District. Some of the **centres have potential for growth.**

Leeds City Council has identified that:

a) The following centres have the ability to intensify their use within existing boundaries:

	<i>Agree</i>	<i>Disagree</i>		<i>Agree</i>	<i>Disagree</i>
Armley			Hunslet		
Bramley			Kirkstall		
Cross Gates			Meanwood		
Dewsbury Road			Otley		
Garforth			Rothwell		
Halton			Seacroft		
Harehills Lane			Yeadon		
Holt Park					

Other centres (please state).....

b) The following centres have the ability to intensify their use within existing boundaries and expand beyond their existing boundaries:

	<i>Agree</i>	<i>Disagree</i>		<i>Agree</i>	<i>Disagree</i>
Dewsbury Road			Kirkstall		
Garforth			Otley		
Harehills Lane			Seacroft		
Hunslet					

Other centres (please state).....

23. National planning policy does not support expansion of **existing out of town centre shopping centres**, particularly for retail uses. So, should:

- Owlcotes (Pudsey): a or b?
  - c) be contained as it is, or,
  - d) within the context of its potential impact on traditional centres and the City Centre, could it be encouraged to diversify its function and integrate into the surrounding communities?
- White Rose (Morley): c or d?
  - e) be contained as it is, or,
  - f) within the context of its potential impact on traditional centres and the City Centre, could it be encouraged to diversify its function and integrate into the surrounding communities?
- Colton e or f?
  - g) be contained as it is, or,
  - h) within the context of its potential impact on traditional centres and the City Centre, could it be encouraged to diversify its function and integrate into the surrounding communities?
- Killingbeck g or h?
  - i) be contained as it is, or,
  - j) within the context of its potential impact on traditional centres and the City Centre, could it be encouraged to diversify its function and integrate into the surrounding communities?

Comments.....  
 .....  
 .....

24. Leeds needs to develop **major cultural and leisure facilities**. Where should these be located?

- |  | Yes                      | No                       |
|--|--------------------------|--------------------------|
| a) Within the City Centre,   | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Adjacent to the City Centre,  | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Outside the City Centre but in locations highly accessible by public transport. | <input type="checkbox"/> | <input type="checkbox"/> |

Comments.....  
 .....  
 .....

25. Leeds needs to maximise opportunities for people to improve their **health and well being**. How should this be undertaken?

- |  | Yes                      | No                       |
|--|--------------------------|--------------------------|
| f) Provision of a green infrastructure throughout the District,    | <input type="checkbox"/> | <input type="checkbox"/> |
| g) Improved provision of public sports halls and leisure centres,  | <input type="checkbox"/> | <input type="checkbox"/> |
| h) Provision of safe, car free routes for cycling and walking,     | <input type="checkbox"/> | <input type="checkbox"/> |
| i) Retain and where possible increase the provision of allotments. | <input type="checkbox"/> | <input type="checkbox"/> |
| j) Ensure provision of an accessible network of health facilities. | <input type="checkbox"/> | <input type="checkbox"/> |

Comments.....  
 .....  
 .....

26. Leeds needs to support the provision of **high quality education** by:

- |  | Yes                      | No                       |
|--|--------------------------|--------------------------|
| a) Encouraging schools and colleges to make their facilities available for wider community use,                      | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Locating schools where they are most accessible to the communities they serve,                                    | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Encouraging the location of new further education provision within the city centre and town and district centres. | <input type="checkbox"/> | <input type="checkbox"/> |

Comments.....  
 .....  
 .....

27. Leeds wants to provide greater choice in **travel options** open to people in order to encourage the use of the most **sustainable forms of transport**. Which of the following measures do you think would be most effective?

- k) Park and Ride,
- l) High quality public transport systems,
- m) Car free or limited access areas e.g. pedestrianisation and Home Zones,
- n) Car parking management and controls,
- o) Safe and accessible walking and cycle routes,
- p) Business and school travel plans to ensure sustainable transport patterns in existing and new developments,
- q) Effective traffic management to give priority to high occupancy vehicles,
- r) Demand management measures such as road user charging,
- s) Low emission zones to improve air quality e.g. for the City Centre,
- t) More local rail stations.

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

Comments.....  
 .....

28. Leeds should allow **Leeds Bradford Airport to expand** to accommodate the air travel needs of either:

- a) Those living and working in the City Region, or,
- b) Those living and working both in and beyond the City Region.
- c) Allow Airport expansion only if supported by improved surface access by public transport,
- d) Allow Airport expansion only if supported by measures to mitigate the effects of aircraft noise.

a, or b?	
<input type="checkbox"/>	
Yes	No
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

Comments.....  
 .....

29. **Scenarios.** Given that Scenario 1 'Base Line/Business as Usual', will continue to provide development needs in the near future, what development form should the City take in the future?

- a) Which Scenario would you choose?
  - o Scenario 2 'The Compact City',
  - o Scenario 3 'Dispersed Development Hubs',
  - o Scenario 4 'New Urban Neighbourhoods'.

2, 3, or 4?

b) Are there any other Scenario options, which you feel should be considered?

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>

If Yes, please describe: .....  
 .....  
 .....  
 .....  
 .....

**THANK YOU FOR YOUR COMMENTS.**

**Please tick this box if you would like to be informed about the next stage of consultation**