

City Centre Area Action Plan Preferred Options: Points raised by Consultees

<p>General Comments Scale of support/objection: 23 responses, 2 support, 10 object 11 unclear</p>	
<p>Issues raised</p>	
1	<p>Subject matter for the photos used in final document should be chosen so as not to become out of date (City Centre Management 1025/1126)</p>
2	<p>Caddick are committed to delivering major redevelopment of the Trinity Quarter site and would welcome the opportunity to work with LCC in the coming months (Caddick/Drivas Jonas 1028/1128)</p>
3	<p>Whether the CCAAP should be held back until the strategic issues affecting the city centre are resolved by the Core Strategy? The CCAAP will fail the conformity test of soundness (PPS12 para 4.24 iv.) as it will neither conform with a core strategy nor with the UDP. The core strategy needs to establish a strategic framework of housing provision that delivers a sustainable pattern of development & regeneration. The CCAAP should then follow, not lead. (Threadneedle Property Investments owner of former Vickers Tank Factory 57/1091, Dacre 480/1109, Home Builders Federation 92/1123, Ashdale Land & Property with land interests at Micklefield 57/1099).</p> <p>GOYH notes that the CCAAP must conform with UDP saved policies except where the AAP is superseding particular policies. Hence, the CCAAP will need to make clear which policies are in conformity and which it is superseding. The submission AAP should briefly explain the relationship of the AAP to the rest of the district & particularly to other AAPs (especially AVAAP). It would also be helpful to set out the relationship with the city region, including other town/city centres, in particular with Bradford & Wakefield. Any inconsistencies between plans will need to be fully justified (GOYH 1994/1118). Because the AAP comes before the Core Strategy, cumulative impacts of all Leeds' AAPs will need to be assessed through the Sustainability Appraisal process and addressed as necessary through the AAPs (Environment Agency 46/1104).</p> <p>MPEC supports the preparation of the CCAAP ahead of the core strategy & seeks reassurance that it will not be held up (MPEC/Savills – developer of Wellington Place 466/1122). The submission draft of the CCAAP should be realistic and relate to criteria established in the Core Strategy, with firm policies & specific site proposals (Sport England Yorkshire 1982/1133).</p>
4	<p>The Preferred Option consultation April-May 2007 was unsound because key background documents – the Housing Market Assessment and the Strategic Flood Risk Assessment – were not available to help consultees make informed comments (Threadneedle Property Investments owner of former Vickers Tank Factory 57/1091, Dacre 480/1109, Home Builders Federation 92/1123), Ashdale Land & Property with land interests at Micklefield 57/1099).</p>
5	<p>Soundness test iii – Sustainability Appraisal. A summary of the main findings of the appraisal & how the AAP will address them is needed. In particular, this should include the social, health, education, skills and employment issues; transport in the light of office growth and the increased risk of flooding (GOYH 1994/1118)</p>
6	<p>Soundness test iv.a – Regard to other strategies. Are all relevant strategies covered? (GOYH 1994/1118)</p>
7	<p>Soundness test iv.b – national policy. The CCAAP is inconsistent with PPS25 because it has not applied a sequential test to justify allowing development in areas of medium & high flood risk. It is inconsistent with PPS1 for failing to account for flood risk as an environmental constraint. It fails to “Bring forward sufficient land...taking into account...the need to avoid flood risk...”. The CCAAP also fails to reflect the findings of the emerging Strategic Flood Risk Assessment (SFRA) by giving a presumption in favour of development with an emphasis on mitigation rather than prevention of flood risk to both people & property (Environment Agency 46/1104). The submission AAP could usefully refer to national guidance (PPS paras), but not repeat it. Any conflicts with national guidance must be robustly justified by local circumstances (GOYH 1994/1118).</p>

	The financial contribution requirements lack conformity with national policy (Evans 2998/1094).
8	Soundness tests iv.c Conformity with RSS and v. Regard to community strategy. A table could helpfully summarise the links between RSS, the community strategy themes and the AAP objectives & policies. Have all relevant aspects of Vision for Leeds been addressed? (GOYH 1994/1118). The issue of conformity with RSS needs to be addressed at the start of the CCAAP submission document. This will help clarify the significance of references to the RSS that are made throughout the documents (Regional Assembly 940/1117).
9	Soundness test vii Alternatives. The submission AAP must show more clearly which alternative approaches have been rejected and why, including SA testing. This should include options put forward as part of the Preferred Options consultation, including different mixes of development of the Proposal Areas (GOYH 1994/1118).
10	Soundness test vii Evidence. Options selected for submission must be fully supported and justified by evidence (GOYH 1994/1118). Weakness in the evidence base is evident in respect of PO-06 & its demand for family sized accommodation (Evans 2998/1094).
11	Soundness test viii Implementation & Monitoring. Policies must be drafted with sufficient precision (eg types & scale of development, inclusion of indicators, targets, timescales, milestones and agencies for delivery) to enable them to be monitored and have their effectiveness measured (GOYH 1994/1118).
12	Soundness test ix Flexibility. Sufficient flexibility should be built into the plan in case development does not take place as expected or infrastructure is not delivered. Contingency plans should be included where risk of non-delivery exists (GOYH 1994/1118). The assumed minima of office development on proposals areas lacks flexibility (Evans 2998/1094).
13	Information leaflet & questionnaire don't make sense on their own (P Lockwood 2990/1072)
14	The document needs more context, a glossary and a conclusion (Civic Trust 62/1146).
15	The survey form should have been more user friendly and in larger print (B Connolly 193/1152)
16	Green roofs should be promoted as they help expand the Green Infrastructure (Mike Barningham, Natural England 3006/1119).
Introduction, para 1.1.1 Describes the nature of the CCAAP. Issues raised	
1	Stated aim does not reflect the aim of the "new" planning system to widen the scope of LDFs beyond land use & development control (GOYH 1994/1118)
Introduction, para 1.1.2 Describes the central geographical location of Leeds. Issues raised	
1	Mention the airport (City Centre Management 1025/1126)
Introduction, para 1.1.3 Describes the success of Leeds embodied within the city centre Issues raised	
1	Mention high level of planned investment in city centre (City Centre Management 1025/1126)
Introduction, para 1.1.5 Describes the growing residential component of the city centre and consequent emerging needs Issues raised	
1	Add need for GP and dental surgeries (City Centre Management 1025/1126)
2	Describe the recent residential growth as a re-establishment of city living which was present up to the second half of 20 th century (City Centre Management 1025/1126)
Introduction, para 1.1.7 Describes the national policy context of PPS6 "Planning for Town Centres" Issues raised	
1	ReLand agrees that Leeds city centre warrants a more sophisticated approach its the role and function. Standard application of national planning policy might

	prejudice the City Councils objectives to see rejuvenation of industrial areas close to the city centre core, like the Kirkstall Rd Renaissance Area (Reland 3016/1140).
Introduction, para 1.1.8 Describes the relevant policy aspects of the Draft Regional Spatial Strategy, including concern about employment land in Leeds city centre.	
Issues raised	
1	Loss of employment land in the form of old industry is not a bad thing, particularly when new office provision is being made. Contradicts para 1.1.5. (City Centre Management 1025/1126)
2	The city centre should be the key area for employment land development, including restraint of out of town schemes (Civic Trust 62/1146).
2	It is clear from references to relevant draft RSS policies that the CCAAP has been drawn up within its wider spatial planning context. The opening section of the submission document should clarify the importance of conformity with RSS (Regional Assembly 0940/1117)
3	More should be made of the Leeds City Region in the whole document. Discussion is needed to clarify the role of places (including the city centre) in the region & city region, (LCC Regional Policy Team 3007/1120).
4	There is minimal reference to other strategies relevant to the LCCAAP, e.g. the "Improving Public Transport and Developer Contributions" SPD, the emerging Leeds City Centre Transport Strategy, the Local Transport Plan, RailPlan6, The Leeds City Region Transport Visions and the Regional Spatial and Transport Strategies (Metro 1933/1148).
Introduction "Other local strategy context" paras 1.1.9 – 1.1.20 Sets out abstracts of relevant local strategies & plans.	
Issues raised	
1	Should there be reference to current LCC Env Policy (City Centre Management 1025/1126)
2	The reference in para 1.1.10 should be to City Centre Leeds Partnership (City Centre Management 1025/1126)
3	It would be helpful to give document dates (City Centre Management 1025/1126)
4	The City Region Development Plan should be included, even though it has no place specific proposals. This will help embed city region working into the statutory process wherever possible (LCC Regional Policy Team 3007/1120)
5	Include the "Older Better" Strategy (B Holden 2999/1093)
6	The Vision for Leeds objective "improve access to greenspace" should permeate through all policies (Civic Trust 62/1146)
7	The unpublished Mabgate and Kirkstall Road Renaissance Area Frameworks were not subject to SCI process – their status in the list of local strategy documents is of concern (Civic Trust 62/1146).
AO: Aim and Objectives. One aim and 6 objectives are set out.	
Scale of support/objection: 45 responses, 34 support, 11 object	
Issues raised	
Aim & General Comments	
1	Add primary & secondary education and support higher education (S. Goulding 3020/1145)
2	Reland supports the aim (Reland 3016/1140).
3	Use the term "Regional Capital" rather than "Regional Centre" in the Vision & Aim (LCC Regional Policy Team 3007/1120)
4	Ensure all facilities are accessible & safe for disabled people including blind & partially sighted (S. Goulding 3020/1145)
5	Lack of vision for the city centre in 20-30 years. Lack of ambition, with the exception of Arena proposals. Lack of coherence of proposals. Lack of emphasis on the overall quality of public realm (LCC Regional Policy Team 3007/1120). Lack of a clear vision to facilitate sustainable growth (B. Smith 2996/1082). A Leeds distinctive vision, ie what the city centre is expected to be like in 10 years such as its role, number & type of jobs, shops, leisure facilities, public transport,

	family & student housing & spatial distribution of facilities. The vision should reflect the approach taken so far since significant departure may require further consultation (GOYH 1994/1118). The AAP's vision of clustering office uses in the core of the city centre is supported as this is one of the most sustainable locations. A compact shopping area should be valued as a means of maximising vibrancy & vitality. It should be enhanced by ensuring good public transport and inclusion of high quality public space (Yorkshire Forward 2597/1115). The Aim is bland for an area of rich historic character & diversity. The aim should be to create a distinctive heart for the City Region which builds upon and reinforces local character (English Heritage 99/1116). The lack of vision and absence of area master-planning needs to be fully addressed in order to capture opportunities in terms of quality of built development, public realm and quality of urban design. The CC Urban Design Strategy has not been followed by co-ordinated and visionary area master plans. Individual developments should be designed in a more holistic context exploring opportunities for new connectivity, quality spaces and facilities (Dacre 480/1109).
6	Following the spatial vision & objectives, a new section should set out the overall spatial strategy for the city centre. This could indicate how the objectives are developed into a spatial strategy (eg change in office employment, change in shopping floorspace, transport, environmental improvements – in relation to the socio-economic and environmental issues identified in the studies undertaken. It should set out what the AAP will deliver in spatial terms (GOYH 1994/1118).
7	Need a clear achievable policy to recruit highest calibre professionals, create an exciting built environment & achieve innovation & quality (B. Smith 2996/1082)
	Objectives i) & ii)
1	Objective i) states to plan to accommodate only employment, residential and higher educational uses of the city centre. It is not satisfactory for other town centre uses such as retailing to merely be referred to in supporting text of objectives ii) and iii). The full range of town centre uses should be included in objective i) (Morley Fund Management 806/1077, National Grid 806/1076).
2	Objective i) should be separated to address the three functions of employment, residential and higher education. The explanatory text for the residential section is insufficiently supported with indications of nature, type, quantity and tenure (Dacre 480/1109)
3	Objective ii) and the Aim should be combined with a sub-divided i) such that facilities to support employment, residential and higher education should be more meaningfully addressed (Dacre 480/1109)
	Objective iii)
1	Objective iii) to strengthen the vibrancy, appeal and accessibility of the city centre to all should make specific reference to supporting the Arena proposals (Montpellier Estates/WYG 420/1130)
2	Caddick support the aim of the plan & the goal of maintaining & enhancing the vitality & viability of the centre, particularly as a regional retail destination (Drivas Jonas 1028/1128)
	Objective iv) & v)
1	The protection of elements which contribute to the city centre's sense of place and distinct identity should be emphasised. Objective iv) does not express the importance of distinctive character, which had been included in Objective 3 of the Issues & Options Report. This should be reinstated as follows: iv) promote and maintain a high-quality, safe environment that reinforces the distinctive character of various parts of the city centre. The supporting text amended to read "...protecting and enhancing heritage, reinforcing distinctive character and ensuring that development is appropriate in its context." (English Heritage 99/1116). Conservation of the city's character needs more emphasis (E. Tate 3019/1143)
2	Objective iv) should mention "good quality public realm" and refer to designing out crime (City Centre Management 1025/1126)
3	Particular support for objectives iv & v. (M Willison – Ramblers Association 38/1075)

4	The protection against dangers such as pollution and flooding in objective iv) is supported (Environment Agency 46/1104).
5	The “promoting provision of greenery” and “negotiating for better quality of schemes and harnessing development to secure environmental improvements” is supported (Environment Agency 46/1104).
6	Objective iv) should promote green infrastructure. Urban environments should be about multifunctional green infrastructure to bring benefits of health, recreation, SUDS, reducing climate change and biodiversity (Natural England 3006/1119).
7	Reland particularly supports objective v (Reland 3016/1140)
Objective vi	
1	Morley Fund Management who own Crown Point Retail Park (CPRP) support this objective. The CPRP forms a key stepping stone between the thriving city centre core and adjacent deprived neighbourhoods (Morley Fund Management 806/1077). For the same reasons National Grid Property Holdings, who own the Kidacre St Proposal area, support objective vi, as Kidacre St forms a stepping stone between the thriving city centre and adjacent deprived neighbourhoods (National Grid 806/1076). Reland particularly supports objective vi (Reland 3016/1140)
2	The paragraph should acknowledge the conflict between improving traffic flow and minimising environmental impact/promoting sustainable links between city centre & surrounding neighbourhoods (Metro 1933/1148).
3	Is this promoting flow of motor traffic or more sustainable modes to connect to adjoining neighbourhoods? Improvements for cycling, walking & public transport access to/from the city centre are needed to compensate for years of improving car access (J Davis 1545/1147)
Principal Use Quarters Section 2.2 Describes the concept of principal use quarters used in the Unitary Development Plan, & that the concept has been dropped from the CCAAP	
Issues raised	
1	The “Alternative Options” stage of consultation referred to in para 2.2.2 needs a proper explanation (City Centre Management 1025/1126)
2	The replacement of the “quarters approach” with an uncontrolled mixed use “free-for-all” (save for the retail zone) will fail to manage the rate of development that needs to be supported by supporting services. It is not in conformity with UDP policy; see General Point 3 above (Dacre 480/1109).
PO-01: Size of the City Centre Retain the existing UDP CC boundary with minor adjustments Scale of support/objection: 61 responses, 45 support 16 object	
Issues raised	
1	Amendment of the CC boundary is a Core Strategy matter (which should have regard to a comprehensive rather than a partial evidence base including the Housing Market Assessment). In order to comment upon one boundary change we need to be aware of its impact upon plans in adjoining AAP's. (Ashdale Land & Property Company 0057/1099, Threadneedle Property Investments Ltd 0057/1091, Dacre Son & Hartley 0480/1109)
2	For clarity and ease of reference, the changes to the UDP boundary should be shown on the map (Leeds Civic Trust 0062/1146).
3	It would help if plans were numbered for cross-reference purposes (Leeds Civic Trust 0062/1146)
4	Expansion of the City should be controlled to ensure that vacant sites in the city centre are developed first and prevent development leapfrogging to unsustainable sites on the edge of the City. Dispersal will leave central areas to stagnate. There is still considerable development potential in the existing city centre including Holbeck (Montpellier Estates/WYG 420/1130).
5	We endorse the approach outlined which is in accordance with PPS6 (John Lewis 2551/1114).

6	Should the Mabgate, Lovell Park & Little London areas be included in the city centre? One view is that the Mabgate area is more 'rim' in character & should be excluded from the city centre (Unsworth/Morgan 0846/1103). Another view is that the Lovell Park & Little London area to the N.W. of Mabgate should be added, following major rather than secondary roads (Gordon Carey 0960/1065, Cllr Penny Ewens 3001/1095). The kink in the boundary on Macauley St should be removed. The kink takes in a triangle of greenspace which is integral to Cromwell Heights flats (Mr Matthew Parkin 2982/1061)
7	An extension should be made to the N.W. at the Leeds University Business School (Gordon Carey 0960/1065).
8	An extension should be made to the large area of land to the S.E. including Pottery Fields and land to the south of Clarence Dock, taking into account the new East Leeds radial road improvements (Gordon Carey 0960/1065).
9	Boundary is not sufficiently flexible to accommodate future economic growth (City Centre Management 1025/1124)
10	Regarding clause iv to facilitate better integration of the CC, this should be clarified as physical and social/employment connections (City Centre Management 1025/1124)
11	The loop road extension to the south could become a barrier to pedestrians (Mrs Margaret Bird 1428/1155). It should avoid creating severance or delay to bus services to/from the city centre, rather enhance services through priority facilities (Metro 1933/1148). No need to accommodate southern loop road proposals which have no rationale & may conflict with stated aims & objectives of the CCAAP (Mr John Bird 3044/1163) Network Rail supports the inclusion of the former Whitehall Goods Yard to the S.W. It is a suitable city centre development site (Network Rail 1024/1087)
12	An additional sub-policy (v) is required to ensure that all developments are built in accessible locations or in locations that can be made accessible (Metro 1933/1148)
13	A compact city centre will help support a vibrant mix of uses (inc residential). A compact centre offers the greatest potential to maximise the vibrancy and vitality of the city centre, whilst also facilitating the continued growth of the city centre (Yorkshire Forward 2597/1115) Consolidation will help boost the image of the city centre (Montpellier Estates/WYG 420/1130).
14	A compact city centre will help maintain good accessibility, particularly for pedestrians (Yorkshire Forward 2597/1115).
15	The Kirkstall Road Renaissance Area should be included as part of the City Centre. The 3 key issues in support of its inclusion are; <ol style="list-style-type: none"> 1. Location, accessibility and connections to the City Centre. 2. Economic and market issues, as well as regeneration benefits. 3. Suitability of mixed use which are complementary to the City Centre. <p>The following reasons expand on the above;</p> <ol style="list-style-type: none"> 1. In order to assist the urban regeneration and renaissance objectives of the area as set out in the Kirkstall Road Planning Framework. The extension of the City Centre is required to meet the economic objectives of growth and development of Leeds City Centre as the regional centre. 2. In order to change the current perception of the area, raising its profile and aspirations, and actively spreading the confidence of the City Centre outwards to the benefit of neighbouring communities. 3. Its strong and direct linkages to the rest of the City Centre in terms of pedestrian and public transport access/ connectivity. In particular it is within 15 minutes walking distance of Leeds City Centre Railway Station. The proposed QBI will also further improve bus and cycle accessibility into the City Centre. 4. The economic hub of the City Centre has shifted westwards, and therefore the extension of the City Centre to include the Kirkstall Road Renaissance Area represents a logical extension to spread the prosperity of the City Centre to the west.

	<p>5. There are already existing mixed town centre uses within area i.e. offices, hotel, leisure and restaurants with a number of mixed use schemes proposed within the area. The inclusion of the area within the City Centre is required to help facilitate the implementation of these schemes.</p> <p>6. The extension of the city centre boundary to Kirkstall Road represents the best opportunity to expand the city centre in a sustainable manner.</p> <p>7. Due to flood risk issues as much of the land between Kirkstall Road and the river is classified as flood risk level 3. Most city centre uses are classified by PPS25 as less sensitive and vulnerable to flood than residential use. Although the Preferred Options propose to allow residential development on zone 3 land, there may be practical reasons for other less sensitive uses at ground/ upper ground floor level with residential above.</p> <p>8. The inclusion of the area within the City Centre Boundary will not cause negative economic effect on the vitality and viability of the City Centre due to the policy approach of the document and the Planning Framework document. The LPA will still have control over the proposed uses along Kirkstall Road as the strategic policy framework for the area provides guidance for the redevelopment of the area including limiting the quantity of office space. The preferred option of the AAP is also to locate major new shopping development within the Prime Shopping Quarter and therefore the level of retail uses will still be restricted if Kirkstall Road is included within the City Centre.</p> <p>9. The Kirkstall Road area is already deemed to be within the City Centre by reference to Council Policy e.g. Affordable Housing Zone and is included within the City and the Centre City Plans Panel.</p> <p>10. The railway viaduct on Kirkstall Road provides a better defined City Centre Boundary than the existing boundary (Kirkstall Holdings (3010/1127)</p> <p>A more sophisticated approach to the western city centre boundary is required. Pertinent objectives of the informal planning guidance for the Kirkstall Road Renaissance Area (KRRRA) may be prejudiced if the land uses, transport accessibility and greenspace improvements fail to materialise. Inclusion of the KRRRA in the city centre will assist to secure the area's restructuring, integral to the city's key urban renaissance objectives (Reland (Leeds) Ltd 3016/1140).</p>
17	Should the title in para 3.1 include a specific reference to Leeds City Region, as well as the City and Region (Martin Gray – Leeds City Council 3007/1120).
18	Figure 4 SFRA map shows the Kirkstall Road Renaissance area but this is not part of the city centre and therefore the plan should not include it (English Heritage 0099/1116).
<p>PO-02: Employment Reinforce and promote office function of core area by controlling mix of uses in new developments. Scale of support/objection: 63 responses, 50 support 13 object</p> <p>Issues raised</p>	
1	There is no flood risk dimension to the location of employment within the policy. All developments should be considered in relation to the sequential approach for flood risk (Environment Agency 0046/1104)
2	The policy proposed gives no weight to, or consideration of, environmental sustainability (Environment Agency 0046/1104)
3	No more land needed. Present level of office space is being occupied by existing companies moving round the city. Need to consolidate existing office space, refurbishing & rebuilding on existing sites and leaving some city centre land for family housing (Cllr Valerie Kendall 0050/1134)
4	Safeguarding opportunities for business and employment growth will bring with it increased commuter trips in the morning and evening peaks. The local and strategic highway networks are nearing capacity and therefore any proposals for increased office development will need to be supported by sustainable transport

	policies (Highways Agency 0060/1100)
5	The core areas are not defined on the map as implied by the text (Leeds Civic Trust 0062/1146, MEPC via Savills 0466/1122)
6	Walking routes will need to be improved as part of this policy. Opportunities for provision and enhancement of recreation areas should be taken (British Waterways 0338/1121)
7	To arbitrarily require all new developments to provide office accommodation will potentially dilute demand and could undermine those areas of the City where new prestige development should be focussed and supported (for example the West End area) (MEPC via Savills 0466/1122)
8	The former Doncasters Site, lies within an easy 5 -10 mins walk distance from the train station. The map should therefore be amended to reflect this (HBG Properties – via Indigo Planning 0806/1112)
9	Floorspace figures in proposal area statements noted. Will need targets for monitoring and management of delivery. Reference is made to Soundness Test viii. Whilst understanding the need for policies and proposals to include an element of flexibility to accommodate unforeseen and changing circumstances they must be drafted with sufficient precision (for example setting out types and scale of development, inclusion of indicators, targets, timescales and milestones, stating agencies responsible for implementation) to enable them to be monitored and effectiveness measured (Government Office for Yorkshire & the Humber 1994/1118) Monitoring of the pipeline will be crucial to ensuring an adequate but not excessive flow of space onto the market (Unsworth/Morgan 0846/1103). Need to avoid requiring office provision in circumstances where there is no demand. How do we intend to monitor this? (City Centre Management 1025/1124).
10	Support the recognition that office development should not compromise the attraction and function of the PSQ (Caddick Developments Ltd – via Driver Jonas 1028/1128)
11	The AAP's vision of clustering office uses in the area surrounding the train station is supported, as this offers one of the most sustainable locations within the city (Yorkshire Forward 2597/1115)
12	Broadly support the emphasis upon promoting office development within the CC. However, it is important to ensure a mix of complimentary uses so that the CC is a genuinely vital and viable centre throughout the day and week. This approach is advocated in PPS6 and acknowledged in PO-01 (ii). (Asda Stores Ltd –via Savills 2763/1129).
13	This policy approach could have the potential to be in conflict with the City Regional Development Programme strategy of targeted displacement, e.g. some financial and business functions (Martin Gray – Leeds City Council 3007/1120)
14	Kirkstall Road Renaissance Area is also a sustainable location for office use given its strong and direct pedestrian links to the heart of the CC and the railway station. The IHT guidelines suggest a preferred maximum walking distance for commuters of 2,000m. The majority of this area falls within this figure. Therefore an additional criterion should be inserted stating that office uses will also be appropriate in other locations accessible to the train station, i.e. up to 15 mins walk. (Kirkstall Holdings 3010/1127)
15	The effect of this PO should not be at the expense of other objectives including those of the KRRR Planning Framework. Some land uses subject to the sequential test of PPS6 are essential to the social, physical and economic restructuring of the KRRR. The accessible nature of Kirkstall Road itself is eminently appropriate for such uses (Reland (Leeds) Ltd 3016/1140)
16	There should be several office cores throughout the city centre. This would also help to ensure some business continuity in case an area of the city came out of action for some reason (i.e. a terror attack). Other Office areas, not affected can keep operating in the following weeks and months after. If all the office core was in one area there could be bigger disruption to business and the Leeds economy if that area became out of action for some reason (Mr David Raper 3000/1092)

<p>PO-03: Employment Encourage office development throughout city centre without compromising the Prime Shopping Quarter. Scale of support/objection: 47 responses, 40 support 7 object</p>	
<p>Issues raised</p>	
1	<p>The proviso that office development shouldn't compromise the PSQ should be extended to avoid compromising the attraction & function of the whole city centre. Accordingly, mixed use developments that incorporate other uses that are important to the growth of the city centre (e.g. healthcare, educational, cultural uses etc) should not be prevented due to a presumption in favour of offices (Montpellier Estates/WYG 420/1130, Leeds Initiative 845/1096) The proviso to protect the PSQ is supported (Caddick Developments Ltd – via Driver Jonas 1028/1128)</p>
2	<p>Floorspace figures in proposal area statements noted. Will need targets for monitoring and management of delivery. Reference is made to Soundness Test viii. Whilst understanding the need for policies and proposals to include an element of flexibility to accommodate unforeseen and changing circumstances they must be drafted with sufficient precision (for example setting out types and scale of development, inclusion of indicators, targets, timescales and milestones, stating agencies responsible for implementation) to enable them to be monitored and effectiveness measured (Government Office for Yorkshire & the Humber 1994/1118)</p> <p>Monitoring of the pipeline will be crucial to ensuring an adequate but not excessive flow of space onto the market (Unsworth/Morgan 0846/1103). Need to avoid requiring office provision in circumstances where there is no demand. How do we intend to monitor this? (City Centre Management 1025/1124).</p>
3	<p>Employment, through provision of further employment space, including offices etc within the city centre is critical to the continued success of the City. Investment in existing stock and development of further high quality office space that fulfils modern requirements is essential to attract tenants and employees in the future (Gordon Carey 0960/1065)</p>
4	<p>Support the approach taken that will help reduce the need to travel (Sport England 1982/1133)</p>
5	<p>The city centre in general is considered an appropriate location for office development. The location of new office developments throughout the city centre will play an important part in promoting vitality within the city centre and support economic growth (Yorkshire Forward 2597/1115)</p>
<p>PO-05: Providing Housing. Encourages housing development throughout the city centre providing it does not prejudice main town centre uses and it has suitable flood risk measures where necessary. Scale of support/objection: 66 responses, 47 support 19 object</p>	
<p>Issues raised</p>	
1	<p>The option doesn't take steps to direct development away from medium and high risk flood areas, so does not comply with the sequential test required by PPS25. The option fails soundness tests iv (conformity with regional & national guidance) & vii (robust & credible evidence). If housing still needs to be located in flood zone 3 after undertaking the sequential test, housing development will need to be subject to the Exception Test of PPS25 (Environment Agency 46/1104, Savills-MEPC 466/1122, Dacre 480/1109, Tangent Properties 3009/1126)</p> <p>Shouldn't allow any building in areas of flood risk, ie. Not just applicable to housing developments. (Mrs P. Auty 3024/1150). Shouldn't allow any building in likely flood areas (Mr Kerrison 3033/3153)</p> <p>Maps (Fig 4 & 5) need more explanation of the categories (Civic Trust 62/1146)</p> <p>Developments in flood risk areas should be encouraged, but with better</p>

	mitigation, contingency planning and raising awareness of developers and residents (British Waterways 338/1121)
2	Expressed support – more housing in the city centre will reduce commuter trips (Highways Agency 60/1100, Sport England 1982/1133). Housing key employees will help the functioning of the City (Civic Trust 62/1146). The recognition of the importance of facilities in para 3.1.11 is welcomed (Civic Trust 62/1146). Housing will help ensure there is a vibrant & safe city centre throughout night & day (Yorkshire Forward 2597/1115)
3	Need for services, facilities, routes, public transport & greenspace to support the expanding population (British Waterways 338/1121, Civic Trust 62/1146, Gordon Carey 960/1065)
4	All flats should have parking underneath (Cllr Valerie Kendall 0050/1134)
5	<p>PO-05 lacks an evidence base of trends of housing supply & consideration of demand (Dacre 4801/1109). To comply with PPS3 paras 52-61, the CCAAP will need to identify sites for housing that are deliverable in the first 5 years & developable over a longer period. Housing targets should be established which should take account of city centre job growth. The policies need to balance “precision” (in terms of targets, types of housing, scale of development & timescales) with “flexibility & responsiveness”. Policies must be monitorable (GOYH 1994/1118).</p> <p>Excessive supply beyond demand from occupiers likely to exacerbate vacancy levels & threaten rental levels & capital values. Take-up of flats should be monitored relative to economic growth and future demand quantified. (Unsworth/Morgan 0846/1103)</p> <p>Too many expensive flats out of reach of most citizens of Leeds – Adjoining neighbourhoods need regeneration & improvements to the existing housing stock (Leeds Initiative 845/1096)</p>
6	<p>PO-05 will not assist in delivering the range of housing sizes & types needed in Leeds as a whole. The city centre appeals to a limited sector (single, childless couples) not all sectors or families. The failure to reflect the findings of the Strategic Housing Market Assessment means the Council could be encouraging the wrong type of accommodation. Only a low % of households planning to move are seeking flats in the city centre (Ashdale landowner at Micklefield 57/1099, Threadneedle 57/1091, Dacre 480/1109).</p> <p>Lack of diversity in type and size – one population group – 25-35 year olds. Need diversity & creativity, particularly in distinct & unique building conversions (British Waterways 338/1121, Leeds Voice 1691/2092, Ms Chesters 2995/1081)</p> <p>More houses (as opposed to flats) and more affordable dwellings are required (Mr/Mrs Salt 2974/1050). City centre housing should be affordable (Older Peoples Reference Group 3018/1142)</p> <p>Affordable housing is needed for service workers (Mrs Tate 3019/1143)</p>
7	The impact of new housing proposals on the operation & future viability of town centre entertainment uses should be controlled, such that housing should be resisted where noise insulation measures will not be adequate (Leeds City Centre Management 1025/1124)
8	Housing should be accepted as a main town centre use consistent with PPS6 (Savills/MEPC 466/1122)
<p>PO-06: Housing Mix. Requires developments of 50 or more units to make 10% 3 bedroomed, to ceiling of 20 units. On sites of 0.5ha + to provide amenity space including roof terraces, communal gardens etc (see PO-25)</p> <p>Scale of support/objection: 62 responses, 40 support 22 object</p> <p style="text-align: center;">Issues raised</p>	
1	The city centre is not an appropriate environment for families. It is insecure &

	<p>lacks facilities (Miss Johnson 33/1144, Park Lane session/Mike Dando 3013/1136, Dacre 480/1109, Unsworth/Morgan 0846/1103)</p> <p>Space & provision should be made for family housing (Cllr V Kendall 50/1134, Cllr Penny Ewens 3001/1095). Larger dwellings are needed to create a more balanced community (British Waterways 338/1121, Mr/Mrs Salt 2974/1050). Mix will help support the economic needs of Leeds (Yorkshire Forward 2597/1115). The Draft Yorkshire & Humber Plan Policy H4 notes a need for a better mix of housing in the region to support sustainable communities (Yorkshire and Humber Assembly 0940/1117). A better mix is required along with facilities such as shops, bars & cafes (Mr Gandy 3017/1141)</p> <p>Larger dwellings are not only needed for families but for residents who want extra space for hobbies, interests or for visiting friends & family (Mrs Bird 1428/1155).</p>
2	There is little attempt to link the city centre housing market to the fringe inner city housing markets (LCC Regional Policy Team 3007/1120).
3	3 & 4 bed houses should be provided, not just high rise, but more creative design (Leeds Voice 1691/2092)
4	<p>CCAAP lacks consideration of housing needs & preferences in seeking to influence mix (Ashdale Land & Property Company 0057/1099, MEPC via Savills 0466/1122, Dacre 480/1109, City Centre Management 1025/1124, Ms Chesters CC Resident 2995/1081, Evans 2998/1094).</p> <p>The requirement is too prescriptive. The market should decide mix, not planning policy (Montpellier Estates/WYG 420/1130, Wimpey Homes/WYG 791/1088, Asda 2763/1129, Evans 2998/1094,</p> <p>The 10% requirement is unreasonable & excessive. It should be reduced to 5% (Kirkstall Holdings 3010/1127)</p> <p>Can the threshold be justified with relation to evidence? In particular, PPS3 para 11, including assessment of market responsiveness (GOYH 1994/1118, Evans 2998/1094)</p> <p>A survey should look at proportion of older people who want to live in the city centre & what facilities they need (Leeds Involvement Project 193/1152).</p>
5	<p>Should the plan require family housing in developments on the fringes of the city centre close to schools? (Civic Trust 62/1146). The mix of housing should take account of site circumstances & the availability of local amenities such as schools & nurseries (MEPC via Savills 0466/1122).</p> <p>The city centre has no schools or playing fields, so family housing is inappropriate (Dacre 480/1109)</p> <p>A strategy of investment in education & health facilities is needed (Gordon Carey 960/1065)</p>
6	Three bed apartments in the city centre will be too small & too expensive for most families (eg sales data for Granary Wharf) (Dacre 480/1109 Evans 2998/1094, Mr Stephenson Older Peoples Reference Group 3018/1142). Three bed apartments are likely to be occupied by 3 adults sharing rather than families (Unsworth/Morgan 0846/1103, Kirkstall Holdings 3010/1127)
7	Provision of 3 bed apartments are more expensive to provide, so the requirement compromises the viability of development schemes (Kirkstall Holdings 3010/1127)
8	<p>The requirement for an extra 5% of amenity space (linked to PO-25) should be removed. It is too prescriptive. The quantum of public space should be decided according to location & proximity to amenities and PO-25 & PO-27 (Montpellier Estates/WYG 420/1130)</p> <p>This part of PO-06 is unclear – whether it is duplicating PO-25ii, contrary to the SCI para 3.7 and PPS12 para 4.24vi (Evans 2998/1094).</p>

	Public spaces & pedestrian routes are needed to accompany a broader range of accommodation (Gordon Carey 960/1065). Green space provision should be meeting ANGSt standards (Natural England 3006/1119). Sufficient recreation space is needed (Sport England 1982/1133).
9	More affordable housing is needed (British Waterways 338/1121, Mr/Mrs Salt 2974/1050, E. Tate 3019/1143). Consideration should be given to targets for affordable housing (social & intermediate) (GOYH 1994/1118)
10	High quality developments are needed (British Waterways 338/1121, Unsworth/Morgan 0846/1103)
11	Family housing should be separated from the main block to avoid conflict between young professionals/students coming home late and families (John Davis 1545/1147)
12	The 3 bed flats should be for disabled people as well as families (Mr Steve Goulding 3020/1145, Mr & Mrs Naylor 3037/1157, Mr & Mrs Oldroyd 3038/1158).
<p>PO-07: Lifetime Home Standard. Requires all new housing to meet lifetime homes standards and 10% to be accessible to (or be easily adaptable for) wheelchair users.</p> <p>Scale of support/objection: 43 responses, 28 support 15 object</p> <p>Issues raised</p>	
1	Express support (Mrs Bird 1428/1155, British Waterways 338/1121)
2	<p>The requirement for all housing to be built to lifetime home standard is unreasonable & inflexible (Savills-MEPC 466/1122, Dr Unsworth 846/1103). More flexibility is needed (HBF 92/1123, Asda 2763/1129).</p> <p>100% provision is excessive & unreasonable. The wording “to require” should be replaced by “to encourage” (Kirkstall Holdings 3010/1127). More appropriate to expect dwellings to be convertible to other uses (Dacre 480/1109)</p> <p>Will need to consider the extent to which the “requirements” can be implemented through controls over planning applications (GOYH 1994/1118)</p>
3	<p>The requirement for 10% of dwellings to be wheelchair accessible is excessive because i) it duplicates the requirement of lifetime homes standard and ii) according to NHS estimates, only 1.4% of Leeds’ population use a wheelchair, & is therefore contrary to Para 4.24 vii of PPS12 (Evans 2998/1094).</p> <p>Will need to consider the extent to which the “requirements” can be implemented through controls over planning applications (GOYH 1994/1118)</p> <p>The 10% requirement is insufficient. Should be 100% (Mr Steve Goulding 3020/1145, Mr & Mrs Naylor 3037/1157, Mr & Mrs Oldroyd 3038/1158).</p>
4	As the city centre has areas of high flood risk, the policy needs to deal with the specific dangers of elderly people being housed in the city centre, including mitigation measures and safe access & egress (Environment Agency 46/1104).
5	There’s a need for more/improved street lighting (Leeds Involvement Project 193/1152).
6	The varying requirements of young and old people need to be understood & planned for. There should be provision of purpose designed accommodation for older people that will allow them to remain in their own home, with peace & quiet & facilities such as on-site recreation, domiciliary healthcare tailored to their changing needs, which enable them to stay in their own homes rather than have to move, often against their will, into sheltered housing or residential homes (Caddick 83/1131).
<p>PO-08: Encouraging Student Housing. Encourages purpose built student housing throughout the city centre providing it has suitable flood risk mitigation in areas of flood risk.</p>	

Scale of support/objection: 44 responses, 32 support 12object	
Issues raised	
1	The encouragement should apply to all areas of the city centre with the exception of the area overlapped by the Area of Housing Mix governed by Policy H15 of the Unitary Development Plan. The protection provided to vulnerable communities like Little Woodhouse by Policy H15 must be maintained in the CCAAP (Mr Tyler 26/1086).
2	Student accommodation is not compatible with the office quarter. The high quality commercial environment needs to be protected. PO-08 & the first sentence of para 3.1.17 need to be changed Savills on behalf of MEPC 0466/1122).
3	PO-08, whilst encouraging student development generally, should seek to prevent the uncontrolled excess of bedspaces provided between Burley & Kirkstall Roads, with lack of open space, infrastructure & connectivity (University of Leeds 1029/1097)
4	Too many students in the city centre already. Supply of accommodation has increased dramatically – is there demand for more? (Leeds Initiative 0845/1096, Leeds City Centre Management 1025/1124, University of Leeds 1029/1097, Mrs Chesters 2995, Cllr Penny Ewens 3001/1095). Housing targets should be established The policies need to balance “precision” (in terms of targets, types of housing, scale of development & timescales) with “flexibility & responsiveness”. Policies must be monitorable (GOYH 1994/1118).
5	Potential for conflict with PO-06 – students mixed with family housing “are an unhappy recipe” (Dacre 480/1109).
6	Student housing yes, but only for disabled students (Mary Seacole Nurses Association 0558/1078)
7	Support PO-08 (Leeds Met 3011/1132, Park Lane College 16/05/07 3014/1137)
PO-09: The shopping ‘offer’ of the city centre. Sets out an approach that maintains the compact form of the city centre shopping centre, one of its major strengths, but accommodates the pressures and expectations placed upon it to maintain its regional shopping centre role.	
Scale of support/objection: 58 responses, 45 support 13 object	
Issues raised	
1	Support the reconfirmation of the Prime Shopping Quarter as Regional Shopping Centre (Yorkshire and Humber Assembly 0940/1117, Caddick Developments Ltd 0083/1131, John Lewis 2551/1114, Mr Mike Yates 2997/1085, Park Lane College 16/05/07 3014/1137, Mr Steve Goulding 3020/1145, Mr & Mrs Barry, Mary Naylor 3037/1157, Mr & Mrs Alan, Joyce Oldroyd 3038/1158)
2	The Eastgate extension to the PSQ will reduce its compactness. This will need to be addressed by ‘positive’ policies to encourage shops to stay in and improve current premises.(Leeds Civic Trust 0062/1146) The extension is more than “minor” & should not be progressed without further study and consultation as to its impact and timescale (Caddick Developments Ltd 0083/1131). In contrast, there are noted supports for the extension ((John Lewis 2551/1114, Mr Richard Gandy 3017/1141).
3	The area between Millgarth Police Station and Eastgate, the Police Station itself and the area of the Eastgate Roundabout should be added to the PSQ forming a clear & logical boundary. (LCC Planning Services 3002/1105)
4	The Eastgate development should be phased to to enable both Trinity Quarter and Eastgate to be delivered successfully. The need for additional retailing should be assessed in order to plan the letting strategies of both schemes, to sustain the retail offer in the existing central retail area which is vital to the continued vitality and viability of the City Centre. A phasing and management strategy for the

	delivery of new retail floorspace is needed. The Trinity scheme should be completed before the Eastgate development is permitted, because Trinity is within the existing city centre and Eastgate is an extension (Caddick 1028/1128).
5	The layout of the retail gallery at present will do little to ensure integration of this peripheral area with the remainder of the City Centre core. Careful consideration needs to be given to the location of pedestrian linkages to ensure effective integration of the major extension of the PSQ into the existing shopping core (Caddick Developments Limited 1028/1128).
6	The focus of retail development in the PSQ should be relaxed: i) only partially, to allowing vibrant uses along the waterfront (corner shops, entertainment uses, restaurants) – day and night (British Waterways 0338/1121) and ii) generally. A spread of shops outside of centres will expand & rejuvenate the city centre & will emulate European cities, Manchester & London (Gordon Carey)
7	The Council should reserve the right to reassess retail capacity in the city centre, at any time, not just on completion of the Eastgate & Trinity schemes. (White Young Green Planning 0420/1102). John Lewis supports the intention to assess need only after completion of the schemes (John Lewis 2551/1114)
8	Rename “Eastgate & Harewood Quarter” to “Eastgate Quarter” (Planning Services 1025/1124)
9	Leeds Kirkgate market needs to be supported & upgraded. (Mary Seacole Nurses Association 0558/1078, Ms Margaret Chesters 2995/1081)
10	The city centre needs more high quality stores like other cities e.g. Manchester and Birmingham (Mrs Margaret Bird 1428/1155, Mr David Raper 3000/1092)
11	Insufficient food shops. (Leeds Involvement Project 2979/1056)
12	Shopping quarter needs more benches and more toilets in order to attract older people. (NB all benches recently removed from Merrion Shopping Centre) (Promoting Healthy and Active Life in Older Age 2999/1093, Leeds Youth Council 3005/1113)
13	The city centre should have an area (or incorporate within all areas) more unique non-chain stores to add variety and make the city's shopping different to other towns and cities (Mr David Raper 3000/1092)
14	Shopping should be given the same positive encouragement as is given for offices & housing. The shopping section should be less passive & emphasise the key role of retailing in the regional centre's mixture of uses. If we achieve successful attraction of retail activity, development & investment, the question of shopping frontages will take care of itself. (Mr John Bird 3044/163)
<p>PO-10 Shopping Frontages. Recent developments of The Light warrant a minimal update of frontages. Major resurvey to be carried out at a later date.</p> <p>Scale of support/objection: 41 responses, 38 support 3 object</p> <p>Issues raised</p>	
	(i) To carry forward the defined Shopping Frontages of the UDP with minor updating (e.g. The Light)
	No specific issues raised by representations received.
	(ii) To carry out, at a later date, a comprehensive update of the Shopping Frontages by means of a Supplementary Planning Document.
1	Timing of update. Unlike Eastgate, Trinity will only require a minor update. This update should take place, and be consulted on, in conjunction with the AAP, not afterwards (Caddick Developments Ltd 0083/1131). Agree that Shopping Frontage update should not be carried out until Trinity Quarter has been developed (Caddick Developments Ltd 1028/1128). Policy approach supported (John Lewis)
2	Shopping frontages approach e.g. fringe frontages, will not lead to full compliance with PPS6 (GOYH 1994).
3	Appropriateness of using an SPD? Are Council satisfied a SPD would provide an

	adequate basis for defining shopping frontages and managing development? Queried in relation to Test iv (b). (GOYH 1994). Comprehensive review through an SPD is supported (John Lewis 2551/1114).
4	Primacy of shopping supported, but also a need for health clubs. (Park La College 16/05/07 3014/1137)
<p>PO-11 Retail Warehousing. UDP currently identifies two areas for retail warehousing, the proposal is to modify the boundaries to those areas. In addition three locations are proposed to explore possibilities for further investigation to accommodate larger format retail developments.</p> <p>Scale of support/objection: 38 responses, 31 support 7 object</p> <p>Issues raised</p>	
	(i) To modify the Regent Street allocation boundary to include the existing frontage retail units on the eastern side of Regent Street.
1	Shops are starting to move into Regent Street which should be in the prime shopping area (Transport 2000 3036/1156)
2	Whilst not disagreeing with the general thrust of this Option, I note that the list of Option topics on the comments form refers to this item as Retail Warehousing. However, 3.2.4 refers to large format retailing, a term which would also include Department Stores. This could be interpreted to mean that part of the Harewood Quarter should be designated for large format/Retail Warehousing. This does need clarifying (Caddick 0083/1131)
	(ii) To make initial suggestions for locations of large format retailing at Marsh Lane Goods Yard, Kidacre Street and the Brewery Proposals Areas.
3	Support the designation of Kidacre St for Large format retailing. The location is suitable, given the proximity of existing retail warehousing area at Crown Point (National Grid Ltd 0806/1112)
4	The wording of the PO implies that the Council considers retail development could be appropriate outside the PSQ. Until the retail study has been undertaken by Leeds City Council, following the development of Trinity Quarter and Eastgate, it is not considered that any sites should be allocated for additional retail development (Caddick 1028/1128).
5	Conditioning goods & types of store. If the Council are determined to persist with identifying sites outside the PSQ, careful consideration should be given to categories of stores, size and goods to be sold, prior to being identified in CCAAP (Caddick Developments Limited 1028/1128). Ensure that it is ONLY large format retailing, rather than high street shops. (Mr John Davis 1545/1147)
	(iii) To consolidate the Crown Point retail park boundary.
6	The policy does not recognise that parts of the Crown Point retail park are in flood zones 3 and 2. PPS25 aims to: 'Ensure that floor risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk.' The development will require a site specific flood risk assessment to demonstrate that the development will be safe for the lifetime of the development. (Environment Agency 0046/1104)
7	Crown Point Retail Park has scope for further retail and other town centre uses, contributing to the economic growth of this southern part of the City Centre. The CCAAP recognises that "large format retailing", which often cannot be physically accommodated within the Primary Shopping Quarter (PSQ) of the City Centre, constitutes an important element of the City's retail offer and attraction. The Plan acknowledges that there may be a need to expand such accommodation across the City, and with this in mind PO-11 identifies the consolidation of the CPRP as a suitable location to meet some of this need.

	<p>The CPRP is in an appropriate location to meet this need without any detriment to the economic merits of the City Centre, given its established position within the retail hierarchy, and the lack of physical opportunity for substantive expansion of floorspace.</p> <p>MFML support the identification of CPRP as a suitable location for retail consolidation (Morley Fund Management Ltd 0806/1112)</p>
<p>PO-12 The entertainment and cultural “offer”.</p> <p>Scale of support/objection: 63 responses, 53 support 10 object</p> <p>Issues raised</p>	
1	<p>Location of Arena, Conference & Exhibition facilities</p> <p>The city centre is the most suitable place because everybody can get there easily by public transport & it will maximise economic benefits for the city (Leeds Chamber Property Forum 0960/1065, Yorkshire and Humber Assembly 09401117, Miss P Johnson 0033/1144, University of Leeds 0846/1103, Yorkshire Forward 2597/1115, Leeds Youth Council 3005, Mr Steve Goulding 3020/1145, Mr & Mrs Barry, Mary Naylor 3037/1157, Mr & Mrs Alan, Joyce Oldroyd 3038/1158, Mr Robin Brincowe 3035/1154).</p> <p>PPS6 allows for large sporting & recreational facilities to locate out of centre where they can't fit into centres. The CCAAP should acknowledge that there are other locations for a major arena linked for example with existing stadia outside the city centre boundary, which with improved linkages to the city centre could be accepted alternatives (Sport England 1982/1133).</p> <p>In instances where it is not possible to locate major entertainment uses within the city centre, it is important to ensure that they are well connected by sustainable modes of transport (Yorkshire Forward 2597/1115)</p> <p>Whilst not disagreeing with this approach it should not preclude the provision of such facilities in other locations, for example within the Aire Valley AAP (Caddick 0083/1131)</p> <p>Arena location would be good on the edge of the city centre, like Manchester. (Mr Richard Gandy 3017/1141)</p> <p>Arena in city centre would cause congestion. Sites should be sought on the outskirts (Leeds City Council 0050/1134)</p>
2	<p>More wheelchair friendly and more toilets for all, including disabled persons. Children's hospital plus a big events stadium with access for disabled users (Mrs Vivian Paterson 2962/1036, Leeds Youth Council 3005/1113) An events stadium must have wheelchair disabled access (Mrs Alice Henderson)</p>
3	<p>A city centre arena should have parking provision if possible (Miss P Johnson 0033). No parking (Leeds Involvement Project 2979/1144)</p>
4	<p>Any arena development should also include a 2500 purpose built concept hall at the side, as per arenas in other cities (Mr Simon Best 2992/1074)</p>
5	<p>There should be a range of facilities available in terms of type and expenditure for an individual. There should be particular inclusion of cultural and entertainment resources for the youth market, this means possible exclusive developments aimed at this age group but also all age range developments which cater for this age group in cultural and entertainment developments. This is to maximise alternative activities for this age group to counteract anti-social behaviour activities such as;</p> <p>i) groups accumulating such as around the Corn Exchange and Brewery Wharf/Centenary Bridge,</p>

	<p>ii) graffiti offenders iii) rough sleepers and iv) drug abuse offenders. (British Waterways 0338/1121)</p> <p>A range of entertainment use appealing to a variety of age groups would make the centre feel more alive and attractive at night and less of a perceived "youth" / "binge drinking" zone (Mr D Raper 3000/1092)</p>
6	Lack of site specific proposals, as required by para 2.18 PPS12. Supporting text to PO-12 suggests it is the role of the Core Strategy to make site allocations. PPS12 para 2.19 advises that it is also the role of AAP's. The CCAAP has the opportunity to make firm allocations for indoor sport and recreation facilities, and should do so on a firm evidence base (Sport England 1982/1133) Needs a clear spatial and planned dimension otherwise there will be no clarity of vision and delivery of quality cultural & entertainment projects will be at risk, to the detriment of the quality of the city centre (Dacre Son & Hartley 0480/1109)
7	A strategic plan is recommended to integrate and link arts facilities (eg galleries, public art, dance) creating "arts routes" and dynamic activity in public spaces. The private sector needs to be consulted & involved, to ensure the plan can be implemented (Leeds Chamber Property Forum 0960/1065)
8	The policy does not recognise flood risk that exists in many parts of Leeds City Centre. The policy direction should support such developments away from high flood risk areas in site allocations and search areas. Sustainable development must take account of flood risk and climate change in both the short and long term (Environment Agency 0046/1104)
9	The students thought entertainment uses should be clustered, to reduce walking between venues, rather than locate them throughout the city centre. (Park Lane College 16/05/07 3014/1137)
	Spreading entertainment provision throughout the city centre is important in terms of maintaining environmental quality (Mr John Bird 3044/1163). Support for PO-12 as it will enable entertainment uses to be developed on certain sites. Kidacre Street (National Grid Ltd 0806/1112). The University's Civic Campus (Leeds Metropolitan University 3011/1132)
10	Consider that the policy should make specific reference to the nature of entertainment and cultural uses including arenas, concert halls, conference facilities and large/regional casinos (Leeds Chamber Property Forum 0960/1065, White Young Green Planning 0420/1102)
11	In favour of more entertainment & cultural uses (Park La College 22/05/07 3015/1138). City needs to improve other cultural attractions such as music venues. Leeds is falling behind other cities (Mr Richard Gandy 3017/1141)
12	Equally bland but encouraging policy on bars and nightclubs should be reviewed with the aim of restricting their expansion in parts of the city centre (Dacre Son & Hartley 0480/1109)
13	Concern at loss of international swimming pool (Mr Steve Goulding 3020/1145, Mr & Mrs Barry, Mary Naylor 3037/1157, Mr & Mrs Alan, Joyce Oldroyd 3038/1158)
14	Discussed the options of community processions access to Leeds city centre. I felt that this was now no longer an option (Mr Kevin 2973/1048)
<p>PO-13 Protection of cinemas, theatres and public houses from change to other uses.</p> <p>Scale of support/objection: 52 responses, 43 support 8 object 1 unclear</p> <p>Issues raised</p>	
1	Private sector landowners/developers must be free to deal with their own property at will (subject to the normal requirements for planning permission etc.). It is not appropriate for the planning authority to dictate to the private sector that it should

	settle for a lower value/loss making use (if there is no planning argument for not granting consent for a higher value use). The market for commercial uses (e.g. cinemas) will be dictated by demand/capacity from the general population. The majority of the Theatres/Museums (i.e. non-viable uses) are owned/operated by the public sector or quango/trust. It is therefore in the public sector's gift to determine whether it keeps these buildings/uses open to the public for the benefit of society. This is not just a planning matter (White Young Green Planning 0420/1102, Leeds Chamber Property Forum 0960/1065). It is unrealistic to protect uses that might not have sufficient supporting market (University of Leeds 0846/1103, Leeds Youth Council 3005/1113)
2	Suggest substituting "those purposes" for "the purpose" would make the policy read more clearly (Mrs Margaret Bird 1428/1155)
3	No parking. (Leeds Involvement Project 2979/1056)
4	No point protecting pubs. More important to get facilities for families. (Park Lane College 16/05/07 3014/1137)
5	The majority considered it was important to protect such provision in the city centre. (Park La College 22/05/07 3015/1138)
6	Accessibility for disable people in and around the building should be considered. (Mr Steve Goulding 3020/1145Mr & Mrs Barry, Mary Naylor 3037/1157, Mr & Mrs Alan, Joyce Oldroyd 3038/1158)
<p>PO-14 Mitigation measures are proposed and required for bars and nightclubs.</p> <p>Scale of support/objection: 43 responses, 35 support 8 object</p> <p>Issues raised</p>	
1	Agree. To include any future entertainments uses such as casinos etc. (British Waterways 0338/1121)
2	These policies are only worth putting forward if they can be enforced successfully (Mrs Margaret Bird 1428/1155)
3	Noise insulation measures, control of opening etc were not considered necessary (Park Lane College 16/05/07 3014/1137)
4	Not necessary. Prefer new clubs & cinemas to be developed rather than housing or hotel users to be protected from possible disturbance. (Park Lane College 22/05/07 3015/1138)
<p>PO-15 Encouragement of hotels and conference facilities provided that there are suitable mitigation measures in high flood risk areas.</p> <p>Scale of support/objection: 38 responses, 33 support, 5 object</p> <p>Issues raised</p>	
1	PPS25 states the Sequential Test is necessary for development on areas of high flood risk. It is not stated that a Sequential Test will be needed for hotels proposed in flood zones 3 and 2. Following the Sequential Test it would be necessary to comply with the Exception Test in PPS25. The information required to comply with parts (a) and (b) of the Exception Test should be clearly given by the LPA at or before submission stage of CCAAP. Not having a site specific Flood Risk assessment for identified sites until planning application stage does not allow for proper assessment of whether development is safe (required by PPS25) and specifically to address part © of the Exceptions Test. This may lead to problems and possible objections from us in the future for proposals. (Environment Agency 0046/1104)
2	Support for PO-15 as it will enable hotels to be developed on certain sites. Kidacre Street (National Grid Ltd 0806/1112). The University's Civic Campus (Leeds Metropolitan University 3011/1132)
3	Don't we have enough already?

	(Leeds Initiative 0845/1096)
4	The effect of this PO should not be at the expense of other objectives including those of the KRRRA Planning Framework. Some land uses subject to the sequential test of PPS6 are essential to the social, physical and economic restructuring of the KRRRA. The accessible nature of Kirkstall Road itself is eminently appropriate for such uses (Reland (Leeds) Ltd 3016/1140)
5	Hotel accommodation needs to be cheaper. A city centre youth hostel should be provided (Leeds Youth Council 3005/1113)
<p>Para 3.2.14 Health related facilities This para explains that the option to require new development to contribute toward health facilities was not considered appropriate.</p> <p>Issues raised</p>	
1	Contributions from development toward health provision should be pursued. This idea by Leeds PCT has been supported by LCC. It would help deliver the commitment to healthy sustainable communities as described in Vision for Leeds. If current provision was found to be sufficient, contributions could be returned to the developer. Feasibility of this policy should continue to be tested. (Leeds PCT 3003/1107).
<p>PO-16(i) Sets out the approach to be adopted on 'service centres' and convenience shopping within the city centre .</p> <p>Scale of support/objection: 57 responses, 40 support, 17 object</p> <p>Issues raised</p>	
	i) To maintain a policy approach that allows small scale ancillary retail provision outside the Prime Shopping Quarter to meet the needs of convenience goods (food).
1	The level of the floorspace restriction. The proposed ceiling of 80sqm is too restrictive (Leeds Civic Trust 0062/1146,(CB Richard Ellis 03541058), A higher threshold is needed to deliver a vibrant mixed-use development at the University's Civic Campus (Leeds Metropolitan University 3011/1132). 280sqm would be appropriate outside of service centres (White Young Green Planning 0420/1102). 80sqm is about right (National Grid Ltd 0806/1112)
2	More supermarkets would be useful with links to covered shopping centres which have good disabled access and affordable retail opportunities for the older market. (Older Peoples Reference Group 0193/1152)
3	More flexibility is required in considering locational options for such facilities to respond to growing residential markets (CB Richard Ellis 0354/1058)
4	The approach may be difficult to implement and enforce (Government Office for Yorkshire & the Humber 1994/1118)
5	Morrisons should be open 24 hrs. There should be a Tesco south of the River. Shops should open later. (Park Lane College 16/05/07 3014/1137)
6	More convenience shopping is required. It needs to be more mixed (Mr Richard Gandy 3017/1141)
	<p>ii) To control development to support 'convenience services' to be located within 'service centres' rather than to be distributed across the city centre.</p> <p>The following existing 'service centres' have been identified :</p> <ul style="list-style-type: none"> • University • Great George Street • City Station <p>The following are proposed and/or have potential to develop as 'service centres';</p> <ul style="list-style-type: none"> • Clarence Dock • Sweet Street

	<ul style="list-style-type: none"> • Wellington Street Wellington Plaza
7	Insufficient service centres are designated to provide vibrancy away from the PSQ and to meet needs where a critical mass of population (residential and worker) is generated (Leeds Chamber Property Forum 0420/1102, National Grid 0806/1112, Morley Fund Management 0806/1077, Dacre Son & Hartley 0480/1109)
8	Additional new service centres should be designated: <ul style="list-style-type: none"> i) at Quarry Hill and around the bus station, Parish Church and Exchange Quarter. Quarry Hill is a large population not well served by existing provision. Kirkgate market is not suitable because of its opening hours (Caddick Developments Ltd 0083/1131, Leeds Civic Trust 0062/1146, Oakgate Group 1026/1110). ii) at Kidacre St. Development of this major site will provide sufficient custom for a service centre (National Grid 0806, Morley Fund Management 0806/1112). iii) at the Leeds Metropolitan University Civic Campus. It has a substantial catchment area & has a shortage of convenience retailing (LMU 3011/1132) iv) at Sweet Street.
9	There is no justification for restricting the size of Convenience Stores to 280 sq m within the Service Centres (White Young Green Planning 04201102, Dacre Son & Hartley 0480/1109). Size of any convenience store should be assessed on identified need and subject to the tests in PPS6 (Savills 0466/1122)
10	Retail demand could be equally be met through a large format convenience store rather than numerous ones up to 280sqm (Savills 0466/1122).
11	A criteria based approach would be more appropriate than arbitrary designation of service centres. The market should dictate where convenience facilities should be located in response to other new development, subject to conditions limiting goods/services (National Grid 0806/1076, Morley Fund Management 08061077, UofL 0846/1103)
12	In pioneer areas, property owners should let premises on a turnover rent basis until businesses become established and a viable service centre is established. (University of Leeds 08461103)
13	"Service centre" is an inappropriate term. Facilities, including retail, need to be considered holistically, rather than in single centres spread throughout the city centre. The range of uses need to take into account pedestrian movement, open space and activities etc. (Leeds Chamber Property Forum 0960/1065)
14	Legal and General support the identification of both Wellington Street and Wellington Plaza as proposed areas to develop as Service Centres((Legal & General Property Ltd 3012/1135)
	iii) To control, by planning condition the use of 'convenience goods' in new ancillary shops located outside the PSQ and preclude, a shift to non-food or other 'A' category Use Classes.
15	Consideration should be given to a policy approach that would allow flexibility of A uses at ground floor level with a mixed use scheme to enable ancillary convenience goods retailing and services. The scale to be discussed and agreed. The threshold of unit numbers within a catchment to be agreed. Further work need to be undertaken to identify the scale of such provision for a mini-supermarket of 10-20,000 sq ft, a district store of 3-5,000 sq ft or a convenience facility of 5-150,000 sq.ft. Such an approach would be responsive and flexible to the emerging changing nature of the city centre. Given that the CCAAP is unlikely to be adopted until 2010 there is a need for a flexible policy stance in the interim. (Leeds Chamber Property Forum 0420/1102)
	iv) To control, by planning condition the use of 'convenience services' in new shops located outside the PSQ but within a designated 'service centre' and preclude, a shift to non-food retail sales.
16	The restriction on goods sold outside the PSQ is supported, however, the sale of University specific and related goods at the Civic Campus should be exempt from

	restrictions. (Leeds Metropolitan University 3011/1132)
17	Service centres should also accommodate banking facilities. (Mr Steve Goulding 3020/1145, Mr & Mrs Barry, Mary Naylor 3037/1157, Mr & Mrs Alan, Joyce Oldroyd 3038/1158)
	General Comments
18	Morrisons should be open 24 hrs. There should be a Tesco south of the River. Shops should open later (Park Lane College 16/05/07 3014/1137)
19	Inclusion of corner shops and small independent retailers will provide "village culture" experience to city centre shopping, rather than just large chain retailers. Uniqueness to Leeds shopping required – community enterprise initiatives to be encourage – e.g. low rent, start up support for young business, entrepreneurs, etc (Mr Robin Brincowe 3035/1154)
<p>PO-17 Design of new development: Requires new development to be attractive & sensitive to context having regard to supplementary townscape appraisal documents. The following list of factors must be planned from the outset: routes, disabled access, waste storage, renewable energy measures, sustainable construction, flood risk and car & cycle provision.</p> <p>Scale of support/objection: 53 responses, 41 support 9 object 3 unclear</p> <p>Issues raised</p>	
1	Policy PO-17 should specify that the consideration of 'desire lines for new routes' includes access to public transport, eg bus stops (WYPTE 1933/1148, Metro 1545/1147)
2	Conservation should be seen as transcending the current highly defined individual conservation areas and as a key element of regeneration, providing the crucial context within which new development takes place (John Bird 3044/1163)
3	The option should be amended to add consideration of all building accretions which often seem to be missed off planning application regs. The option should also refer to views of the building from key locations(Leeds Civic trust 0062/1146)
4	Leeds skyline is a jumble of modern characterless tall buildings. They are obscuring some of the elegant older buildings. No more should be allowed and every opportunity should be taken to demolish (Mrs P Auty, 3024/1150) No more ugly buildings such as Bridgewater Place please (Miss P Johnson, 33/1144)
5	Support for new buildings to be well designed in a contemporary style (Mr G Kerrigan, 3033/1353)
6	Should include a reference to quality of materials. Town centres and conservation areas deserve high quality (Mrs M bird, 1428/1155) Should be rigorous scrutiny of all design aspects and particularly the need to use good quality materials. Do not allow developers to dumb schemes down once they have got consent (British Waterways and SORM, 0338/1121)
7	Ensure waste storage is off street (Mr & Mrs Oldroyd 3038/1157, Mr S Goulding 3020/1145)
8	Design of new developments should be attractive to families as well as single people and have ample facilities such as recycling. (Mr D Raper,3000/1092)
9	Flood risk Mitigation should only be considered after the location of a development has been determined to be appropriate through the application of a sequential test and where necessary an exception test. Suggest therefore that the word "mitigation" is not included. (Environment Agency, 0046/1104)
10	The CCAAP Should strongly support good design and innovative layouts which offer opportunities for natural surveillance. Residential uses within the plan will help to ensure the city centre is safe and vibrant support for inclusion of 'activity' uses, but need to carefully consider where such uses might best be located. (Yorkshire Forward, 2597/1115)
11	Design quality will not be achieved without framework master plans. These are needed for all opportunity areas and wherever poor quality development has

	taken place. The preferred option is totally inadequate. A more extensive suite of urban design policies is required (Dacre San and Hartley , 0480/1109)
12	Broad support for PO17 however should require that new developments should help to reinforce the distinctive character of the various parts of the city centre (English Heritage, 0099/1116).
<p>PO-18 Pre-application discussions: expects pre-application discussion to take place on significant new buildings or re-modelling of existing.</p> <p>Scale of support/objection: 39 responses, 33 support 6 object</p> <p>Issues raised</p>	
1	Developers should be required to engage in pre-application discussions with the council and Metro should be involved as appropriate. (Metro, 1933/1148)
2	The option should be amended to ensure that the pre-application discussion should be governed by adopted or agreed policies. Developers should be required to carry out consultations in line with the SCI. The responses made by consultees should be published and subsequent changes to the proposals. Reference should be made to the city model and the requirement for appropriate visual material at all stages. (Leeds civic Trust, 0062/1146)
3	Scheme should compliment wider design and character aspirations of the city centre (City Centre Management, 1025/1124)
4	Is it intended to base a policy on the need for pre-application discussions? If so, the need for it is questionable. (Government office for Yorkshire and the Humber, 1194/1118)
5	The policy should be backed by the commitment to increasing staff capacity to ensure that consultation is possible. (Unsworth/Morgan 0846/1103).
6	Pre-app discussions should be held with local people and other immediate stakeholders as well as with planning officers
7	This is no more than a standard development control policy rather than a design policy which provides clear encouragement and vision. (Dacre, Son and Hartley, 0480/1109)
8	Support for PO18 however the preceeding text should include English Heritage in pre-application discussions (English Heritage, 0099/1116).
<p>Para 3.3.5 Character Areas This para explains that the Council is identifying Character Areas in the city centre.</p> <p>Issues raised</p>	
1	Support for the identification of Character Areas. Necessary Policy framework is required in the AAP to ensure that the distinctive character of parts of the city centre is sustained, reinforced or complemented (English Heritage, 0099/1116).
2	The outcomes of the Character Area Study should also be used to inform the framework for the Proposal Areas (English Heritage, 0099/1116).
<p>PO-19 Tall buildings: proposes a parent policy to judge the acceptability of tall buildings informed by supplementary advice. Matters to be considered: impairing views of landmark buildings & street scenes, impact on amenity of buildings and spaces in terms of shading etc and aesthetic relationships with other tall buildings. A final bullet point clarifies that the waterways are considered to be spaces and that the whole of the city centre is considered sufficiently accessible by public transport for tall buildings.</p> <p>Scale of support/objection: 45 responses, 31 support 12 object 1 unclear</p> <p>Issues raised</p>	
1	The meaning of the final bullet point is unclear. It needs to be re-written to clarify that tall buildings will only be built in accessible locations (Metro, 1933/1148). Support for tall buildings located in accessible areas (Mrs D Roper 3800/1092).

2	Policy is too late as so many tall buildings have now been either built or approved in Leeds city centre (Civic Trust 0062/1146, Mr Bird 3044/1163, Mrs M Bird 1428/1155)
3	The impact of any proposed tall building should be demonstrated by modelled views for key view points (Civic Trust 0062/1146)
4	Great care needs to be taken about the micro climate around tall buildings at ground level (Mrs M Bird 1428/1155)
5	Tall buildings need to be well managed (Mr A and Mrs J Oldroyd,3038/1157)
6	The strategy must be responsive to changing dynamics and the urban landscape (Gordon Carey 960/1065)
7	The SPD should stress the importance of good design, appropriate size, build quality, material quality etc. In certain cases, tall buildings should be encouraged to reflect the heritage and character of its surroundings. (British Waterways and SORM 0038/1121)
8	Any policy should be locally distinctive to Leeds city centre. (Government office for Yorkshire and the Humber, 1994/1118)
9	They should be good to look at both close-up and from distance and should be well lit at night (Mrs D Roper 3800/1092)
10	Disagree with the proposal to allow more tall buildings if it means they are visible from the surrounding countryside, particularly the Yorkshire Moors which would be devalued as a tourist attraction as a result (Ms M Chester 2995/1081)
11	The identification of clearly defined zones for tall buildings would help to ensure that are in the most appropriate locations (Yorkshire Forward, 2597/1115)
12	Tall buildings will harm both panoramic views across the city and also heritage and are not people friendly. Their height and sitting needs too be restricted (Mrs P Sherwood 26/2406)
13	Dislike very tall buildings (Mr M Healey 26/206, Mrs L Crumbie, 0558/1078)
14	Support for PO19, should take account of longer distance views across the City as a whole (English Heritage, 0099/1116).

PO-20: Disabled Access. Expects all development to be accessible to all users in accordance with latest best practice guidance, unless exceptional circumstances are present, including safeguarding valued elements of historic buildings.

Scale of support/objection: 54 responses, 51 support 3 object

Issues raised

1	Express support (Leeds Involvement Project 193/1152)
2	Justification for exceptional circumstances. One view is that these are not justified. People are more important than buildings (Mr Steve Goulding 3020/1145, Mr & Mrs Naylor 3037/1157, Mr & Mrs Oldroyd 3038/1158). Another view is that where provision is not possible, alternatives such as better signage & other routes of access need to be used (British Waterways 338/1121) No attempt should be made to define the exceptional circumstances (GOYH 1994/1118).
3	Long term accessibility & maintenance needs to be considered for all types of disabled users (British Waterways 338/1121)
4	Access to the city needs to be improved, not just access to buildings (Ms Chesters CC Resident 2995/1081). People with limited mobility need help accessing the shopping area – further pedestrianisation would be positive (Healthy & Active Life 2999/1093)
5	There's a need for more public conveniences (Leeds Involvement Project 193/1152, Ms Chesters CC Resident 2995/1081, Mr Patterson 2962/1036, Leeds Youth Council 3005/1113). The public conveniences need to be wheelchair accessible (Mrs Henderson 2991/1073, Mr Patterson 2962/1036).

6	There's a need for more public seating (Leeds Involvement Project 193/1152, Ms Chesters CC Resident 2995/1081).
7	In the context of loss of general car parking, it is essential that greater provision is given over to disabled drivers. They need to be well sited in relation to facilities. (Mr Kerrison 3033/1153).
8	There's a need for more/improved street lighting (Leeds Involvement Project 193/1152).
9	Disabled people should be involved in the process. This needs to be wider than just wheelchair users (Mr Stephenson Older Peoples Reference Group 3018/1142)
10	Any children's hospital or events stadia should have disabled access (Mrs Henderson 2991/1073, Mr Patterson 2962/1036)

PO-21 Waste Storage

This Preferred Option requires all new development to provide storage space for waste and recycling.

Scale of support/objection: 47 responses, 44 support 3 object

Issues raised

1	Different types of waste should be separated at source eg separate bins within the building (John Davis 1545/1147)
2	More recycling and waste storage, (Park Lane College students, 3013/1136). Need to ensure housing has adequate storage for recycling and waste facilities (Leeds City Centre Management 1025/1124).
3	PO-21 must be successfully enforced, (Mrs Margaret Bird, 1428/1155).
4	Policy also needs to cover containment, cleanliness and security of waste storage sites (British Waterways 0338/1121).
5	Support for the policy (Environment Agency 0046/1104).

PO-22 Renewable Energy

This Preferred Option requires all new development over 500sq.m or 3 residential units to provide renewable energy.

Scale of support/objection: 62 responses, 52 support 9 object 1 unclear

Issues raised

1	Both old and new buildings should provide renewable energy, (Park Lane College students, 3013/1136).
2	Support for PO-22. Important to have a parent policy to support the SPD, (Sarah McMahon, 0857/1106).
3	Need to justify residential units threshold with regard to guidance in PPS22 (esp. para 8), (GOYH, 1994/1118).
4	Merton rule is not workable and not most efficient method of reducing carbon, (Home Builders Federation, 0092/1123).
5	Aspirational figures for increasing % over time are unrealistic, (Home Builders Federation, 0092/1123).
6	On-site renewable energy is not suitable for all sites, sometimes large scale renewable energy is better, (Home Builders Federation, 0092/1123). Policy needs to be flexible enough to deal with individual circumstances, (Savills on behalf of Asda Stores Ltd, 2763/1129). Policy should be market led and not prescriptive, (Montpellier Estates/WYG 420/1130).
7	Explicit mention should be made of the incorporation of CHP into schemes above a certain size, (Unsworth/Morgan Unsworth/Morgan 0846/1103).
8	Support for PO22, recommend this Policy should apply to 10 houses or more (Yorkshire and Humber Assembly 0940/1117), (Legal and General Property Ltd , Indigo Planning 3012/1135), (Kirkstall Holdings, Indigo Planning 3010/1127), (National Grid 0806/1115).
9	Para 11 of PPS22 states that in CAs renewable energy should only be given permission when it can be demonstrated that there is no harm to the objectives of CA designation, therefore it is reasonable to require 'all' developments to include renewable energy generation (English Heritage, 0099/1116).

10	Support for policy but ensure flexibility (Leeds Metropolitan University, 3011/1132). Support for policy but should not require it when it is not viable and should not put undue burden on the developer (Legal and General Property Ltd , Indigo Planning 3012/1135), (Kirkstall Holdings, Indigo Planning 3010/1127), (Morley Fund Management Ltd 0806/1077), (National Grid 0806/1115), (HBG Properties Ltd, 0806/1112).
11	Should be aspirational rather than a requirement (Legal and General Property Ltd , Indigo Planning 3012/1135), (Kirkstall Holdings, Indigo Planning 3010/1127), (Morley Fund Management Ltd 0806/1077), (National Grid 0806/1115), (HBG Properties Ltd, 0806/1112).
12	The AAP does not justify going beyond the 10% RSS requirement (Legal and General Property Ltd , Indigo Planning 3012/1135), (Kirkstall Holdings, Indigo Planning 3010/1127), (Morley Fund Management Ltd 0806/1077), (National Grid 0806/1115).
13	Strong support for the policy and thresholds used. Due to the potential high levels of new residential and commercial developments proposed in the city centre, we consider it imperative that energy requirements are minimised and that at least a minimum standard of renewable energy is required (Environment Agency 0046/1104).
14	The following words should be included in the Policy: 'All development with a floor space of 500 square metres or three or more residential units will be required to incorporate on-site renewable energy generation to provide at least 10% of the predicted energy requirements of developments approved prior to 2010 (Environment Agency 0046/1104).
15	Strong support for the Policy, complements objective 5 (cii) of the RES which seeks to promote 'energy security and reduce fossil fuel dependence by more energy efficiency and clean renewable energy generation' (Yorkshire Forward 2597/1115).

PO-23 Sustainable materials & construction

This Preferred Option requires all new major development to meet at least a very good or excellent BREEAM rating.

Scale of support/objection: 51 responses, 44 support 7 object

Issues raised

1	Planning system should not attempt to implement things covered by the building regs or voluntary codes, (GOYH, 1994/1118).
2	Is this practical to enforce? What is the cost to construction and which other cities are implementing it? (Leeds City Centre Management, 1025/1124).
3	Should not introduce locally based performance standards as should apply national methods, (Home Builders Federation, 0092/1123).
4	Such requirements make homes even more expensive and therefore there is a concern about affordability, (Home Builders Federation, 0092/1123).
5	Such requirements can affect viability and hold up the delivery of new homes, (Home Builders Federation, 0092/1123).
6	Policy should be market led and not prescriptive, (Montpellier Estates/WYG 420/1130).
7	Policy should be aspirational rather than prescriptive (Legal and General Property Ltd , Indigo Planning 3012/1135), (HBG Properties Ltd, 0806/1112).
8	Strong support for the policy and thresholds used. Suggest including the corresponding Code for Sustainable homes and Level 3 is appropriate (Environment Agency 0046/1104, Yorkshire Forward 2597/1115).
9	These issues are critical to the success of Leeds and the rest of the world. The Leeds Property Forum are working with the Council to encourage truly energy efficient and sustainable development. This strategy should be acknowledged in the CCAAP (Gordon Carey 960/1065).

Para 3.1.12 Flood Risk

Explains the background to flood risk issues in the city centre and the approach taken.

Scale of support/objection:

Issues raised	
1	Sequential test has not been applied, (Tangent Properties 3009/1126, Savills on behalf of MEPC 0466/1122). Alternative sites are available for housing development in a lower flood risk category eg Former Vickers Tank Factory site, (Threadneedle Property Investments Ltd, 57/1091).
2	Disagree that alternative development sites are not available in lower flood risk area (Dacre , Son and Hartley 0480/1109).
3	Flood risk issues have not been comprehensively addressed because there is no sequential approach (Environment Agency 0046/1104).
4	SFRA should be used to inform choices (Environment Agency 0046/1104).
Para 3.3.12 Flood Risk Mitigation Explains the background to flood risk issues in the city centre and the approach taken.	
Issues raised	
1	Statement is incorrect in terms of the use of the Exception Test as can only do Exception Test once have completed the Sequential Test (Environment Agency 0046/1104).
2	Paragraph does not constitute a sequential approach or sequential test (Environment Agency 0046/1104).
3	Disagree with statement as alternative sites are available in a lower flood risk zone (Dacre, Son and Hartley 0480/1109).
PO-24 Flood Risk Mitigation This Preferred Option requires all development to ensure that there is no increase in surface water run-off, no increase in flood risk on-site or elsewhere, account to be made for climate change and developer contributions for flood defence. Scale of support/objection: 47 responses, 31 support 16 object	
Issues raised	
1	Encourage SUDS in and around all development, (British Waterways, 0338/1121). Need to include a policy on SUDS and maintenance of SUDS, (Yorkshire Water, 0948/1084).
2	Encourage softer, and where applicable, hardy, native landscaping, (British Waterways, 0338/1121).
3	The application of PPS25 will not be relevant to all planning applications in the city centre, the prefix 'where appropriate' should be added, (Savills on behalf of MEPC,0466/1122).
4	Flood risk policy and mitigation should not apply to all development, should only apply where it is shown that there is a flood risk directly related to the development, quotes circular 05/2005 (Legal and General Property Ltd , Indigo Planning 3012/1135), (HBG Properties Ltd, 0806/1112).
5	Support for restrictions on surface water runoff and requirement for an FRA, however flood risk contribution should not apply to all development, should only apply where it is shown that there is a flood risk directly related to the development, quotes circular 05/2005 (Kirkstall Holdings, Indigo Planning 3010/1127), (Morley Fund Management Ltd 0806/1077), (National Grid 0806/1115), (Robert Waite of Cobbetts, representing Evans Property Group 2998/1094).
6	The policy does not demonstrate a sequential approach as required by PPS25 (Environment Agency 0046/1104).
7	If the sequential test demonstrates that it is necessary for sites to be identified in flood zone 2 or 3, the LPA will need to provide information for parts a) and b) of the exception test. Part c) of the exception test can only be demonstrated by an FRA and therefore would not be done until a later stage and therefore sites may prove to be undeliverable. (Environment Agency 0046/1104).
8	Support for the requirement for all development in the city centre to contribute to flood defence, as a requirement of PPS25 Annex G, G4 and G5 (Environment Agency 0046/1104).
9	Support for the requirement to manage surface water across the city centre, not just in areas at risk of flooding (Environment Agency 0046/1104).

Para 3.3.13-3.3.14 Open Space Explains need for more open space. Scale of support/objection: n responses, n support n object Issues raised	
1	Expand further on need to make city centre greener, it should be a priority, (British Waterways, 0338/1121).
2	Strengthen green infrastructure, particularly along waterways, (British Waterways, 0338/1121).
3	Need allocation of sizeable areas of greenspace, particularly along the waterfront, (British Waterways, 0338/1121).
4	CCAAP does not cross reference with the objectives of the Draft Parks and Green space Strategy (LCPF/WYG 0420/1102).
5	Insufficient regard to public realm and open space, (LCPF/WYG 0420/1102).
6	Support for PO24 (Yorkshire and Humber Assembly 0940/1117).
PO-25 Open Space This Preferred Option requires a minimum of 20% of the site area to be open space. Scale of support/objection: 64 responses, 48 support 13 object 3 unclear Issues raised	
1	Need to justify particular thresholds and requirements, (GOYH, 1994/1118). A development should only provide open space when it is directly related to the proposed development, not just to satisfy a deficiency in the locality, (Home Builders Federation, 0092/1123).
2	Developers should be encouraged to inspect, manage and maintain open spaces, maintenance framework should be drawn up (British Waterways, 0338/1121). Need a clear policy on maintenance, (LCPF/WYG 0420/1102). Contribution needed for cleaning, (Leeds City Centre Management, 1025/1124). Developer should not have to cover the cost of 10 years maintenance as this is too onerous and not their responsibility, (Home Builders Federation, 0092/1123). Maintenance should be met in part from Council tax, (Unsworth/Morgan 0846/1103). As BID areas become established, business will be increasingly involved in contributing to upkeep of areas, (Unsworth/Morgan 0846/1103)
3	Significant shortage of POS in the east and south of the city centre, CCAAP should acknowledge lack of POS to justify further provision, (Leeds Civic Trust, 0062/1146).
4	Insufficient POS on Eastgate site as too much of it is precinct and not proper POS, (Leeds Civic Trust, 0062/1146). Needs an accessible green Square as well as a roof top garden (Mr S. Pinder 1781/1089).
5	LCC land on Bath Road and to the rear of Temple Works should not be allocated as greenspace as it is derelict and is a potential development site, (Montpellier Estates/WYG 420/1130).
6	Commitment needed to creating spaces along the waterfront, prime shopping quarter and rest of city centre, (British Waterways, 0338/1121). Support for creation of open spaces but where will they be? (Mr R. A. Stephenson, 3018/1142). Lot more priority for greenspaces needed (Bronwen Holden, Healthy and Active Life, 2999/1093).
7	Difficult to distinguish between the two contributions – open space and public realm, contributions should just focus on one of them, contributions too onerous, (LCPF/WYG 0420/1102), (Montpellier Estates/WYG 420/1130).
8	Need transparent approach to use of funds collected for off-site works, (Unsworth/Morgan 0846/1103). Do not support using developer contributions outside the city centre, (Leeds City Centre Management 1025/1124), (The Venerable Tony Comber, 2987/106?).
9	Should not specify a threshold for open space provision, should determine on a site by site basis according to need in the locality, (Home Builders Federation, 0092/1123), (Legal and General Property Ltd , Indigo Planning 3012/1135).
10	Strategic approach needed to identifying aspirations for green corridors and spaces to connect to the rim, (Unsworth/Morgan 0846/1103).

11	Millennium Square should be allocated on the City Centre public space map, (Montpellier Estates/WYG 420/1130).
12	Should clarify how the 20% of total site area is to be defined, (John Davis, 1545/1147).
13	Bigger spaces provide maximum benefit, (John Davis, 1545/1147).
14	No more building on green sites re-use derelict warehouses first, (Mr Robin Blincoe, 3035/1154).
15	Support for PO25 (Yorkshire and Humber Assembly 0940/1117).
16	It is not clear what type of open space will be provided. Will it be ANGSt standard or just some greenery around buildings? (Mike Barningham, Natural England 3006/1119).
17	Support the policy but also need to increase access to the pedestrianized area (Ms Chesters 2995/1081).
18	Support policy except disagree that contributions should be used for spaces outside of the city centre (The Venerable Tony Comber, 2987/106?).
19	Spaces adjacent to noisy traffic are unacceptable (The Venerable Tony Comber, 2987/106?).
20	Part i) of PO-25 should be supplemented by text to facilitate the redevelopment of sites including amenity greenspace provided that acceptable alternative provision is incorporated in the redevelopment (Leeds Metropolitan University 3011/1132).
21	The City Centre Public Space map should be amended to exclude the green hatched area to the east of entry 139 as it is not open space (Cobbetts 2998/1090).
22	Unused waterside areas attract boating people. Support for open space uses of waterside (Ms Sheila McMahon. (2981/1060)
23	A PPG17 audit has not been carried out yet and therefore there is no strategic framework in place to direct the spending of open space contributions (Sport England 1982/1133).
24	No methodology included for calculating contributions, a blanket requirement is unreasonable and contrary to circular 05/2005 (Legal and General Property Ltd , Indigo Planning 3012/1135), (HBG Properties Ltd, 0806/1112), (Cobbetts 2998/1090).
25	Unreasonable to ask for an extra 5% POS to meet the needs of families (Kirkstall Holdings, Indigo Planning 3010/1127), (Cobbetts 2998/1090).
26	There should be a process to involve people in decision making about public space, particularly young people (Leeds Youth Council 3005/1113)
27	20% POS is an arbitrary figure with no evidence base to support it, cannot use existence of UDP policy to justify an LDF policy (Cobbetts 2998/1090).
28	The part of the policy that states that contributions are required from developments of below 0.5ha must add that this should be where they are called for within the policy tests in circular 05/2005 (Cobbetts 2998/1090).
29	Should develop a more holistic public space strategy (Gordon Cary 960/1065)
<p>PO-26 Use of Public Open Space This Preferred Option requires open space to be predominantly 'green'. Scale of support/objection: 46 responses, 39 support 5 object 2 unclear</p> <p style="text-align: center;">Issues raised</p>	
1	The circumstances where hard landscaping will be appropriate should be extended to i) allow topographical factors to be taken into account, ii) accommodate large volumes of foot traffic and iii) allow for the siting of art and other features (CaddickGroup 83/1131)
2	More seating needed in designated barriered areas, (Mr and Mrs Alan and Joyce Oldroyd, 3038/1158, Mrs E. Tate, 3019/1143, Mr Steve Goulding, 3020/1145, Mr S. Pinder 1781/1089, Leeds Youth Council 3005/1113, Ms Chesters 2995/1081).
3	Space that attracts wildlife, particularly water features should be encouraged, (Mr and Mrs Alan and Joyce Oldroyd, 3038/1158), (Mr Steve Goulding, 3020/1145).
4	Use of open space should be promoted, should have something unique to Leeds such as a city centre beach volley ball court, (David Raper 3000/1092).

5	No mention made of implications of planning gain supplement, (LCPF/WYG 0420/1102).
6	Support PO-26 but regret has come too late for the Eastgate development, (Leeds Civic Trust, 0062/1146).
7	Account should also be taken of the character of the surrounding area (English Heritage, 0099/1116).
8	More trees needed (Mr S. Pinder 1781/1089).
9	There should be a process to involve people in decision making about public space, particularly young people (Leeds Youth Council 3005/1113)
10	Support the emphasis on green space as it offers more benefits in regards to drainage and biodiversity (Environment Agency 0046/1104).
11	Support the requirement for porous surfaces but these must be properly assessed to prevent pollution of protected waters, as certain areas of the city centre will be contaminated due to previous use. The land would need to be remediated first (Environment Agency 0046/1104).
<p>PO-27 Public realm and environmental improvements This Preferred Option requires commuted sum payments for public realm improvements. Scale of support/objection: 46 responses, 33 support 10 object 3 unclear</p> <p style="text-align: center;">Issues raised</p>	
1	Support intention to secure environmental nature conservation & public realm improvements (English Heritage 0099/1116, Yorkshire Forward 2597/1115, Environment Agency 0046/1104, Gordon Carey 0960/1065, University of Leeds 1029/1097)
2	The policy as drafted is imprecise, e.g. it is not clear what 'proportionate' refers to (Asda Stores Ltd 2763/1129). Expressed too generally therefore appears to conflict with the planning obligation tests in Circular 05/05 (Savills 0466/1122). Clearer wording needed that both environmental and public realm improvements are being sought (English Heritage 0099/1116)
3	Should include waterways and waterfront, to improve biodiversity, aesthetics and recreational (British Waterways 0338/1121)
4	The relationship with the requirements of PO-25 is unclear. It implies double counting, particularly in terms of PO-25v maintenance requirements (LCPF/WYG 0420/1130)
5	Maintenance of public realm and opens space is critical to its success. There should be a clear policy proposal that the City Council's wider role of its responsibility for maintenance of the public realm not just new open spaces vested via new developments (LCPF/WYG 0420/1130)
6	Location of spend. Contributions should be spent in the area where development is taking place, to comply with Circular 05/2005 "Planning Obligations" (Evans Property Group 29981090, Kirkstall Holdings 3010/1127) and to ensure that all spaces in the city centre are equally treated and improved. Improvements to the PSQ would be welcomed, but not at the expense of other areas. The PSQ area is capable of raising money through BIDS & other means to ensure improvements take place (Gordon Carey 0960/1065). The Option should focus spending on sectors of the city centre, based on area master plans so that developers can see direct benefit of contributions within immediate spatial context of the considered development (Dacre Son & Hartley 0480/1109) Investments in public realm should be focussed in key locations to prevent investment being spread too thinly (Yorkshire Forward 2597)
	Circular 5/05 tests: (i) relevant to planning (ii)necessary to make the proposed development acceptable in planning terms (iii)directly related to the proposed development, and, (v)reasonable in all other respects.
7	The University and other similar charitable bodies should be exempt from

	contributions, given we already provide and maintain a high quality environment in the centre (University of Leeds 1029)
8	The CCAAP does not cross reference in sufficient detail with the objectives of the Draft Parks and Green Space Strategy (LCPF/WYG 420/1130)
9	Funds raised must be ring-fenced to public realm improvements. Avoid spending money on uplighting, which can dazzle (Mr Steve Goulding 3020, Mr & Mrs Barry, Mary Naylor 3037, Mr & Mrs Alan, Joyce Oldroyd 3038)
10	No mention made of Planning gain Supplement which will be in place prior to the adoption of the CCAAP (LCPF/WYG 0420/1130).
11	More seating & litter bins are needed (Leeds Youth Council 3005/1113)
12	Granary Wharf Weir and Crown Point Weir are suitable for the installation of fish passes (Environment Agency 0046/1104).
<p>PO-28 Safety and Security This Preferred Option requires open space to be permeable, accessible and designed to avoid opportunities for crime. Scale of support/objection: 49 responses, 44 support 2 object 3 unclear</p> <p style="text-align: center;">Issues raised</p>	
1	Better policing preferred to restrictions on access, (Mr C. V. Barton, 3036/1156).
2	Illumination and CCTV should be considered where appropriate, (Mr and Mrs Alan and Joyce Oldroyd, 3038/1158), (Mr Steve Goulding, 3020/1145).
3	Attention to detail required for gaps between buildings and access to waterfront, (British Waterways, 0338/1121).
4	Public accessibility should not be restricted where there is fear of crime, instead the site should have improved design and adequate resources to reduce the fear of crime (Sport England 1982/1133).
<p>PO-29 Waterways This Preferred Option encourages the opening up of culverted waterways. Scale of support/objection: 39 responses, 36 support 2 object 1 unclear</p> <p style="text-align: center;">Issues raised</p>	
1	Culvert map is difficult to read, (Leeds Civic Trust, 0062/1146).
2	No explanation of SFRA culverts definition, (Leeds Civic Trust, 0062/1146), (Mrs Margaret Bird, 1428/1155).
3	Ensure on-going maintenance for safety and aesthetic reasons, (Mr and Mrs Alan and Joyce Oldroyd, 3038/1158), (Mr Steve Goulding, 3020/1145).
4	All water should not be fenced off, (Mr R. A. Stephenson, 3018/1142).
5	Important to also stress the need for improvement of environmental quality of watercourses, including biodiversity and chemical, biological and physical water quality, (British Waterways, 0338/1121).
6	Support for the policy, especially the requirement to undertake FRA when considering the opening up of a culvert (Environment Agency 0046/1104).
<p>PO-30: Routes for Pedestrians and Cyclists The map identifies missing links for cycle routes and pedestrian routes and existing routes needing enhancement. Preferred Option asks for routes to be protected, delivered and/or enhanced through the control of new development. Scale of support/objection: 49 responses, 39 support 9 object 1 unclear</p> <p style="text-align: center;">Issues raised</p>	
1	White lining the highway to provide for cycle lanes is not adequate (Leeds Chamber Property Forum 960/11792) – segregation is required. (Miss P Johnson 33/12613), (Mr S Goulding 3020/12648), (Mr&Mrs Naylor, 3037/13033), (Mr&Mrs Oldroyd 3038/13070), Ms M Chesters 2995/12076). Cycle lanes are better laid out on pavements as opposed to roads (Leeds Youth Council 3005/1113)
2	The wording is odd and does not produce a policy. The wording needs attention

	and redrafting. (Savills 2763/12353), (Leeds Civic Trust 62/12686), (Metro 1545/12736),
3	Routes adjacent to the waterways require improvement. (British Waterways 338/13080)
4	Need to protect existing routes. (Mr J Isaacs 2980/1693)
5	Increase the pedestrian area and reduce where cars are allowed in the city centre. (Miss K Burton 2983/1754)
6	This plan of routes should be made part of a cohesive plan with further consultation so that a broader picture of improving connectivity is developed (Leeds Chamber Property Forum 960/1792)
7	Require more specific detail on how the proposed routes link in with the redevelopment of the Kidacre St site. (Indigo Planning 806/11981) Need to elaborate in greater detail on how sites to the south of the city centre will be linked to the city centre. (Yorkshire Forward 2597/3082)
8	Policy needs to make specific reference to new developments layouts which support connectivity for, and with, public transport. (Metro 1933/2787)
9	Need to tackle existing barriers to movement such as Armley gyratory (Leeds Voice 1691/2092)
10	Policy should go further. More cycle lanes and safer walking routes are required. Both well lit and maintained. (Leeds Initiative 845/2249)
<p>PO-31: Bus Interchanges The map identifies areas of search for potential interchanges. Preferred Option asks for areas to be identified where bus interchanges could be developed to enhance and improve opportunities for service provision and interchange between routers and travel modes. Scale of support/objection: 54 responses, 38 support 15 object 2 unclear</p> <p>Issues raised</p>	
1	<p>Confusing for visitors/elderly (Miss Pauline Johnson, 0033/1144), (Harrogate Line Rail User Group 2931/1064), (Promoting Healthy and Active Life in Older Age 2999/1093), (Mrs P. Auty, 3024/1150)</p> <p>The existing New Station St Interchange is too confusing/dangerous for pedestrians (Mr Tony Comber, 2987/1069)</p>
2	Bad for disabled people (Miss Janice Greaves, 2967/1042)
3	<p>Changing buses is inconvenient, and would damage bus use. (First Bus, 0186/1067), (Transport 2000 – West Yorkshire Group, 2986/1068), (Transport 2000, 3008/1125).</p> <p>Would add to cross city journey times (Harrogate Line Rail User Group 2931/1064), (Mrs P. Auty, 3024/1150), (Ms Margaret Chesters 2995/1081)</p> <p>Not in favour of terminating on edge of retail core (Park Lane students 3015/1138)</p>
4	Bus station should be next to railway station (Miss Pauline Johnson, 0033/1144), (Ms Margaret Chesters 2995/1081), (Mr C. V. Barton, 3036/1156).
5	Would require constant stream of shuttle buses (First Bus, 0186/1067), would it work in the rush hour with high volumes of commuters? (Harrogate Line Rail User Group 2931/1064)
6	Various comments on existing Free bus: Free bus is good/ often overcrowded / should go 2 ways. (Older Peoples Reference Group 0193/1152), (University of Leeds 0846/1103), (Park La College students 3013/1136), (Harrogate Line Rail User Group 2931/1064)
7	May be important in preventing traffic delays caused by journeys through the centre. (First Bus, 0186/1067)
8	Need free bus circular services to provide the links (Mr and Mrs Barry, Mary Naylor 3037/1157), (Mr Robin Broincowe 3035/1154) (Mr Steve Goulding 3020/1145) (Mr and Mrs Alan, Joyce Oldroyd 3038/1158)
9	Metro fully supports the proposals, but would like changes to the text: no

	reference to 'high frequency' for city centre orbital service; and no expectation of 'review/rationalisation' of existing services; disagrees with view that existing bus station 'not ideally located'; expand text to include an expectation in respect to quality of interchanges (Metro, 1933/1148)
10	New developments in the areas around the interchanges should enhance the interchange environment (Mr John Davis, 1545/1147)
11	Too much change (Leeds Involvement Project, 2979/1056)
12	There should still be a central bus station as well as interchanges. (Mr David Raper 3000/1092)
<p>PO-32: Public Transport Routes The map identifies the preferred line and options for BRT together with tram-train alignment options. Preferred Option asks for preferred routes to be identified for Bus Rapid Transit and for future tram-train schemes. Scale of support/objection: 55 responses, 45 support 7 object 3 unclear</p> <p style="text-align: center;">Issues raised</p>	
1	Tram train alignment shown passing through Crown Point Retail Park – object to safeguarding at this stage due to commercial impacts on existing development. (Morley Fund Management Ltd - via Indigo Planning 0806/1077)
2	Supportive of improvements to public transport (Leeds Chamber Property Forum 0960/1065) (Park La College students 3014/1137) (Park La College students 3015/1138)
3	Proposals are unclear (Mrs Margaret Bird 1428/1155)
4	Bus priority measures/ bus gateways should be shown (Mr John Davis, 1545/1147), (Metro, 1933/1148)
5	Tram train not beneficial. Risk losing Network Rail investment. Could trams share track? National ticketing issues? Would trams go to York? (Harrogate Line Rail User Group 2931/1064) Tram train best shelved due to limited investment resources (Mr Tony Comber, 2987/1069) Difficult to see how tram train would fit into the train timetable (Mr C. V. Barton, 3036/1156).
6	On street running not supported due to impact on journey times from congestion (Harrogate Line Rail User Group 2931/1064)
7	Stick with plans for Light Rail in Leeds (Transport 2000 – West Yorkshire Group, 2986/1068) (Mr Simon Best 2992/1074)
8	Bus Rapid Transport would benefit relatively few people. Improve all bus routes with enhanced priority. (Ms Margaret Chesters 2995/1081) New rapid bus not a good idea (Mr David Raper 3000/1092) FTR bus compares poorly with Sheffield tram (Mr C. V. Barton, 3036/1156).
10	Lack of a strategy for BRT routes, tram-train or heavy rail improvements (Mr John Bird 3044/1163). The BRT needs to link facilities of interest, such as the new arena (Leeds Youth Council 3005/1113)
11	Show indicative routes and stop locations (Leeds Metropolitan University 3011/1132)
12	Need to protect disused rail viaduct west of city Centre as a tram train option (Metro, 1933/1148), (Transport 2000 – West Yorkshire Group, 2986/1068)
13	AAP should include explicit requirement for developers to contribute to public transport improvements (Metro, 1933/1148)
14	Should refer to the need to safeguard public transport routes (Metro, 1933/1148)
15	Should clarify that tram train would run on street through city centre. Minor inaccuracies in BRT alignments (Metro, 1933/1148)
16	Improve access to hospitals by public transport (Promoting Healthy and Active Life in Older Age 2999/1093)
17	Need more frequent / reliable buses (Michael Healey 2063/1051), (Park Lane students 3015/1138)
<p>PO-33: Railway Stations</p>	

The map identifies areas of search for new stations. Preferred Option asks for potential locations to be identified for new stations.
Scale of support/objection: 50 responses, 44 support 5 object 1 unclear

Issues raised

1	Area of search on Castleford line should be extended to include Kidacre St development site (National Grid Ltd – via Indigo Planning 0806/1077), (Mr John Davis, 1545/1147) (Metro, 1933/1148)
2	Capacity to east of Leeds station is extremely limited. New station would be dependent on substantial and expensive rail infrastructure (Network Rail 1024/1087) LTP Railplan 6 highlights no business case for stations in the City Centre in the short term (Metro, 1933/1148)
3	No need for additional stations (Mrs Margaret Bird 1428/1155). Would increase journey times and disbenefit existing passengers (Mr John Bird 3044/1163) Apart from Marsh Lane (serving an Arena) new stations not advantageous (Park Lane students 3015/1138)
4	Holbeck within reasonable walking distance of Leeds station – therefore a new station here may not be necessary (Mr John Davis, 1545/1147)
5	Support the policy (Metro, 1933/1148), (Transport 2000 – West Yorkshire Group, 2986/1068), (Leeds Youth Council 3005/1113), (Park La College students 3014/1137) Marsh Lane station specifically supported (Mr David Raper 3000/1092), (Mr Mike Yates 2997/1085), (Park Lane students 3015/1138), (Transport 2000 – West Yorkshire Group, 2986/1068)
6	New stations search should include suitability of alternative modes eg tram-train and BRT (Metro, 1933/1148)
7	New access, particularly southern access to Leeds rail station is badly needed (Mr C. V. Barton, 3036/1156 Leeds Youth Council 3005/1113).
8	All the stations between Shipley and Castleford should be re-opened to reduce congestion and allow buses to operate without need for BRT (Mr C. V. Barton, 3036/1156).

PO-34: Traffic Circulation

The map shows schematic proposals for two southern loops. Preferred Option asks for schematic desire lines to be identified for new traffic circulation routes to the south of the city centre.

Scale of support/objection: 47 responses, 38 support 9 object

Issues raised

1	Congestion occurs on bus routes because the roads are too narrow (Miss Pauline Johnson, 0033/1144)
2	New Government guidance on highway design should be used to reduce the visual dominance of vehicles, with tighter bends to reduce speeds, wider pedestrian crossings, fewer signs and guardrails (Leeds Civic Trust 0062/1146)
3	Divert the existing Loop south of the river (Leeds Civic Trust 0062/1146), (Mr John Davis, 1545/1147), (Mr Alan Cann 2988/1070). Loop traffic needs to be removed from Bishopgate and the main station access. (Mr Alan Cann 2988/1070).
4	Existing loop road is too inflexible, too much of a barrier and too fast. Cannot see any advantage in extending it. One way nature makes it difficult to backtrack. (Mrs Margaret Bird 1428/1155) Should concentrate on improving public transport not the building of new roads. (Transport 2000 – West Yorkshire Group, 2986/1068)

	<p>It will take more than a loop road to unify the city of Leeds. (Mrs P. Auty, 3024/1150)</p> <p>With the proposed new rail stations giving improved access to this area is a southern loop needed? (Mr C. V. Barton, 3036/1156)</p> <p>Disagree with further facilitating the flow of traffic around the city centre. (Mr John Davis, 1545/1147)</p>
5	Needs to give specific consideration to bus movements, particularly improved connectivity between areas N and S of river. Southern loop should include priority facilities for buses, particularly where routes cross the loop. (Metro, 1933/1148)
6	An amendment to PO-34 or an additional policy should be included to support the principals of introducing bus priority measures (bus gates, bus only roads, bus lanes, junction priority) on routes entering, exiting and through the City Centre. (Metro, 1933/1148)
7	Beyond the public transport box there is a lack of a coherent strategy for traffic circulation. Loop proposals would appear to inhibit direct vehicular access, increase travel distances and (if one way) encourage greater speeds. Would deter activity and investment, reduce accessibility and detract from environmental quality. (Mr John Bird 3044/1163)
<p>PO-35: Proposals for long stay commuter parking</p> <p>The map identifies the boundary of the proposed Core car parking policy area, together with the Public Transport Box and existing parking policy boundaries. Preferred Option asks for stricter parking standards to be applied to sites within and fronting onto the Public Transport Box; the existing Core parking policy boundary to be extended; revised standards to be applied when park and ride sites are developed; and provision to be made for people with a disability.</p> <p>Scale of support/objection: 64 responses, 37 support 24 object 3 unclear</p> <p>Issues raised</p>	
1	<p>Need improved public transport and park and ride before reducing parking for commuters. (Cllr V. Kendal 0050/1134), (Leeds Chamber Property Forum 0420/1130), (Dacre Son & Hartley, 0480/1109), (University of Leeds, 1029/1097), (Leeds Financial Services Initiative 3004/1108).</p> <p>Will only work if public transport is improved and park and ride provided. (Mr G. Kerrison, 3033/1153)</p> <p>Provide P&R to prevent parking around residential areas (Cllr P. Ewens 3001/1095)</p>
2	Park and Ride sites in unsuitable locations adjacent to the strategic road network may be of concern if they impact upon the safe operation of the network. (Highways Agency 0060/1100)
3	If policies are too restrictive they will drive business, consumer spending and investment away from Leeds City Centre. Extending the boundary could inhibit regeneration. (Caddick Developments Ltd, 0083/1131) (Caddick Developments Ltd via Drivers Jonas 1028/1128)
4	Distribution of parking around the City Centre is an issue that requires consideration. Loss of parking, or substantial increases can lead to unbalanced distribution that would be detrimental. (Caddick Developments Ltd, 0083/1131) (Caddick Developments Ltd via Drivers Jonas 1028/1128)
5	Parking is too expensive (Older Peoples Reference Group 0193/1152), (Mr Kevin 2973/1048), (Mrs C Limbert 2978/1055), (Mr Marcus 2985/1066), (Park La College students 3014/1137), (Park Lane students 3015/1138)
6	Support reduction in long stay spaces. (Park Lane students 3015/1138) (Yorkshire and Humber Assembly 0940/1117), (Metro, 1933/1148)
7	Consideration should be given to granting temporary planning permission for

	commuter parking on well located sites while investment is made in PT. (Leeds Chamber Property Forum 0420/1130)
8	Sites with outline planning permission based on current parking ratios should be retained under the new policy. (Leeds Chamber Property Forum 0420/1130)
9	No consideration is given to demand management which should be an integral part of a city centre transport plan to reduce congestion and increase PT use. (Dacre Son & Hartley, 0480/1109)
10	Should include consideration of parking levels for other land uses (residential, hotels, retailing). (Mr John Davis, 1545/1147), (Metro, 1933/1148)
11	Short and long stay car parks should be connected to the road system around the city centre perimeter and be served by the free city centre bus. (Leeds Chamber Property Forum 0960/1065)
12	How will applications for new car parks be dealt with? (Mr John Davis, 1545/1147)
13	LTP policy C2 – “Manage the demand for travel – car parking” should be referenced. (Metro, 1933/1148) Table following PO35 is not referenced (Asda Stores Ltd (via Savills) 2763/1129)
14	Price of LCC controlled parking (particularly long stay) should be increased in real terms (Metro, 1933/1148)
15	Principal of Prestige Development Areas should be retained. (Asda Stores Ltd (via Savills) 2763/1129)
16	Unclear as to impact upon Prestige Development Areas (Evans Property Group (via Cobbetts LLP) 2998/1094)
17	Public transport should be encouraged not more cars into the city (Mr Mike Yates 2997/1085) (Miss Laura Dibb 2972/1047) All parking in the City Centre should be discouraged except for disabled people (Ms Margaret Chesters 2995/1081) If air quality is to be improved how can city centre parking be justified? (Mr C. V. Barton, 3036/1156).
18	The policy should explicitly acknowledge that parking controls seek to underpin the economic vitality and environmental quality of the city centre. (Mr John Bird 3044/1163)
19	LCC parking services are considering building a multi-storey car park at West Street as an alternative to Woodhouse La (which is approaching the end of its economic life). (LCC Parking Services 3154/1278).
<p>PO-36: Cycle and motorcycle parking options A review of the existing Cycle Parking Guidelines and Motorcycle Parking Guidelines will be undertaken. Scale of support/objection: 41 responses, 35 support 5 object 1 unclear</p> <p style="text-align: center;">Issues raised</p>	
1	Support the proposals for motorcycle parking. (Ms Shelia McMahon 2981/1060)
2	Bigger bike park than Hyde Park is required. (Park Lane students 3015/1138). There is not enough parking for cycles and motorcycles. (Leeds Initiative 0845/1096)
3	Secure cycle parking required. (Park Lane students 3015/1138)
4	Parking for cycles and motorcycles should be in locations to avoid hazards to pedestrians. (Mr and Mrs Barry, Mary Naylor 3037/1157), (Mr Steve Goulding 3020/1145) (Mr and Mrs Alan, Joyce Oldroyd 3038/1158)
5	Leeds Metropolitan University wishes to be consulted on the review. (Leeds Metropolitan University 3011/1132)
<p>PO-37: Extending the success of the City Centre Exploring training and employment agreements. Scale of support/objection: 48 responses, 42 support 6 object</p>	

Issues raised	
1	Improvement required in the “won’t work” section of Leeds society, plus training in literacy & numeracy (Cllr Valerie Kendall 0050/1134).
2	The policy needs policing to ensure implementation (Leeds Voice 1691/1079)
3	Allowing town centre uses such as offices on the Bankside site would provide more opportunity for training & employment agreements (Reland (Leeds) Ltd 3016/1140)
4	Can the agreements seek to help train and employ people with disabilities? Mr Steve Goulding (3020/1145) Mr & Mrs Naylor (3037/1157) Mr & Mrs Oldroyd (3038/1158)
5	Leeds Metropolitan University wishes to be consulted on the review. (Leeds Metropolitan University 3011/1132)
Proposal Area Statements Introduction Paras 4.1.1 – 4.1.6 explain the generic reasons for identifying the proposals areas and renaissance areas.	
Issues raised	
1	Question of whether the scale of different uses on each proposal area should be fixed. One opinion is that the submission plan must offer clarity over the quantum and mix of acceptable development and the proposals must be shown to be realistic. Otherwise the plan will be unsound (Asda/Savills 2763/1129). The proposal area statements should be more spatial identifying what goes where (English Heritage 99/1116). Another viewpoint is that proposals for specific areas are too prescriptive and restrictive in terms of mix of uses by stating floor areas etc. Substantial mixed use developments should be welcomed, providing that they meet wider requirements of flood risk, office content, residential content etc. Better to prepare a strategy document for a blend of uses, giving proportions of space and a range of uses to be achieved within the city centre, so that the “overall balance” of the city can be considered in more detail (Unsworth/Morgan 0846/1103, Gordon Carey 960/1065) Advice on sites would better be given through separate planning guidance documents in order to give flexibility to deal with changes over the next 10/20 years (Gordon Carey 960/1065). There should be an overall paragraph discussing there may be more than one location for specific proposals, or one listing “essential” elements that should be provided on all sites (Civic Trust 62/1146)
2	Regarding areas not covered by Proposal Area Statements. Unfortunate that undeveloped sites with planning permission were excluded. There should also be statements for areas subject to development pressure such as the Markets and East of Black Bull St (Civic Trust 62/1146). Consideration needs to be given to what policies would apply if permissions already granted for areas of major change are not implemented. Is the commitment to apply all standard requirements of the AAP (para 4.1.4) sufficient? (GOYH 1994/1118). An additional proposal area statement should be incorporated into the City Centre Area Action plans which is “New Holbeck”. This area includes the land to the south of Sweet Street as well as Temple Works and the Leeds City Council owned land at Bath Road. This area extends to approximately 35 acres of underutilised and derelict land and is therefore capable of being brought forward for development within the plan period. Given the “gateway” location of this area; its proximity to the railway station; the grade 1 listed Temple Works; and, connectivity/synergy between Holbeck Urban Village and Holbeck and Beeston this area should be recognised as a proposal area statement. Suitable land uses which could be accommodated in this area include the aforementioned major entertainment facilities (e.g. arena/conferencing) amongst other uses (i.e. similar to the Kidacre Street and Marsh Lane proposal areas). (White Young Green Planning 0420)
3	The proposals areas have been considered too much in isolation. More guidance is needed on how developments should integrate with the rest of the city centre. Negotiations with owners will be necessary to ensure forward thinking on potential

	synergies and physical linkages. The Proposal Areas and adjoining areas need to be master-planned (Unsworth/Morgan 0846/1103, Dacre Son & Hartley 0480/1109). There is a lack of a strategic overview of how green infrastructure (people & nature) interacts and links with the proposal areas (English Nature 3006/1119). Commitment should be given to prepare development briefs for key sites, as is the case for Holbeck Urban Village (Civic Trust 62/1146).
4	PPS12 advises on the importance of protecting areas sensitive to change and resolving conflicting objectives (para 2.17). Hence, each section should set out constraints & conflicting objectives needing to be addressed & resolved. This should include measures to preserve the character of areas, particularly where conservation areas and listed buildings are involved (English Heritage 99/1116).
5	The proposal area statements should set out guidance on scale and the design principles, particularly where it would help to resolve conflicts. Reference to the City Centre Urban Design Strategy should be made as appropriate (English Heritage 99/1116).
6	No certainty of commitment can be given to advancing some of the development options as the planning areas identified are currently in use and may never come forward for redevelopment. The submission draft of the CCAAP should be realistic and relate to criteria established in the Core Strategy, with firm policies & specific site proposals (Sport England Yorkshire 1982/1133).
7	Expectation of public transport improvement to encourage mode shift could be explicitly referenced as one of the generic reasons for the Proposals Areas (para. 4.1.3) Public transport priority, permeability and accessibility should be considered in detail for each of the Proposal Areas. Public transport improvements are identified in the map key (page 41) but not shown on any Proposals Area map. A number of the Proposal Areas include, or are in close proximity to BRT and Tram-train route alignments and areas of rail station search. Redevelopment within Proposal Areas provides opportunities to include / improve public transport priority measures (e.g. bus gates / bus only roads etc) and stop facilities and enhance access to these services/facilities (Metro 1933/1148). For all areas, sustainable transport accessibility & permeability need more detailed consideration (J Davis 1545/1147).
8	The need for open space should be another generic reason for identifying the proposal areas (Civic Trust 62/1146)
9	Brownfield sites should be carefully considered for the biodiversity and ecological value when selecting alternative uses (Mike Barningham, Natural England 3006/1119).
PA-01: City Gate Proposal Area	
Scale of support/objection: 32 responses, 23 support, 9 object	
Issues raised	
1	There is a healthy supply of Grade A office accommodation for the next 8-10 years. On this basis it seems premature to stipulate both a primary use and the quantum required. (MEPC via Savills 0466/1122) The deliverability is questionable of an arbitrary minimum figure of 30,000sqm of office space in the context of existing supply and demand trends within the CC. The requirement is too prescriptive (Evans Property Group via Cobbetts LLP 2998/1094)
2	This site is outside the 10 mins walk isochrone and physically separated by the elevated A58 thus making it an unsustainable location for 30,000 sqm of office space (MEPC via Savills 0466/1122). The site is peripheral (Evans Property Group via Cobbetts LLP 2998/1094).
3	The site is in flood zone 3 as defined by PPS25 as having a high probability of flooding. There is no evidence that a sequential test has been completed for this site. As residential and hotel development may be proposed on this site a

	sequential test to determine if the site can be justified and Exception Test will be necessary (Environment Agency 0046/1104)
4	Particular support for the proposals to provide/enhance footpaths & provide a foot bridge (British Waterways 338/1121, Mrs Bird 1428/1155, Sport England 1982/1133, Ramblers Assoc 38/1075). Management & maintenance of walkways needs to be considered (British Waterways 338/1121) Should the proposal be for an “underpass” rather than a “footbridge” on account of the height of Wellington Rd above the river (Civic Trust 62/1146).
5	This proposal area statement ought to address the outstanding footbridge link to Gotts Island & the “Monkbridge site” (Civic Trust 62/1146, British Waterways 338/1121).
6	The proposal to set development back from the river is supported (Ramblers Assoc 38/1075, Environment Agency 0046/1104).
7	This site is in close proximity to the M621 which is currently severely congested in the busy peak periods. Development generally and proposals specifically for increased office development will need to be supported by sustainable transport measures to reduce impact on the local & strategic road network (Highways Agency 0060/1100)
8	A framework masterplan should cover the wider area including Wellington Plaza and the area to the north & immediate west (Unsworth/Morgan 0846/1103, Dacre 0480/1109).
9	Lack of reference to the Kirkstall Road Renaissance Area informal planning statement (English Heritage 99/1116).
10	A 7+ layer multi-storey car park is needed on site of surface car park, with ancillary ground floor shops. Design should not be of highly prestigious gateway standard (Parking Services 3154/1278)
11	Sustainable transport accessibility & permeability need more detailed consideration (J Davis 1545/1147).
<p>PA-02 Elmwood Road and Brunswick Terrace Proposal Area</p> <p>Scale of support/objection: 25 responses, 20 support, 4 object 1 unclear</p> <p>Issues raised</p>	
1	4.3.1 (i) & (ii) The statement places too strong an emphasis on office development reducing the prospect of a proper mixed use development, conflicting with the Government and RSS policy promoting mixed use development on brownfield sites. The CCAAP paragraph 2.2.3 confirms that planning policy controls about spatial location of uses will only be used where there is a clear rationale which is not the case for office use in this Proposals Area. (iv) Residential use should be an integral element of any mixed use development, including student accommodation, as part of a mix use development. (Castlemore Securities Ltd 0409/1101)
2	(v) The 20% minimum threshold for public space is considered to be excessive. (Castlemore Securities Ltd 0409/1101) Support for a minimum of 20% public open space provision and improved pedestrian routes to off-site public open space. (Ramblers’ Association, Leeds Group 0038/1075)
3	(vi) Requirement for underground parking with no support for surface parking is not viable or practical. The proposal area statement as currently expressed lacks any flexibility and should be reworded to state a preference for underground parking and above ground parking is acceptable in principle subject to good design. (Castlemore Securities Ltd 0409/1101) Underground car parking is supported instead of surface parking.(Ramblers’

	Association, Leeds Group 0038/1075)
4	This site is within zone 1 and should be scored more positively in the SA for flood risk.(Environment Agency 0046/1104)
5	The site could be extended to include the airspace over the ring road to minimise its impact on the local environment. (Leeds Civic Trust 0062/1146)
6	Assumed that a 'positive and visible statement of office use' means a tall building. What is the likely impact of such a development upon the character of the remainder of the city? Questions how this area been identified in advance of the City Centre Characterisation project or the SPD on Tall Buildings. Suggests it would be more appropriate to record the effect as 'uncertain' rather than 'neutral' in the SA. In line with PPS12, this section should outline how this potential conflict will be resolved. (English Heritage 0099/1116)
7	Sustainable transport accessibility & permeability need more detailed consideration (J Davis 1545/1147)
PA-03: Kidacre Street Proposal Area	
Scale of support/objection: 26responses, 19 support, 7 object	
Issues raised	
1	Site is rather isolated but 8 students support the proposals, (Park Lane College Students, 3013/1136).
2	Prefer Marsh Lane to Kidacre St. as the location for an Arena due to walkability, (Park Lane College Students, 3013/1136).
3	Is the proposed rail halt on the adjoining line? (Leeds Civic Trust, 0062/1146).
4	POS will need to be carefully designed in what is a noisy and polluted environment, considers there must be better sites for outdoor events (Civic Trust 0062/1146).
5	Will only be appropriate for an Arena if there are stronger links to the City Centre with a pedestrian route via Asda site, (Leeds Civic Trust, 0062/1146).
6	There is no need to allocate a site for the Arena as this will be dealt with through the procurement process before the adoption of the CCAAP, (Montpellier Estates/WYG 420/1130).
7	Sustainable transport accessibility & permeability need more detailed consideration (J Davis 1545/1147)
8	Arena must be in a City Centre location as it is most accessible to young people (Leeds Youth Council 3005/1113).
9	Support for proposals (Sport England 1982/1133), (Morley Fund Management Ltd 0806/1077), (National Grid 0806/1115).
10	Query over the exclusion of specific reference to hotel and conference / exhibition facilities (National Grid 0806/1115).
11	Northern part of the site is in flood zones 3 and 2 and this has not been acknowledged. Sequential approach needed to the allocation of uses within the site (Environment Agency 0046/1104).
PA-04: Leeds General Infirmary Proposal Area.	
Scale of support/objection: 30 responses, 23 support, 6 object 1 unclear	
Issues raised	
1	The main concern remains the prescription of a requirement for 70,000sqm of office space to be provided on site as part of redevelopment. This figure seems to have been arrived at by applying a simple multiplier figure to the site area. This approach is inappropriate for this complex site which is covered by listed buildings. At this stage it is not possible to predict what level of redevelopment floorspace will be appropriate. This is appreciated on how much demolition is approved, density and scale of future development.

	This figure should be removed and office use retained within the menu of acceptable uses. The Trust intends to carry out a detailed study of the site which will provide the context for more detailed policies in the future (Leeds Teaching Hospital NHS Trust 2819/1111)
2	This site is within zone 1 and should be scored more positively in the SA for flood risk.(Environment Agency 0046/1104)
3	Listed buildings and others of "architectural merit" should be identified & protected and regard should be had to the City Centre Characterisation Project (English Heritage 99/1116)
4	Particular support for proposal iv to provide public access across the site (Ramblers Assoc 38/1075) Sustainable transport accessibility & permeability need more detailed consideration (J Davis 1545/1147)
5	A framework masterplan should cover the wider area of LGI/LEEDS MET/UofL (Dacre 0480/1109).
6	The section of the LGI site which abuts the University Worsley building is ideally located for development of medical science or innovation. The requirement for a minimum of 70,000sqm of office space should be broadened to include space for medical science, incubators or innovation (University of Leeds 1029/1097).
PA-05: Marsh Lane Proposal Area	
Scale of support/objection: 29 responses, 22 support, 7 object	
Issues raised	
1	The process of allocation must be transparent and be shown to take account of flood risk as required by PPS25. This site is within zone 1 and should be scored more positively in the SA for flood risk (Environment Agency 0046/1104)
2	The proposal for an arena here would be counter-productive toward other developments closer to the city centre. It is premature and misleading for the CCAAP to allocate this site for an arena; the CCAAP process is out of sync with LCC's arena procurement process. The CCAAP should state that any location within the City Centre boundary would be suitable for a new arena development subject to the PMP locational criteria. (Montpellier Estates/WYG 420/1130). In order to provide access for an arena, significant works will need to be carried out to provide routes around Quarry House. Use of levels to bridge over Marsh Lane and feed direct into Quarry Hill - further bridges to take people to Eastgate from Playhouse? A strategy for this link will be vital (Leeds Civic Trust 0062/1146) Allocation can stymie development on a site, as evidenced by Elland Road (Montpellier Estates/WYG 420/1130, Rushbond Plc via GVA Grimley 2996/1083). 3 out of 14 students voted for an arena at Marsh Lane. A plus that it is near the bus station. The facilitator mentioned a third site at Elland Road but this was not supported by students who considered it to be too remote (Park Lane College, 16/05/07 via Planning Aid 3014/1137) Preference is for this site for an arena as compared with Kidacre St. This area is more accessible by foot and bus. A rail halt would help to ease congestion. Further bus improvements would be required. (Park Lane College 22/05/07 via Planning Aid 3014/1137) Good site for Arena which might incorporate rail halt for use in connection with events (Mr John Bird (3044/1163, Leeds Youth Council 3005/1113)
3	This site is too far out to contribute sensibly to Public Open Space provision for the City Centre - separated by major roads and monolithic development (Leeds Civic Trust 0062/1146)
4	The area statements are in certain respects generalised and looking for a similar use mix (albeit with a different balance of floor space per use). This approach

	tends to work against a vibrant CC with each area having an enhanced sense of place and a good relationship with adjoining areas. In this context there is a strong case for framework master plans to cover the wider areas of Marsh Lane and areas to south west and connectivity to Quarry Hill development (Dacre 0480/1109). The AAP should set out how the vision for the area will be delivered (Rushbond Plc via GVA Grimley 2996/1083)
5	Network Rail welcome the continued acceptance of the importance of this development site in the context of the City Centre and we look forward to working with the City Council in bringing this to fruition. However the reference to contributions towards a railway halt in the vicinity must bear in mind our comments on PO-33. Network Rail (1024/1087)
6	The Marsh Lane area forms an important but underutilised land resource linking the city centre with the EASEL regeneration area. This needs to be articulated at 4.6.1. (Rushbond Plc via GVA Grimley 2996/1083)
7	A mix of uses, at a high density and promoting design excellence should naturally be promoted, given the area's prominence and strategic importance in a city centre context. The plan should acknowledge that high value uses will be needed to pay for infrastructure, linkage improvements, design quality & public realm provision (Rushbond Plc via GVA Grimley 2996/1083).
8	Further clarification is required in relation to the provision of "large format retailing". This is one of a number of retail allocations being promoted within the AAP and it is unclear whether one or a combination of sites are to be identified for large format retailing. If retailing is proposed at Marsh Lane, then there needs to be consideration of the scale, nature and type of the large format retailing proposed. Any retail use must complement the regeneration and renaissance ambitions within the adjacent EASEL area. Convenience retail would undermine the ambitions to create a community focus and retail centre in Richmond Hill. Marsh Lane is too distant from a residential population (Rushbond Plc via GVA Grimley 2996/1083)
9	This rail freight facility is too precious to develop for other uses. The representor suggests that any development should be on stilts above the existing railway (air rights). (Transport 2000 3036/1156)
10	Sustainable transport accessibility & permeability need more detailed consideration (J Davis 1545/1147)

PA-06 Leeds Metropolitan University Civic Campus Proposal Area

Scale of support/objection: 32 responses, 25 support, 6 object 1 unclear

Issues raised

1	The PAS needs to be flexible on the format, extent and timing of any redevelopment (Leeds Met 3011/1132)
2	Conference facilities & science park should be added to the list of supported facilities (Leeds Met 3011/1132)
3	A "service centre" for convenience retailing should be designated (Leeds Met 3011/1132)
4	The map should identify the listed buildings to the south of the Area. Development should have regard to impact on these listed buildings and to historic buildings further away because of the topography making this Area prominent (English Heritage 99/1116).
5	The proposal for a swimming pool is supported (Park Lane College Students 3013/1136, 3014/1137 3015/1138, Sport England 1982/1133). The proposal should be reconsidered now that the University of Leeds is proceeding with a pool close by (University of Leeds 1029/1097,Civic Trust 0062/1146,).
6	This site is within zone 1 and should be scored more positively in the SA for flood risk.(Environment Agency 0046/1104)

7	Particular support for proposal iii which supports provision of student accommodation (Mr Tyler 26/1086, Ramblers Assoc 38/1075). Particular support for proposal iii to provide residential accommodation (Ramblers Assoc 38/1075,
8	Particular support for proposal iv to investigate provision of a link across the Inner Ring Road (University of Leeds 1029/1097, Ramblers Assoc 38/1075) LEEDS MET cannot accept an absolute requirement to provide the link – it depends upon financial feasibility (LEEDS MET 3011/1132)
9	Particular support for proposal vii to provide open space public access across the site (Ramblers Assoc 38/1075, Sport England 1982/1133) The campus space designations on the City Centre Public Space map should be removed so that the provision of appropriate green/public space can be considered in any redevelopment proposal. The CCPS map does not accord with para vi of the PAS which states “there is no functional open space network around LMU.” (LEEDS MET 3011/1132).
10	A framework masterplan should cover the wider area of LGI/LEEDS MET/UofL (Dacre 0480/1109).
11	Sustainable transport accessibility & permeability need more detailed consideration (J Davis 1545/1147)
<p>PA-07: New Lane & ASDA Proposal Area</p> <p>Scale of support/objection: 27 responses, 17 support, 9 object 1 unclear</p> <p>Issues raised</p>	
1	The site is in flood zone 3 as defined by PPS25 as having a high probability of flooding. There is no evidence that a sequential test has been completed for this site. As residential development may be proposed on this site a sequential test to determine if the site can be justified and Exception Test will be necessary (Environment Agency 0046/1104).
2	Management and maintenance of these sites is necessary, i.e. land adjacent to River Aire and its banks (British Waterways 338/1121). If the site is to be redeveloped it should include a set back policy similar to policy (v) and (vi) for the Yorkshire Post site so that it is in compliance with Biodiversity and Waterfront Development SPD. There should be better access to the waterfront of the River Aire at this site location and should include a continuation of a green infrastructure corridor along the river frontage (Natural England 3006/1119, Environment Agency 0046/1104)
3	This site is in close proximity to the M621 which is currently severely congested in the busy peak periods. Development generally and proposals specifically for increased office development will need to be supported by sustainable transport measures to reduce impact on the local & strategic road network (Highways Agency 0060/1100)
4	Sustainable transport accessibility & permeability need more detailed consideration (J Davis 1545/1147)
5	Why is this site not one of those considered as being appropriate for an Arena and/or Concert Hall development? Excellent transport links and potential for full integration with the City Centre (Leeds Civic Trust 0062/1146)
6	Broadly agree with the contextual analysis. Redevelopment of the ASDA house site would only be contemplated in the right circumstances (Asda Stores Ltd -via Savills (2763/1129). The CCAAP should make it clear that any new office headquarters complex should be high-density development in keeping with urban fabric of a major European City incorporating ancillary uses to ensure sustainability including cafes and restaurants, convenience retailing, adequate car parking and access to public

	transport (Montpellier Estates/WYG 420/1130)
7	Scope for more open/green space exists with the potential for a pocket park. This could complement the future possible placement of the bridge. British Waterways (0338/1121)
8	Clear linkages around the site is necessary (British Waterways 0338/1121)
9	Increase and enhance the service centre area. (British Waterways 0338/1121)
10	Increase the vibrancy of the area (British Waterways (0338/1121).
11	The CCAAP should make it clear that the Council supports the re-location of ASDA's headquarters in the city centre in order to protect employment (Montpellier Estates/WYG 420/1130).
12	<p>The area statements are in certain respects generalised and looking for a similar use mix (albeit with a different balance of floor space per use). This approach tends to work against a vibrant CC with each area having an enhanced sense of place and a good relationship with adjoining areas. In this context there is a strong case for framework master plans to cover the wider areas of New Lane/Brewery Site (Dacre Son & Hartley 0480/1109).</p> <p>This site should be treated as a comprehensive project with consideration being given to the potential for diverting/relocating Great Wilson Street - this would open up wider development options (Leeds Civic Trust 0062/1146)</p> <p>The proposal area in common with all the consultation options lacks detail and (perhaps deliberately) stops well short of being a formal development allocation. Due to the importance of this site it is important that the submission version of the DPD reflects what is realistically likely over the plan period so that uncertainty is avoided (Asda Stores Ltd -via Savills (2763/1129)</p>
<p>PA-08: The Brewery Proposal Area</p> <p>Scale of support/objection: 30 responses, 24 support, 5 object 1 unclear</p> <p>Issues raised</p>	
1	The site is in flood zone 3 as defined by PPS25 as having a high probability of flooding. There is no evidence that a sequential test has been completed for this site. As residential development may be proposed on this site a sequential test to determine if the site can be justified and Exception Test will be necessary (Environment Agency 46/1104).
2	This site is in close proximity to the M621 which is currently severely congested in the busy peak periods. Development generally and proposals specifically for increased office development will need to be supported by sustainable transport measures to reduce impact on the local & strategic road network (Highways Agency 60/1100)
3	Presumably this site would also be appropriate for an Arena/concert hall development although it is appreciated that it may not be released until such a project has been completed. Leeds Civic Trust 0062/1146).
4	Reference should be made to the retention of historic buildings on the site (Leeds Civic Trust 62/1146)
5	Is there potential to review the line of principal highways through the site, including the potential for a southern route for the Loop? (Leeds Civic Trust 62/1146)
6	Agree in principle with open space & transport linkages. The development of this site could complement the high quality environment of Dock Street (British Waterways 338/1121) Pedestrian links into/from and through the area are very important and there may be a case for the additional pedestrian bridge (Mrs Bird 1428/1155)
7	Site has potential to accommodate a wider diversity of residential and commercial uses. (British Waterways 338/1121)
8	Maintenance and management provision of the site should be made (British Waterways 0338/1121)

9	<p>Carlsberg recognises that should future redevelopment of the site ever occur, then it should seek to improve accessibility and permeability of the site.</p> <p>Carlsberg would wish to work in partnership with the City Council understand how the AAP proposals fit with Carlsberg's need to develop their brewing activities, including an opportunity to influence site-specific development plan policy (including, for example, the requirement for 30% public open space), if necessary (Carlsberg UK Ltd – via ARUP 0397/1080)</p>
10	<p>The area statements are in certain respects generalised and looking for a similar use mix (albeit with a different balance of floor space per use). This approach tends to work against a vibrant CC with each area having an enhanced sense of place and a good relationship with adjoining areas. In this context there is a strong case for framework master plans to cover the wider areas of New Lane/Brewery Site. (Dacre Son & Hartley 0480/1109)</p>
11	<p>This is an important manufacturing and employment site which creates few if any environmental problems for its neighbours. Its presence should be welcomed and supported and everything done to keep it in its current location.</p> <p>I am concerned at the negative tone of this policy. I find the Brewery a good neighbour and it provides employment (Mrs Margaret Bird 1428/1155, Mr John Bird 3044/1163)</p>
12	<p>If it were to be redeveloped, I don't feel that tall buildings are appropriate in view of the historic buildings along the waterfront and the general scale of development. Mrs Margaret Bird (1428/1155)</p>
13	<p>Sustainable transport accessibility & permeability need more detailed consideration (J Davis 1545/1147)</p>

PA-09: University of Leeds

Scale of support/objection: 28 responses, 26 support, 2 object

Issues raised

1	<p>No reference made to swimming pool and sports plan, (Leeds Civic Trust 62/1146).</p>
2	<p>Support for St. Georges Field and improved connectivity, (Mr Richard Tyler, 0026/1086), (Miss Rachel Swindells 0845/1096).</p>
3	<p>Site in the southern campus is the only development site left on the campus, would like the proposed use widened to include incubator/ enterprise and education use as would like to accommodate further University expansion on this site (University of Leeds 1029/1097).</p>
4	<p>Should include a clear statement that character and setting of the Listed Buildings in this proposal Area must be preserved and enhanced (English Heritage 99/1116).</p>
5	<p>Sustainable transport accessibility & permeability need more detailed consideration (J Davis 1545/1147)</p>
6	<p>Framework master plan should be provided to cover this site and wider area (Dacre, Son and Hartley, 0480/1109).</p>

RA-01 Holbeck Urban Village Regeneration Area

Scale of support/objection: 27 responses, 22 support, 4 object 1 unclear

Issues raised

1	<p>In particular, the RA supports proposals (vi)-Environmental improvements to the public realm and public space and (vii)- financial support for public realm and highway network improvements. (Ramblers' Association, Leeds Group 0038)</p>
2	<p>There is no evidence that a Sequential Test has been completed for this site. The site is in flood zone 3 as defined in PPS25 as having a high probability of flooding. As residential development is proposed a Sequential Test to determine if the site</p>

	<p>can be justified and the Exception Test will be necessary.</p> <p>We also consider that too much emphasis is being placed on mitigation rather than following guidance of PPS25. PPS25 aims to ensure that sites are suitable in the short and long term and that the type of development is suitable in the short and long term and that the type of development is suitable to the flood risk, and that areas of lowest flood risk are used where possible.</p> <p>If this site is to be redeveloped it should include a set back policy similar to policy (v) and (vi) for the Yorkshire post site, so that it is in compliance with the Biodiversity and Waterfront Development SPD. (Environment Agency 0046)</p>
3	<p>It is unfortunate that the design guidance established for the Canal Basin site was not adhered to when considering the approved ISIS scheme</p> <p>(ii): why are development briefs considered an appropriate route forward here but not for any other site in this section of the CCAAP - the value was demonstrated by the high quality and varied approach of the submissions made with regard to the Tower Works site. The market will live with strong briefs if they are soundly based and argued (Leeds Civic Trust 0062)</p>
4	<p>Refer to previous consultations and development guidance etc. ISIS</p> <p>How is this LDF AAP hoping to develop Granary Wharf and HBU as they are currently well progressed in terms of development and guidance? (British Waterways 0338)</p>
5	<p>Vibrancy would be paramount. (Leeds Initiative 0845)</p>
6	<p>This outstanding historic environment badly need mastering and clear high profile signposting for city visitors especially the Round Foundry site. (Transport 2000 3036)</p>
7	<p>Better links to Holbeck & Beeston are needed. Para 1.11.4 should be reworded: "The Framework reflects the policies operating in the "Riverside" and "Waterfront Strategy" areas and aims to improve both the physical and economic linkages with the adjoining Beeston/Holbeck Comprehensive Neighbourhood Renewal Area."</p>
<p>RA-02 Mabgate Renaissance Area Describes the area and statement to anchor the detailed guidance in the Mabgate Framework</p> <p>Scale of support/objection: 24 responses, 19 support, 5 object</p>	
1	<p>The proximity of the area to Richmond Hill and Lincoln Green means that new development needs to be extremely sensitive to community needs and opinion (R Swindells 845/1096)</p>
2	<p>This section seems like an afterthought with little consideration (Civic Trust 62/1146).</p>
3	<p>The site has an area of flood zone 3 and flood zone 2 in the middle, therefore applications will need to do a sequential test and possibly an exception test (Environment Agency 46/1104).</p>
4	<p>If the site is to be redeveloped it should include a set back policy similar to policy (v) and (vi) for the Yorkshire Post site so that it is in compliance with the Biodiversity and Waterfront Development SPD. The watercourses in this case are Meanwood Beck and Sheepscar Beck (Environment Agency 46/1104).</p>
<p>Miscellaneous</p>	
1	<p>I think it could work extending the city centre and I really think they should also be putting a fun pool with slides not just an International pool.</p> <p>Mr Marcus (2985/1066)</p>

2	The City Centre Public Space map should be amended to exclude the green hatched area to the east of entry 139 as it is not open space (Cobbetts 2998/1090).
Sustainability Appraisal	
1	Table 4.1 Relevant Plans and Programmes makes no reference to Sport England's Yorkshire Plan for Sport, which is relevant (Sport England 1982/1133).
2	Baseline indicators could reflect Sport England's key performance indicators (Sport England 1982/1133).
3	Some of the findings of the SA are not reflected in the Preferred Options eg recreation on the Aire has been abandoned even though it scored well on most SA objectives and PO do not state that elderly people should not be housed in high flood risk areas (Environment Agency 0046/1104).
4	Cumulative impacts of all AAPs together need to be considered (Environment Agency 0046/1104).
5	SA of PO-05 and PO- 08 is robust and recognises negative effects of locating housing in high flood risk areas however this is not followed through in the Preferred Options which support housing in flood risk areas (Environment Agency 0046/1104).
6	Scores against the SA economic objectives do not adequately reflect the negative impacts of flooding on the economy (Environment Agency 0046/1104).
7	Proposal areas in flood zone 1 should score more positively in the SA (Environment Agency 0046/1104).
8	Disagree with the SA score for New Lane /Asda site as neutral for the proposed use, as it is in zone 3 (Environment Agency 0046/1104).

Abbreviated names & representation notes:

Gordon Carey represents his architectural practice, himself as a city centre resident and the Leeds Chamber Property Forum

LCPF/WYG stands for consultancy White Young Green representing Leeds Chamber Property Forum

Unsworth/Morgan is a combined response by Rachel Unsworth and Jonathan Morgan