

# CCAAP Preferred Options

## Summary of Responses

### General

A number of house builders with site outlying greenfield development interests claim that the Core Strategy should come first with the AAPs to follow.

Some representations suggest that the CCAAP is “unsound” when judged against the **tests of soundness** set down by Government for all LDF plans. GOYH mentions each of the nine tests, but more as a warning for the final submission document than criticism that the POs are flawed.

In particular, objectors suggest that the flood risk aspect of the POs is unsound because it conflicts with national guidance in PPS25. It is also suggested that the plan should demonstrate its conformity with Vision for Leeds and the Regional Spatial Strategy better.

### Vision, Aim and Objectives

A number of representors criticise the POs for lacking “vision” but few suggest what that vision should be. GOYH expects the AAP to set out a vision of how the city centre will have changed in, say, 10 years in clear quantified terms, eg how many dwellings of different types, stock of office space, stock of retail, what leisure facilities will there be, what public transport etc. Yorkshire Forward values a compact city centre. English Heritage suggests the vision should be to create a distinctive heart for the city region utilising the rich historic character of the city centre. Dacre Son & Hartley suggest that the vision should be built around a series of sub-area masterplans.

In terms of individual objectives, some key comments are: that the retail function of the city centre should be included in Objective i) along with employment, residential & higher educational; that Objective iv) to promote a high quality environment should also seek to reinforce the distinctive character of the city centre; and that Objective vi should be clarified that it doesn't mean encouraging more car traffic between city centre and inner city.

### PO-01 Size of the city centre

A clear majority of respondents support the PO to make only minor adjustments to the boundary. Supportive comments claim that major expansion of the city centre will lead to stagnation of existing city centre areas & sites and that a compact city centre will be better for vibrancy, pedestrian movement & public transport accessibility.

However, landowners along Kirkstall Road suggest that extension is needed to promote renaissance & regeneration, that the area already accommodates city centre uses and that the area will soon benefit from the Quality Bus Initiative along Kirkstall Rd. Gordon Carey suggests major extensions to include Pottery Fields beyond Clarence Dock and parts of Little London.

### PO-02 Ensuring some office use in developments in core areas

A clear majority of support the intention of the PO to promote office floorspace in the core areas around Leeds city station. Concern is expressed that up-to-date monitoring and flexibility is required to avoid over-supplying office space.

**PO-03 Encourage office development in the city centre**

A clear majority of respondents support this PO.

**PO-05 Provision of Housing**

A clear majority of respondents support this PO. Serious objection is made that the promotion of housing in the city centre areas in high flood risk is contrary to national guidance because sequentially preferable land for housing development hasn't been identified. There is also objection that the expected scale of housing development overall and for Proposal Area sites is not quantified.

**PO-06 Mix of housing – 10% of major developments to be 3+ bedroomed**

Two thirds of respondents support this PO. Objections raised are that the city centre is not a suitable environment for families, it lacks school facilities and playspace, and in any case, 3 bedroom flats are likely to be occupied by adults sharing rather than families. There is also objection that the 10% requirement is arbitrary, lacks transparent evidence of quantification and is too prescriptive.

**PO-07 Housing to Lifetime Homes standard**

Two thirds of respondents support this PO. Several objectors claim that the requirement is too onerous & inflexible. In contrast, some claim that 10% of homes to be wheelchair accessible is insufficient & this requirement should be increased to 100%. There is also a suggestion that there ought to be specific planning for purpose built accommodation designed for older people with appropriate on-site facilities such as recreation & domiciliary health care. Also, a comment is made that specific flood risk planning will be needed for elderly residents of the city centre.

**PO-08 Encourage provision of student housing**

A clear majority of respondents support this PO. Some respondents think that too much student accommodation has already been provided. GOYH asks for clear targets for numbers of flats & bedspaces to be set. A number of concerns about location are expressed. Encouragement should not be given to student housing in office areas nor the Area of Housing Mix which overlaps part of the city centre. The AAP should avoid uncontrolled excesses of provision in locations such as between Kirkstall Road & Burley Road.

**PO-09 Maintain the compactness of the prime shopping quarter.**

A clear majority of respondents support this PO to maintain the compactness of the prime shopping quarter with extensions to the boundary to accommodate The Light & the Eastgate redevelopment. Some objectors claim that the Eastgate extension will be an extension too far which will spoil the compactness of the shopping quarter, or that its development needs to be co-ordinated to avoid harm to the rest of the shopping quarter. Gordon Carey & British Waterways want to see the compact nature of the shopping quarter relaxed to allow a wider spread of shopping facilities throughout the city centre.

**PO-10 Shopping frontages**

An overwhelming majority of respondents support the proposal to carry forward the shopping frontages Policy of the UDP and review this once the major development of Eastgate & Trinity have taken place. The owners of Trinity believe that the review should take place sooner when Trinity has been completed but not wait until Eastgate.

**PO-11 Retail warehousing – i) to extend the Regent Street area, ii) to identify Proposals Areas that could accommodate large format retailing and iii) to consolidate the Crown Point retail park.**

A clear majority of respondents support this PO. Concerns are expressed by the developer of the Trinity scheme that large format retail permissions need to be justified in terms of need and tightly controlled to avoid undermining the prime shopping quarter. Others also query the effectiveness of controlling only bulky goods retailing uses within the retail warehousing areas. The implications of flood risk on the Crown Point retail park need to be properly considered.

**PO-12 Promoting the entertainment & cultural offer**

A clear majority of respondents support this PO. There is strong support for the location of the arena in or on the fringes of the city centre. One suggestion is that the AAP should make more specific allocations for indoor sport & recreation facilities.

**PO-13 Protection of cinemas, theatres & traditional pubs**

A clear majority of respondents support this PO. Some objectors thought that such protection could be too restrictive, particularly if a use is not profitable.

**PO-14 Bars & nightclubs – preventing nuisance**

A clear majority of respondents support this PO. Good enforcement is needed to compliment the policy.

**PO-15 Encouragement of hotels & conference facilities**

A clear majority of respondents support this PO. Serious objection is made that the promotion of hotels in the city centre in areas of high flood risk is contrary to national guidance because sequentially preferable land for hotel development hasn't been identified.

**Para 3.2.14 Health related facilities**

Leeds PCT objects to the decision not to seek financial contributions from development to be used toward provision of primary health care facilities.

**PO-16 “Service Centres” & convenience stores**

A clear majority of respondents support this PO. Some objectors think that the size threshold of 80sqm for accepting stand-alone ancillary convenience stores is too small & should be raised to 280sqm. Additional “Service Centre” designations are needed, specifically around the bus station, Kidacre St and Leeds Metropolitan University civic campus. The size threshold of 280sqm for convenience goods stores within Service Centres should be lifted.

**PO-17 Control of design of new development**

A clear majority of respondents support this PO. Dacre Son & Hartley suggest a need for locally specific masterplans with design advice and for a more extensive suite of urban design policies.

**PO-18 Pre-application discussions**

A clear majority of respondents support this PO. GOYH questions whether this should become a plan policy. Some objectors suggest widening discussions beyond design matters and to include third parties as well as council officers. Others are concerned that LCC doesn't have sufficient staff to run enough pre-application discussions.

### **PO-19 Control of tall building**

A clear majority of respondents support this PO. The policy needs to be locally distinctive to Leeds city centre with clearly defined areas of control. Some objectors feel that tall buildings are inherently damaging to the appearance & skyline of Leeds. Clarification is needed as to whether the whole of the city centre is considered sufficiently accessible for tall buildings.

### **PO-20 – Expect new development to be accessible to disabled people**

An overwhelming majority of respondents support the PO. There are suggestions for more fully accessible public conveniences and more public seating in the city centre, which are of particular benefit to disabled people. Some objectors claim that the exceptions in the policy should be removed.

### **PO-21 Planning for waste**

Most respondents are supportive.

### **PO-22 Require 10% on-site renewable energy in new development**

There is a reasonable level of support for this Policy, however there are some objections, largely from developers. Objections are that the policy is too inflexible & should be able to deal with individual circumstances. For example, larger developments might better provide large scale renewable energy or CHP. The reasoning for setting the threshold at 3 dwellings or 500sqm needs to be transparent; one objector suggests application at 10+ dwellings.

### **PO-23 Sustainable materials & construction**

Objections are that the policy is inflexible and it is inappropriate for Leeds to set local requirements that duplicate or exceed the requirements of building regulations. Requirements add to the price of homes & delay completions. Strong support for the Policy comes from a number of respondents including statutory consultees.

### **PO-24 Flood risk mitigation**

Mitigation is immaterial if a sequential test of areas of the city centre for development has not taken place. Requirements for mitigation should not apply to all development, only that which would impact upon flooding. Sustainable urban drainage systems (SUDS) and landscaping around development should be provided. Developers object to the contributions requirement.

### **PO-25 Provision of Open Space by new development**

The PO lacks a transparent justification for requirements to provide open space. It lacks a PPG17 audit. Developments should only have to provide open space to cater for their own needs, not to meet general deficiencies. Requiring contributions to maintenance for 10 years is too onerous; maintenance should be met from Council tax. There is a particular need for new spaces along the waterfront. The requirement for contributions toward open space provision (PO-25) is confusing with the requirement for contributions toward public realm improvements (PO-27). Contributions should not be used toward improvements of spaces outside of the city centre.

### **PO-26 Preference for new spaces to be green**

The criteria to allow hard surfaced spaces should be widened to include topographical factors. "Barriered areas" should be created with seating. There should be a process to enable local people to be involved in decisions on how open space is to be used.

**PO-27 Contributions to public realm improvements**

A clear majority of respondents support this PO. Objections claim that the policy requirement is imprecise and that contributions must be well related to the source development. The requirement for contributions toward open space provision (PO-25) is confusing with the requirement for contributions toward public realm improvements (PO-27). Universities & other charitable bodies should be exempt. Maintenance of improvements must be a consideration.

**PO-28 Safety & security with preference for permeability & accessibility**

Some objectors suggest that better policing & innovative design is preferable to any restrictions over access.

**PO-29 Opening up culverted waterways where appropriate**

Maintenance of revealed waterways must be considered. In addition, waterways should be opened up to improve biodiversity.

**PO-30 Designation of routes for pedestrians & cyclists**

Four fifths of respondents support this PO. Some objectors suggest the network of routes ought to be amplified & extended. One suggestion is that the central pedestrianised area should be extended. Concern about safety is expressed, that cycle & pedestrian realms need to be separated (for safety of the pedestrian, particularly blind, elderly) & that cycle lanes are safer forming part of the pavement than part of the road (for safety of cyclists).

**PO-31 Proposal for bus interchanges**

A clear majority of respondents support this PO. Objectors express concerns that the proposal will be confusing, place stress on the orbital bus service, be inconvenient, particularly for those with impaired mobility & would add to cross city journey times.

**PO-32 Proposals for public transport – safeguarding the BRT route and tram-train alignment options**

Four fifths of respondents support this PO. Most objections concern the totality of these schemes rather than their impact in the city centre. Objections are made that improved bus services will have a wider benefit and that the tram-train could hinder services from Harrogate to York. City centre specific objections are that safeguarding a route through Crown Point retail park for the tram train is premature & could blight new development. Also objection is made that the disused railway viaduct running through Holbeck Urban Village should be safeguarded for future transport use.

**PO-33 Suggested locations for new rail stations**

An overwhelming majority of respondents support this PO. Objections are that new stations would slow down trains into Leeds and that the capacity of the rail line to the east of City Station is limited, which would make the proposal for a new Marsh Lane station expensive and inappropriate.

**PO-34 Extension of the “loop road” south of the river**

A clear majority of respondents support this P.O. Objections raised suggest that public transport needs to be improved rather than creating new road routes. An larger one-way loop would inhibit access, increase travel distances & encourage greater speeds & could discourage investment. If constructed, the extended loop road must give priority to pedestrians and public transport needing to cross it for access into and out of the city centre.

### **PO-35 Control over long stay commuter car parking in new development**

A small majority of respondents support this PO. Objections were raised. Park and ride should be in-place before applying further restriction to commuter car parking provision. Demand management would be better than parking control. Parking control could deter investment. The cost of parking is disputed with some objectors saying it is too expensive and Metro suggesting it should be made more expensive.

### **PO-36 Cycle & motor cycle parking guidelines to be reviewed**

Most respondents support this PO. Objections suggest that more cycle parking, particularly secure cycle parking, is required. It should be located where it will not cause hazard to pedestrians.

### **PO-37 Extending the success of the city centre with training & employment agreements**

An overwhelming majority of respondents support this PO. One key objection is that such policy needs to be properly policed & enforced.

### **Proposal Area Statements – General Comments**

A difference of view is expressed whether the statements ought to quantify the scale of development envisaged of different uses. GOYH says quantification is necessary, albeit with flexibility to modify. Others suggest quantification is too onerous & prescriptive.

It is suggested that the Proposal Area Statements should offer design advice concerning building layout, scale & form. It is also suggested that wider masterplans or linkages around the Proposal Areas should be developed. Commitment should be given to prepare development briefs for key sites, as is the case for Holbeck Urban Village.

Some representors suggest additional areas including sites that already have planning permission. An additional Proposal Area is suggested to the south of Holbeck Urban Village. Also, the area beyond Clarence Dock ought to be considered.

The Highway Agency objects to office development on several of the Proposal Area Sites because they are likely to generate more traffic on the M621 unless sustainable transport alternatives can be provided.

### **PA-01 City Gate**

Over 2/3 of respondents support the PA statement. The landowner objects to the 30,000sqm of office space expected saying it is too prescriptive and onerous and the site is beyond the 10min walking isochrone from City Station. The site is in flood zone 3, so the Environment Agency objects to vulnerable uses - housing and hotels – being developed on this site without a sequential test. It is suggested that the area could be extended to include Wellington Plaza and that the traffic island part of the site ought to be safeguarded for a 7 layer multi-storey car park to replace Woodhouse La MSCP.

### **PA-02 Elmwood Rd & Brunswick Terrace**

An overwhelming majority of respondents support the PA statement. The landowner objects to the scale of office development expected, to the requirement for 20% open public space and to the requirement for underground car-parking.

### **PA-03 Kidacre St**

With support for this site as a possible location for the arena, and promotion of public open space, concern is expressed that good pedestrian connections are needed toward the train station.

### **PA-04 Leeds General Infirmary**

A clear majority of respondents support the PA statement. The landowner objects to the 70,000sqm of office space expected saying it is unjustified & too prescriptive. It is suggested that the part of the site that abuts the University of Leeds' Worsely Building would be suitable to provide a centre for medical science, innovation, research & development or business incubator units. This should make up some of the 70,000sqm of office space.

### **PA-05 Marsh Lane Goods Yard**

A clear majority of respondents support the PA statement. A number of objections have been raised. Links to Quarry Hill and to EASEL need further development. Large format retailing should not undermine regeneration efforts in EASEL. The rail station may not be achievable because of cost and limited capacity on the east Leeds line. A difference of views was expressed on whether Marsh La would be a good location for the Arena. Some thought it was too far from the core of the city centre.

### **PA-06 Leeds Metropolitan University Civic Campus**

A clear majority of respondents support the PA statement. The landowner – Leeds Metropolitan University – believes public space provision needs to be considered flexibly, with the open space designations deleted. It also suggests that the campus would be a good location for a convenience service centre (see PO-16 above) and for conference facilities and a science park. The proposed covering over the Inner Ring Road should not be a requirement as it depends upon feasibility.

### **PA-07 New Lane & ASDA HQ**

A clear majority of respondents support the PA statement. ASDA are not committed to moving, but would contemplate redevelopment in the right circumstances. Others suggest that the HQ ought to be retained in any redevelopment either on site or elsewhere in the city centre. The site is in flood zone 3, so the Environment Agency objects to vulnerable uses - housing and hotels – being developed on this site without a sequential test. It is suggested that this site would be another suitable site for the Arena. More could be made of the riverside location with uses that attract activity – a service centre (see PO-16 above). Consideration should be given to the closure of Great Wilson St & to sustainable transport accessibility.

### **PA-08 The Brewery**

A clear majority of respondents support the PA statement. The site is in flood zone 3, so the Environment Agency objects to vulnerable uses - housing and hotels – being developed on this site without a sequential test. It is suggested that this site would be another suitable site for the Arena, depending on timing of the site becoming available for re-development. There is some objection that the site should be retained as a brewery. The site owner – Carlsberg - is not currently committed to vacating the site at any particular time. The historic buildings on the site should be retained. Consideration should be given to improved sustainable transport accessibility.

### **PA-09 University of Leeds Campus**

The University would like the potential use for the redevelopment area at the south eastern end of the campus to be widened to include education use, not just science

park with incubator technology/business uses. The historic buildings on site need better recognition for protection. Consideration should be given to improved sustainable transport accessibility.

**RA-01 Holbeck Urban Village**

The site is in flood zone 3, so the Environment Agency objects to vulnerable uses - housing and hotels – being developed on this site without a sequential test. The historic environment needs safeguarding with high quality signposting for visitors. Vitality should be paramount. Better links with Holbeck & Beeston are needed.

**RA-02 Mabgate**

The proximity to inner city areas means development should be sensitive to local community needs & opinion.