



The Planning Inspectorate

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# Report to Leeds City Council

by Mr A Thickett BA(HONS) BTP MRTPI Dip RSA

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 5 September 2014

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO LEEDS CITY COUNCIL CORE STRATEGY**

Document submitted for examination on 25 April 2013

Examination hearings held between 8 July 2013 and 14 May 2014

File Ref: PINS/N4720/429/10

## **Non-Technical Summary**

This report concludes that Leeds City Council Core Strategy is sound and provides an appropriate basis for the planning of the City and district up to 2028 providing a number of modifications are made to the Core Strategy. The Council has specifically requested that I recommend any modifications necessary to enable the Core Strategy to be adopted.

All the modifications necessary to make the Plan sound arose from the discussions at the Hearings and most were suggested by the Council. I have recommended their inclusion after considering the representations from all parties on these issues.

The most significant modifications can be summarised as follows:

- The introduction of targets and thresholds into Policy H5 (Affordable Housing)
- Setting pitch targets for gypsies, travellers and travelling show people
- The target rate of 3,660 dwellings per year up to 2016/7 does not preclude delivering more if possible
- The Council acknowledge that the growth planned in the Core Strategy cannot be accommodated without a review of Green Belt boundaries. In order to ensure that any review is fair, comprehensive and consistent with the Core Strategy's aim of directing development to the most sustainable locations, all references to a selective review are deleted.
- Changes to Policy H1 to ensure that sites are brought forward as necessary to maintain a continuous supply of housing land
- The introduction of a monitoring schedule

## **Abbreviations Used in this Report**

AA	Appropriate Assessment
CIL	Community Infrastructure Levy
EVS	Economic Viability Study
HMCA	Housing Market Characteristic Area
HMO	Houses in Multiple Occupation
MM	Main Modification
NPPF	National Planning Policy Framework
PPG	National Planning Practice Guidance
SA	Sustainability Appraisal
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment

Reference to documents in footnotes and elsewhere such as CD1/1 or ID/1 relate to the document number in the examination library. References beginning S relate to participants' submissions to the hearings; for example S2/1 is the statement submitted by the Council to session 2.

## Introduction

1. This report contains my assessment of Leeds City Council's Core Strategy in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Core Strategy's preparation has complied with the duty to co-operate and then considers whether the Core Strategy is sound and whether it is compliant with the legal requirements. To be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy<sup>1</sup>.
2. The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. The basis for my examination is the Publication Draft Core Strategy February 2012 as amended by the Pre Submission Changes December 2012, hereafter referred to as the Core Strategy or Plan.
3. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council requested that I make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in Appendix 2.
4. Having considered them further, the changes proposed by MM9, MM10, MM20 and MM21 are not considered to constitute main modifications and are not, therefore, referred to in this report. Nor do I refer to the list of minor changes the Council proposes to make to the Core Strategy.
5. The main modifications that are necessary to make the plan sound have been subject to public consultation<sup>2</sup> and, where necessary, Sustainability Appraisal (SA) and I have taken the consultation responses into account in writing this report.
6. The National Policy Practice Guidance (PPG) was introduced on 6 March 2014. The PPG consolidates previous guidance and the 'beta' mode of the PPG (which is largely the same as the adopted guidance) was referred to during the hearings in October 2013. In light of advice contained in the PPG, the Council proposed main modifications and suggested a change to a proposed main modification<sup>3</sup>. These matters were discussed at a hearing in May 2014 and the subsequent main modifications subject to consultation. Neither I nor the Council considered it necessary to seek views on the implications of other parts of the PPG on the soundness of the Core Strategy as it was considered that not doing so would not prejudice any interested party.

## Assessment of Duty to Co-operate

7. A hearing was convened on 8 July 2013 specifically to explore whether the Council had complied with the duty in the preparation of the Core Strategy. I wrote to the Council on 10 July 2013 setting out the reasons why I consider

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<sup>1</sup> National Planning Policy Framework (NPPF) Paragraph 182

<sup>2</sup> Two separate consultations were held in March and June 2014

<sup>3</sup> MM6 of the March 2014 consultation relating to the 'step up' in Spatial Policy 6

that the duty has been met. I have neither seen nor heard anything since to change that view. The letter is attached as Appendix 1 to this report.

## Assessment of Soundness

### Main Issues

8. I have considered all the representations, written evidence and the discussions that took place at the hearings and identified five main issues.

#### **Issue 1 – Whether the Core Strategy makes adequate provision to meet the full, objectively assessed needs for market and affordable housing in the city and district.**

The overall need for new housing

9. The Core Strategy states that the Council will identify sites for 66,000 dwellings between 2012 and 2028 which, together with an estimate of 8,000 units to be provided through windfalls, gives a gross target of 74,000. Assuming that 250 dwellings will be demolished per year, Spatial Policy 6 sets a target of 70,000 (net) new dwellings to be delivered between 2012 and 2028.
10. I have listened to the concerns of residents' groups and their representatives but assessing the need for additional dwellings is not as simple as calculating the percentage increase in the population of Leeds between the censuses of 2001 and 2011 and using that to predict future requirements. Further, given Leeds' position in the region, geography, history, specific needs and the ambitions of the City Council, comparisons with other major cities is of little relevance. Nor should an assessment of need be influenced by things such as past build rates, infrastructure or environmental constraints<sup>4</sup>. An objective assessment of need should be based on facts and unbiased evidence.
11. On 29 May 2014 the Office for National Statistics published its 2012-based Subnational Population Projections for England and I have been urged to revisit the issue of housing numbers. According to national guidance, the starting point for assessing housing need should be the household projections published by the Department for Communities and Local Government<sup>5</sup> and account may also be taken of, amongst other things, local demographic evidence and the Strategic Housing Market Assessment (SHMA). The population projections are, therefore, only part of the picture and I do not consider that reopening the debate to discuss the population projections would lead to any clear and reliable conclusions regarding objectively assessed need. However, the Council is aware of the importance of keeping matters under review and **MM6a** commits it to monitor evidence regarding need and delivery.
12. The Council produced a SHMA in 2007<sup>6</sup> which was updated in 2011<sup>7</sup>. The 2011 SHMA assessed the existing market and housing stock, affordability and modelled different scenarios for growth. It concluded an employment led

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<sup>4</sup> National Planning Policy Guidance (PPG) ID 2a-004-20140306

<sup>5</sup> PPG ID 2a-015-20140306

<sup>6</sup> CD6/17

<sup>7</sup> CD6/14

scenario to be the most appropriate and which projected a need to accommodate 72,600 new households between 2010 and 2026. The employment led approach is generally supported by representatives of the house building industry in Leeds although there are differences of opinion regarding certain assumptions which I will come to later.

13. The SHMA update recalibrated the Office for National Statistics (ONS) 2008 based forecasts using locally sourced data and predicted a population in Leeds in 2010 of 755,136 which was much closer to the 2011 census figure of 751,136 than the ONS 2008 prediction of 791,105. The Council argue and I agree, that the close alignment of the 2011 SHMA figure and the 2011 census supports its approach to basing its housing need figure on an independent assessment and not forecasts released before 2011.
14. In September 2013 the Council produced 'Demographic Evidence – an update'<sup>8</sup>. That study incorporates the latest evidence from the 2011 census, revised mid year population estimates for 2002 – 2010 and the 2011 based household projections and concludes that the Core Strategy's target of 70,000 (net) new dwellings is at the upper end of the likely growth scenarios for Leeds.
15. The robustness and reliability of the Council's approach and evidence is challenged by those who consider the Core Strategy's target to be either too high or too low. The 2011 based household projections show lower rates of household formation than in previous projections. That, in part, is due to the recession and, given the recent encouraging signs, I agree that it would be unwise not to anticipate a rise in household formation rates as the economy and confidence improves<sup>9</sup>. However, the Council has not sought to reduce the target in the Core Strategy in light of the 2011 household projections.
16. Between 2008/9 and 2011/12 housing delivery in Leeds fell below the rates set in the Regional Strategy<sup>10</sup>. The Regional Strategy has been revoked and its housing targets were underpinned by assumptions which the 2011 census and later projections have shown to be inaccurate. This significantly reduces the weight to be attributed to under delivery against the Regional Strategy target and the need to address any shortfall against the Regional Strategy through the Core Strategy. The principal reason for the difference is attributed to the over estimation of levels of international in migration. There is some merit, in my view, to the argument that in migration will be affected by the supply of housing but the difference in population estimates and the 2011 census are such that it is unlikely to be all as a result of housing delivery being lower than prescribed by the Regional Strategy.
17. That is not to say that all past housing need has been met. The SHMA identifies a significant need for affordable housing. The 2011 SHMA indicates that approximately 1,150 affordable dwellings per year would have to be built over the next 5 years in part to clear the existing waiting list backlog. However, increasing the requirement over the first few years of the Plan to take account of the affordable targets set out in Policy H5 (as modified below) is likely to lead to a level of development which cannot be supported by

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<sup>8</sup> CD6/48

<sup>9</sup> new estimates of housing demand and need in England, 2011 to 2031, Alan Holmans CD6/59

<sup>10</sup> Requirement 2007-2012, 19,460 – Supply, 13, 259 = -7,517; Table 3.8 S4/8c

necessary infrastructure (see paragraphs 20 to 25 below).

18. The Council produced a summary of the demographic evidence just before the hearings<sup>11</sup>. The employment led scenario uses the migration based scenario in the 2011 SHMA as its base and, in the circumstances of Leeds, I have neither seen nor heard anything to suggest that it is not a reasonable approach.
19. On this basis, I am satisfied that other migration led scenarios which predict significantly higher or lower levels of growth can be discounted. The latest employment forecasts<sup>12</sup> paint a brighter picture than those used in the Council's estimates. Most of the employment led scenarios contained in the Council's summary lead to figures in the region of 70,000<sup>13</sup>. Assessing housing need is not an exact science and small changes in headship rates<sup>14</sup> and other assumptions can have a significant impact on the calculations. However, on the basis of the evidence before me I am satisfied that the Core Strategy figure of 70,000 (net) is based on a reasonable objective analysis of the need for new housing in Leeds up to 2028.

#### Phasing

20. Spatial Policy 6 splits the delivery of the 70,000 into two phases; 3,660 dpa 2012 to 2016/7 (18,300) and 4,700 thereafter (51,700). In October 2013 the Council's case for a lower build rate up to 2017 was based, amongst other things, on depressed build rates during the recession, difficulties in securing mortgages and uncertainty regarding the economic recovery. Based on the evidence submitted at that time, I was not persuaded that a lower build rate in the early years of the Plan was justified. Consequently, I proposed a main modification removing the 'step up' in Spatial Policy 6 which was subject to consultation in March 2014.
21. The Council wrote to me on 31 March 2014 and again on the 8<sup>th</sup> of April seeking to submit further evidence to support the phased approach in Spatial Policy 6<sup>15</sup>. That evidence was submitted and discussed at a hearing on 14 May 2014.
22. As indicated above and acknowledged by the Council<sup>16</sup>, the calculation of need should not be influenced by matters such as past build rates and infrastructure (and reference to such in the Plan is removed by **MM5**). However, as recognised by the PPG<sup>17</sup>, considerations such as environmental constraints and infrastructure will need to be addressed to inform specific policies in development plans. Spatial Policy 1 seeks to achieve sustainable growth by, amongst other things, matching the provision of new homes and jobs with the infrastructure necessary to support them.
23. The evidence submitted by the Council to the May hearing<sup>18</sup>, together with the

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<sup>11</sup> CD6/48a

<sup>12</sup> REM September 2013 NLP doc

<sup>13</sup> Between 62, 573 and 76,304. NLP discounts its own employment led scenario leading to 53, 392 on the grounds that it would lead to a misalignment with the Council's vision for job growth.

<sup>14</sup> Headship rate; the propensity of a particular group (usually by age group or gender) to form their own households

<sup>15</sup> LCC/11 & 12

<sup>16</sup> Paragraph 3.2.2, Housing Background Paper CD1/25

<sup>17</sup> PPG ID 2a-004-20140306

<sup>18</sup> S18/1

Infrastructure Delivery Plan<sup>19</sup> illustrate the challenges faced by the Council in providing the infrastructure necessary to support the growth planned in the Core Strategy. I have some sympathy with those that argue that the Council should have planned better for the provision of infrastructure. However, the phased approach will help the Council manage growth and allow for the Council and its partners to gear up for the higher build rate post 2017.

24. **MM6b** as proposed by the Council states that the 3,660 relates to delivery and does not alter the need to maintain a 5 year supply of housing against the requirement set out in the Plan (based on a rate of 4,375 per year over the Plan period). However, for the reasons given above, the housing requirement, until 2016/7 is 3,660. That rate is set to enable the Council to match housing growth with, as far as is possible, the provision of the infrastructure necessary to support it. The NPPF at paragraph 14 requires local planning authorities to meet objectively assessed needs unless any adverse effects of doing so would outweigh the benefits. To base the requirement on a figure higher than 3,660 per year before 2017 would, given the provisions of paragraph 49 of the NPPF, severely undermine the Council's ability to plan for sustainable growth with potentially serious consequences for the people of the city and district.
25. Consequently, I have amended **MM6b** and its associated target in the monitoring schedule to state that the housing requirement to 2016/7 is 3,660 per year. Notwithstanding this, there is a need for housing and affordable housing in Leeds now and the 3,660 dpa build rate should not be used to prevent the delivery of a higher figure provided it can be satisfactorily accommodated. **MM6c** allows for a higher rate to be achieved.
26. I heard that the build rate since 2012 is below 3,660 dpa. The Council will have to monitor the situation carefully and take positive steps to address shortfalls by bringing sites forward and, if necessary, considering alternative strategies and reviewing policies and strategies which are constraining development<sup>20</sup>.

#### Distribution

27. As amended by **MM1**<sup>21</sup>, Spatial Policy 1 includes, amongst other things, a sequential approach giving priority first to the development of brownfield land in settlements, then to other sites within settlements before sustainable extensions. Policy H1 sets targets for the development of previously developed land and includes criteria to guide the release of sites which, read together with Spatial Policy 1, first directs new housing to the main urban area. This is the most sustainable location and should assist much needed regeneration in the inner urban area in particular. The release of sites will be phased through Site Allocation Plans.
28. Evidence submitted to the hearing in October 2103 indicated that *'development within the city centre and inner areas is unviable in the current market'*<sup>22</sup>. Later evidence supporting the Council's proposed affordable housing targets and draft CIL charging schedule point to an improvement in

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<sup>19</sup> CD1/19a

<sup>20</sup> PPG ID 12-018-20140306 & ID 3-022-20140306

<sup>21</sup> The modification is necessary to address poor drafting and to ensure that the policy is effective

<sup>22</sup> Paragraph 7.13, CD6/42

viability<sup>23</sup>. Nevertheless, Policy H1 as submitted placed unduly onerous restrictions on the release of sequentially less preferable sites. This is rectified by **MM16** which is necessary to ensure that accommodating the city's housing needs can be met and a continuous supply maintained. Some will argue that relaxing Policy H1 will allow developers to develop greenfield sites ahead of brownfield. I cannot say that this would not happen but, as modified, Policy H1 should enable the Council to ensure that land in less sequentially preferable locations is only released when necessary to maintain a supply of housing land.

29. The Council acknowledge that the growth planned in the Core Strategy cannot be accommodated without a review of Green Belt boundaries but, as submitted, the Core Strategy only commits the Council to a selective review. This may lead to pressure to release land in the review area when, having regard to the advice in paragraph 85 of the NPPF, there is more suitable land elsewhere. A comprehensive review is also more likely to ensure consistency with the spatial strategy and increase the likelihood that boundaries will not need to be reviewed again at the end of the plan period. Consequently, **MM1**, **MM13** and **MM14** remove references to a selective review. The Council intend that Green Belt boundaries will be reviewed through the Site Allocations Plan which is due to be submitted for examination in 2015.
30. Spatial Policy 7 sets out how housing is to be distributed by settlement level and across 11 Housing Market Characteristic Areas (HMCA). It is argued that the city centre and inner area should take more and some outlying areas less but 20,200 dwellings are allocated to the city centre and inner area. This figure rises to 31,600 if one includes East Leeds HMCA, part of which is close to the city centre. Together this equates to about 48% of the total housing requirement.
31. The Council acknowledge that the proposed distribution is based on a supply side approach, relying heavily on the 2011 Strategic Housing Land Availability Assessment (SHLAA)<sup>24</sup>. That feeds into the Site Allocations Plan which is yet to be tested. However, the Council is confident that there is sufficient capacity to achieve the figures for each HMCA. It could be argued that this puts the cart before the horse but to be effective the Plan must be able to deliver. Provided it can do so in a way that accords with the overall strategy, the principles of sustainable development and can be satisfactorily accommodated, I see no reason to find the approach unsound.
32. I have considered the concerns of residents including those in Aireborough, Morley and Scholes. Morley is a small town with its own town centre, a railway station, easy access to the motorway network and is rightly defined as a major settlement. I agree with the Council that as such it should play its part in meeting the identified need and that its contribution should be proportionate to its place in the settlement hierarchy. I understand residents' concerns but Leeds cannot meet its objectively assessed need without developing greenfield land and it is inevitable that some land which communities' value will be lost to development.
33. Subject to planned improvements to the motorway network, including works

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<sup>23</sup> S16/1a

<sup>24</sup> CD



to junctions, the Highways Agency has no objection to the Core Strategy. The Council's Infrastructure Schedule includes a list of highway and public transport improvements (including rail, bus and the proposed Leeds NGT trolleybus network). The Council has taken a holistic view, combining measures to make public transport more attractive with physical improvements to manage the growth planned in the Core Strategy. It is argued that certain routes cannot accommodate more traffic and the efficacy of the projects and proposals is questioned. However, a representative for Aireborough accepted at the Hearings that claims that the A65 is gridlocked at peak times and weekends are exaggerated. I have neither seen nor heard anything to persuade me that the HMCAs would not be able to accommodate the levels of development envisaged in the Core Strategy. Site specific matters will be addressed at the Site Allocations Plan stage.

34. Retaining a gap between Scholes and Swarcliffe is essential if Scholes is to retain its separate identity. The North Leeds HMCA includes a large part of the urban area and I have seen nothing to indicate delivering the 6,000 new dwellings proposed for the HMCA would inevitably result in Scholes being subsumed.
35. Wetherby lies within the Outer North East HMCA wherein 5,000 new dwellings are proposed. Wetherby is by far the largest settlement in the Outer North East HMCA which is mainly rural with small villages. It is for the Site Allocations Plan to make allocations but by directing 5,000 new homes to Outer Leeds the Core Strategy clearly allows for development to meet the needs of the town.

#### Affordable Housing

36. Paragraph 174 of the NPPF states that; '*Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing*'. With regard to affordable housing, these standards include the thresholds which trigger the requirement for affordable housing and the percentage target that will be sought. As submitted Policy H5 did not include thresholds or targets to guide the provision of affordable housing. Consequently, it did not accord with national guidance and was unsound<sup>25</sup>.
37. Policy H5 and its reasoned justification were subsequently revised setting different thresholds and targets for 4 separate zones across the city. The Council's has operated differential affordable housing requirements for some time based on work which identified market housing areas across the administrative area of the city. The scale of the plans showing the 4 zones to be included in the Plan is such that, where a site is close to a boundary between zones, it may be difficult to ascertain which target/threshold applies. To overcome this and to ensure that the policy is applied effectively, **MM62** directs users the Council's web site where more detailed maps can be viewed.
38. The thresholds and targets are supported by an economic viability study<sup>26</sup> (EVS) produced to inform the Council's draft Community Infrastructure Levy Charging Schedule (CIL). Table 15 (Market Value Benchmarks) of the EVS was updated in May 2014 to inform the thresholds and targets to be included

<sup>25</sup> The Council was informed of my conclusions regarding Policy H5 in my letter of 8/11/13; Exam Ref: ID/13

<sup>26</sup> CD6/42

in the revised policy. The EVS uses a residual valuation approach and, combined with the May 2014 updates, tests the ability of a range of developments throughout the city and its environs to contribute to affordable housing and the provision of infrastructure through CIL.

39. The EVS takes into account other policy requirements and, as I say in the accompanying CIL report, I am satisfied that the findings in the EVS are based on reasonable standard assumptions for factors such as building costs, profit levels, fees. The EVS acknowledges that development in the city centre and in inner areas is challenging. However, the evidence submitted by the Council indicates that, due to an improving market, the 5% target in the city centre (zone 4) is viable.
40. The EVS is a high level viability study and the Council acknowledge<sup>27</sup> that it is likely that some sites in the same affordable housing zone may be more viable than others. Further, the viability of some brownfield sites and large sites is questionable. However, I am satisfied that the evidence supports the thresholds and targets and the policy allows for flexibility should it be demonstrated that the targets cannot be met.
41. As revised Policy H5 requires an off site contribution to affordable housing from schemes below the thresholds set in zones 1 and 2 (10 and 15). In the DCLG consultation paper, 'Planning performance and planning contributions', the government proposed a 10 unit threshold for affordable housing contributions. At the time of writing the government had not issued its response to the consultation. The Council will need to review this requirement if the 10 dwelling threshold becomes a national standard. However, the EVS concludes that small sites in these outer zones are able to support a contribution and there is no bar, at this time, to the application of this requirement.
42. I conclude that the Council has produced evidence to justify the revised targets and thresholds and, subject to the following modifications, I consider Policy H5 to be sound; **MM57, MM58, MM59, MM60 and MM61**.

#### Gypsies, Travellers and Travelling Showpeople

43. Planning Policy for Traveller Sites (PPTS) requires local planning authorities to set pitch targets for gypsies and travellers and plot targets for travelling showpeople based on a robust assessment of need. Following concerns I expressed with regard to Policy H7, the Council worked with Leeds Gypsy and Traveller Exchange (GATE) and carried out site surveys to assess the needs of the travelling community in Leeds. Policy H7 and its reasoned justification were subsequently revised setting targets for gypsies and travellers and travelling showpeople. GATE was critical of Policy H7 as submitted but, at the hearing in May 2014, praised the Council's officers and the collaborative approach taken in compiling the survey. This is to be commended and I have no reason to consider that the new evidence which supports the modified targets is not robust.
44. Having set the targets in Policy H7 it will be for the Site Allocations plan to identify sites sufficient to provide 5 years worth of supply. Sites identified

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<sup>27</sup> S16/1

through the Site Allocations Plan process will be subject to consultation. PPTS requires local planning authorities to ensure that their policies promote peaceful and integrated co-existence. This will doubtless be a factor in choosing sites through the site allocations process and I see no need to repeat that requirement in the Core Strategy. **MM63, MM64, MM65, MM66, MM67, MM68** and **MM69** bring all the proposed changes together and are necessary to ensure that the Core Strategy meets the identified needs of gypsies and travellers and complies with national guidance.

#### Houses in multiple occupation (Policy H6A)

45. In 2012 the Council introduced an Article 4 Direction across a large part of the city which removes permitted development rights with regard to changing from Class C3 (dwelling house) to Class C4 (HMOs)<sup>28</sup>.
46. Houses in multiple occupation (HMO) make an important contribution to meeting the housing needs of Leeds, particularly students and other young people. Some landlords' representatives argue that there is no evidence of high concentrations of HMOs causing harm but statements made and evidence submitted by residents at the examination indicate otherwise. There is a high concentration of HMOs, flats and bedsits around Hyde Park and I saw the impact of the conversion of a large number of properties on a no doubt once attractive and desirable area of Victorian/Edwardian houses. I share representors scepticism regarding turning back the clock in areas like Hyde Park but the maintenance of mixed and diverse communities is a legitimate policy objective and accords with national guidance<sup>29</sup>.
47. It is reasonable, therefore, that Policy H6A seeks, amongst other things, to avoid the loss of housing suitable for families in areas with high concentrations of HMOs. However, the Council conceded at the examination that this could penalise owners of houses in streets where the battle has already been lost and where there is little point in blocking the conversion of the last 'family' house in a street. **MM18** introduces flexibility and indicates that the conversion to a HMO will not be resisted where the concentration of such uses means that it is not likely to be attractive as a family home.
48. I heard that landlords are unwilling to let empty HMOs to families for fear that they would be prevented from using them again for that purpose. The Council accept that it makes no sense for accommodation that could meet the needs of a family to stand empty. **MM19** commits the Council to consider granting planning permissions which would enable 'flipping' from C4 to C3 and back again and is necessary to ensure flexibility. In my view, subject to the modifications referred to above, Policy H6A strikes the right balance between maintaining a sufficient supply of HMOs whilst ensuring they do not have a detrimental impact.

#### Student accommodation (Policy H6B)

49. Student accommodation includes purpose built halls, flats and HMOs. Policy H6B is aimed at purpose built student accommodation and, as submitted,

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<sup>28</sup> Town and Country Planning (Use Classes) order 1987: Class C4, Use of a dwellinghouse by not more than six residents as a HMO

<sup>29</sup> NPPF; paragraph 50

seeks to; extend the supply of purpose built student accommodation to avoid the loss of family housing, to avoid excessive concentrations of student accommodation and to avoid locations not easily accessible to the city's universities. Following the submission of the Plan for examination the Council requested that I consider modifications to Policy H6B. The revisions would; require developers to demonstrate a need for student accommodation or be in receipt of a formal agreement with a university to supply accommodation, provide accommodation to environmental health standards and to ensure that it can be adapted to allow 'occupation by average sized households'.

50. The proposed test of need is based on the findings of a study completed in August 2013 which assesses the demand for and supply of student accommodation<sup>30</sup>. However, that study is rightly criticised. On one hand the study states that demand for bed spaces will reduce by 1,200 in 2013/14 but on the other says that it is likely that there will be 1,200 more students in 2013/14 compared with the previous year. The consultant's predictions of falling student numbers conflicts with their own assessment made only a few months earlier and are not supported by evidence from UCAS<sup>31</sup> (quoted in the August report) of an increase in student applications. The study also records that the 2011 census data points to a gradual increase in people seeking university places.
51. Evidence provided by the consultants that shows that a number of permitted schemes for purpose built student accommodation are not proceeding undermines the Council's argument that the market will not control the provision of such accommodation. I find it difficult to believe that a commercial developer whether from Leeds or elsewhere would invest in a scheme for which there is no demand. Landlords with older and poorer quality accommodation may find students going elsewhere but it is not the place of planning to interfere with the market in favour of certain providers (including universities). I am not persuaded, therefore, that the evidence supports requiring developers to demonstrate need.
52. According to the August 2013 report, 45% of all students live in purpose built accommodation which includes returning students as well as first years. Many factors will influence a student's choice of accommodation but the provision of purpose built accommodation inevitably places less pressure on traditional housing. Housing which could be used by others in need of HMOs or used again by families, contributing to the Council's aim of maintaining mixed and diverse communities.
53. What is meant by 'average sized household' is not defined nor has the Council produced any evidence to indicate the impact of requiring schemes to be capable of adaptation for occupation for the 'average sized household' on viability (and hence delivery). Student accommodation is not likely to need the same amount of outdoor amenity space or parking as that designed for families and so although a building may be capable of adaptation, it still may not be suitable or attractive to the 'average sized household'. The Council's suggested modification is not justified and is not necessary to make the Plan sound.

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<sup>30</sup> CD6/38; Student Housing Demand and Supply: A Review of Evidence

<sup>31</sup> Universities and Colleges Admissions Service

54. As submitted Policy H6B does not require the provision of satisfactory living conditions for the occupiers of student accommodation. Consequently, I agree that such a requirement be introduced (**MM22**) but see no need to duplicate environmental health standards.

#### Housing for independent living

55. Policy H8 requires developments of over 50 dwellings to include measures to enable the elderly and disabled to live independently. This could be no more than planning a development so that housing aimed at such groups is located within easy walking distance to shops etc and I have seen nothing to suggest that the requirement would be unduly onerous. **MM23** deletes a table which included access standards which are out of date.

### **Issue 2 – Whether the Core Strategy makes adequate provision to meet the full, objectively assessed needs for employment in the city and district.**

#### The overall need for employment land

56. The Leeds Employment Land Review 2010 Update (ELR)<sup>32</sup> identifies a need for 490,000m<sup>2</sup> of new office floorspace and between 320 and 367 ha of industrial land (depending on plot density) between 2010 and 2026. The ELR goes on to recommend higher targets to provide a contingency and a 'margin of choice'. The figures recommended by the ELR are set as targets in Spatial Policy 9 and are 706,250m<sup>2</sup> of office floorspace and 493 ha of industrial land.
57. In 2010, Leeds had a pool of unimplemented planning permissions for office floorspace totalling 840,000 m<sup>2</sup>, significantly exceeding the recommended requirement for the whole plan period. However, because a significant proportion of the permitted floorspace is in an out of town location (and therefore out of step with the Core Strategy) an additional 160,000m<sup>2</sup> is to be identified in or on the edge of the city and town centres. Adding the existing permissions and land to be identified together (840,000 + 160,000) effectively means that the Core Strategy makes provision for 1,000,000 m<sup>2</sup> of office floorspace up to 2028. This is not clearly expressed in the Plan and **MM12**, **MM26** and **MM27** are necessary in the interests of clarity and effectiveness.
58. The permitted 840,000 m<sup>2</sup> floorspace significantly exceeds the target set in Spatial Policy 9 which itself includes a healthy contingency. However, the additional floorspace proposed guards against the likely possibility that not all the 840,000 m<sup>2</sup> will be built. Further, given the current state of the economy and the need to stimulate growth, I see no harm in an ambitious target particularly given that Leeds city centre (where most floorspace will be directed) is a highly sustainable location and sequentially the preferred location for major office uses.
59. The ELR identified an existing supply of 350 ha of general employment land with planning permission in 2010, leaving 143 ha to be identified. The Council has assessed the UDP allocations that have yet to be developed and are not carrying forward a number which it considers are unfit or not likely to be delivered<sup>33</sup>. Even discounting these sites, I have neither heard nor seen

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<sup>32</sup> CD8/5

<sup>33</sup> CD8/5

anything to indicate that 143 ha of general employment land could not be identified and delivered. The ELR is based on a thorough understanding of the existing market and its predictions based on sound methodology. Its findings in this regard are not challenged and I have no reason to question its conclusions.

#### Distribution of employment land

60. Other than directing office development to city and town centres, the Plan does not distribute employment land across the city and district. Some argue that it should, balancing new housing and employment in the Housing Market Characteristic Areas to reduce travel or to make up for buildings and land lost to other uses; principally housing. However, the regeneration areas in East and South Leeds and Aire Valley are in great need of economic development. Further, benefitting as they do from being close to the motorways and the city centre with its excellent public transport links, these areas are the most sustainable locations for growth given Leeds' regional role in providing employment.
61. Policy EC1 sets out the principles for allocating general employment land. It will be for the Site Allocations Plan to identify sites but I have seen nothing that would rule out the provision of employment land in other suitable places. Policy EC2 directs new office development first to town centres. **MM31** sets out the circumstances in which out of centre office development may be acceptable and is necessary to provide clarity and ensure the policy is effective. The threshold used to determine whether small scale office development should be subject to a sequential test is also changed by **MM28**, **MM29**, **MM31** and **MM39** to reflect amendments to the Town and Country Planning (General Permitted Development) Order 1995. In the absence of any evidence to support a locally determined figure, **MM30** makes clear that the NPPF's default threshold of 2,500m<sup>2</sup> will be used to determine whether proposals for office development outside town centres will be required to be supported by impact assessments.
62. **MM24** deletes confusing guidance regarding how an oversupply of employment land would be determined and the implications for the application of Policy EC1 should there be an over supply.

#### Protection of employment land and premises

63. The existing stock of employment land and premises makes an important contribution to the Leeds economy. Policy EC3 seeks to ensure that suitable sites (existing and allocated) are not lost to non employment uses without good reason. The policy sets out a series of tests (more stringent in areas with a shortfall of employment land) but as submitted the policy and its reasoned justification lack clarity. **MM32**, **MM33**, **MM34**, **MM35**, **MM36**, **MM37**, **MM38** and **MM40** tighten the policy and the reasoned justification and are necessary to ensure that the policy is effective. **MM25** deletes Policy EC1(C) which unnecessarily duplicates part of Policy EC3. I am satisfied that, subject to the proposed modifications, Policy EC3 is justified and accords with national guidance<sup>34</sup>.

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<sup>34</sup> NPPF; paragraph 22

## Rural economy

64. Leeds has a sizable rural hinterland. Policy SP8 supports the development of the rural economy provided, amongst other things, it is consistent with the settlement hierarchy. Given the proximity of the conurbation and in order to ensure that the size of a new employment use is appropriate to its location, it is right, in my view, to require consistency with the settlement hierarchy. As submitted the Plan includes reasoned justification relating to the rural economy which is really a statement of policy. This is rectified by **MM8** and **MM11** which are necessary to ensure that the Plan is effective. **MM7** makes a subtle but nevertheless important change to ensure that the purposes of including land in the Green Belt are taken into account when considering the provision of new employment land.
65. Policy EC2 would require offices in villages not listed in the settlement hierarchy and in the rural area to be within a 5 minute walk of a bus stop/10 minutes from a railway station with services timed to coincide with the beginning and end of the working day. This is unrealistic and unduly onerous and conflicts with the aims of encouraging a prosperous rural economy as set out in the NPPF. Consequently, this requirement is deleted by **MM31**.

## Regeneration Priority Areas

66. The Council is working with its partners to improve 4 key priority regeneration areas at East Leeds, Aire Valley, Leeds Bradford corridor and South Leeds. The boundary of the Aire Valley Area Action Plan (AAP) is shown on Map 6 at a scale which enables its boundaries to be clearly discerned. The other areas are shown together on a map of the city and district and at a much smaller scale and their boundaries cannot be clearly discerned. Spatial Policy 4 targets these areas to be given priority for regeneration and funding and the Plan encourages development that will, amongst other things, improve employment prospects. It is important therefore, in my view, that these areas are clearly defined for the benefit of existing residents, businesses and potential developers. **MM2** introduces maps at an appropriate scale.
67. A strategic allocation of between 6,500 to 9,000 dwellings, 250 ha of employment land and supporting infrastructure and services at Aire Valley is set out under Spatial Policy. The latest SHLAA indicates that it may not be possible to deliver 9,000 dwellings and **MM4** amends Spatial Policy 5 accordingly.
68. The promoters of Aire Valley point to a study which recommends the creation of a new town centre in the area<sup>35</sup>. However, that was predicated on a level of housing development which the Council argues the latest SHLAA shows is no longer deliverable. There is also an existing centre in the area at Hunslet. I do not consider there to be sufficient evidence before me to justify the provision of a new town centre at Aire Valley, whether it be at Richmond Hill (Policy P5) or at Skelton Gate. However, nor does the evidence rule it out. Retail development will be required to support the regeneration of the area. **MM3** and **MM4** amend the Plan to that effect and are necessary to guide the emerging AAP.

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<sup>35</sup> CD7/10

**Issue 3 – Whether the Core Strategy makes adequate provision to meet the full, objectively assessed needs for retail in the city and district.**

69. Leeds city centre is a regional destination for shoppers and the Core Strategy rightly directs the majority of additional floorspace to the city centre. Outside the city centre Policy P1 ranks other centres in 3 categories; town centres and Higher Order and Lower Order Local Centres. The study identifies quantitative and qualitative deficiencies in convenience floorspace in parts of the city. No targets are set but provision is made for additional development in accordance with a sequential approach (Policy P5).
70. Policy CC1 deals specifically with the city centre and makes provision for 31,000m<sup>2</sup> of new comparison goods floorspace. It is argued that the city centre has a greater capacity for comparison goods floorspace but 31,000m<sup>2</sup> is based on the findings of the Leeds City Centre, Town and Local Centres Study<sup>36</sup>. The study also warns that significant increases in the city centre offer could have a detrimental impact on lower tier centres in Leeds and elsewhere.
71. The new floorspace will only be released once the impact of the two recent schemes at Victoria Gate and Trinity has been assessed. This too is criticised but the Council's consultants foresee that the new developments will lead to some re modelling of the city centre retail offer and advise re assessing the situation when things settle down. I acknowledge that the Core Strategy should make provision for the whole plan period and be flexible but given the significant size of the Trinity and Victoria Gate schemes, I consider this to be a sensible approach.
72. Policy CC1 also sets out a sequential approach to comparison goods retailing in the city centre, directing development first to the Primary Shopping Quarter. **MM15** will ensure that the policy sets out the requirements clearly and is necessary to make the policy effective. It also introduces a recognition that the Primary Shopping Quarter may not be the best place for bulky goods and sets out a separate sequential approach for such development. Certain department stores display and sell furniture and electrical goods in store. However, the characteristics of retailers which predominantly only sell bulky goods is different and a tailor made approach is justified and necessary to make the policy effective. Finally, **MM15** includes a provision requiring the amenity of neighbouring residents to be taken into account when considering proposals in the city centre.
73. The White Rose Centre offers a range of goods and services akin to those found in a town centre. However, it is a stand alone out of town retail park and other than a range of shops it shares no other characteristics with a traditional town centre (sense of place, heart) and is rightly not listed as a town centre in Policy P1.
74. The NPPF allows local planning authorities to set local thresholds to indicate when a proposed retail, leisure or office development should be subject to an impact assessment. Policy P8 sets out thresholds and indicates when a sequential test and/or impact assessment will be required. This approach complies with national and local policy which aims to protect and nurture town centres. It is supported by the Council's consultants and would provide

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<sup>36</sup> CD5/2 Colliers 2011



certainty for developers. However, other than retail it does not define what is meant by 'main town centre uses' and the policy does not allow for impact studies to be proportionate to the size and type of development proposed.

**MM41** embeds this into Policy P8 and, in accordance with the NPPF<sup>37</sup>, applies the policy to retail, leisure and office uses. It also amends some thresholds to bring the policy into line with changes to permitted development rights.

#### **Issue 4 - Whether the Core Strategy's policies relating to energy, natural resources and sustainable construction comply with national policy, are effective and justified.**

75. Policies EN1 and EN2 set out the Council's targets for carbon dioxide reduction and sustainable construction. Policy EN4 requires developers to connect to district heating schemes. Although laudable aims, the Council's own viability study<sup>38</sup> indicates that the requirement for housing schemes to achieve Code for Sustainable Homes Level 4 is challenging. **MM70** introduces necessary flexibility by allowing technical and financial feasibility to be taken into account. The Council is keen to promote district heating and **MM74** expands on the assistance that the Council will provide and what is expected from developers. **MM75** deletes the unduly onerous requirement that all major schemes contribute whether feasible or otherwise. There have been a number of developments in this field since the Plan was submitted for examination. **MM71**, **MM72**, **MM73** and **MM76** bring the Plan up to date and are necessary to make it effective.

#### **Issue 5 - Whether the Plan's approach to design, conservation, transport, open space and monitoring and implementation is justified and complies with national policy**

##### Design and conservation

76. Policy P10 encourages good design but poor drafting could undermine the Plan's effectiveness. This is rectified by **MM42**, **MM43** and **MM44**. Leeds is blessed with a fine range of historic buildings and spaces and Policy P11 and its reasoned justification attract complaints from those who feel that the plan fails to recognise its full range of historic assets. In my view, were it to do so, Policy P11 would become unwieldy and less effective. The general description is acceptable and will not lessen the protection due to any historic asset. However, **MM45**, **MM46**, **MM47** and **MM48** are necessary to ensure that the historic environment is properly conserved and enhanced.

##### Open space

77. The standards for the provision of open space in Policy G3 are based on the Council's 2011 Open Space, Sport and Recreation Assessment<sup>39</sup>. The study included an audit and survey work and although some at the examination claimed to have been unaware of the on street, postal and other surveys, I see no reason to doubt that they took place. The study was undertaken in accordance with the Companion Guide to Planning Policy Guidance Note 17. That guidance has been cancelled but it was based on sound principles and I

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<sup>37</sup> Paragraph 26

<sup>38</sup> CD6/42

<sup>39</sup> CD11/12

am satisfied that the survey is robust. The requirements in Policy G4 may prove challenging but they are justified by evidence. **MM53** provides necessary clarification with regard to the possible need for qualitative improvements when existing space is already under pressure.

## Transport

78. The Highways Agency and the Council are working together to manage the impact of growth on the strategic road network. A number of major, medium and small scale interventions have been identified, including measures to tackle congestion on the M621 and major works required to junction 43 on the M1 and junctions 27 to 28 on the M62. The Highways Agency produced the Leeds Infrastructure Study in 2013 which it considers marks the start of a process that should lead to an agreed strategy for the management and operation of the strategic road network. The Council and Highways Agency acknowledge that existing problems will be exacerbated by the growth planned in Leeds and that solutions may require major investment. However, the Highways Agency consider that this can be managed and I have neither seen nor read anything to suggest otherwise.
79. Combined with any road improvements the Council, including through the Core Strategy, is taking measures to reduce car use, improvements in rail (including new stations), to facilitate the NGT (trolley bus) and managing parking. I heard that temporary planning permission for 3,500 parking spaces will not be renewed once the NGT and other improvements are in place. In addition, Council commuter parking (long stay) will be made more expensive, encouraging use of public transport/park & ride.
80. The approach attracts criticism but largely on matters of detail. New railway stations may have localised impacts but these are most appropriately addressed through the planning application process. The principle and route of the NGT has been determined and is not a matter for this examination. I conclude that the transport strategy and policies in the Plan are sound subject to **MM49**, **MM50**, **MM51** and **MM52** which are necessary to make the policies effective and flexible (mainly by removing reference to a specific Local Transport Plan).

## Flood risk

81. Policy EN5 directs development away from areas at risk of flooding and includes measures for managing and mitigating flood risk. **MM54** makes a minor but necessary change to recognise that it is not always possible to avoid developing in flood risk areas but does not weaken the thrust of the policy which complies with national guidance.

## Monitoring and Implementation

82. Monitoring is important to ensure that policies and proposals in the Plan deliver the proposed housing etc and to indicate when intervention may be necessary. **MM55** and **MM56** introduce a monitoring framework which should provide an effective basis for this by providing specific and measurable targets by which the success of the Core Strategy can be gauged and enabling informed decisions to be made to address any failings. **MM17** clarifies how the Council will calculate housing density and is necessary to aid effective

monitoring of Policy H3 (Density of Residential Development).

## Assessment of Legal Compliance

83. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Core Strategy is identified within the approved LDS of April 2013, which sets out an expected adoption in 2014. The Core Strategy's content and timing are compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in February 2007 and consultation has been compliant with the requirements therein.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report (December 2012) sets out why AA is not necessary.
National Policy	The Core Strategy complies with national policy except where indicated and modifications are recommended.
2004 Act (as amended) and 2012 Regulations.	The Core Strategy complies with the Act and the Regulations.
Public Sector Equality Duty	The Core Strategy complies with the Duty.

## Overall Conclusion and Recommendation

84. The Plan has a number of deficiencies in relation to soundness and/or legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.
85. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in Appendix 2, the Leeds City Council Core Strategy satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the NPPF.

*A Thickett*

Inspector

Appendix 1: Letter to the Council regarding the Duty to Co-operate

Appendix 2: Main Modifications

Appendix 3: Main Modifications, Maps

## Appendix 1

### Examination of Leeds City Council Core Strategy

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Mr D Feeney  
Head of Forward Planning &  
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By email only

**Inspector: Anthony Thickett BA(Hons)**  
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Date 10 July 2013

Dear Mr Feeney,

Further to Hearing held on 8 July, I set out below my reasons for concluding that the Council has satisfied the duty to co-operate.

The Council's Duty to Co-operate Background Paper<sup>40</sup> and the supplementary submission<sup>41</sup> set out how the City Council engaged with its neighbours and other bodies in the preparation of the Core Strategy. A number of representors point to alleged shortcomings in the Core Strategy and strategic planning in the Leeds City Region generally and argue that this demonstrates a failure to engage constructively with neighbouring authorities. To my mind, most of these representations relate to the merits of the Core Strategy and raise issues of soundness or go beyond the role of the Core Strategy. As I indicated at the Hearing, at this stage I am limiting my considerations to whether the City Council has satisfied the legal duty to co-operate as set out in Section 33A of the Localism Act 2011.

A number of representors accept that the City Council has met the duty but argue that the Core Strategy should include a detailed explanation of the collaboration between neighbouring local planning authorities. Whilst this may have avoided representations on this issue and so may have been helpful in that regard, I see no need for the Core Strategy to detail the various meetings, consultations and other correspondence which informed its production.

One of those representors was Wakefield Metropolitan Borough Council and, as you know from my letter of 16 May, I was concerned with the comments attributed to that Authority in the 'Duty to Co-operate' Background Paper. However, having considered the supplementary statement and the statement made by Wakefield at the hearing, I am satisfied that the City Council did engage constructively with that Authority.

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<sup>40</sup> Core Document CD23

<sup>41</sup> Core Document LCC/4

I am still not persuaded of the merits of the 'beyond the plan area' approach advocated set out in the methodology agreed by you and others. However, having considered the information set out in the supplementary statement and the submissions at the Hearing (including those made by Wakefield, Bradford and the Highways Agency) I am satisfied that constructive engagement has taken place. I note that some differences remain but the duty does not require everyone to agree and any outstanding areas of dispute will be addressed during the examination.

I remain concerned with the apparent lack of engagement with the Environment Agency (EA) between the Core Strategy Preferred Approach Options stage in 2009 and the Publication Draft consultation. However, the supplementary statement catalogues meetings at which the EA were present and although most were not directly focussed on the Core Strategy, they appear to have covered strategic issues<sup>42</sup>. Also it is clear that the City Council and the EA have been in discussion since the publication stage and the inception of the duty. Consequently, I am satisfied that the City Council has done more than consult the EA at the formal stages of plan preparation.

Having considered the evidence base and the representations, I consider that the City Council has satisfied the legal duty to co-operate as set out in Section 33A of the Localism Act 2011 with regard to the production of the Core Strategy.

Turning to procedural matters, I indicated at the hearing that it is critical that I know the Council's position with regard to representations made to the Core Strategy. It is of equal importance that everyone who is entitled to be heard and has expressed a wish to do so is identified. In light of the problems already experienced with the representor data base, I require an assurance that it is accurate.

It is also necessary to ascertain which representors who are entitled to appear but did not express a preference, wish to be heard. This information will have a direct bearing on the number and structure of the hearings and is required as a matter of urgency. It will be necessary to contact all those who would be entitled to be heard but have not indicated whether they wish to do so. It should be made clear that representations carry the same weight whether made orally or in writing. I suggest you liaise with Mrs Wilson with regard to the wording of the letter.

I am concerned with the seeming inability to secure appropriate accommodation for the hearings. One cannot predict with any accuracy how many people will wish to observe proceedings but given the number of representations relating to, for example, housing numbers and distribution, it would be prudent to secure accommodation large enough to accommodate a significant number of people. It is better to have surplus space rather than not be able to accommodate all those who wish to attend (which could disrupt the programme).

To that end, I am pleased that you have secured Leeds Museum for 7 to 10 October but I understand that there is no accommodation in the museum for the Programme Officer's office or a retiring room. Although not ideal, given that they are closeby, the Town Hall, Civic Hall or Carriageworks would be suitable. However, it would now appear that there are problems with the Sullivan Room in the Town Hall for the dates discussed.

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<sup>42</sup> Annex 2, Core Document LCC/4

It is important that the examination proceeds as expeditiously as possible and that a programme is set soon so that all parties can plan and prepare. Hearings will commence in the week of 7 October 2013 and I envisage will run over a period of two possibly 3 weeks<sup>43</sup>. Advice regarding accommodation can be found under Programme Officer Guidance on the Planning Portal. I look forward to confirmation that suitable accommodation has been secured by 19 July 2013.

Yours faithfully

*A Thickett*

Inspector

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<sup>43</sup> Depending on finalising the data base and on the number of representors to be heard.

**Appendix 2**  
**Leeds City Council Core Strategy Main Modifications**

Modification No.	Page No.	Policy /Paragraph	PROPOSED MODIFICATIONS New text: <u>underlined</u> Deleted text <del>Struckthrough</del>
MM1	23	Spatial Policy 1	<p>Amend Policy text and points (i), (ii) and (viii) as follows:</p> <p>To deliver the spatial development strategy based on the Leeds settlement hierarchy <u>and to concentrate the majority of new development within and adjacent to urban areas, taking advantage of existing services, high levels of accessibility, priorities for urban regeneration and an appropriate balance of brownfield and greenfield land, the distribution and scale of development will be in accordance with the following principles:-</u> <del>the broad spatial framework for the location and scale of development is:</del></p> <p>(i) <del>To concentrate the majority of new development within urban areas taking advantage of existing services, high levels of accessibility and priorities for urban regeneration and an appropriate balance of brownfield and greenfield land.</del> The largest amount of development will be located in the Main Urban Area <u>with and</u> Major Settlements. <del>delivering significant amounts of development.</del> Smaller Settlements will contribute to development needs, with the scale of growth having regard to the settlement's size, function and sustainability.</p> <p>(ii) <u>In applying policy (i) above, the priority for identifying land for development will be as follows: That settlements within the hierarchy will guide the identification of land for development, with priority given in the following order:</u></p> <ol style="list-style-type: none"> <li>a. Previously developed land and buildings within the <u>Main Urban Area / relevant settlement,</u></li> <li>b. Other suitable infill sites within the <u>Main Urban Area / relevant settlement,</u></li> <li>c. Key locations identified as sustainable extensions to the <u>Main Urban Area / relevant settlement.</u></li> </ol> <p>(viii) To undertake a <del>selective</del> review of the Green belt (asset out in Spatial Policy 10) to direct development consistent with the overall strategy.</p> <p>Remainder unchanged</p>
MM2	29		<p>Maps showing boundaries of Regeneration Priority Areas to be inserted after Map 5 as follows:</p> <ol style="list-style-type: none"> <li>5a. West Leeds Gateway</li> <li>5b. East Leeds</li> <li>5c. Inner South</li> <li>5d. South Leeds</li> <li>5e. Leeds Bradford Corridor</li> <li>5f. Aire Valley AAP</li> </ol>

**Appendix 2**  
**Leeds City Council Core Strategy Main Modifications**

Modification No.	Page No.	Policy /Paragraph	PROPOSED MODIFICATIONS
			<b>New text: <u>underlined</u> Deleted text <del>Struckthrough</del></b>
MM3	31	Para. 4.5.2	<p>Amend text as follows:</p> <p>The unique selling point for AVL remains the delivery of a sustainable new district for the city and its region, delivering new jobs and homes. AVL, which has been identified as one of Leeds City Region’s Urban–Eco Settlements, will promote sustainable development by seeking the delivery of commercial and residential areas which have high quality environment, energy efficient buildings and operations, low carbon and green business, sustainable transport, <u>retail and</u> community facilities and linked areas of green infrastructure including a new city park in the South Bank area of the City Centre.</p> <p>Remainder unchanged</p>
MM4	32	Spatial Policy 5	<p>Amend first paragraph of Policy text as follows:</p> <p>Aire Valley Leeds (Urban Eco–Settlement) is identified (see Key Diagram) as a strategic location, providing <del>between a minimum of 6,500 and 9,000</del> <u>a minimum of 6,500 and 9,000</u> new homes, and at least 250 hectares of land for employment uses (including research and development, industrial, and warehouse development) <u>and new retail services of an appropriate scale (in accordance with the approach set out in Policies P5 and P7).</u></p> <p>Remainder unchanged</p>
MM5	33	Para 4.6.7	<p>Delete paragraph 4.6.7 and renumber subsequent paragraphs:</p> <p><del>The housing figure is to be provided in stages, as part of a phased approach, increasing over the life time of the Plan. The Council has taken this course of action because the current economic climate has impacted on a range of factors, which have in turn frustrated recent housing delivery. These factors include:</del></p> <ul style="list-style-type: none"> <li><del>• The current fragility of the housing market and the dramatic reduction in completion rates when compared to the 10 year average of 3,000 dwellings per year from 2000 – 2010 (and 2,000 from 2009 – 2011),</del></li> <li><del>• The availability and affordability of mortgage finance,</del></li> <li><del>• The affordability of new housing stock in meeting local needs,</del></li> <li><del>• Rates of household formation,</del></li> <li><del>• Uncertainties regarding the rate of economic recovery and growth and the impact of this upon, job retention and creation,</del></li> <li><del>• The availability of funding to deliver infrastructure requirements associated with new development.</del></li> </ul>



**Appendix 2**  
**Leeds City Council Core Strategy Main Modifications**

Modification No.	Page No.	Policy /Paragraph	PROPOSED MODIFICATIONS
			<b>New text: <u>underlined</u> Deleted text <del>Struckthrough</del></b>
MM6a	32	4.6.3	<p>Insert the following text into Para 4.6.3:</p> <p>Within the context of evidence derived from the Strategic Housing Market Assessment (2011) and informed by the above considerations, a housing requirement of 70,000 <u>(net) new homes</u> <del>net</del> has been set, as a basis to meet the housing demands and job growth aspirations of the City. This figure is broadly consistent with the <u>former Regional Spatial Strategy. It is based primarily on the 2008-based population projections and has not reflected the 2012-based population projections which were published at a very late stage of the Core Strategy Examination process. As part of the implementation of the Core Strategy, the City Council will continue to monitor the evidence base and delivery and through allocations plans, manage the release of sites through phasing.</u></p> <p>Remainder unchanged</p>
MM6b	34	4.6.12	<p>Replace Para 4.6.12 with the following</p> <p><u>It is recognised that in planning to accommodate 70,000 (net) new homes it will be necessary to ensure that a supply of deliverable sites is available to meet this need throughout the plan period. Nevertheless, given market conditions moving out of recession, the need to plan for infrastructure and demographic evidence it is considered that it is unrealistic to expect that completion rates reflecting the annual average of 4,375 per annum can be achieved in the early years of the Plan. A lower, but nevertheless challenging, rate of delivery of at least 3,660 per annum is set for the period 2012/13-2016/17. This lower figure relates specifically to delivery and does not alter the assessment made in relation to the overall level of need over the plan period. Taking into account levels of provision, demolitions and the role of windfall, Leeds will seek to identify 66,000 units for housing delivery over the lifetime of the Core Strategy.</u></p>
MM6c	35	Spatial Policy 6	<p><u>The provision of 70,000 (net) new dwellings will be accommodated</u> <del>net</del> <u>between 2012 and 2028 with a target that at least 3,660 per year should be delivered from 2012/13 to the end of 2016/17 will be accommodated at a rate of:</u>  <del>3,660 per annum from 2012/13 to the end of 2016/17 (18,300)</del>  <del>4,700 per annum from 2017/18 (51,700)</del></p> <p>Remainder unchanged</p>

**Appendix 2**  
**Leeds City Council Core Strategy Main Modifications**

Modification No.	Page No.	Policy /Paragraph	PROPOSED MODIFICATIONS New text: <u>underlined</u> Deleted text <del>Struckthrough</del>
MM7	40	Para 4.7.12	<p>Amend text as follows:</p> <p>Overall a balance needs to be struck between providing local employment opportunities, promoting sustainable patterns of development and protecting the character of the countryside and <u>reflecting Green Belt purposes</u> <del>designations</del>. The District's Major Settlements have a vital role in serving surrounding rural areas and in providing local job opportunities. In preparing the LDF Allocations documents, sufficient land needs to be made available for economic development purposes (for example rural social enterprises) in these locations taking into account the needs of the wider rural catchment area.</p>
MM8	40	Para 4.7.13	<p>Delete paragraph 4.7.13:</p> <p><del>4.7.13 Outside the major settlements, small businesses and local services are a vital part of the economy and the life of the community. In order to grow and diversify the rural economy the following proposals should be supported, where appropriate;</del></p> <ul style="list-style-type: none"> <li><del>• conversion of existing buildings promote the development and diversification of agricultural and other land-base rural businesses</del></li> <li><del>• support provision &amp; expansion of tourist and cultural facilities in appropriate locations</del></li> <li><del>• retention and development of local services and community facilities.</del></li> </ul>
MM9	40	Para's 4.7.14 to 4.4.17	<p>Amend paragraph numbers and text as follows:</p> <p>4.7.14<del>3</del> In order to ensure residents are able to access local job opportunities, employers and developers will be required through planning obligations to enter into local labour and training agreements <u>and apprenticeships</u>, appropriate to the individual development.</p> <p><b>Supporting most new employment development within urban and rural areas</b></p> <p>4.7.15; unchanged and becomes 4.7.14 4.7.16; unchanged and becomes 4.7.15 4.7.17; unchanged and becomes 4.7.16</p>
MM10	40	Para 4.7.18	<p>Amend paragraph number and text as follows:</p> <p>4.7.18 <del>7</del> Leeds and the region <u>have an important play an integral</u> role in assisting emerging new businesses <u>links</u> (business start-up, investment in new projects) and encourage young entrepreneurship. These will be supported by the retention and provision of new small start up units including workshops in appropriate locations.</p>

**Appendix 2**  
**Leeds City Council Core Strategy Main Modifications**

Modification No.	Page No.	Policy /Paragraph	PROPOSED MODIFICATIONS
			<b>New text: <u>underlined</u> Deleted text <del>Struckthrough</del></b>
MM11	41	Spatial Policy 8 (v) & (ix)	<p>Amend points (v) and (ix) of Policy as follows:</p> <p>(v) Supporting <u>the growth and diversification of the rural economy, consistent with the Settlement Hierarchy and the protection and enhancement of a high quality rural environment. <del>Outside the Main Urban Area, Major Settlements and Small Settlements, small businesses and local services are a vital part of the economy and the life of the community. In order to grow and diversify the rural economy</del></u> the following proposals should be supported, where appropriate;</p> <ul style="list-style-type: none"> <li>• <u>conversion of existing buildings</u></li> <li>• <u>promote the development and diversification of agricultural and other land-based rural businesses</u></li> <li>• <u>support provision &amp; expansion of tourist and cultural facilities in appropriate locations</u></li> <li>• <u>retention and development of local services and community facilities.</u></li> </ul> <p>(ix) Support the advancement of high quality communications infrastructure to foster sustainable economic growth and to enhance business links <u>subject to landscape, townscape and amenity considerations.</u></p> <p>Remainder unchanged</p>
MM12	42	Para 4.7.22	<p>Amend text as follows:</p> <p>The methods for forecasting demand used in the Leeds ELR (2010 Update) concluded 706,250 square metres of office floorspace would be required over the period 2010-28 as a minimum (this includes the margin of choice discussed above). Currently 840,000 square metres already exists in planning permissions. However the City Centre and Town Centres are identified as being priority locations for office development, and a large proportion of the existing supply is in an out of centre location. Therefore additional land in the City and Town Centres should be identified for office use. Therefore a minimum of 1,000,000 square metres of <u>land floorspace</u> will be identified <del>for office use, through LDF allocations documents</del> of which 840,000 square metres is <u>already identified in planning permissions</u>. The additional floorspace will be identified in or on the edge of the City and town centres. By identifying floorspace in excess of need, the Council will be in a position to re-examine any renewals for out of centre office locations and direct them to more central locations as appropriate. No new out of centre office locations will be allocated.</p>

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			<b>New text: <u>underlined</u> Deleted text <del>Struckthrough</del></b>
MM13	44	Para 4.8.5	<p>Amend text as follows:</p> <p>To meet Leeds' housing and employment requirements, it is anticipated that some land will need to be taken out of the Green Belt to provide for these allocations. As emphasised throughout the Core Strategy, a key priority for Leeds is to respond to the consequences of population growth and demographic change and the development needs associated with this. Within the Core Strategy, focus is therefore placed upon opportunities for growth within Regeneration Priority Programme Areas (Spatial Policy 4) and within the Main Urban Area and settlements identified as part of the Settlement Hierarchy. This framework (and as directed by Spatial Policy 1) will be used to direct growth to the most appropriate and sustainable locations, to meet housing need and other growth requirements. The Core Strategy provides the overall basis for a <u>selective</u> Green Belt review (as set out in Spatial Policy 10 below). The detailed mechanism for the review will be through the Site Allocations DPD, informed by the above approach and through consultation with stakeholders including local communities, developers and infrastructure providers, to determine the precise extent and location of boundary changes.</p>
MM14	45	Spatial Policy 10	<p>Amend Policy text as follows:</p> <p>A <del>selective</del> review of the Green Belt will need to be carried out to accommodate the scale of housing and employment growth identified in Spatial Policy 6 and Spatial Policy 9, as well as an additional contingency to create new Protected Areas of Search (to replace those in the UDP which will be allocated for future development). The <del>selective</del> review will generally consider Green Belt release around:</p> <p>(i) the Main Urban Area (Leeds City Centre and surrounding areas forming the main urban and suburban areas of the city);</p> <p>(ii) Major Settlements of Garforth, Guiseley/Yeadon/Rawdon, Morley, Otley, Rothwell and Wetherby;</p> <p>(iii) Smaller Settlements (listed in Table 1 : Settlement Hierarchy);</p> <p>Exceptionally, sites <del>outside</del> <u>unrelated to the Main Urban Area, Major Settlements and Smaller Settlements, Settlement Hierarchy</u> could be considered, where they will be in sustainable locations and are able to provide a full range of local facilities and services and within the context of their Housing Market Characteristic Area, are more appropriate in meeting the spatial objectives of the plan than the alternatives within the Settlement Hierarchy. Otherwise review of the Green Belt will not be considered to ensure that its general extent is maintained.</p> <p>In assessing whether sites in the <del>selective</del> Green Belt review should be allocated for development, the following criteria will be applied:</p> <p>(iv) Sites will be assessed against the purposes of including land in Green Belts identified in national guidance (National Planning Policy Framework). These purposes are:</p> <ul style="list-style-type: none"> <li>o to check the unrestricted sprawl of large built up areas,</li> <li>o to prevent neighbouring towns from merging,</li> <li>o to assist in safeguarding the countryside from encroachment,</li> </ul>

**Appendix 2**  
**Leeds City Council Core Strategy Main Modifications**

Modification No.	Page No.	Policy /Paragraph	PROPOSED MODIFICATIONS
			<p><b>New text: <u>underlined</u> Deleted text <del>Struckthrough</del></b></p> <p>o to preserve the setting and special character of historic towns; and o to assist in urban regeneration.</p> <p><del>(v) Development proposals not part of the selective Green Belt review will be considered against the suite of Green Belt policies saved from the UDP and through the emerging guidance and legislation of the Localism Act.</del></p>
MM15	57	Policy CC1	<p>Insert criterion d), amend points e), and g) of Policy text as follows:</p> <p>d) <u>Comparison retail proposals will be subject to a sequential order of preference of Primary Shopping Quarter, then edge of the Primary Shopping Quarter, then the rest of the City Centre. Proposals for comparison retail space located outside of the Primary Shopping Quarter will undergo a sequential assessment to demonstrate that there are not site opportunities within other sequentially preferable locations. Impact Assessments will be in line with the requirements of Policy P8. Comparison retail space will only be permitted outside of the Prime Shopping Quarter when it cannot be accommodated within the Prime Shopping Quarter, or in the case of bulky goods retailing space cannot be accommodated also in areas designated for bulky goods retailing. This will be according to NPPF sequential testing, and, in the case of proposals of 2,500sqm or more according to NPPF impact testing.</u></p> <p>e) <u>It is recognised that in many cases the Primary Shopping Quarter will not be an appropriate location to direct Bulky Goods. Therefore, where this is demonstrated through a Sequential Test, Bulky Goods proposals will be directed to within the City Centre boundary, and then on to fringe areas beyond the City Centre boundary that are well connected by Public Transport corridors and that are not more than 300m from the City Centre boundary. Impact Assessment will be in line with the requirements of Policy P8.</u></p> <p>e) <del>f) Considering proposals for convenience retailing and convenience facilities (such as dry cleaners, off licences, small branch banks, cafes and pubs) as follows:</del></p> <p><u>g) All other Town Centre uses will be supported within the City Centre boundary provided the use does not negatively impact on the amenity of neighbouring uses and that the proposal is in accordance with all other Core Strategy policies.</u></p> <p><u>Existing criteria (f) becomes (h)</u></p> <p>Remainder unchanged</p>

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			<b>New text: <u>underlined</u> Deleted text <del>Struckthrough</del></b>
MM16	62	Policy H1	<p>Amend Policy text as follows:</p> <p>LDF Allocation Documents will phase<sup>1</sup> the release of allocations according to the following criteria in order to ensure sufficiency of supply, geographical distribution in accordance with Spatial Policy 7, and achievement of a previously developed land target of 65% for the first 5 years and 55% thereafter. Subject to these considerations, phases with the earliest release should be made up of sites which best address the following criteria:</p> <ul style="list-style-type: none"> <li>i) Location in regeneration areas,</li> <li>ii) Locations which have the best public transport accessibility,</li> <li>iii) Locations with the best accessibility to local services,</li> <li>iv) Locations with least impact on Green Belt objectives,</li> <li>v) Sites with least negative and most positive impacts on existing and proposed green infrastructure, green corridors, greenspace and nature conservation,</li> </ul> <p>Consideration will be given to bringing forward large sites, of more than 750 dwellings, to facilitate, early delivery in the Plan period.</p> <p>In special circumstances, allocated sites may be permitted to be released in advance of their phasing outlined above, so long as the permitted site delivers infrastructure and housing investment that is needed within Regeneration Priority Areas. In such cases, suitable mechanisms will be agreed to ensure that delivery within the Regeneration Priority Area occurs either before, or in conjunction with the delivery of the permitted site.</p> <p><u>The Council will maintain</u> <del>Where</del> a five year supply (plus appropriate NPPF buffer) of deliverable housing sites <del>cannot be demonstrated through annual monitoring, consideration will be made to through considering release of</del> the subsequent phase or phases of sites to help address the shortfall. <del>Any release of further phases of housing land will only be considered if it is found that either:</del></p> <ul style="list-style-type: none"> <li><del>i) Delivery on PDL in the past year has met the target;</del></li> <li><del>ii) Delivery on PDL is expected to meet the target for the next five years; or</del></li> <li><del>iii) A sufficient number of sites (equivalent to the five year supply figure minus the windfall allowance) are reasonably capable of being developed.</del></li> </ul> <p>1 Phase means a series of sequential bandings of site preference</p>

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MM17	63	Para 5.2.9	<p>Add following text to end of paragraph 5.2.9:</p> <p><u>Density is measured by the number of dwellings per hectare (dph). Net housing density is calculated by dividing the developable area (i.e. excluding land for roads, greenspace etc.) within the red line boundary of the planning approval by the total number of units granted permission.</u></p> <p>Delete the definition of density from the glossary.</p>
MM18	68	Para 5.2.25	<p>Amend text as follows:</p> <p>Leeds has a diverse housing stock ranging from large Victorian terraces to modern city centre flats. Some houses tend to be more suitable for families and when these are in areas with high concentrations of HMOs they should remain available for occupation by families. Factors to consider include the size of the dwelling, the amount of garden and private amenity space available, location of the property and any prolonged period of vacancy. <u>In the interpretation of H6Aiii it is recognised that some streets (or a part of a street) may already have such a high concentration of HMOs that the conversion of remaining C3 dwellings will not cause further detrimental harm. Also, in the interpretation of H6Av it may be the case that the remaining C3 dwellings would be unappealing and effectively unsuitable for family occupation. In such circumstances policy H6A would not be used to resist changes of use of such dwellings to HMOs.</u></p>
MM19	68		<p>Insert new paragraph as follows:</p> <p><u>5.2.26 In order to encourage landlords to experiment with lettings of HMOs to non-HMO occupants, the Council will consider granting flexible C3/C4 permissions for new and existing C4 HMOs. This will enable a C4 HMO to convert to a C3 dwelling house without losing the potential to revert back to C4 use within a fixed period (normally 10 years). If a property has a lawful C4 use when applying for a flexible permission this will then be a material consideration when the Council considers the planning application. The permission will enable flexibility to let a property between C3 and C4 uses during the specified period. On expiry of the dual use period, the use of the property at that time would become the permitted use of the property.</u></p>

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MM20	68	5.2.26	<p>Amend paragraph number and text as follows:</p> <p>5.2.26<del>7</del> The <del>decade</del> period 2001 – 2010<del>2</del> witnessed considerable development of new purpose built student accommodation particularly in and around the north west sector of the City Centre. Growth in this accommodation is to be welcomed in order to meet need and to deflect pressure away from private rented houses in areas of over-concentration. Nevertheless, care is needed to ensure that purpose built accommodation does not itself become over-concentrated and is located with good access to the universities.</p>														
MM21	68	5.2.27	<p>Amend paragraph number as follows:</p> <p>The existing 5.2.27 becomes 5.2.28</p>														
MM22	69	Policy H6	<p>Insert new criteria (v) under Part B of Policy as follows:</p> <p><u>v) The proposed accommodation provides satisfactory internal living accommodation in terms of daylight, outlook and juxtaposition of living rooms and bedrooms;</u></p> <p>Remainder unchanged</p>														
MM23	72	Table above Para 5.2.34	<p>Delete the table above paragraph 5.2.34:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: left;">Item</th> <th style="text-align: left;">Standard</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Driveways for parking</td> <td>Gradient of 1:20</td> </tr> <tr> <td>Crossfall of 1:40</td> </tr> <tr> <td>Minimum size of 6m x 3.6m</td> </tr> <tr> <td rowspan="3">Access Routes to from parking or pavements /pedestrian routes</td> <td>Minimum surface width of 1.2m</td> </tr> <tr> <td>Must not rely on steps</td> </tr> <tr> <td>Must have a gradient less than 1:20</td> </tr> <tr> <td rowspan="3">Principal Entrance Door</td> <td>Shall have a 1200mm x 1200mm level landing clear of door swing</td> </tr> <tr> <td>Shall have a threshold no higher than 15mm</td> </tr> <tr> <td>Minimum effective clear opening width of 800mm</td> </tr> </tbody> </table>	Item	Standard	Driveways for parking	Gradient of 1:20	Crossfall of 1:40	Minimum size of 6m x 3.6m	Access Routes to from parking or pavements /pedestrian routes	Minimum surface width of 1.2m	Must not rely on steps	Must have a gradient less than 1:20	Principal Entrance Door	Shall have a 1200mm x 1200mm level landing clear of door swing	Shall have a threshold no higher than 15mm	Minimum effective clear opening width of 800mm
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MM24	73	Para 5.2.38	<p>Delete paragraph 5.2.38:</p> <p>An oversupply position will have been reached if more land is allocated and/or has planning permission in the district than is needed to meet the outstanding requirement until the end of the Plan period and this also represents more than ten years worth of supply.. In the event of an oversupply, consideration should be given as to whether the excess land is more appropriately used for other forms of development, with first priority given to other forms of economic development other than those set out in part A &amp; B of the Policy. Along with the total amount of employment land, consideration also needs to be given to the availability of employment land and premises in local areas of the district</p>
MM25	74	Policy EC1(C)	<p>Delete Part C of Policy EC1:</p> <p><del>(C) In the event of an oversupply position being reached during the plan period, general employment land allocations will be acceptable for uses other than those set out in parts (A) and (B) of this policy providing the proposal accords with overall strategy and other plan policies.</del></p> <p>Remainder unchanged</p>
MM26	75	Para 5.2.41	<p>Amend text as follows:</p> <p>The breakdown of the existing supply of commitments includes for out of centre sites amount to 322,470 sq.m, with a further 19,290 sq.m is located in or on the edge of town centres and 498,736sq.m is located in the City Centre. Spatial Policy 9 states that an additional 160,000 sqm will be identified in, or on the edge of City and Town centres. Policy CC1: City Centre Development proposes to accommodate at least 655,000sq.m of office-based development, equating to 98% of the total provision with a further 3,710sq.m to be identified in or on the edge of town centres (2%). The proposed total of offices in or on the edge of centres reflects the current percentage of commitments, scaled up to the new requirements.</p>

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MM27	75	Table above para 5.2.42	<p>Amend table as follows:</p> <p>The proposed distribution of office <u>development</u> <del>allocations</del> will be:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th colspan="2" style="text-align: center;">Gross Total Floorspace</th> <th></th> </tr> <tr> <th style="text-align: center;">Location</th> <th style="text-align: center;">Existing planning permissions</th> <th style="text-align: center;">Proposed new locations</th> <th style="text-align: center;">Net total Floorspace*</th> </tr> </thead> <tbody> <tr> <td>Out of Centre</td> <td>322,470 sq.m</td> <td></td> <td>322,000 sq.m</td> </tr> <tr> <td>In or On Edge of Town Centres</td> <td>19,290 sq.m</td> <td>3,710sq.m</td> <td>23,000 sq.m</td> </tr> <tr> <td>City Centre</td> <td>498,736 sq.m</td> <td>156,264sq.m</td> <td>655,000 sq.m</td> </tr> <tr> <td>Total <del>proposed allocations</del> <u>office provision</u></td> <td>Approx. 840,000 sq.m</td> <td>Approx. 160,000sq.m</td> <td>Approx. 1,000,000sq.m</td> </tr> </tbody> </table>		Gross Total Floorspace			Location	Existing planning permissions	Proposed new locations	Net total Floorspace*	Out of Centre	322,470 sq.m		322,000 sq.m	In or On Edge of Town Centres	19,290 sq.m	3,710sq.m	23,000 sq.m	City Centre	498,736 sq.m	156,264sq.m	655,000 sq.m	Total <del>proposed allocations</del> <u>office provision</u>	Approx. 840,000 sq.m	Approx. 160,000sq.m	Approx. 1,000,000sq.m						
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MM28	76	Table below the first para 5.2.46	<p>Amend table as follows:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Scale</th> <th style="text-align: center;">Office Floorspace (Gross Internal)</th> <th style="text-align: center;">Sequential Assessment</th> <th style="text-align: center;">Impact Assessment</th> <th style="text-align: center;">Other Requirements</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"><b>Small</b></td> <td><del>Under 250 sq.m located within rural areas or villages</del></td> <td style="text-align: center;">No</td> <td style="text-align: center;">No</td> <td style="text-align: center;">Accessibility standards*</td> </tr> <tr> <td style="text-align: center;"><b>Small</b></td> <td>Under 250 sq.m located within urban areas</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> <td style="text-align: center;">n/a</td> </tr> <tr> <td style="text-align: center;"><b>Small</b></td> <td><u>Up to 500 sq.m</u></td> <td style="text-align: center;">No</td> <td style="text-align: center;">No</td> <td style="text-align: center;">Accessibility standards*</td> </tr> <tr> <td style="text-align: center;"><b>Medium</b></td> <td><u>254 501 – 2,499 sq.m</u></td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> <td style="text-align: center;">n/a</td> </tr> <tr> <td style="text-align: center;"><b>Large</b></td> <td>Over 2,500 sq.m</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">n/a</td> </tr> </tbody> </table>	Scale	Office Floorspace (Gross Internal)	Sequential Assessment	Impact Assessment	Other Requirements	<b>Small</b>	<del>Under 250 sq.m located within rural areas or villages</del>	No	No	Accessibility standards*	<b>Small</b>	Under 250 sq.m located within urban areas	Yes	No	n/a	<b>Small</b>	<u>Up to 500 sq.m</u>	No	No	Accessibility standards*	<b>Medium</b>	<u>254 501 – 2,499 sq.m</u>	Yes	No	n/a	<b>Large</b>	Over 2,500 sq.m	Yes	Yes	n/a
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MM29	76	Para 5.2.46	<p>Amend paragraph number and text as follows:</p> <p><del>5.2.46</del> <u>5.2.47</u> It is considered appropriate for small scale offices and office extensions to be supported in regeneration areas and in accessible rural locations away from town and local centres, without the need for a sequential test. The threshold size of small scale is defined as <del>250-500</del> sq.m. Therefore in regeneration areas and in those areas not served by a centre in rural areas or villages (as shown on Map 4) small scale office development (up to <del>250-500</del> sq.m) will be permitted without the need to undertake a sequential test. Locations outside of the Settlement Hierarchy will need to demonstrate compliance to accessibility standards as outlined in Table 1, Appendix 2 of the Core Strategy. All office development larger than 500 sq m will need to undertake a sequential assessment.</p>
MM30	77	Para 5.2.49	<p>Amend text as follows:</p> <p>National planning guidance advises <u>that</u> when assessing applications for office development outside of town centres, an impact assessment <del>should</del> <u>will</u> be required if the development is over 2,500sq.m. <del>This threshold will be used in the application of Policy EC2. For the purposes of the Core Strategy it is considered appropriate to apply this threshold to large scale office development</del></p>
MM31	77	Policy EC2	<p>Amend Policy text as follows:</p> <p>Appropriate locations for allocations and windfall office development;</p> <p>(i) A target of 655,000sqm for the city centre and 23,000 sqm <del>(equivalent to 2.3% of identified need over the plan period)</del> of new office floorspace is set for locations in or on the edge of town centres to guide allocation documents.</p> <p>(ii) The focus for most office development will be within and/or edge of the City Centre, and designated town and local centres.</p> <p>Due to the availability of development opportunities in centre and edge of centre, out of centre proposals would normally be resisted. <u>Exceptions would apply where either (iii) or (iv) below are applicable, with the exceptions of,</u></p> <p>(iii) <u>There are</u> existing commitments for office development <del>will</del> <u>that can</u> be carried forward to meet the identified floorspace requirement over the plan period, unless it would be more sustainable for the land to be re-allocated to meet identified needs for other uses.</p> <p>(iv) <u>There is a need</u> to provide flexibility for businesses, <u>so that</u> small scale office development (up to <del>250</del> <u>500</u> sqm) will not be subject to sequential assessments in the following locations;</p>

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			<p><b>New text: <u>underlined</u> Deleted text <del>Struckthrough</del></b></p> <p>i. Regeneration areas identified under Spatial Policy 4            ii. Settlements within the Hierarchy which do not have a designated centres as outlined in Map 4            iii. Villages or rural areas that are not included in the Settlements Hierarchy, <del>which will also be subject to the accessibility standards as defined by Table 1 in Appendix 2.</del></p> <p>(v) In existing major employment areas, which are already a focus for offices, some small scale office floorspace may be acceptable where this does not compromise the centres first approach.</p> <p>Map 13: shows which locations are subject to a sequential assessment</p>
MM32	77	Heading above Para 5.2.50	<p>Amend heading above paragraph 5.2.50:</p> <p><del>Safeguarding existing industrial and warehouse employment sites and premises</del></p> <p><b><u>Safeguarding existing employment land and industrial areas</u></b></p>
MM33	78	Para 5.2.51	<p>Amend text as follows:</p> <p>Policy EC3 applies to proposals on sites currently or last in use for employment purposes <del>within the B Class Uses (B1a – offices, B1b – Research &amp; Development, B1c – Light industry, B2 – General Industrial; and B8 – Storage or Distribution).</del> The issue to be determined is whether there is a planning need for the site to remain in employment uses. There is a shortage of employment sites in certain locations but potential oversupply in others. The conclusions relating to land supply in the Leeds Employment Land Review (2010 Update) and subsequent updates will be a key consideration when making assessments of proposals for the development of existing employment sites.</p>
MM34	78	5.2.53	<p>Amend text as follows:</p> <p>This is a criteria based policy which applies to the consideration of planning applications. Part A, <del>which includes bullet points (i) to (iii),</del> relates to all sites not identified in an area of shortfall and therefore assessed on a District-wide basis. <del>Whilst Part B (iv) refers to only sites located within areas of shortfall.</del></p> <p><u>Part A: For all sites across the District outside of areas of shortfall</u></p> <p><u>Bullet point (i) relates to employment allocations and other land identified in the Leeds Employment Land Review (2010 Update) or future updates of the review. Employment needs are identified in Spatial Policy 9 which sets out the amount of land needed over the plan period.</u></p> <p><u>Bullet point (ii) applies to all existing premises and land previously or currently used for employment uses but which are not allocated. Non-viable may be defined as:</u></p>

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			<p><b>New text: <u>underlined</u> Deleted text <del>Struckthrough</del></b></p> <ul style="list-style-type: none"> <li>• <u>property or land has remained empty or vacant for a period of time despite being marketed (for a minimum of 12 months), or</u></li> <li>• <u>the employment space no longer serves the needs of businesses, and may be incompatible with neighbouring uses through noise and amenity issues.</u></li> </ul> <p><u>Bullet point (iii) provides opportunity for mixed use proposals to deliver the Core Strategy employment objectives as identified in Spatial Policy 8 and 9.</u></p> <p><del>(i) Relates to points (ii) and (iii) where existing premises/site are considered nonviable in marketability terms. Non-viable may be defined as:</del></p> <ul style="list-style-type: none"> <li><del>• property or land has remained empty or vacant for a period of time despite being marketed, or</del></li> <li><del>• the employment space no longer serves the needs of businesses, and may be incompatible with neighbouring uses through noise and amenity issues.</del></li> </ul> <p><del>(ii) (i) Relates to any proposals on employment land, sites or premises which already have an employment allocation* or identified in the Employment Land Review in place for B Use Class employment type.</del> <del>(* Current land/premises allocated for employment uses will be safeguarded until their long term future is reviewed and determined through the LDF Allocation documents.)</del> <del>Employment needs are identified in Spatial Policy 8 which defines the key job sectors whilst Spatial Policy 9 sets out the amount of land needed to deliver these employment sectors over the plan period.</del> <del>Applies to land or premises previously or currently used for employment but which are not allocated.</del></p> <p><u>Part B: Proposals in shortfall areas</u></p> <p><u>Part B refers to general employment sites in shortfall areas.</u> <u>Please see Glossary for the definition of general employment land.</u></p> <p>Applications will be assessed using an appropriate definition of “surrounding area” as agreed between the Council and the applicant with reference to Table 1 – Accessibility Standards and Indicators for Employment and Social Infrastructure Uses in Appendix 2.</p> <p>The availability of sites and past take up in the surrounding area will be assessed to determine how much supply should be maintained to achieve the economic objectives of the Core Strategy.</p>
MM35	79	5.2.54	<p>Amend text as follows:</p> <p>Local need is calculated for the total amount of land that will be required in an area based on <u>local population</u> <del>projected population change</del>. This calculation will identify surplus and deficit of any local provision.</p>

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			New text: <u>underlined</u> Deleted text <del>Struckthrough</del>
MM36	79	5.2.55	<p>Amend text as follows:</p> <p>Leeds Employment Land Review (Update 2010) identified a potential shortfall of available <u>general</u> employment land in some areas of the district, particularly in the north and west of the city. Over the last decade there has also been a significant loss of existing employment sites to other types of development, particularly new housing encouraged by the focus on Brownfield development. While redevelopment is often positive, consideration also has to be given to retention of local employment opportunities. Therefore, in areas where there is an identified shortfall in the provision of <u>general</u> employment land there will be a presumption against loss of <u>general</u> employment sites to other uses.</p>
MM37	79	5.2.56	<p>Amend text as follows:</p> <p>The Leeds Employment Land Review (2010 Update) identifies the following local sub areas - Inner North East, Inner North West, Inner West, Outer North West and Outer North East where there are currently shortfalls in employment land provision. <u>It may not always be possible to address deficiencies in some area due to the lack of availability of suitable sites.</u> Accessibility is also an important issue, particularly the needs of businesses to access transportation networks. Subsequent updates of the Leeds Employment Land Review will monitor and bring up to date any changes to these areas <u>and identify any new areas.</u></p>
MM38	79	5.2.57	<p>Delete paragraph 5.2.57:</p> <p><del>Many of these areas where deficiencies exist are in locations where land is not available and accessibility is also an important issue, particularly needs of businesses to access transportation networks. Subsequent updates of the Leeds Employment Land Review will monitor and bring up to date any changes to these areas.</del></p>
MM39		Map 13: Key	<p>Amend Map key as follows:</p> <p>Smaller Settlements without an identified centre: offices smaller than <u>500m<sup>2</sup></u> <del>250m<sup>2</sup></del> not subject to sequential test  Rural Areas: Offices smaller than <u>500m<sup>2</sup></u> <del>250m<sup>2</sup></del> not subject to sequential test but must demonstrate compliance with Appendix Two Accessibility Standards  Regeneration Areas: Offices smaller than <u>500m<sup>2</sup></u> <del>250m<sup>2</sup></del> not subject to sequential test</p> <p>Remainder unchanged</p>

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MM40	80	Policy EC3	<p>Amend Policy text as follows:</p> <p>Part A: For all sites across the District outside of areas of shortfall</p> <p><u>A) Proposals for a change from B Use Classes of use on sites which were last used or allocated for employment to other economic development uses including town centre uses or to non-employment uses will only be permitted where:</u></p> <p><del>(ii) (i)</del> <u>(i)</u> The proposal would not result in the loss of a deliverable employment site necessary to meet the employment needs during the plan period ('employment needs' are identified in Spatial Policy <del>ies 8 &amp; 9</del> <del>ies 8 &amp; 9</del>).</p> <p><u>Or</u></p> <p>(ii) Existing buildings and land are considered to be non-viable in terms of market attractiveness, business operations, age, condition and/or compatibility with adjacent uses.</p> <p><u>Or</u></p> <p><u>(iii) The proposal will deliver a mixed use development which continues to provide for a range of local employment opportunities and would not undermine the viability of the remaining employment site;</u></p> <p><u>And where appropriate,</u></p> <p><u>Part B: For sites in shortfall areas</u></p> <p><u>B) Where a proposal located in an area of shortfall as identified in the most recent Employment Land Review would result in the loss of a general employment allocation or an existing use within the Use Classes B1b, B1c, B2 and B8, non-employment uses will only be permitted where:</u></p> <p>The loss of the <del>general employment site or premises</del> <del>the employment provision on the site</del> can be <del>mitigated</del> <del>offset</del> sufficiently by the availability of existing <u>general</u> employment land and premises in the surrounding area <u>(including outside the areas of shortfall)</u> which are suitable to meeting the employment needs of the area.</p>

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MM41	95	Policy P8	<p>Amend first paragraph and Part D of Policy as follows:</p> <p>Leeds City Council has adopted a centres first approach to main town centre uses* as set out in Policy SP2. Proposals must accord with the following sequential and impact assessment requirements. <u>Impact assessments should be proportionate to the level of development proposed.</u></p> <p><u>D) Proposals for all other edge of centre or out of centre Class A, leisure or office uses. A sequential assessment will not be required for rural offices or other rural development with a floorspace of less than 500sqm (see Policy EC2 iv).</u></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">TOTAL GROSS SIZE OF BUILT DEVELOPMENT</th> <th style="text-align: center;">SEQUENTIAL ASSESSMENT</th> <th style="text-align: center;">IMPACT ASSESSMENT</th> <th style="text-align: center;">WITHIN RESIDENTIAL AREAS: CATCHMENT AREA (RADIUS) INBOUND DRIVE TIME</th> <th style="text-align: center;">OUTSIDE RESIDENTIAL AREA: CATCHMENT AREA (RADIUS) INBOUND OFF PEAK DRIVE TIME</th> </tr> </thead> <tbody> <tr> <td>A2, A3, A4, A5 0-1,499 SQ.M</td> <td style="text-align: center;">YES</td> <td style="text-align: center;">NO</td> <td style="text-align: center;">5 MINUTE</td> <td style="text-align: center;">10 MINUTE AND CITY CENTRE (INCLUDING EDGE OF)</td> </tr> <tr> <td>A2, A3, A4, A5 0-1,500+ SQ.M</td> <td style="text-align: center;">YES</td> <td style="text-align: center;">YES</td> <td style="text-align: center;">10 MINUTE AND CITY CENTRE</td> <td style="text-align: center;">15 MINUTE AND CITY CENTRE (INCLUDING EDGE OF)</td> </tr> <tr> <td><u>MAIN TOWN CENTRE USES EXCEPT CLASS A 0-500SQ.M</u></td> <td style="text-align: center;"><u>YES</u></td> <td style="text-align: center;"><u>NO</u></td> <td colspan="2" style="text-align: center;"><u>5 MINUTE</u></td> </tr> <tr> <td>MAIN TOWN CENTRE USES EXCEPT CLASS A <del>0</del>501-1,499 SQ.M</td> <td style="text-align: center;">YES</td> <td style="text-align: center;">NO</td> <td colspan="2" style="text-align: center;">10 MINUTE AND CITY CENTRE (INCLUDING EDGE OF)</td> </tr> <tr> <td>MAIN TOWN CENTRE USES EXCEPT CLASS A 1,500+ SQ.M</td> <td style="text-align: center;">YES</td> <td style="text-align: center;">YES</td> <td colspan="2" style="text-align: center;">15 MINUTE AND CITY CENTRE (INCLUDING EDGE OF)</td> </tr> </tbody> </table>					TOTAL GROSS SIZE OF BUILT DEVELOPMENT	SEQUENTIAL ASSESSMENT	IMPACT ASSESSMENT	WITHIN RESIDENTIAL AREAS: CATCHMENT AREA (RADIUS) INBOUND DRIVE TIME	OUTSIDE RESIDENTIAL AREA: CATCHMENT AREA (RADIUS) INBOUND OFF PEAK DRIVE TIME	A2, A3, A4, A5 0-1,499 SQ.M	YES	NO	5 MINUTE	10 MINUTE AND CITY CENTRE (INCLUDING EDGE OF)	A2, A3, A4, A5 0-1,500+ SQ.M	YES	YES	10 MINUTE AND CITY CENTRE	15 MINUTE AND CITY CENTRE (INCLUDING EDGE OF)	<u>MAIN TOWN CENTRE USES EXCEPT CLASS A 0-500SQ.M</u>	<u>YES</u>	<u>NO</u>	<u>5 MINUTE</u>		MAIN TOWN CENTRE USES EXCEPT CLASS A <del>0</del> 501-1,499 SQ.M	YES	NO	10 MINUTE AND CITY CENTRE (INCLUDING EDGE OF)		MAIN TOWN CENTRE USES EXCEPT CLASS A 1,500+ SQ.M	YES	YES	15 MINUTE AND CITY CENTRE (INCLUDING EDGE OF)	
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MM42	98	Para 5.3.41	<p>Amend text as follows:</p> <p>Good design is a key aspect of sustainable development and essential in creating places in which current and future generations can <del>live</del> <u>enjoy</u> a high quality of life which is fulfilling and healthy.</p> <p>Remainder of paragraph unchanged</p>
MM43	98	Para 5.3.42	<p>Amend text as follows:</p> <p><del>The urban environment of Leeds is rich in quality and ranges</del> <u>Leeds has a rich and diverse urban environment. It ranges</u> from leafy suburbs, <del>and</del> rural villages, to market <u>and</u> towns, industrial towns, inner urban areas and a vibrant city centre. Good Urban Design can <u>reinforce the distinctiveness of</u> these unique and special places. <del>and it should</del> inform opportunities for <del>appropriate</del> <u>contextual</u> development that is <del>respectful</del> and enhances our City as a whole. An overarching aim is to create and sustain people-friendly places for the benefit of the residents and businesses of Leeds, <del>and</del> <u>whilst</u> endeavouring to support developers seeking to deliver <u>the</u> highest quality design solutions.</p>
MM44	100	Policy P10	<p>Amend first two paragraphs and point (iii) of Policy as follows:</p> <p>New development for buildings and spaces, and alterations to existing, should be based on a thorough contextual analysis and provide good design that is appropriate to its location, scale and function.</p> <p>New development will be expected to deliver high quality inclusive design that has evolved, where appropriate, through community consultation and thorough analysis and understanding of an area. Developments should respect and enhance existing landscapes, <u>waterscapes</u>, streets, spaces and buildings according to the particular local distinctiveness and wider setting of the place with the intention of contributing positively to <del>P</del>place <del>M</del>making, quality of life and wellbeing.</p> <p>Proposals will be supported where they accord with the following key principles;</p> <p>(iii) The development protects the visual, residential and general amenity of the area through <del>positive</del> <u>high quality</u> design that protects and enhances surrounding routes, useable space, privacy, air quality and satisfactory penetration of sunlight and daylight,</p> <p>Remainder unchanged</p>
MM45	100		<p>Insert the following paragraph after the Conservation heading:</p> <p><u>5.3.45 There are complementary 'Saved' Development Plan conservation policies which should be considered in conjunction with this policy (see paragraph 1.6 and appendix 1).</u></p>

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MM46	100	5.3.45	<p>Amend paragraph number and text as follows:</p> <p><del>5.3.45</del> <u>5.3.46</u> The historic environment of buildings and spaces is one of the key contributors to Leeds' identity, making it visually distinct from other cities. Leeds' historic environment is a finite resource which needs careful management, particularly in the balance between preservation and change. <u>In new design,</u> <del>On the whole,</del> <del>considered</del> innovation which <u>takes account of its surroundings</u> should be encouraged except where the context demands a response which <u>fully reflects the character of adjoining properties</u> <del>response which copies the host.</del> Sustainable construction is as relevant in an historic context as it is elsewhere.</p>
MM47	100	5.3.46	<p>Amend paragraph number text as follows:</p> <p><del>5.3.46</del> <u>5.3.47</u> In all cases change, especially harmful change, should be justified. The good management of the historic environment relies on informed conservation which identifies the historic significance of buildings and spaces and strategies to overcome harm. <u>Except for the most minor changes, it is expected that developers will consult the Heritage Environment Record maintained by the West Yorkshire Archaeology Advisory Service which contains information on all know archaeological sites, including battlefields, historic parks and gardens and some conservation areas.</u></p> <p><del>On the whole, considered innovation should be encouraged, except where the context demands a response which copies the host. Sustainable construction is as relevant in an historic context as it is elsewhere.</del></p> <p><u>Re number following paragraphs.</u></p>

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MM48	102	Policy P11	<p>Amend Policy text as follows:</p> <p>The historic environment, consisting of archaeological remains, historic buildings townscapes and landscapes, including locally significant undesignated assets and their settings, will be conserved and enhanced, particularly those elements which help to give Leeds its distinct identity:</p> <ul style="list-style-type: none"> <li>• the Victorian and Edwardian civic and public buildings, theatres, arcades, warehouses and offices within the city centre and the urban grain of yards and alleys.</li> <li>• the nationally significant industrial heritage relating to its textile, tanning and engineering industries, including its factories, chimneys and associated housing.</li> <li>• its legacy of country houses, public parks, gardens and cemeteries.</li> <li>• the 19th century transport network, including the Leeds and Liverpool Canal.</li> </ul> <p>Development proposals will be expected to demonstrate a full understanding of historic assets affected, including any known or potential archaeological remains. <u>Where</u> appropriate, heritage statements assessing the significance of assets, the impact of proposals and mitigation measures will be required to be submitted by developers to accompany development proposals.</p> <p>Innovative and sustainable construction which integrates with and enhances the historic environment will be encouraged.</p> <p>Conservation-led regeneration schemes will be promoted. Priorities for new schemes will be in Regeneration Priority Areas, but schemes outside these areas <u>may also be considered</u> <del>identified</del> where <del>eligibility criteria are met</del> the historic environment offers potential as a catalyst for the wider regeneration of the area.</p> <p>The Council maintains a register of historic assets at risk to help it prioritise action and will seek to impose planning conditions or obligations for their repair and refurbishment where appropriate. Where appropriate, the City Council will use the <del>statutory</del> provisions of the planning acts to secure repairs.</p> <p>Enabling development may be supported in the vicinity of <del>Listed Buildings and in Conservation Area Areas</del> <u>historic assets</u> where linked to the refurbishment or repair of heritage assets. This will be secured by planning condition or planning obligation.</p>

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MM49	104	Para 5.4.1	<p>Amend text as follows:</p> <p>Increased economic prosperity and population growth are likely to lead to increasing pressure upon the local transport infrastructure. In particular, greater levels of car use will lead to significantly higher levels of congestion affecting more hours of the day, and will also generate greenhouse gases that contributes towards climate change. In order to tackle these two issues new transport infrastructure will be provided during the plan period (See Spatial Policy 11). However it will also be necessary to use other initiatives to manage the level of car use and to gain maximum benefits from investment in more sustainable choices <del>as outlined in Proposal 11 of the Local Transport Plan.</del>, <u>and t</u><del>t</del> This will be delivered through Policy T1.</p>
MM50	104	Policy T1	<p>Amend first paragraph of Policy text as follows:</p> <p>To complement the provision of new infrastructure <del>and Proposal 11 of the Local Transport Plan</del> the Council will support the following management priorities: Remainder Unchanged</p>
MM51	104	Para 5.4.3	<p>Amend text as follows:</p> <p>A key element of accommodating an increased population whilst minimising traffic growth is to ensure that new development is located in accessible locations that provide a real choice of sustainable transport alternatives. <del>In accordance with Proposal 12 of the Local Transport Plan</del> As part of this, <u>A</u>ccessibility standards have been developed (based on the RSS evidence base) that define the minimum standards that a new development will need to meet. The standards are set to ensure that all new development, including sites in rural areas and smaller settlements, occurs in sustainable locations which are accessible to a range of key destinations. Where these standards do not apply, investment will be required so that they can be achieved.</p>
MM52	105	Policy T2	<p>Amend point (iii) of Policy text as follows:</p> <p>New development should be located in accessible locations that are adequately served by existing or programmed highways, by public transport and with safe and secure access for pedestrians, cyclists and people with impaired mobility, in accordance with Proposal 12 of the Local Transport-Plan.</p> <p>(iii) Significant trip generating <del>sites</del> <u>uses</u> will need to provide Transport Assessments/Transport Statements in accordance with national guidance.</p> <p>Remainder Unchanged</p>

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MM53	110	Policy G4	<p>Amend Policy text as follows:</p> <p>On site provision of greenspace of 80 square metres per residential unit, will be sought for development sites of 10 or more dwellings that are outside the City Centre and in excess of 720 metres from a community park, and for those which are located in areas deficient of greenspace.</p> <p>In areas of adequate supply, contributions of an equivalent value towards the safeguarding and improvement of existing greenspace will take priority over the creation of new areas. <u>In this circumstance, qualitative improvements would be needed to address the pressures placed upon existing greenspace in the form of increased usage and increased demand arising from new residential development.</u></p>
MM54	122	Policy EN5	<p>Amend first paragraph of Policy text as follows:</p> <p>The Council will manage and mitigate flood risk by:</p> <p>Avoiding development in flood risk areas, <u>where possible</u>, by applying the sequential approach and where this is not possible by mitigating measures, in line with the NPPF, both in the allocation of sites for development and in the determination of planning applications.</p> <p>Remainder Unchanged</p>
MM55	131	Para 6.38	<p>Amend para 6.38 by adding text at the end of the para as follows:</p> <p><u>The indicators, policies to which they relate, targets, triggers and interventions are set out in a summary monitoring table below.</u></p>
MM56	131	Table following Para 6.38	<p>Add monitoring table after para 6.38 as set out at the end of this appendix.</p>

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MM57	64	5.2.12	<p>Amend paragraph 5.2.12 as follows:</p> <p>In conformity with national planning guidance, affordable housing will be required to meet local needs. The policy has been informed by the evidence base, including the Leeds Strategic Housing Market Assessment (Update 2011) <u>(as referred to in PPS3, Annex C). (as referred to in the NPPF, Para 159), and the Economic Viability Assessment 2010, and the Economic Viability Study 2013, (in accordance with NPPF Para 174).</u></p>
MM58	64	5.2.13	<p>Amend paragraph 5.2.13 as follows:</p> <p>Since affordable housing planning policy was first developed in the early 1990s, Leeds has always been able to demonstrate a need for affordable housing. <del>(UDP paras 7.5.14 – 19, Assessment 2001/02, Assessment 2003, Assessment 2007 and Assessment 2011). Following national practice guidance, need for affordable housing was calculated to be 480 per annum 2003 and 1889 per annum in 2007. The most recent Strategic Housing Market Assessment (2011) identifies an annual need of 1158 affordable housing dwellings. Not all of this need will be met by the planning system, other methods of delivery such as grant funded schemes also play an important role in the delivery of affordable housing. Given the high level of need, action to secure affordable housing (or contributions) from all developments of new dwellings, will be taken. Reflecting the varied housing characteristics of Leeds, 4 housing zones are identified. Map 12 provides the overall location and extent of the areas, but more detailed maps with precise boundaries are provided on LCC's website.</del></p>
MM59	65	5.2.14-17	<p>Delete paragraph 5.2.14 as follows:</p> <p><del>The Economic Viability Assessment 2010 explored what percentages of affordable housing and what mixes for example social rented /sub-market types of affordable housing would be viable. It did this for different geographical areas of Leeds and for different states of the market, firstly baseline (the depressed period of 2010), secondly mid point and thirdly height of the Market (2007). It concludes that in periods of buoyancy affordable housing could be delivered at 50% in high value areas but that in periods of adversity some areas are hardly able to sustain any affordable housing.</del></p> <p>Existing paragraph 5.2.15 becomes 5.2.14</p> <p>Existing paragraph 5.2.16 becomes 5.2.15</p> <p>Existing paragraph 5.2.17 becomes 5.2.16 with the following amendments:</p> <p>The SHMA suggests that households need earnings of at least £15,000 to afford more than “social rented” housing. This equates to approximately the lowest decile of earnings in Leeds. The affordability of affordable housing</p>

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			should be designed to meet identified needs of households in both lower quartile and lower <del>decile</del> -decile bands of earnings <u>with</u> <del>From</del> an initial starting point of 40% of affordable housing to meet needs of households in lower quartile earnings and 60% to meet the needs of households in lower <del>decile</del> decile earnings., <del>an SPD will advise how these percentages may vary in different areas of Leeds and may vary over time as new evidence emerges.</del>
MM60	65	5.3.18	Existing paragraph 5.3.18 becomes 5.2.17 with the following amendments:  <del>Within this context, Policy H5 provides an overall framework for the provision of affordable housing. It is appropriate that details such as thresholds and targets is provided through a Supplementary Planning Document. This will reflect market conditions and can be reviewed as economic conditions change and the life of the Core Strategy within the context of Policy H5. For schemes that are below the threshold to require the provision of on-site affordable housing, the City Council will seek financial contributions in the housing market zones 1 and 2 toward affordable housing tapered down from the equivalent cost of on-site provision at the lowest size threshold. If the scheme has exceptional costs a financial appraisal will be necessary to determine what contribution can be provided without undermining scheme viability.</del>
MM61	66	Policy H5	Amend Policy H5 as follows:  <b><u>POLICY H5: AFFORDABLE HOUSING</u></b>  <del>The Council will seek affordable housing either on-site, off-site or financial contributions from all developments of new dwellings. Housing developments above a certain threshold should include a proportion of affordable housing to be normally provided on the development site. The affordable housing provision should provide for a tenure mix in terms of submarket and social rented housing. Over the plan period to 2028 the threshold, amount of affordable housing and tenure splits may vary depending on housing needs and market conditions applicable at the time. An Affordable Housing Supplementary Planning Document will therefore provide up to date guidance on thresholds, targets, affordability mix and provision sought, which may vary depending on the local area. An annual update to the SPD of affordable housing price benchmark figures will also be provided.</del>  <del>The broad range of provisions for a Supplementary Planning Document will be:</del>  <del>i) A threshold between 10 and 15 dwellings will apply – on-site affordable housing will be sought on any development at or above the threshold. There is no site size threshold.</del> <del>ii) Overall targets for affordable housing will vary from 5 to 50%.</del>

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			<p><u>On-site provision</u></p> <p>On site affordable housing will normally be expected at the targets specified for developments at or above the dwelling thresholds in the following zones:</p> <table style="margin-left: auto; margin-right: auto; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center; border-bottom: 1px solid black;">Zone</th> <th style="text-align: center; border-bottom: 1px solid black;">Target</th> <th style="text-align: center; border-bottom: 1px solid black;">Threshold</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td style="text-align: center;">35%</td> <td style="text-align: center;">10</td> </tr> <tr> <td style="text-align: center;">2</td> <td style="text-align: center;">15%</td> <td style="text-align: center;">15</td> </tr> <tr> <td style="text-align: center;">3</td> <td style="text-align: center;">5%</td> <td style="text-align: center;">15</td> </tr> <tr> <td style="text-align: center;">4</td> <td style="text-align: center;">5%</td> <td style="text-align: center;">15</td> </tr> </tbody> </table> <p><u>Off-site provision for smaller schemes</u></p> <p><u>For housing schemes below the on-site size thresholds in Zones 1 and 2, an offsite commuted sum will be sought tapered down proportionately from the equivalent cost of on-site provision at the lowest size threshold.</u></p> <p>iii) <del>Affordability of affordable housing to</del> <u>should be designed to meet the identified needs of households as follows;</u></p> <ul style="list-style-type: none"> <li>• 40% affordable housing for households on lower quartile earnings</li> <li>• 60% affordable housing for households on lower <del>decile</del> <u>decile</u> earnings</li> </ul> <p>iv) <del>off site contributions to take into account geographical variations in the housing market.</del></p> <p>The affordable units should be a pro-rata mix in terms of sizes and types of the total housing provision, unless there are specific needs which indicate otherwise, and they should be suitably integrated throughout a development site. Applicants may choose to submit individual viability appraisals to verify that the affordable housing target cannot be met. In such cases, affordable housing provision may be reduced accordingly. Affordable housing provision should be on site, unless off site provision or a financial contribution can be robustly justified.</p> <p>Elderly persons sheltered housing and low cost market housing should not expect the requirement for affordable housing to be automatically waived or reduced, although individual viability appraisals will be taken into account.</p> <p>Secure arrangements in the form of S106 agreements, must be agreed to ensure delivery and that affordability embodied within affordable housing is maintained for future people of Leeds in housing need.</p>	Zone	Target	Threshold	1	35%	10	2	15%	15	3	5%	15	4	5%	15
Zone	Target	Threshold																
1	35%	10																
2	15%	15																
3	5%	15																
4	5%	15																



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			<b>New text: <u>underlined</u></b> <b>Deleted text <del>Struckthrough</del></b>
MM62	66	After Policy H5	Insert Map 12 Affordable Housing Market Zones. From existing Map 12 all existing maps will need to be re-numbered accordingly. Council to insert link to web site where more detailed maps can be viewed
MM63	70	5.2.28	Amend paragraph 5.2.28 as follows:  Paragraph number 5.2.28 becomes paragraph 5.2.29  In planning for all sections of the community to have access to decent housing, there is a need to make appropriate provision for <u>Gypsies, Travellers and Travelling Showpeople</u> <del>gypsies, travellers and travelling showpeople</del> . According to government guidance, <del>Core Strategies should provide criteria for future Site Allocations DPD, to enable sufficient sites to be allocated to provide for identified need</del> <u>Planning for Travellers Sites 2012, local planning authorities should identify a need for Gypsies, Travellers and Travelling Showpeople's accommodation for the plan-period and allocate sufficient sites (pitches and plots) to meet identified needs as well as demonstrate a sufficient supply of sites to meet identified needs within a five year period.</u>
MM64	70	5.2.29	Replace existing paragraph 5.2.29 which is re-numbered as paragraph 5.2.30  <del>The West Yorkshire Gypsy and Traveller Accommodation Assessment 2008 (GTAA) provided an overall assessment of the long term requirement for Gypsies and Travellers (residential and transit sites) and Travelling Showpeople. The GTAA identified that there was an unmet need for residential pitches (not including pitches for transit sites and travelling showpeople) up to 2015.</del>  5.2.30 In Leeds there is a current supply of 48 pitches for Gypsies and Travellers. The Council maintains a site at Cottingley Springs, Gildersome with 41 pitches. Elsewhere there are 7 pitches on private sites. There are currently no authorised plots for Travelling Showpeople within Leeds, although there are currently 7 families living on plots with the consent of landowners.
MM65	70	5.2.30	Replace existing paragraph 5.2.30 which is re-numbered as paragraph 5.2.31  <del>Following consideration of the GTAA findings, relevant guidance, local circumstances and the analysis of immediate short/medium term priorities, the initial focus of the City Council has been to address the housing needs of the Leeds based 'roadside' families, who have a housing need for 12 pitches in advance of producing future Site Allocations plans.</del>  5.2.31 In accordance with national guidance, "pitch" means a pitch on a Gypsy and Traveller site and "plot" means a pitch on a Travelling Showperson's site (often called a "yard"). This terminology differentiates between residential pitches for Gypsies and Travellers and mixed-use plots for Travelling Show people, which may need to incorporate space or to be split to allow for the storage of equipment.

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MM66	70	5.2.31	<p>Revise existing paragraph 5.2.31, which is re-numbered as paragraph 5.2.32, as follows:</p> <p>In order to determine an up to date level of <u>Gypsy and Traveller local</u>-needs for the plan period, the City Council worked with <u>Leeds Gypsy and Traveller Exchange (GATE) in preparing a Gypsy and Traveller Accommodation Assessment in 2013/14. This assessment was based on methodology derived from Communities and Local Government, Planning Policy for Traveller Sites (2012) and also Communities and Local Government, Gypsy and Traveller Accommodation Needs Assessments (2007). The approach is locally based, in accordance with Planning Policy for Traveller Sites, and agreed between the Council and Leeds GATE. The main sources of information used were Leeds' housing applications data (including housing needs assessments for Gypsies and Travellers on the housing waiting list), Leeds GATE local knowledge and a survey prepared and carried out by Leeds GATE with support from the Council.</u> <del>will undertake further monitoring, evidence based work and through appropriate mechanisms establish requirements. In order to guide the identification of sites to meet these requirements, Policy H7 sets out site selection criteria to accommodate additional pitches through the Site Allocations DPD.</del></p>
MM67	70	Below existing paragraph 5.2.31 (re-numbered 5.2.32)	<p>Insert the following paragraphs:</p> <p><u>5.2.33 This information provides an understanding about the needs and preferences of Leeds' Gypsies and Travellers. It suggests that there is a preference for small sites, that whilst many Gypsies and Travellers wish to live on a Council run site there is a significant group that wish to make their own provision and that there are a number of people in pitch based provision that seek a bricks and mortar house as a preference.</u></p> <p><u>5.2.34 An assessment by Leeds GATE and the City Council, including revisions to the Council's Gypsy and Traveller Pitch Requirement Study and a survey of local Gypsies and Travellers carried out by Leeds GATE shows an unmet housing preference for 58 pitches made up of 26 households seeking permanent public sector provision and having an assessed housing need and 26 households seeking permanent private pitch provision. There is also an identified expressed preference from 6 households seeking negotiated stopping. By applying a compound growth of 3% and allowing for vacancy levels within the existing provision there is a need for 62 pitches for the plan period (i.e. up to end March 2028). For the plan period this need can be split as follows:</u></p> <ul style="list-style-type: none"> <li>• <u>Council provision</u> = 25 pitches</li> <li>• <u>Private provision</u> = 28 pitches</li> <li>• <u>Negotiated stopping provision</u> = 9 pitches</li> </ul> <p><u>5.2.35 For Travelling Showpeople the Travelling Showmen's Guild has indicated that there is a need to provide suitable provision for 15 families throughout the Core Strategy plan period i.e. on 15 plots. They advise that this should be provided on either one or two sites (approximately 1 hectare in total), which would also contain some transit provision.</u></p>

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			<p><u>5.2.36</u> The Council will allocate land for Gypsies, Travellers and Travelling Showpeople on the basis of the identified needs above through the Site Allocations Plan. In order for Gypsies and Travellers to have a high quality of life it will desirable for pitches and plots to have the same access to services as the settled population. This is a message that has arisen from consultation with the Gypsy and Traveller community themselves who do not desire to live in remote or inaccessible locations. At the same time it should be recognised that sites should in all cases be deliverable to Gypsies, Travellers and Travelling Showpeople and in reality this may mean that, for example, the most accessible sites are not viable. The deliverability of sites is therefore included as a criteria to inform the allocation of sites and decision taking.</p> <p><u>5.2.37</u> The Site Allocations Plan will engage positively with the Gypsy and Traveller community and Leeds GATE to ensure that suitable council run sites (including where appropriate an element of transit provision) are identified and allocated to meet the full needs for the plan period. For private pitch provision, including for Travelling Showpeople, the Council will work proactively with the Gypsy and Traveller communities, Leeds GATE and the Showmen’s Guild to help identify and allocate such sites through the Site Allocations Plan in line with the criteria in Policy H7.</p> <p><u>5.2.38</u> Planning Policy for Traveller Sites confirms that a criteria based policy can provide a basis for decision taking as well as allocating sites, therefore the policy contains criteria to guide land supply allocations and provide a basis for decisions, should applications nevertheless come forward</p>
MM68	70	5.2.32	<p>Revise existing paragraph 5.2.32, re-numbered as 5.2.39, as follows:</p> <p>Consultation responses from representatives of the Gypsy and Travellers community have previously indicated a strong preference for sites to be of a small size suited to occupation by close family groups, <del>and reasonably located for local facilities. Extension of the existing site at Cottingley Springs was not favoured.</del> It may not be possible to identify sites without considering exceptional and limited alterations to the Green Belt Boundary. Any alterations to the Green Belt boundary will need to be considered as part of the Site Allocations DPD. Alternatives will be explored before Green Belt locations are considered.</p>
MM69	70	Policy H7	<p>Revise Policy H7 as follows:</p> <p>The City Council will identify suitable sites in the Site Allocations Plan <del>(of around no more than 15 pitches per site)</del> to accommodate the following identified needs:</p> <ul style="list-style-type: none"> <li>• <u>62 pitches for Gypsies and Travellers (of no more than 15 pitches per site), and 15 plots for Travelling Showpeople (to be accommodated on either one or two sites),</u></li> </ul>

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			<p>In identifying land or determining planning applications for pitches / plots, consideration will be based on <u>Gypsies, Travellers and Travelling Showpeople, through a Site Allocations DPD, subject to the following criteria:</u></p> <ul style="list-style-type: none"> <li>i) <u>pitches and plots should</u> <del>Sites must be located near major roads and</del> have reasonable access to public transport, health care, schools, shops and local services <del>(and should not be located on land that is deemed unsuitable for general housing such as land that is contaminated, adjacent to refuse sites, landfill sites, heavy industry or electricity pylons.);</del></li> <li>ii) <u>pitches and plots should not be located on land that is deemed unsuitable for general housing, such as land that is contaminated, adjacent to refuse sites, landfill sites, heavy industry or electricity pylons</u></li> <li>iii) <u>pitches and plots</u> <del>Sites</del> should avoid zones of high flood risk (zone 3 flood risk areas),</li> <li>iv) the following order of preference for categories of land should be followed: brownfield, greenfield and Green Belt. <u>Alterations to the Green Belt boundary to accommodate pitches and plots will only be considered in exceptional circumstances, to meet a specific identified need. In such circumstances and as part of the Site Allocations Plan, sites will be specifically allocated as a Gypsy, Traveller and Travelling Showpeople’s site only.</u></li> <li>v) <u>the availability of alternative deliverable sites for Gypsies and Travellers and Travelling Showpeople</u></li> <li><del>iv) Alterations to the Green Belt boundary to accommodate sites will only be considered in exceptional circumstances, to meet a specific identified need. In such circumstances and as part of the Site Allocations DPD, site will be specifically allocated as a Gypsy, Traveller and Travelling Showpeople site only.</del></li> <li><del>v) Sites should avoid designated areas, including nature conservation sites and Special Landscape Areas and should not introduce unacceptable off-site impacts such as might occur from recreational pressures on such sites.</del></li> </ul>
MM70	116	Policy EN1	<p>Amending Policy EN1 to move the second bracket from after “feasible” to after “conversion”:</p> <p>All developments of 10 dwellings or more, or over 1,000 square metres of floorspace, (including conversion) where feasible), will be required to:</p>

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			<p><b>New text: <u>underlined</u> Deleted text <del>Struckthrough</del></b></p>
MM71	120	5.4.49	<p>Modify paragraph 5.4.49 as follows:</p> <p><u>The Department of Energy and Climate Change’s (DECC) document, The Future of Heating (2013) says “Local authorities are in the best position to undertake the Energy Master planning of areas suitable for heat networks and the initial assessment of the feasibility of projects. They are well placed to act as ‘brokers’, for example putting together prospective promoters of projects with prospective providers and customers for heat.” In addition, local authorities are encouraged to consider low carbon and renewable heat networks through the National Planning Policy Framework published in 2012. The framework encourages local planning authorities to identify opportunities for development that can draw their energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers. Future Energy Yorkshire have completed a study which recommends the establishment of a strategic body (‘Energy Leeds’) whose role would be to take responsibility for the delivery of energy related activities. These activities could include the co-ordination and delivery of heat networks. This role is particularly important to enable developments to reach code levels 5 and 6 of the Code for Sustainable Homes (as required under Policy EN2). Heat distribution is most likely to be viable in areas of higher density. Opportunities exist around Leeds City Centre (for example major development proposals for the Victoria Gate area, in the provision of an new energy centre, low carbon heating, cooling, electricity generation and potentially other utilities), the Aire Valley, the universities and St James University Teaching Hospital, as a consequence of high heat loads, which offer the potential for low carbon energy for local communities.</u></p>
MM72	120	5.5.50	<p>Modify paragraph 5.5.50 as follows:</p> <p><u>The Council has mapped the areas of greatest potential for the creation of heat networks across the district (see Map 20). DECC has developed a heat map for England, which helps to identify areas of high heat demand and potential sources of heat supply. The current heat map shows total heat demand for public, commercial, industrial and residential buildings. DECC have made this data available to local authorities and the council is now undertaking a significant piece of work that will broaden our evidence base further. This is the Strategic Heat Programme, led by Leeds City Region, which has two elements. First, a high level heat map covering the entire city and city region, identifying areas that currently have high heat demand, potential anchor loads, major heat supply plant and their replacement dates, potential heat supply locations and the estimated heat demand of future developments, in order to help guide the implementation of this policy to the most appropriate areas for district heating. Essentially, those areas identified as having high current/future heat demand will have a presumption in favour of district heating. Second, the study will develop an Energy Masterplan for the Aire Valley and city centre. This will be achieved by conducting a very detailed study of potential DH opportunities in the Aire Valley and city centre, building on previous studies. The Energy Masterplan will provide information on preferred network routes, potential customers and a detailed business case for implementation. Map 20 shows the locations with the greatest potential for the creation of heat networks, this map will be updated with the Strategic Heat Map when it becomes</u></p>

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			<p><b>New text: <u>underlined</u> Deleted text <del>Struckthrough</del></b></p> <p><u>available in 2014.</u> Where there is an existing heat network then it is expected that new developments will make the necessary connections. Where there is no heat network, but there is a low cost heat source such as energy from waste facilities, then opportunities should be taken through proposals for developer to investigate the potential for connection. Where neither existing heat networks nor low cost heat sources are available or feasible then a new heating plant/energy centre needs to be provided.</p>
MM73	120	5.5.51	<p>Modify paragraph 5.5.51 as follows</p> <p>Heat Density is the annual heat demand in KWh divided by 8,760 (the number of hours in a year), to give a heat demand, and then divided by the area of land concerned. This calculation is key to evaluating heating network viability. Research conducted by the Department of Energy and Climate Change into the potential for district heating in the UK has found that areas with a heat density above 3,000 kWh/km<sup>2</sup> is currently required to create a viable network. <u>The National Heat Map referenced above and available from <a href="http://tools.decc.gov.uk/nationalheatmap/">http://tools.decc.gov.uk/nationalheatmap/</a> shows that much of Leeds is already above this threshold.</u> The higher the heat density the more cost effective the network. <del>A</del><u>As</u> technology and expertise improve the current viability threshold will decrease.</p>
MM74	120	After paragraph 5.5.51	<p>Insert a new paragraph after paragraph 5.5.51 and renumber subsequent paragraphs:</p> <p><u>5.5.52 The Council always encourages pre-application discussions but ultimately the developer has responsibility for preparing the assessment for their site, and submitting it with their planning application. The information will then be assessed as part of the planning application by the development control officer, with support from technical officers in the council, who will ultimately determine whether or not district heating is technically viable, appropriate to the development and in an area with sufficient potential to accommodate a district heating scheme. However, before this formal planning stage is reached, the Council has an important role to support developers, in order to facilitate the development of district heating networks across the city. This support will be initiated when a developer comes in for a pre-application meeting, where it will be explained to them what is required to meet EN4 and what assistance the Council can give. Specialist energy and sustainable construction officers will help developers to evaluate options for their site and if other approaches to low carbon and distributed energy are more appropriate will recommend these alternatives to both developers and development control officers.</u></p>

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			<p><b>New text: <u>underlined</u> Deleted text <del>Struckthrough</del></b></p>
MM75	121	Policy EN4	<p>Modify Policy EN4 as follows:</p> <p><b><u>POLICY EN4: DISTRICT HEATING</u></b> Where technically viable, appropriate for the development, and in areas with sufficient existing or potential heat density, developments of 1,000 or more square metres or 10 dwellings or more (including conversions where feasible) should propose heating systems according to the following hierarchy:</p> <ul style="list-style-type: none"> <li>(i) Connection to existing district heating networks,</li> <li>(ii) Construction of a site wide district heating network served by a new low carbon heat source</li> <li>(iii) Collaboration with neighbouring development sites or existing heat loads/sources to develop a viable shared district heating network,</li> <li>(iv) In areas where district heating is currently not viable, but there is potential for future district heating networks, all development proposals will need to demonstrate how sites have been designed to allow for connection to a future district heating network.</li> </ul> <p><del>All major developments will be expected to contribute (either financially or in-kind) towards the creation of new or enlargement of existing, district heating networks. Such contributions will be secured through the use of legal agreements and subsequently financial contributions through the CIL once introduced.</del></p> <p>Carbon savings and renewable energy generation achieved under this policy will contribute to EN1 (i) and EN1 (ii).</p>
MM76	121	Map 20	Update to Map 20 Locations with Greatest Potential for the Creation of Heat Networks (nb this will be re-numbered as a result of Modification MM62 above),
MM77	Monitoring Framework P16	Monitoring Indicator 6 'Five year supply of housing sites and the long term housing trajectory'	<p>Amend the third paragraph of the Definition as follows:</p> <p>Each year the next five year period from 1st April following the current monitoring year will set out the net supply of additional dwellings i.e. the five year supply. Specific deliverable sites will be determined by the Site Allocations Plan and sourced from the SHLAA for each rolling five year period <u>including the net supply of student accommodation, older people's housing (use class C2 and C3) and bringing long term empty homes back into use from the base date of the plan.</u> The expected number of dwellings likely to be completed in the current year will be identified taking into account net additional dwellings that have already been recorded.</p>

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**Summary Monitoring Table**

The following summary table is intended to provide an overarching monitoring framework for the Core Strategy. Given the plan period to 2028, the monitoring framework may however be subject to change as new requirements emerge over this period.

No.	Indicator	Key Policies	Targets	Triggers / Intervention	Source
<b>City Centre</b>					
1	% of development activity to the south of the river in the City Centre as compared to north of the river	SP3	Increasing development activity in the southern part of the city centre up to 2020 and exceeding development activity when compared to the northern half post 2020.	Review mechanisms for bringing forward development opportunities to identify any barriers preventing southern development e.g. preparation of planning frameworks.	LCC City Centre Audit Building Control Council Tax
2	Vibrancy, character and cultural appeal of the City Centre	SP3	Increase in footfall, hotel occupancies, residential developments and environmental enhancements. Increase of developments such as cinema screens, theatres, live music venues, restaurants and bars/pubs.	Working with other council services, to help support and facilitate opportunities and promotional events.	LCC City Centre Audit National vibrancy rankings e.g. Experian
<b>Managing the needs of a successful district</b>					
3	Net additional dwellings by location within the Settlement Hierarchy	SP1, SP7	The release of land and completions meet the broad spatial distribution pattern outlined in SP1 and table 1 and SP7 table 2	In the case of over provision / under provision in any one area seek to determine whether it is appropriate to limit / promote permissions or adjust the phased release of allocated sites until an appropriate balance is maintained	Housing Land Monitor Site Allocations Plan SHLAA SHMA Five Year Housing Land Supply
4	Net additional dwellings by Housing Market Characteristic Area	SP7	The release of land and completions meet the broad spatial distribution pattern outlined in SP7 table 3		
5	New and converted housing units on Previously Developed Land	H1	65% of all new housing development between 2012 – 2017 to be on PDL 55% of all new housing development 2017 onwards to be on PDL	Review land release. The Council will resist further greenfield land release if the PDL targets are not being met, so as to encourage brownfield and regeneration development, as part of the overall approach of the Core Strategy	Housing Land Monitor Site Allocations Plan SHLAA SHMA Five Year Housing Land Supply
6	Five year supply of housing sites and the long term housing	SP6, H1	Maintain and update annually a 5 year supply of deliverable net housing land covering 5 years from the beginning of the next monitoring year and in line with para 47 of the NPPF. For the period 2012/13	Positively maintain an annual five year housing land supply by bringing forward further supply identified in the next phase of the Site Allocations Plan (and/or SHLAA),	Housing Land Monitor Site Allocations Plan SHLAA



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No.	Indicator	Key Policies	Targets	Triggers / Intervention	Source
	trajectory		<p>to 2016/17 this will be 3,660 per year and 4,700 per year thereafter.</p> <p>Identify developable sites for housing for the plan period and illustrate in a housing trajectory.</p> <p>For monitoring and performance purposes assess a residual housing requirement against plan requirements from April 1<sup>st</sup> 2012 as set out in Policy SP6 (note 3,660 homes per annum between 2012 and 2017) and bring forward additional sites to accommodate any under delivery.</p>	where there is not an identified five year supply, sufficient to achieve a five year supply.	
7	Housing completions by land type	H1, SP1	<p>To identify 66,000 units for housing delivery over the lifetime of the plan through the Site Allocations Plan.</p> <p>To ensure that windfall delivery meets or exceeds the allowance set of 8,000 units (500 units / annum) over the plan period.</p>	If windfall is not being met, as assessed over a five year period the Council will need to review Policy H1 to determine if further land release is needed. This review should take into account rates of housing delivery on PDL, vacancy rates, accessibility and delivery as it relates to the Settlement Hierarchy.	Housing Land Monitor Building Control
8	Density of new housing sites	H3	<p>For sites over 5 units, net densities as follows:</p> <ul style="list-style-type: none"> <li>• City Centre and fringe – 65 units/ha</li> <li>• Other urban areas – 40 units/ha</li> <li>• Fringe Urban Areas – 35 units/ha</li> <li>• Smaller Settlements – 30 units/ha</li> </ul>	If the targets in SP1 and SP7 are not being met due to lower than anticipated densities, the Council will seek to more stringently enforce Policy H3 as necessary.	Planning permissions Building Control
9	Mix of housing units delivered each year by housing type and number of bedrooms	H4	Preferred housing mix as follows and shown in Table H4:	Where it is found that the targets in Table H4 are not being met over a number of years (average provision over the previous three to five years), the Council will review the housing mix policy against the current and projected population demands. This is to ensure that the policy is still relevant to the current and expected residential make-	Planning permissions Building Control

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No.	Indicator	Key Policies	Targets	Triggers / Intervention	Source																
			<table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Type</th> <th>Target %</th> </tr> </thead> <tbody> <tr> <td>Houses</td> <td>75</td> </tr> <tr> <td>Flats</td> <td>25</td> </tr> <tr> <th>Size</th> <th>Target</th> </tr> <tr> <td>0/1 bed</td> <td>10</td> </tr> <tr> <td>2 bed</td> <td>50</td> </tr> <tr> <td>3 bed</td> <td>30</td> </tr> <tr> <td>4 bed+</td> <td>10</td> </tr> </tbody> </table>	Type	Target %	Houses	75	Flats	25	Size	Target	0/1 bed	10	2 bed	50	3 bed	30	4 bed+	10	up of the District. If the policy is found to be still relevant, the Council will need to encourage developments to help address the problem through the planning application stage. Refusals of planning applications may be required if they do not meet the mix.	
Type	Target %																				
Houses	75																				
Flats	25																				
Size	Target																				
0/1 bed	10																				
2 bed	50																				
3 bed	30																				
4 bed+	10																				
10	Gross affordable housing completions	H5	<p>The SHMA identifies need for affordable homes as 1,150 affordable units per annum.</p> <p>Targets and thresholds are set out in Policy H5 and are dependent on housing market characteristic area and size of scheme.</p>	Review SHMA, Economic Viability Study and Economic Viability Assessment as necessary dependant on achievability of targets and changes to the key inputs e.g. state of the housing market / economy. To review alternative delivery options, such as obtaining grants, to enable affordable housing.	Quarterly delivery forecasts from Neighbourhoods and Housing																
11	Total number of C2 housing units delivered per annum	H6	No target	Monitor development within the article 4 areas of Leeds and monitor future concentrations of HMOs.	Housing Land Monitor Council Tax																
11a	Total number of C2 housing units delivered per annum	SP6, H1, H6	<p>No target</p> <p>Total C2 older persons houses will be monitored and will contribute to overall housing completions, in line with the NPPG, where:</p> <p>there is a net additional stock (taking account of any C2 demolitions in the past monitoring year)</p> <ul style="list-style-type: none"> <li>units are self-contained for a single household (i.e. akin to C3 accommodation), or</li> </ul>	<p>CLG have indicated that further guidance will be provided to support the monitoring of this stock of housing.</p> <p>Older persons C3 use class housing is counted as part of overall dwelling completions.</p>	Housing Land Monitor Council Tax																

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No.	Indicator	Key Policies	Targets	Triggers / Intervention	Source
			<ul style="list-style-type: none"> <li>• units free up accommodation from the existing housing stock</li> </ul>		
11b	Total number of student housing units	SP6, H1, H6	<p>An increasing number of purpose built accommodation to free up existing housing stock for non-students.</p> <p>Total student housing units will be monitored and will contribute to overall housing completions, in line with the NPPG, where:</p> <ul style="list-style-type: none"> <li>• there is net additional stock (taking account of any purpose built student housing demolitions in the past monitoring year)</li> <li>• units are self-contained (a ratio of beds to households will be dependent on the design of the scheme)</li> <li>• units are halls of residence (a ratio of 4:1 beds to households will be applied)</li> </ul>	Where there is a decreasing number of purpose built accommodation application of the policy will be evaluated to see whether it is unduly restricting delivery / sufficient opportunities for purpose build accommodation exist.	Housing Land Monitor  Planning applications / permissions
12	Total number of Gypsy and Traveller pitches in the District as compared to the previous year	H7	<p>As set out in Policy H7 as follows:</p> <ul style="list-style-type: none"> <li>• 62 pitches for Gypsies and Travellers made up of: <ul style="list-style-type: none"> <li>○ Council provision = 25 pitches;</li> <li>Private provision = 28 pitches;</li> <li>Negotiated stopping provision = 9 pitches</li> </ul> </li> </ul>	Identify sites through the Site Allocations Plan to meet the needs as set out in Policy H7. Ensure that changes to the inputs of the 2014 assessment upon which the needs are based are reflected as appropriate e.g. current expressed preference for private provision may materialise during the plan period as need for Council provision. Be responsive to changes in need arising through the plan period.	LCC, Housing Support Leeds Gypsy and Traveller Exchange

**Appendix 2**  
**Leeds City Council Core Strategy Main Modifications**

No.	Indicator	Key Policies	Targets	Triggers / Intervention	Source
13	Total number of travelling showpeople pitches in the District as compared to the previous year	H7	As set out in Policy H7 as follows: <ul style="list-style-type: none"> <li>15 plots for Travelling Showpeople</li> </ul>	Identify sites through the Site Allocations Plan to meet the needs as set out in Policy H7. Be responsive to any changes in need arising through the plan period.	Travelling Showmen's Guild
14	% of empty homes in the District (as measured through properties classified as long term vacant)	SP1, H1, SP6	Reduce the current short term (i.e. less than 6 months empty) vacancy rate from 4.6% (April 2012) to around 3%.  Reduce the number of long term empty properties by at least 400 dwellings per annum net up to 2020 and by progressively fewer dwellings per annum after 2020 as the baseline stock is returned to use.  Empty properties for longer than six months which are returned to use will contribute to overall housing completions in line with the NPPG.	Monitor short term vacancy rates alongside the number of new housing units developed to ensure that appropriate churn is maintained, new housing is having a positive impact on vacancy rates.  To ensure that there is no double counting long term empty properties which became long term empty after 1 <sup>st</sup> September 2012 will not contribute towards housing completions.	Council Tax Records  SHMA  LCC  Empty Homes Strategy
15	Total amount of additional employment floorspace by type	EC2, SP9	493 ha of land for employment and 1 million sq m of office floorspace over the plan period as set out in para 5.2.41	To safeguard land against loss to other uses as supported by Policy EC3. Review target as per Employment Land Review updates to ensure that total requirements are in line with land supply	Employment Land Review Employment Land Availability Database Employment Land Supply analysis Regional Econometric Model Employment updates
16	Total demand for employment land forecasted in the District until the end of the plan	SP9, EC1, EC2, EC3	To ensure that the forecasted demand for land can be met by the available land supply	Depending on whether demand is more or less than supply: a) call for sites to identify appropriate parcels of land to deliver employment opportunities, b) more stringent application of Policy E3, which seeks to preserve current employment land from being lost to non-employment uses c)	Employment Land Review Employment Land Availability Database Employment Land Supply analysis Regional Econometric
17	Employment land available by sector		Employment land supply accommodates demand for employment		

**Appendix 2**  
**Leeds City Council Core Strategy Main Modifications**

No.	Indicator	Key Policies	Targets	Triggers / Intervention	Source
18	Net change of employment land in Leeds			review of the portfolio of sites available for employment uses and to release to other, appropriate uses. In all instances a sustained trend (5 years) will be required before action is taken so as to smooth out economic fluctuations.	Model Employment updates
19	Retail land supply	P1, SP3, P5, P6, P7, P8	Forecast demand for retail to be met by the availability of retail land supply	If forecasted demand is greater than Retail land supply, the Council may undertake a review of forecasted demand. The Council may also undertake a comprehensive review of its retail sites to identify if the portfolio is up to date, if interventions are needed to help bring forward sites or if new site allocations are needed.	Employment Land Availability Database Leeds City and Town Centre Study Retail news bulletins
20	Total leisure development delivered in District	P1, SP3, P9	No target	Work with market and leisure providers to facilitate delivery of appropriate development	Employment Land Availability Database Leeds City and Town Centre Study
<b>Place Making</b>					
21	% of A1-A5, B1a , C1 and D1-D2 development within and on the edge of town and local centres	P1, P2, P3, P4, P8	For the majority of office development to be located in the City Centre.	Review of application of sequential test when determining planning policies.	Employment Land Review Employment Land Availability Retail monitoring
22	% of A1-A5, development within and on the edge of town and local centres outside town and local centres		For town and local centres to provide some small scale office development.	Review to see if sufficient locations are available in the City, town and local centres to accommodate uses.	
23	Provision of Infrastructure as outlined in CIL	ID2	As in IDP and determined through CIL		Community Infrastructure Levy Infrastructure Delivery Plan
24	Provision of Green Infrastructure and greenspace as	SP13, G1, G2, G3, G4,	To see continued investment to improving the offer of greenspace and green infrastructure in the District in line with	Review reasons for lower achievement and apply policies more strictly if necessary.	Open Space and Recreation Needs Assessment

**Appendix 2**  
**Leeds City Council Core Strategy Main Modifications**

No.	Indicator	Key Policies	Targets	Triggers / Intervention	Source
	obtained through development process and other sources	G5, G7	standards as set out in Policy G3		Planning permissions
25	Amount of greenspace lost to redevelopment	G6	To lose no greenspace that is not justified according to Policy G6 criteria	Review reasons for lower achievement.	Planning permissions
26	Number of Conservation Area appraisals completed as a proportion of total Conservation Areas	P11	100%		Conservation Area Appraisals
27	Number of buildings noted as 'At Risk' on the 'At Risk Register'	P11	For the number of buildings considered to be 'At Risk' in Leeds to be less in 2028 than at the start of the Plan. In 2012, there were 11 buildings at risk in Leeds.		Buildings At Risk Registrar
28	Number of Listed Buildings demolished	P11	Zero	Examine reasoning for demolitions. Raise awareness about the importance of retaining listed buildings. Apply policies more stringently.	Listed Buildings Register
29	Total development in Regeneration Priority Programme Areas	SP4, SP5	There is a priority for development within regeneration areas, but no specific target per se. The Aire Valley has specific targets for housing development (minimum of 6500 homes) and to provide at least 250 ha of employment land.	See indicators relevant to the City Centre and Meeting the needs of a Successful District.	Aire Valley Area Action Plan documents Neighbourhoods and Housing Regeneration Priority Programmes
30	Performance as measured by the Index of Multiple Deprivation	SP4	Identify how poorly performing neighbourhoods (as measured by the index of multiple deprivation) are changing over the years.	Determine whether the Regeneration Priority Programme Areas (as set out in SP4) represent the most appropriate areas for regeneration support.	Index of Multiple Deprivation Ward and area based analysis
31	Delivery of a City Centre park	SP3	Delivery of a City Centre Park of at least 3 hectares in size.		South Bank Planning statement and permissions
<b>A Well Connected District</b>					
32	Accessibility of new dwellings to local services, employment, health, education and centres	SP1, T1, T2, P9	Most new housing development is accessible to a variety of services either by walking or by public transportation.	Review the location of allocated housing land available for development.	Housing Land Monitor Strategic Housing Land Availability Assessment

**Appendix 2**  
**Leeds City Council Core Strategy Main Modifications**

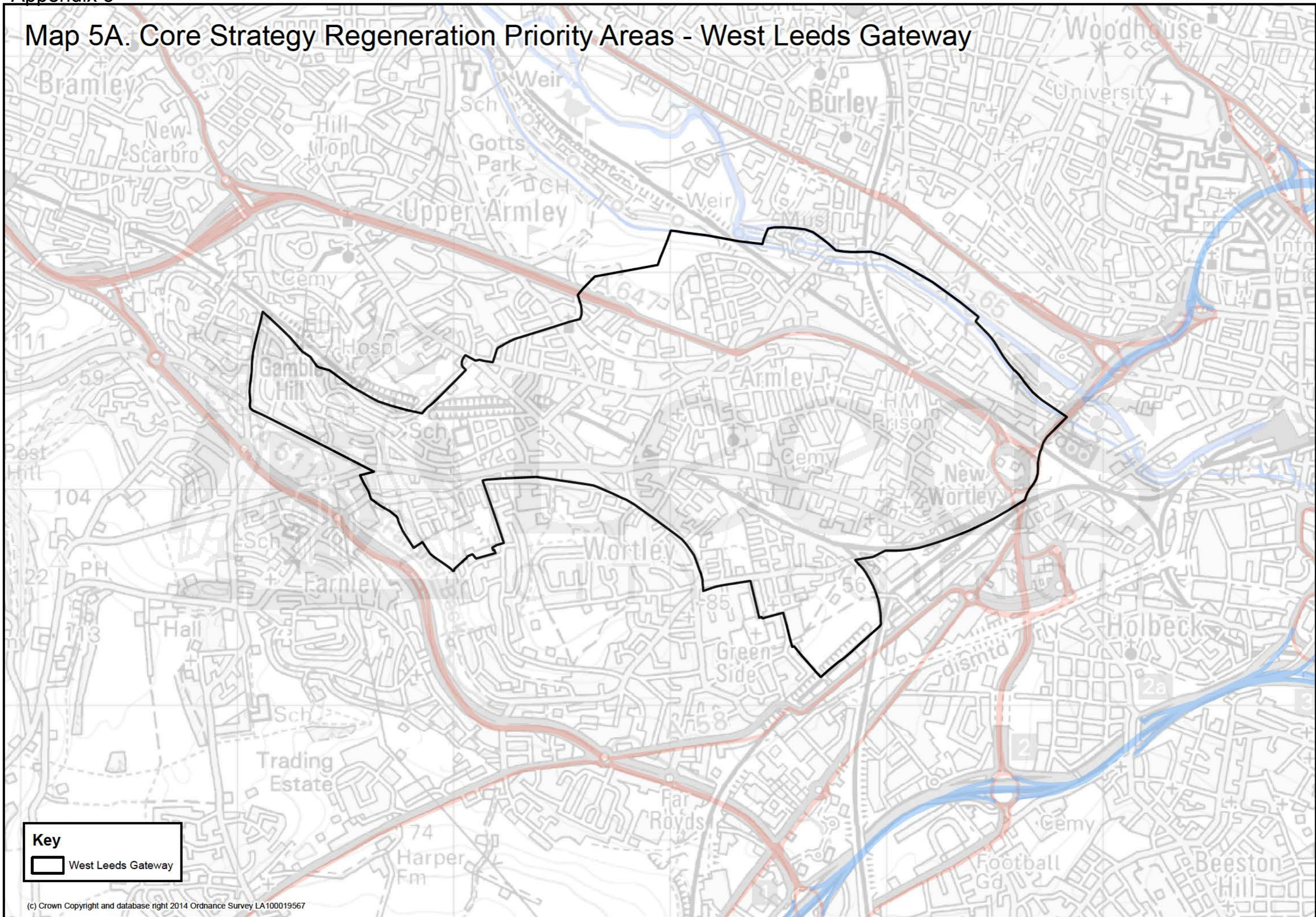
No.	Indicator	Key Policies	Targets	Triggers / Intervention	Source
33	Accessibility of new employment, health, education, leisure and retail	EC1, T1, T2, P7, P8, P9,	Most new employment, health, education, leisure and retail uses is accessible to a variety of services either by walking or by public transportation.	Apply Policies SP9, EC1, EC2, P7 and T2 more stringently. Review the location of allocated employment land available for development.	Employment Land Review
34	The delivery of transport management priorities	T1, T2, SP1	Increasing the modal share of sustainable transport use and supporting new development / growth areas	Review priorities to determine if appropriate. Seek investment to further enact priorities	Local Transport Plan
35	Mode of travel to work	T1, T2, SP1	Increasing the modal share of sustainable transport use	Lobby for public transport infrastructure improvements and stricter application of policies to focus new employment in locations accessible by public transport, cycling and walking	Local Transport Plan
36	Expansion of the Leeds Core Cycle Network	T1, T2		Review constraints.	Local Transport Plan
<b>Managing Environmental Resources</b>					
37	Net amount of designated sites directly lost to development	G8, G9	0 ha of land designated as SSSI, SEGI or Local Wildlife Site directly lost to development without replacement or improvement	Liaise with Council services and West Yorkshire Ecological Advisory Service	Natural England Planning permissions
38	Increase in the amount of tree cover in the District	G2, G9	Increase the amount of tree cover in Leeds from 6.9% to the England average of 8.2% (an additional 32, 000 trees).	Negotiations on planning applications and identification of major opportunities	Trees in towns Planning permissions Planning Briefs
39	Planning permissions granted contrary to Environment Agency advice on flood risk and water quality	EN5, SP1	Reduce number	Negotiations on planning applications	Environment Agency
40	Delivery of the Leeds Flood Alleviation Scheme	EN5, SP3	Delivery of scheme by 2025	Progress monitoring via the appropriate Programme Board	Leeds City Council
41	Air quality in Leeds	EN1, SP1, T1, T2	Continued reduction of specific pollutants throughout the lifetime of the Plan	Consider need for specific technical guidance to assist planning applications	Leeds City Council
42	Renewable energy generation	EN1, EN2, EN3,	75MW of installed capacity by 2021	Review of development application process to ensure policy implementation	Digest of United Kingdom energy statistics (DUKES)

**Appendix 2**  
**Leeds City Council Core Strategy Main Modifications**

No.	Indicator	Key Policies	Targets	Triggers / Intervention	Source
		EN4		Identify alternate sources of funding to promote and install renewables	Natural Resources and Waste Local Plan
43	Production of primary land won aggregates	EN7	As set out in the Natural Resources and Waste Local Plan  Average annual production of sand and gravel of at least 146,000 tonnes per annum until 2026.  Average annual production of crushed rock of at least 440,000 tonnes per annum until 2026.	Action will be taken when provision undershoots 25% over five years of the plan period  Review apportionment alongside the other West Yorkshire Authorities.  Feedback to the YHRAWP to review the sub-regional apportionment.	Natural Resources and Waste Local Plan Regional Aggregates Working Party Updates
44	Capacity of new waste management facilities	EN6	To provide for the projected arisings by waste stream to 2026 as follows in tonnes per annum: MSW - 383,976 C&I - 1,212,000 CD&E - 1,556,000 Hazardous -103,026	Review if any new national waste management targets are set for after 2020	Natural Resources and Waste Local Plan
45	Amount of municipal waste arising and managed by waste stream	EN6	To provide for the projected arisings of Municipal Solid Waste - 383,976 tonnes per annum	Failure to meet targets over a five year period  Review if any new national waste management targets are set for after 2020.	Natural Resources and Waste Local Plan

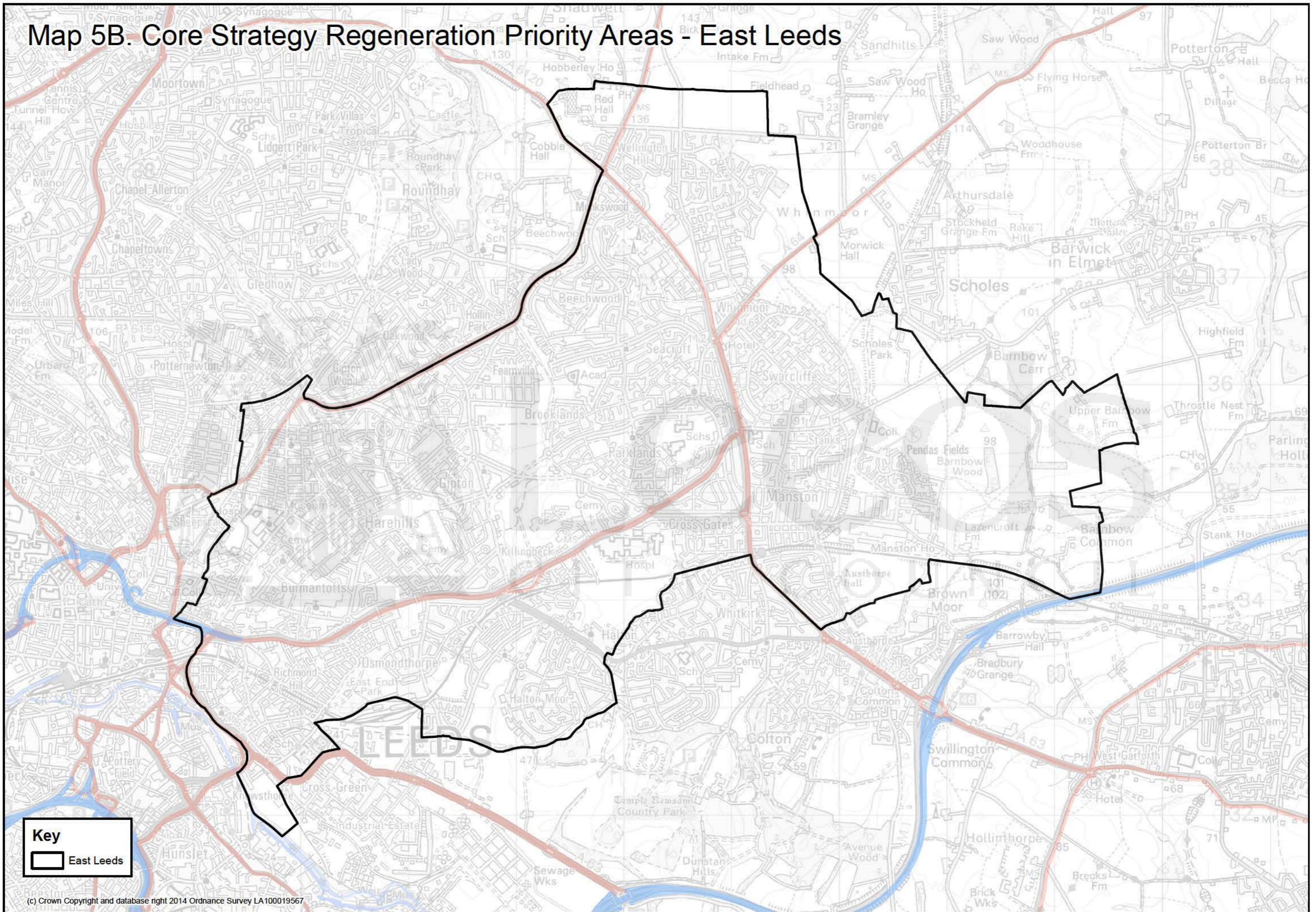


# Map 5A. Core Strategy Regeneration Priority Areas - West Leeds Gateway



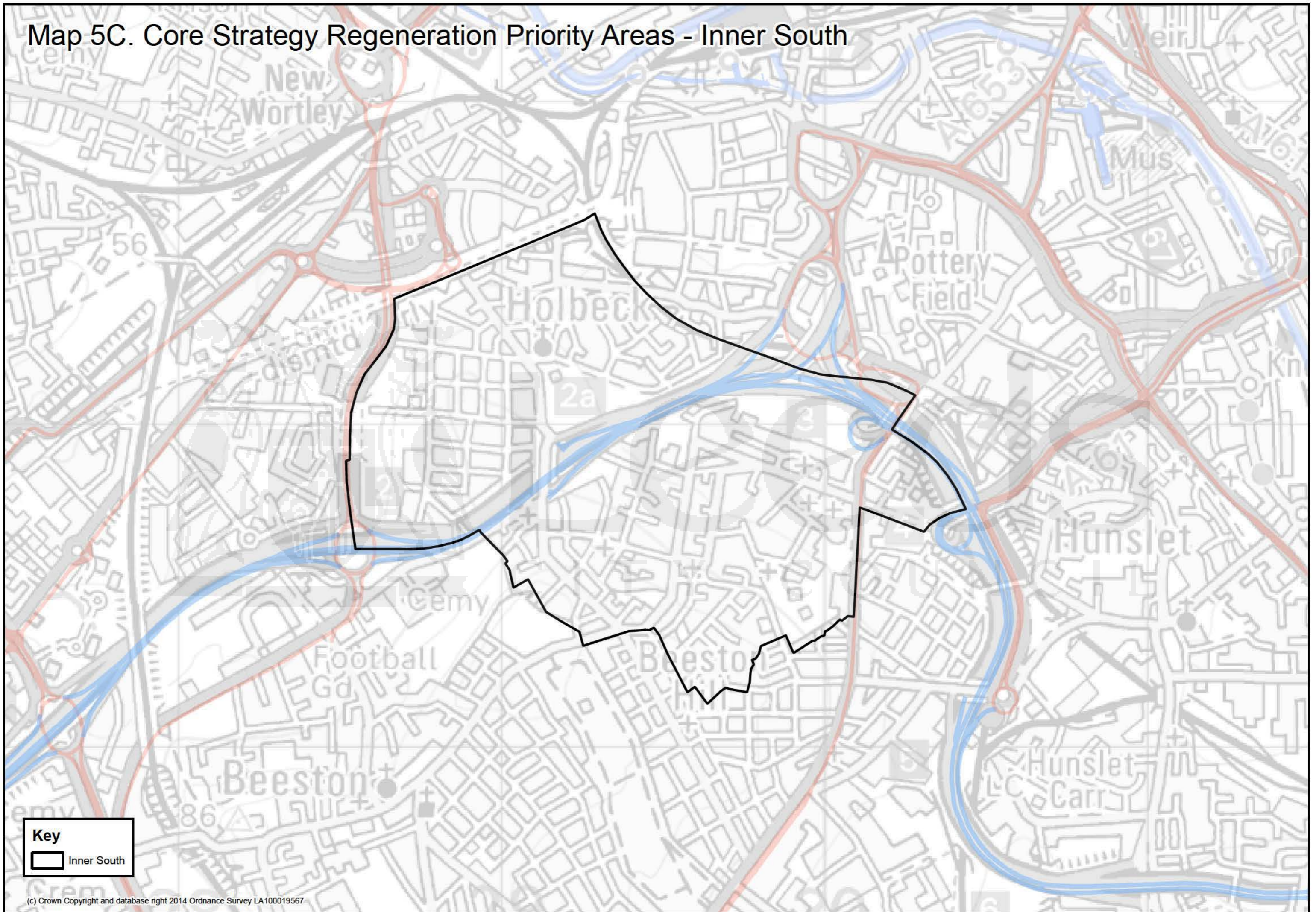
**Key**  
[Black Outline] West Leeds Gateway

# Map 5B. Core Strategy Regeneration Priority Areas - East Leeds



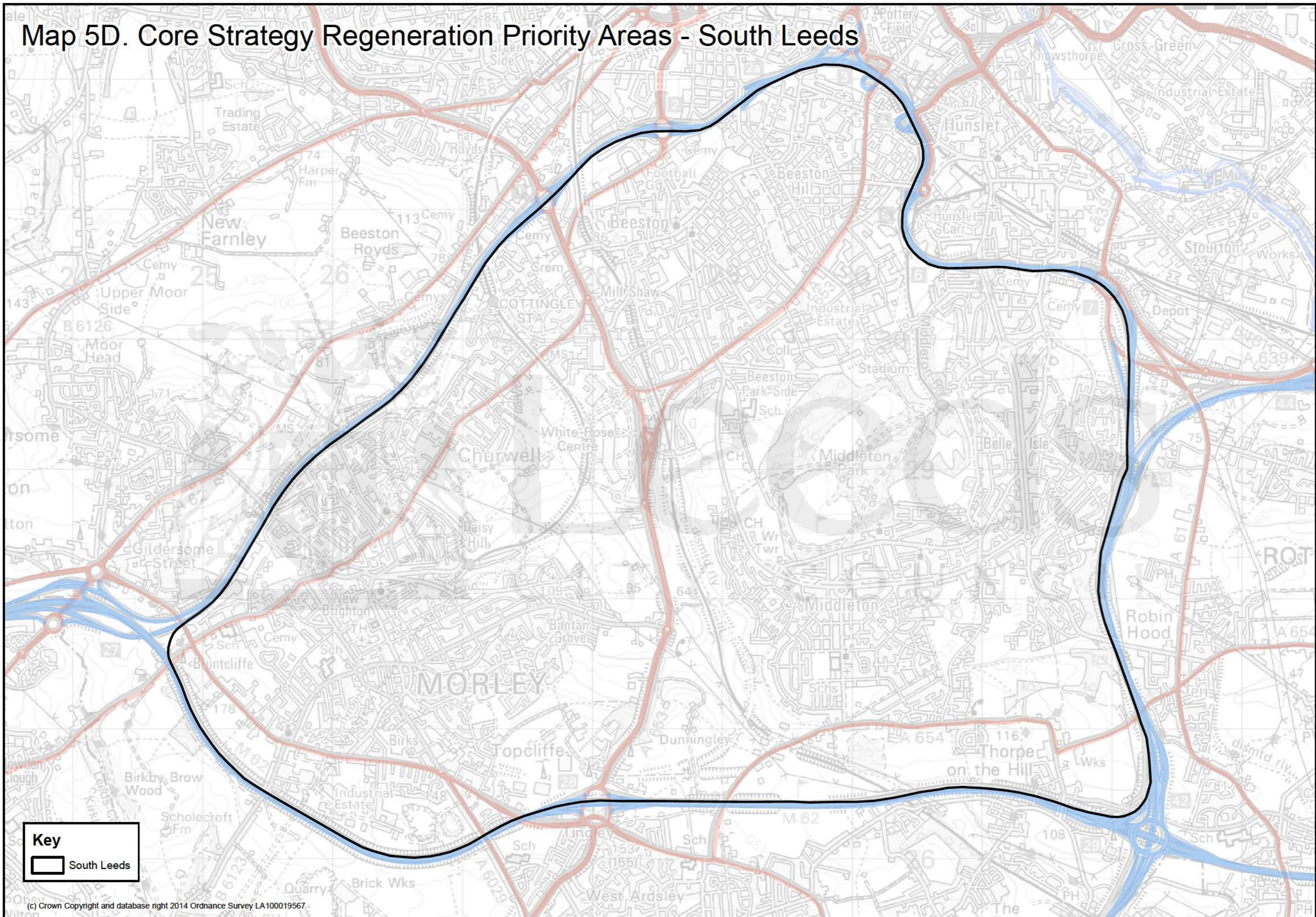
**Key**  
[Black Outline] East Leeds

# Map 5C. Core Strategy Regeneration Priority Areas - Inner South



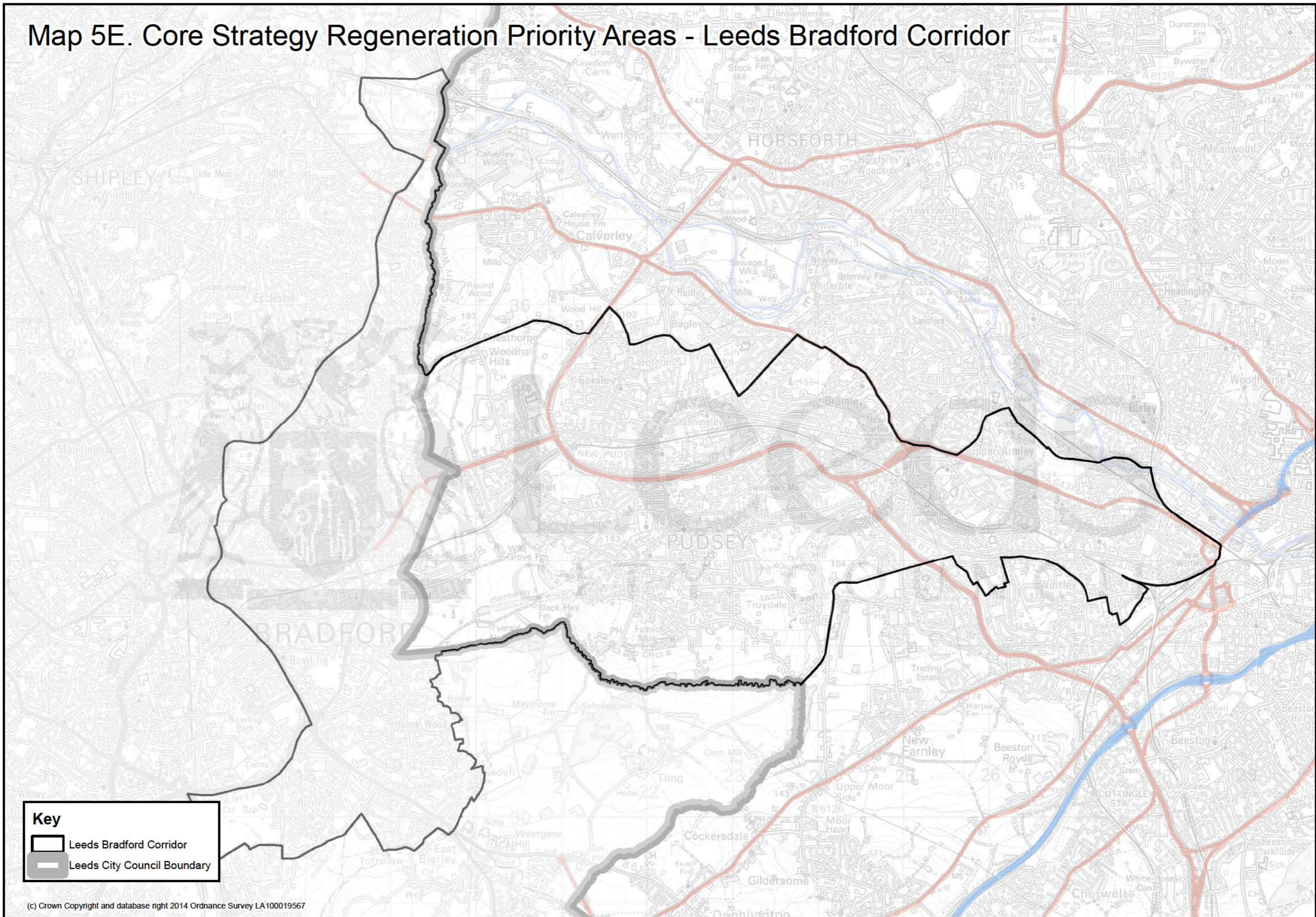
**Key**  
Inner South

# Map 5D. Core Strategy Regeneration Priority Areas - South Leeds



**Key**  
[Black Outline] South Leeds

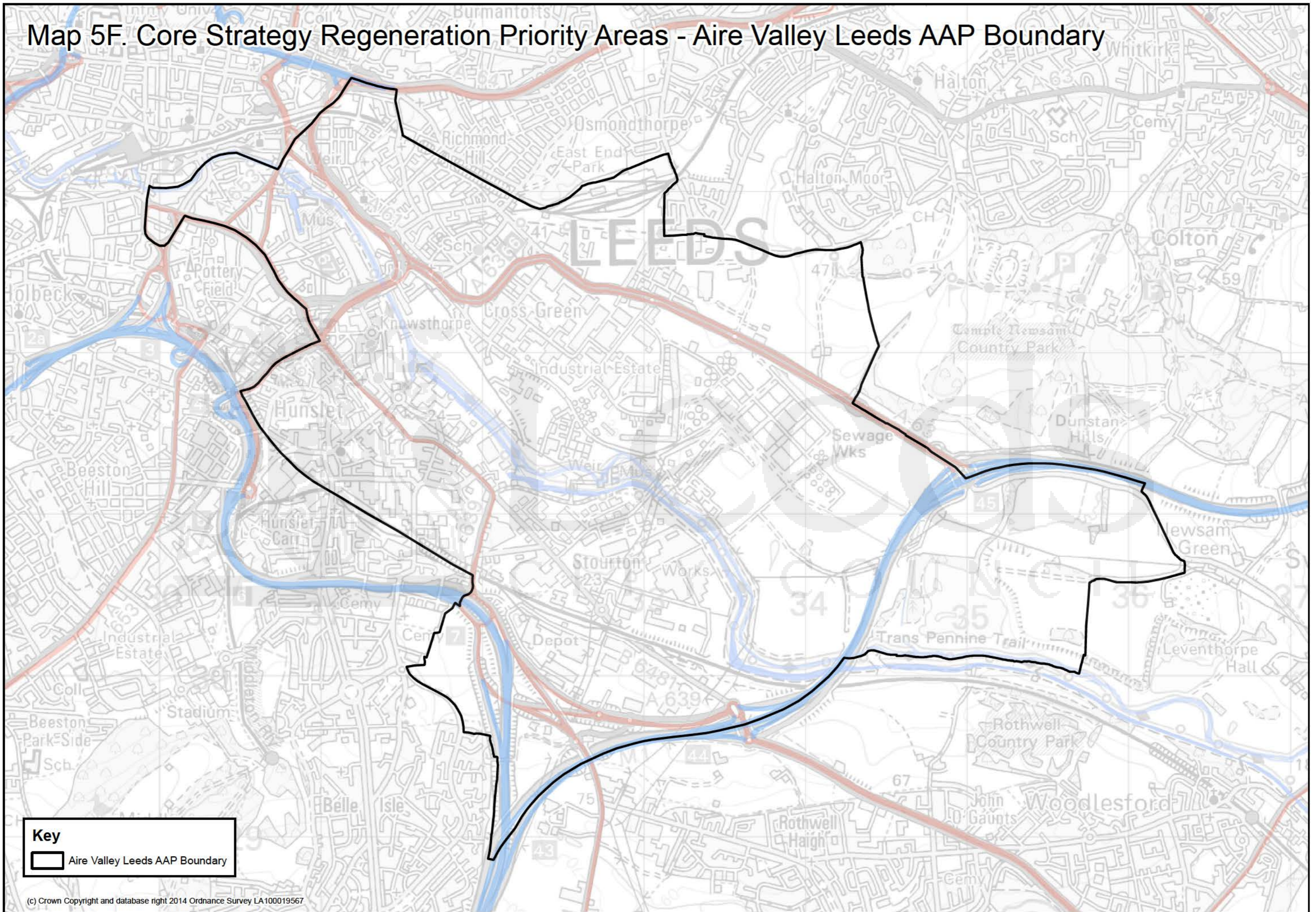
# Map 5E. Core Strategy Regeneration Priority Areas - Leeds Bradford Corridor



**Key**

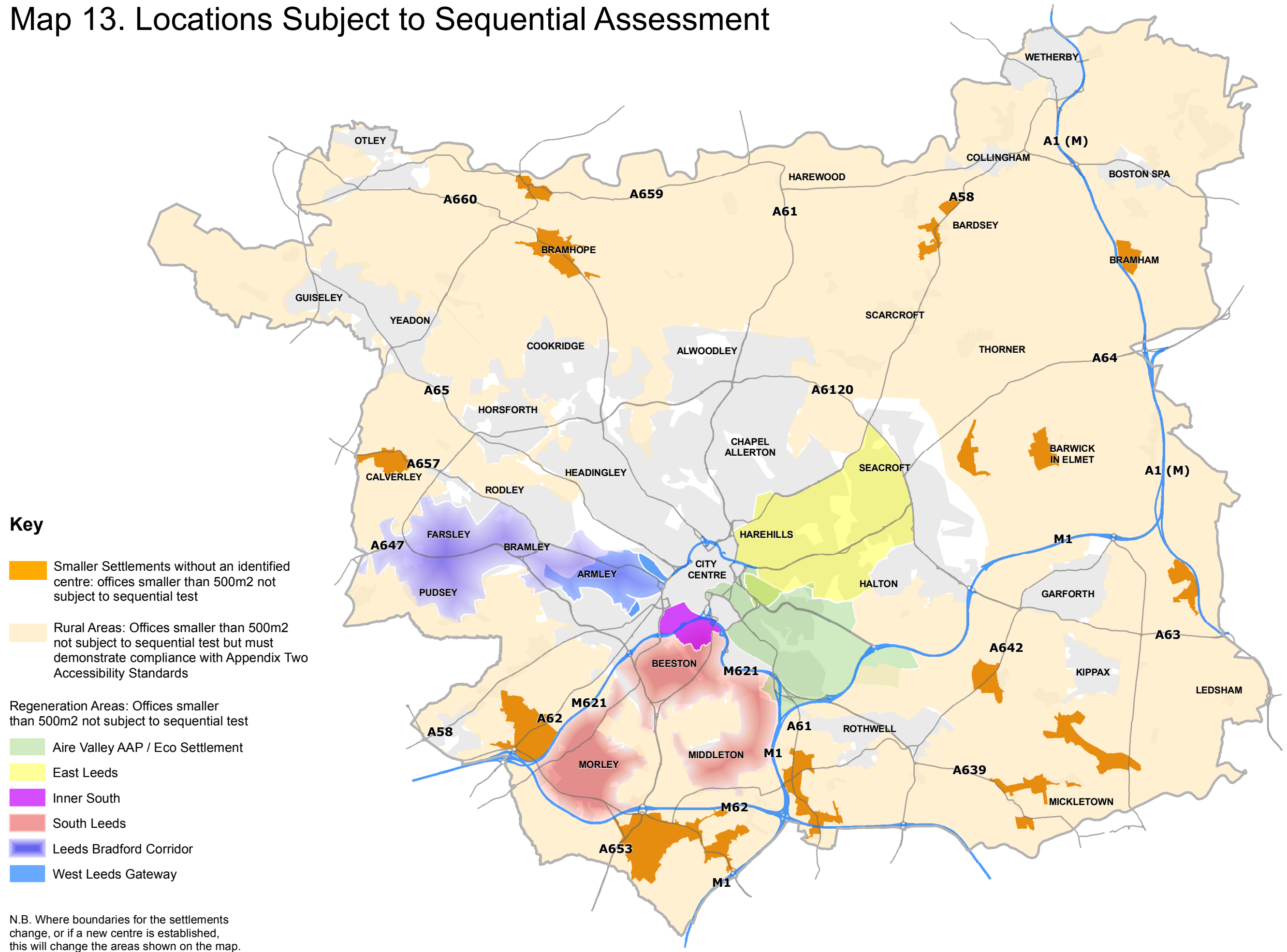
-  Leeds Bradford Corridor
-  Leeds City Council Boundary

Map 5F. Core Strategy Regeneration Priority Areas - Aire Valley Leeds AAP Boundary



**Key**  
Aire Valley Leeds AAP Boundary

# Map 13. Locations Subject to Sequential Assessment



**Key**

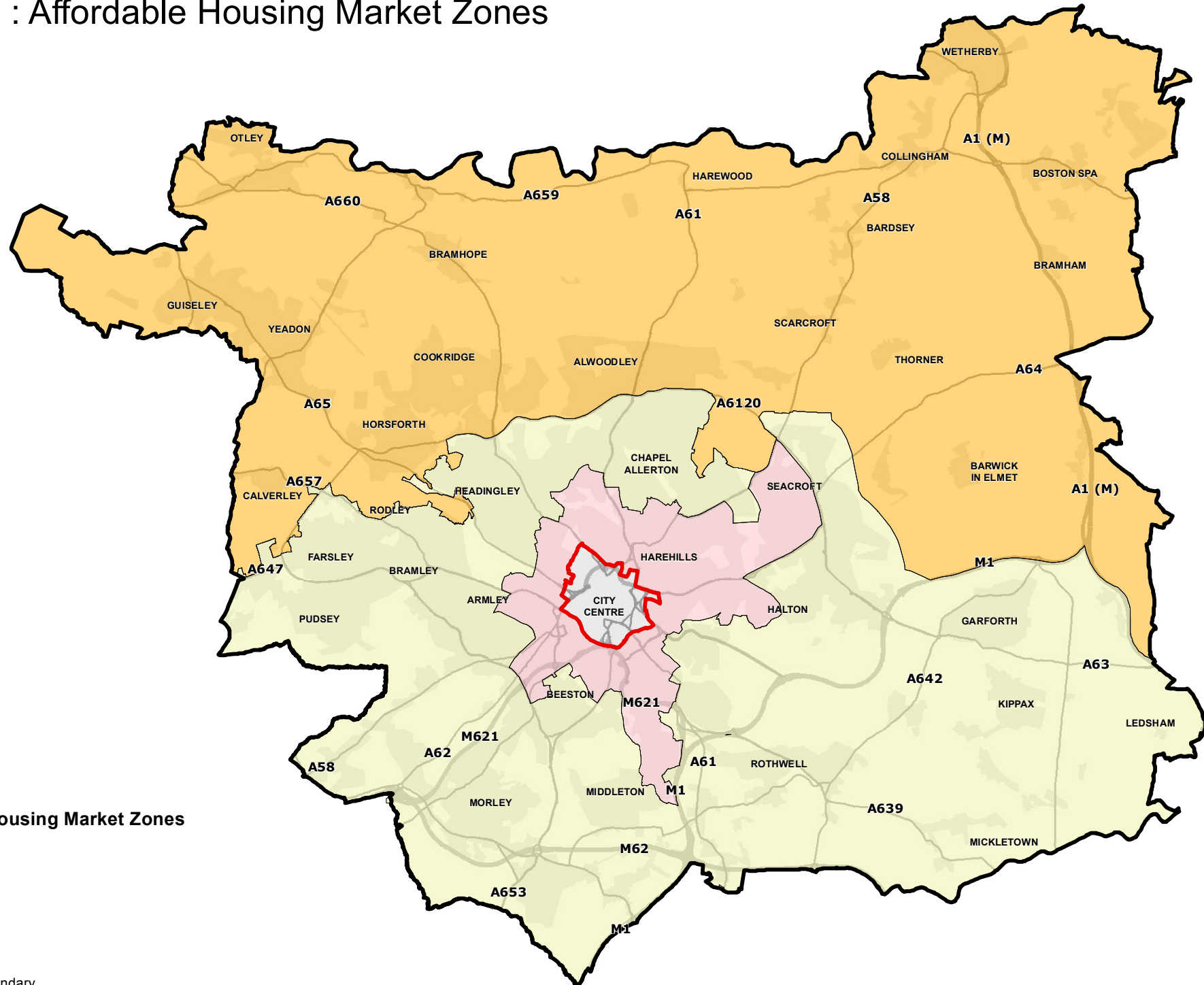
- Smaller Settlements without an identified centre: offices smaller than 500m2 not subject to sequential test
- Rural Areas: Offices smaller than 500m2 not subject to sequential test but must demonstrate compliance with Appendix Two Accessibility Standards

Regeneration Areas: Offices smaller than 500m2 not subject to sequential test

- Aire Valley AAP / Eco Settlement
- East Leeds
- Inner South
- South Leeds
- Leeds Bradford Corridor
- West Leeds Gateway

N.B. Where boundaries for the settlements change, or if a new centre is established, this will change the areas shown on the map.






# Map 12 : Affordable Housing Market Zones



## Key

### Affordable Housing Market Zones

#### ZONE

-  Zone 1
-  Zone 2
-  Zone 3
-  Zone 4
-  Leeds Boundary



Map 20. Locations with Greatest Potential for the Creation of Heat Networks

