

Craven Branch – The Campaign to Protect Rural England

CRAVEN AND THE LEEDS CITY DEVELOPMENT AREA. ALSO THE CORRIDOR ALONG THE A 65 AND THE LEEDS/CARLISLE RAILWAY LINE.

Affordable housing is very important, especially in the present crisis. However, Leeds has thousands of empty dwellings. The nearby towns in West Yorkshire have many empty houses. Keighley has many brown field areas, though these do need decontamination.

TO PUT HOUSING ESTATES ON GREEN FIELD SITES AND OPEN COUNTRYSIDE IS UNACCEPTABLE BECAUSE;

1. The biggest and most urgent problem we have is climate change. Building on green fields creates a greater problem, as it prevents carbon being absorbed.
2. Commuting to Leeds and Bradford is ecologically unacceptable and is expensive for people of lower income.
3. Since so many homes are for sale, these should be bought rather than new homes being built. This ensures a better social mix, does not require new infra structures, and is cheaper for tax payers...
4. Beautiful countryside is of great value for people who wish to visit it and find inspiration and recreation. A continuous urban sprawl has a depressing effect on people. With the credit crunch, we need to have more inspiring landscape nearby rather than encouraging local people to holiday abroad.
5. With the countryside being used for leisure it provides jobs and encourages local businesses. Profits remain local as well...
6. With world shortages of food, local agriculture is essential. The urbanisation of the country prevents food production and requires us to import food with too many food miles. This is bad for local jobs, the national economy and for ecology.

Hilary Fenten

Chair, Craven Branch of The Campaign to Protect Rural England

Showmen's Guild of Great Britain (Yorkshire Section)

Dear Sirs

Submission from the Showmen's Guild re the above mentioned.

The Showmen's Guild would like to see the Needs Assessments being enacted by the Local Authorities in the Yorkshire & Humber Area, and would like them to make more affordable land available at this critical time.

Policy's need to be updated at regular intervals and Showmen should be included in these updates.

Showmen's travelling pattern is different from other travelling sub groups. Showmen need permanent all year sites not transient sites.

The greatest need lies within the South & West Yorkshire areas, that is where most Showmen park, these sites are vastly overcrowded and has been pointed out in the South & West Yorkshire assessment of needs.

Matthew Morley JP
Vice Chairman
Showmen's Guild of Great Britain (Yorkshire Section)
0113 2853341

This is a submission from Mr James Finnie member and Past Chairman of the Showmen's Guild

As a long standing member I welcome the Needs Assessment, which is long overdue.

In my years of office, this is the first time the Showmen's Guild members have been recongised.

I totally agree with the comments made in our previous email sent my Mr Morley

J Finnie
Past Chairman

Lancashire County Council

Our ref: R.11/4

Thank you for your email dated 10 November 2008 inviting comments on The Housing Challenge: Yorkshire and Humber Plan 2009 Update Spatial Options.

The Yorkshire and Humber Route Utilisation Strategy Draft for Consultation includes proposed schemes that would enhance infrastructure between Leeds and Central Lancashire City Region. The recognition on Page 21 of The Housing Challenge that '...some public transport corridors operate at or close to capacity now and further growth would not be possible until the infrastructure and services are improved.' is welcomed. Any further growth in this corridor should be phased so that capacity is maintained.

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Sirs

This representation is submitted on behalf of George Wimpey North Yorkshire Ltd

Question 1

GWNY would support the an increase on the current RSS housing requirement.

Question 5

No . In order to accommodate and deliver the levels of housing growth proposed stronger focus need to be given to the role of certain Principal Towns like Malton and their capacity to accommodate additional housing and employment development. Such settlements offer a sustainable location for development and this in turn will make settlements in their hinterland more sustainable by reducing distances travelled to access employment opportunities, shops and key services.

Question 6

Option 2 in the York Sub Area

Question 7

No. Option 2 in the York Sub Area provides the better opportunity to deliver the higher housing growth identified in this Update

Questions 17-19

GWNY would support Spatial Option 2 in relation to relation to the York Sub Area i.e. the RSS should have a stronger focus on Principal Towns such as Malton and should encourage urban extensions to the north and south of Malton. Malton has the physical capacity to accommodate extra growth identified in this update to the north and south of the town. It needs to grow as a centre in order to reduce out migration, meet housing needs, attract additional employment and reduce commuting to York and town/cities in W Yorkshire and adequately service its hinterland.

The current strategy acknowledges this to some degree but contrary to the suggestion in Spatial Option 1 RSS is not explicit about the need for urban extension at Malton and the need for Malton to expand its role

If you have any queries concerning the above pleas do not hesitate to contact me. Please also add my contact list to your database and contact me in relation to the publication of further RSS documents.

Regards

Ian Lyle

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West Lindsey District Council

Dear Sir/Madam,

Please find below West Lindsey District Council's Consultation response to the above document - Section 7 (Question 8): Gypsies, Travellers and Travelling Showpeople:

I would like to point out that West Lindsey District Council is working with North Lincolnshire Council in order to meet the needs of Gypsies and Travellers arising from Brigg; however West Lindsey District Council would like to see sites provided for Gypsies and Travellers in North Lincolnshire in and around Brigg to meet the needs identified in their Gypsy and Traveller Needs Assessment (GTAA).

Kind regards

Richard Green

Development Plans Officer

Tel: 01427 676526

West Lindsey District Council

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Hull City Council

Dear Mr Elliot,

Thank you for allowing Hull City Council the opportunity to comment on the RSS update. A response jointly agreed at the Hull and Humber Ports City Region Planning Board by the four Humber authorities has, or will be submitted which gives detailed answers to your 31 specific questions. In addition, following consideration by our Planning Committee, Hull City Council decided to submit individual comments as well, as Hull City Council believe the other Humber authorities intend to do. It is the view of Hull City Council that:

- The current RSS Core Approach is both robust and flexible enough to cope with changing situations without being altered. This ensures continuity and assists in the production of Development Plan Documents. Any change could see a need for a costly and time consuming revision of these documents.
- It is not necessary to make any changes to the hierarchy diagram in the current RSS. There is a risk that if the diagram is altered, Hull's position as a Regional City could be challenged, and additional settlements could be 'promoted' which could threaten Hull's housing market.
- The levels of housing development indicated in the current RSS are the appropriate figure, but we would like to reiterate that in our opinion the tiered phasing originally proposed in the draft RSS is more appropriate, particularly in view of the current slump in house building.
- In the current economic downturn, a revision of the RSS is inappropriate. The imminent production of the Integrated Regional Strategy renders the need for an update unnecessary.

I would be grateful if these comments could be taken into consideration when the Assembly decides on the appropriate course of action with regard to the RSS update.

Regards,

Mark Palmer, Policy Planner

The Housing Challenge
The Yorkshire & Humber Plan – 2009 Update
Spatial Options

Leeds City Council Response

1. Overview Response

1.1 Throughout the RSS process, the City Council has consistently raised fundamental concerns regarding the scale and distribution of housing growth proposed for Leeds. Linked to this, the Council has also expressed reservations regarding the absence of a sufficiently funded, phased and robust delivery plan to support such growth. In addition, the City Council has emphasised that there is a need for major investment infrastructure to support both *existing* patterns of regeneration and development (such as public transport and managing flood risk), as well as infrastructure to supporting *unprecedented levels of growth proposed in the Plan*. The 2009 Update, in turn proposes further levels of growth, without any further certainty about infrastructure or details as to how such levels of growth can be managed without detrimental impact.

1.2 The 2009 Update consultation is primarily focused upon the delivery of higher levels of housing growth (beyond the already challenging requirements of the Adopted Plan). Since the Update has been published for consultation economic and housing market conditions have severely deteriorated. Within this context, the City Council's Full Council (November) has unanimously agreed the following resolution:

"That this Council believes that the Regional Spatial Strategy (RSS) target of 4740 houses per year should be scrapped with immediate effect to allow local authorities to make a more realistic decision based on local economic factors and housing need.

This Council notes the comprehensive approach taken by this administration to address housing issues in the city, including:-

- The continued development of the Easel Project,
- Wide ranging plans to tackle poor housing standards in the private sector with an initial focus on tackling excess cold,
- The development and establishment of an Affordable Housing Strategic Partnership to maximise the development and delivery of affordable housing in the city,
- The delivery of multi million pound Housing PFI projects in Swarcliffe, Little London and Beeston Hill and Holbeck, with further plans to secure £270m to tackle older people's housing,
- The delivery of the first new council homes in Leeds for over 20 years,
- Significant reductions in the number of homeless people living in the city,
- Continuing delivery of the Social Housing decency programme,
- Increased assistance to vulnerable people through disabled facilities grants."

1.3 The City Council recognises the fundamental need for housing and as emphasised above, is pressing, with some urgency - through a wider range of initiatives to tackle issues of affordability, provision and the wider regeneration of communities. Whilst the RSS Update material seeks to set out a longer term

approach and provides evidence of some of the drivers for change, the information predates the current economic slow down, recession and dramatic decline in the housing market. This therefore calls into question the basic assumptions of the approach and the envisaged timescales for implementation. In recent months housing delivery has dramatically slowed, the house building industry has contracted and there is even less certainty regarding the scale of investment required to sustain the 'growth agenda'. Given these prevailing conditions, a strategy for longer term growth, struggles to be tenable given the strategic consequences of economic restructuring and downturn in the housing market. As a basis to tackle longer term issues of regeneration, investment and strategic development, the emphasis of the Update needs to be changed in order to focus upon immediate issues in the short term, to enable the region to be better placed to take advantage of a future up turn.

- 1.4 The 2009 Update includes within it a sustainability appraisal and a scoping report. This identifies key sustainability issues to be addressed in the region. It is not evident from the consultation questions and physical distribution of development, how these underlying issues will be ameliorated. Of particular concern, given the potential scale of growth envisaged – is the impact of the 2009 Update upon environmental capacity or how the 'strategy for growth', will sufficiently address climate change adaptation and mitigation (especially in the light of challenging CO2 targets announced by the Government in December). Linked to the issue of the spatial distribution of growth, is the issue of managing flood risk. Whilst it is understood that a Regional Strategic Flood Risk Assessment (RSFRA) has been completed, it is not clear how this relates to more detailed Strategic Flood Risk Assessments (SFRA) within local authority areas (see 2.5 below). It is appreciated that such issues are challenging. However, without any direct recognition of the direct links between physical development, urban and environmental capacity, a longer term strategy for housing growth is not only contingent upon the wider economic and housing conditions (noted above) but the ability to put in place the necessary interventions to achieve other key aspects of the Plan's Core approach. These include also the need to manage flood risk and adaptation and mitigation measures (which are likely to become a more significant policy issue as a consequence of the Climate Change Bill).

2. Comments on the Evidence base

2.1 Scale of Housing growth

The testing methodology begins with the 2006 Population projections; various adjustments are then made to convert population into households and then need for houses. A fundamental flaw in this methodology is that the 2006 Population Projections use migration trends over the previous 5 years to project future population growth. The previous five years up to 2006 was a period of particular economic growth and buoyancy, which led to unprecedented gains in net international migration into all parts of the UK, including Yorkshire. It is extremely unlikely to be representative of the whole RSS period to 2026, which will experience significantly reduced in migration during the current economic downturn. If the RSS 2009 update housing growth figures (25,100 to 30,000 p.a.) are to be properly tested as being robust, the 2006 population projections need to be adjusted to reflect a more realistic long term trend in international migration.

A key feature of the draft RSS, was a recognition that a 'plan, monitor and managed' approach was necessary for longer term housing delivery. In the light of current

economic and housing circumstances, it is the Council's view that such an approach needs to be reinstated in any 'Update' going forward. Such an approach in turn, would help clarify how and via what means housing targets might be 'stepped up' and also specify how RSS targets relate to more realistic housing levels being identified in Local Area Agreements. Within this context, the City Council has had agreement with CLG that 3,400 is a realistic housing target (over a 3 year period) and is currently in discussion to further review the figure to a lower aspirational target, given current economic and housing conditions. In providing a framework for such adjustments, the RSS needs to identify phasing mechanisms and an ability to 'roll forward' targets as necessary. This would enable a more realistic assessment of delivery to be made and avoid the need for local planning authorities (including Leeds) to achieve impossible targets towards the end of the plan period.

2.2 Economic Growth

The current economic downturn, duration of the recession and implications of ongoing economic restructuring, post dates the adopted RSS and the assumptions which underpin the Update. As a consequence, basic assumptions upon which the existing Plan and spatial options are precipitated need to be recalibrated in the light of such dramatic circumstances. This is essential in order for any ongoing update to have credibility and cohesion.

It is to be hoped that the current economic downturn is short lived and that any adverse effects in the region are minimised. In the meantime, in revisiting the economic assumptions of 'growth' and longer term delivery, the future Update needs to be upfront in addressing these challenging circumstances and realign its strategy accordingly. Central to this is the need to maintain momentum and confidence in major regeneration projects as a key priority. This needs to include a package of measures to deal with the current downturn and recognise that there will be a transitional period until full economic recovery. Consequently, emphasis needs to be given to housing affordability & access to finance, maintaining economic capacity and positioning the region to access additional investment. Such investment in turn needs to be geared to climate change resilience, public transport investment and exploring opportunities (where necessary) to relocalise the economy, as a basis to facilitate sustainable regeneration, quality of place and an economy which is well placed to be competitive in the longer term.

2.3 Housing Affordability & Sub Regional Markets

Affordability

The Update needs to be more sensitive to and more explicitly address the issue of 'affordability' and access to the housing market. The ambition to improve housing affordability through a dramatically increased land supply assumes that the house building industry has the capacity to built at such rates for the Plan period, that the infrastructure will be delivered to achieve sustainable communities (as required of the Plan's Core Approach) and that such dwellings once built, will be affordable to those in greatest need.

From a Leeds perspective, there is evidence that suggests that the Update's proposals are not only unrealistic and undeliverable but that the underlying assumptions of the proposals, need to be revisited in the light of current and emerging economic conditions. In the light of current and ongoing economic circumstances, there is a belief that once normal lending conditions and public

confidence returns, there is very likely to be a rapid price growth against reduced supply that will drive house prices up, which in turn spells a return to worsening affordability. This is due to the fact that house building rates have fallen so dramatically (32% across the north in the past year) and that this decline will in all likelihood continue until the end of 2010. The consequent knock on effect on the building industry will then take many months to stabilise and then improve. Although house prices will continue to drop during 2010, this will slow over the year. In Leeds, patterns of house price reductions are not consistent across the city with affordability in the short to medium term still being a major issue in terms of people being able to move within the housing market, which will lead to an increase in private sector renting with citizens choosing location and quality over the traditional desire to own a property.

In taking proactive steps to address the key issue of housing affordability (linked to a range of issues across Leeds), the City Council in association with key partners has established the Affordable Housing Strategic Partnership Board (AHSPB) with the remit to deliver affordable housing. To date, 87 acres of Council owned land has been transferred to the Partnership to be sold at 'less than best consideration' to Housing Associations so that they can obtain grant funding from the Housing Corporation. The first phase of this land is now being developed (5 acres) and has attracted significant public funding and private investment to deliver affordable housing. The successful HA is in the process of interviewing contractors with the view to a start on site anticipated in March 2009. A rolling programme of building work is envisaged. The land in question is Brownfield. The Partnership is also working ensure that affordable housing is delivered through the planning process and is contributing to the delivery of the LAA targets, which like the RSS targets are under review. Nevertheless the Partnership is working to maximise the delivery of new and access to affordable housing and related solutions using Government resources.

In addition to the establishment of the AHSPB, the City Council is also proactively progressing a range of initiatives to promote affordability and to stimulate the housing market. These include:

Engaging with Developers:

A range of local developers have been in contact with the City Council to discuss the possibility of Housing Associations with the support of the local authority purchasing individual or a block of properties, where funding could be attracted through the Homes and Communities Agency.

Engaging with a Registered Social Landlords:

As noted above, through the Affordable Housing Strategic Partnership eight sites are being developed across the city that will deliver 190 units of affordable housing. Attracting £4.6m of Homes and Communities Agency funding and £18.4 of private sector through Accent Housing Group who secured funding for the sites as part of the National Affordable Housing Programme 2008/11.

Engaging with Lending and Other Institutions:

The Leeds Affordable Housing Strategic Partnership has responded to the challenges of improving the delivery of affordable housing by having a number of key players on the Board. Representations are being made for a member of the Council of Mortgage Lenders to become a Board member. In relation to Community Investment and Land Trusts discussions have taken place with the Regional Stock Exchange could lead to the development of such a model within the city.

Private Sector Landlords:

The development of Leeds Landlord Accreditation scheme has been a key mechanism of working with private sector landlords and is one of the types of scheme envisaged within the Rugg review. The aims of the scheme have been to encourage, acknowledge and actively promote good standards of privately rented accommodation and to assist landlords and tenants to undertake their respective responsibilities to each other. The scheme also encourages and acknowledges responsible behaviour by tenants through an Accredited Tenant Scheme. The scheme comprises an element of self-regulation and accordingly relies on a degree of goodwill and trust on the parts of landlords, tenants and the Local Authority. The scheme applies to the private rented sector only and not to Local Authority owned or Housing Association properties where other Service Level Agreements apply. On a year on year basis since the inception of the scheme the number of bed spaces and numbers of landlords have increased. This approach together with the investment from the Regional Housing Board and the authorities funds have led to improving the quality of private sector stock in relation to renewal and facelift programmes, energy affiance measures and the PAL scheme that has been operating across West Yorkshire. These approaches also contribute towards responding to the Empty Property Strategy and the targeting of areas around the city centre 'rim' (Cross Green, East End Park, Beeston) to reduce the level of private sector vacant properties and to improve the housing offer that private sector landlords provide as well as the increase of private sector stock meeting the decency standard.

Homelessness:

The Homelessness situation in Leeds has seen a rise in presentations from October to December 2007 the number presenting was 194. October to November 2008 has increased to 423. The collapse of the buy to let market has had an effect on those people renting in the private sector and along with mortgage arrears has led in part to this increased figure. A mortgage rescue scheme is being launched by the Golden Triangle Partnership (of which Leeds is a member). The national mortgage rescue scheme is also being announced. Leeds CC will endeavour to utilise the scheme as much as possible to help people in danger of losing their home.

Planning Policy:

The City Council is currently in the process of producing a new Supplementary Planning Document on Affordable Housing with the intention of increasing the supply of affordable housing secured via planning policy. The new policy is applicable to new housing, which fall within the Class C3 dwelling houses of the Use Class Order. It is proposed that any application for residential development of 5 or more residential units has to provide affordable housing in line with policy.

The three main housing areas and percentages of affordable housing required are:

City Centre Housing Zone	15%
Inner Areas Housing Zone	25%
Outer Housing Zone	35%

The split in affordable housing tenure is that 70% should be intermediate affordable housing and 30% social rented affordable housing. This will be irrespective of the housing zone in which a development lies.

Strategic Housing Land Availability Assessment (SHLAA):

Within the context of national guidance and the Adopted RSS, the City Council is undertaking a SHLAA. The purpose of this is to identify any developable land. The process is underway and all landowners have been written to and asked to put forward developable sites.

Private Finance Initiatives (PFI)

The regeneration element of the Little London and Beeston Hill and Holbeck PFI schemes are currently being taken forward. The annual contribution to the affordable housing target figure will be in the region of n100 units per annum over a period of 5 years.

In the light of current circumstances, the City Council considers that the above housing measures and interventions are essential practical steps to address housing affordability. The RSS Update, therefore needs to fully recognise such issues at a local level and their critical importance to housing delivery. Consequently, there is a need for the RSS Update to revise and reduce the longer term targets for housing growth, to ensure that they are sensitive to and deliverable within the context of local circumstances

Sub Regional Markets

The Spatial Options consultation material, provides some information on the 'affordability of the housing market' (Page 14) and Sub Regional Housing Markets (Page 16). It is not clear when this information dates from but in the light of subsequent and dramatic changes to the housing market, such information needs to be reviewed.

The effects of the changes in economic conditions over the past year have clearly had a significant impact on the Leeds Housing Market and due to the wider economic effects the slowdown in economy, these influences have had a subsequent effect on the surrounding housing markets within North West and to a lesser extent South Yorkshire.

It has to be recognised that the nature of the housing market across the sub region, has a direct correlation to the Leeds Housing Market. For instance, significant areas of North Leeds have similar housing market conditions to that of Harrogate and York. This has already been recognised with the development of the "Golden Triangle Partnership", which has striven to create affordable housing solutions in areas, which have similar housing market conditions to that of the South East. In areas of West Leeds such as Pudsey, there are direct links with the housing market in East Bradford together with a range of business links that have been identified within the emerging work relating to the Leeds\Bradford corridor.

2.4 Travel to Work Patterns

The Spatial Options (Page 16) provide details of Travel to Work Patterns across the region. It is not clear to what extent the Spatial Options are seeking to redirect such patterns or to manage them. Furthermore, it is not evident how such patterns might be influenced by longer term economic restructuring, modal shift or levels of current (and planned additional capacity), to sustain or redirect travel to work patterns. Clearly, the delivery of future patterns of regeneration and growth raise issues

regarding the capacity of the transport system to cope with additional trips within and to and from Leeds. It should be emphasised that development needs to be able to support sustainable attractive transport improvements - whether catering for more dispersed local trips or longer distance trips as a result of its location and the location of employment opportunities.

2.5 Regional Flood Risk Assessment

At the RSS Proposed Changes stage, the City Council submitted its own SFRA as part of its consultation response. This detailed flood risk issues within Leeds main urban area and across Leeds MD as a whole. It is not clear in the RSS Update how the management of flood risk (both fluvial and surface water) within the main urban area of Leeds has been addressed and to what extent major interventions have been identified to make proposals for further major growth possible or viable. It is understood from the Yorkshire & Humber Assembly web site that a request has been made to tender for a Regional Climate Change Adaptation Study. It is not clear if this study has been tendered and if so what the findings are or how these may relate to the spatial options (and the nature / cost of any mitigation / adaptation measures).

2.6 Accommodating growth in Sub Areas

This needs to take into account not only the relationship of sub regional housing markets and travel to work patterns but also issues of longer term regeneration and 'growth' linked to managing flood risk and climate change factors. Such approaches need to operate in an integrated way to ensure that the longer term prosperity, competitiveness and sustainability of the region is not just exclusively linked to the delivery of unrealistic housing numbers.

3.0 Response to Consultation Questions

How much housing should we be planning to provide in the future ?

QUESTION 1:

What rate of house building should we be planning for within the region ?

- *Given current economic conditions, a longer term strategy for housing growth needs to be reappraised. Whilst it is helpful to set an overall strategic direction (for a future 'up turn' in the economy), such an approach at this stage – to be tenable, will need to be heavily caveated and linked to pathways for delivery.*
- *Fundamental assumptions need to be revised re. economic growth rates, migration patterns & mechanisms for housing delivery.*
- *The RSS should provide advice on how local authorities to economic and housing market downturns in terms of housing release policy i.e. if undersupply is a result of economic conditions, this should counter need to release Greenfield sites.*
- *The City Council considers that central to this approach needs to be the reinstatement within the Plan of a phased (and 'planned, monitored and managed') approach to housing delivery. This is necessary, not only to give much needed clarity to the delivery of housing requirements but also to facilitate a more realistic approach to delivery (and to manage the uncertainty of future years) and to give immediate emphasis to supporting the housing market in the light of challenging circumstances (rather than entirely promoting unrealistic growth scenarios).*

The distribution of housing provision

QUESTION 2

If the Region were to introduce a step – up of housing from 22,260 dwellings per year to Levels 2, 3, 4 or 5 (Question 1) how soon do you think this could take place and please provide reasons ?

- *Given the current economic and housing conditions, it difficult, if not impossible to state with any certainty if such a 'step up' (in addition to already demanding targets within the adopted Plan) will be possible and when, indeed it is not clear whether the current figure of 22,260 can be achieved. Economic restructuring is taking place and the housing building industry (upon which the Plan is largely dependent upon for delivery) has dramatically contracted.*

QUESTION 3

In looking at where new homes needed in the Region could be located, should we continue to use existing RSS distribution ? If yes, please summarise your reasons below.

- *No, a spatial distribution needs to be developed which safeguards the longer term economic development and regeneration of Leeds, whilst maintaining the unique character of the District, recognise environmental limits and the need to adapt and mitigate to the consequences of climate change,*
- *The current adopted Plan, places major emphasis upon Leeds. This provides a major challenge in terms of delivery and given current circumstances is not realistic. Notwithstanding this there are also major issues regarding environmental capacity, the capacity of existing infrastructure and little certainty regarding the provision of infrastructure (of an appropriate scale) to deliver planned growth.*

QUESTION 4

If no, tell us how much emphasis you think should be placed on the following factors in shaping where new homes are located. Please rate each factor on a scale of 1 – 5 (1 least important, 5 most important).

Matching housing growth with forecast economic change

- *Given the current economic and housing market conditions, RSS forecasting is evidently insufficiently responsive to actual trends.*
- *Very difficult given current circumstances and future uncertainties.*

Addressing affordability

- Yes

Meeting new household growth trends

- *OPCS forecasting is insufficiently responsive to actual changes in trends.*
- *Need to review what future projections are in the light of current circumstances*

Reflecting market demand

- *Need to review in the light of current circumstances (housing market collapse)*

Other

- *Ability to manage flood risk / environmental capacity*
- *Capacity of existing infrastructure*
- *Availability of future planned infrastructure*

QUESTION 5

Do you consider that the Plan's Core Approach (Spatial Option 1) can accommodate current levels of housing growth to 2026 ? If, yes, please state why and provide any evidence that you have to support this view.

- *Not in Leeds*
- *Given the increase in the housing requirement at the time of adoption – without changing the nature of the overall Core Approach, it is questionable whether the Core Approach can deliver its own policy objectives simultaneously (i.e. achieving dramatically higher levels of housing growth - in areas susceptible to flood risk but with more stringent controls on development in such areas, whilst defining and protecting an integrated network of Green Infrastructure and addressing climate change).*
- *Leeds Strategic Flood Risk Assessment (SFRA)*
- *Environmental baseline information tabled at the RSS Examination in Public as a Core Document*
- *Weakness in housing market. Adversity to risk means that house builders likely to avoid city centre & inner urban areas*

QUESTION 6

If you consider that the Plan's Core Approach cannot accommodate current levels of house building within the Region, please tell us which Spatial Option (s) you think should be used to deliver the current RSS housing requirements of 22,260 homes per year to 2026 ?

- *The RSS Update is being promoted in very challenging and uncertain economic conditions. The Update needs therefore to fundamentally recognise that the evidence base upon which both the existing adopted RSS and RSS Update have been based has been dramatically superseded by more recent and profound economic change. The reality of this regrettably is economic recession and the collapse of the housing market. At the current time, it is uncertain how long such circumstances will prevail and what form a restructured economy will take (and the local/spatial implications of this) once conditions begin to improve. Given the nature of these circumstances and the scale of growth currently envisaged, the Update needs to be recalibrated in order to put forward a more realistic and deliverable strategy,*
- *In going forward, the Update therefore needs to be revisited and realigned to help 'lead the way'. This should retain a longer term view which plans for investment in climate change resilience, public transport and local energy supply (as basic attributes of a competitive 21st century low carbon economy) – whilst supporting continued investment in skills within the labour market,*
- *Central to this approach from a housing perspective, is the need to reinstate within the Plan a phased (and 'planned, monitored and managed') approach to housing delivery. This is necessary, not only to give much needed clarity to the delivery of housing requirements but also to facilitate a more realistic approach to delivery*

(and to manage the uncertainty of future years) and to give immediate emphasis to supporting the housing market in the light of challenging circumstances (rather than entirely promoting unrealistic growth scenarios),

- *In the immediate term, the Update needs to be upfront in addressing key issues, such as housing affordability and the need to maintain momentum and confidence in major regeneration projects. In the immediate and intermediate period the Update needs to set out a strategy and delivery plan for the infrastructure investment required to support ongoing regeneration and growth as integral elements. A planned and managed approach to regeneration and targeted growth, where this is still necessary and feasible needs to be clearly established,*
- *Central to this approach is the need for the Update to support the housing affordability and market interventions being pursued by the City Council (as described in section 2.3 above),*
- *Linked to the City Council's desire to support a range of housing initiatives, the Update also needs to give greater emphasis and support to opportunities for 'growth' in the short term where they do exist. For example, the City Council has been vigorous in its support for an 'Urban eco-settlement' within the Aire Valley as a means of regeneration and to deliver an exemplar of sustainable development,*
- *A prerequisite of the opportunity for the Update to manage the 'down turn' and to assist with economic recovery, is the need to secure the delivery of a range of economic and infrastructure initiatives. These include, for example, the Leeds City Region Transport Vision through the procurement and implementation of the following schemes/interventions:*
 - *Incremental upgrade to core radial bus routes, procurement of new vehicles, bus priority etc*
 - *Phase 1 of NGT (potentially Stourton and city centre)*
 - *Additional parking at railway stations*
 - *Extra 100 rail carriages (as per Rail White Paper)*
 - *A65 Quality Bus Corridor*
 - *Bus based park and ride at M1 Junction 45*
 - *Bus based park and ride on M621 South-West Corridor*
 - *East Leeds Parkway (new railway station by 2014)*
 - *New station at Woodside Quarry including Park & Ride (post 2014)*
 - *New station at Apperley Bridge including Park & Ride (2011)*
 - *New station at Kirkstall Forge (2011)*
 - *Expansion of the Metrocard to cover the City Region*
 - *Green travel plans, integrated / smart ticketing and revised parking policy, walking and cycling measures*
 - *Junction improvements to the A6120 outer ring road;*
 - *Minor changes to the city centre road network;*
 - *Motorway capacity improvements (between M1 junctions 35-42 and M62 junctions 25-29;*
 - *Implementation of the Yorcard.*
- *The above short term strategy needs to have regard to the Yorkshire & Humber economy as a whole, the inter relationships of sub areas both within and adjacent to the region, together with the settlement hierarchy and travel to work dynamics at an individual sub regional and city region level.*
- *The RSS Update therefore needs to maintain a focus upon supporting investment, in building confidence in the regeneration of existing communities and integrated strategies for 'growth', for which infrastructure is planned now (to help facilitate and direct a future economic upturn). If the RSS Update continues to focus on housing growth at the exclusion of the above factors, it is not only undeliverable but not credible.*

QUESTION 7

Do you think the Plan's Core Approach could accommodate higher levels of house building through to 2026?

- *The fundamental basis of the approach (and assumptions used) need to be re-evaluated in the light of current market circumstances, to assess needs and longer term implications.*

If yes, which level(s) of growth could be accommodated (Question 1).

If no, please tell us which Spatial Option (s) you think should be used in order to deliver higher levels of house building.

Accommodating Growth in the Sub – Areas

QUESTION 8

To what extent can the current strategy deliver current house building rates in this sub area ?

- *Without dramatic improvements to the economy & provision of infrastructure, the targets are unrealistic (notwithstanding concerns regarding detrimental impact upon environmental capacity).*

QUESTION 9

To what extent can the current strategy deliver higher house building rates in this sub area ?

- *Not possible – given major challenge with current rates.*

QUESTION 10

Which Spatial Option or combination of Spatial Options do you think provide sufficient guidance for Local Authorities to determine broad locations for where further house building should be located ?

- *Need to delivery major regeneration opportunities within Leeds (including Aire Valley) as a priority, these should not be compromised by urban expansion,*
- *Existing and new development needs to be in accessible locations well served by public transport, major constraints given capacity of existing heavy rail network*
- *Need to examine more explicitly, the roles and interrelationships of the settlement pattern across the region, to achieve a more balanced approach and one that recognises the dynamic operation of a 21st century economy. Within this context, a City Region approach needs to be developed further.*
- *The Update considers that unless an area has a national 'environmental' designation (such as a National Park or Area of Outstanding Natural Beauty), it is less valued in environmental terms. Such an approach fails to recognise the wider significance of 'environmental capital' and 'environmental justice'. Quality of place and a 'clean', 'green' environment and resource efficiency are especially important in highly populated areas (where the Update proposes further growth). Not to fully recognise the significance of these factors is inconsistent with the Plan's own Core Approach, which seeks to promote sustainable development across the region. Open land (with or without national designation) is vital for green infrastructure, recreation, amenity and for water storage (to help combat flooding). In addition,*

within urban locations, such areas are especially important for urban cooling (in the context of climate change).

Gypsies, Travellers & Travelling Show People

QUESTION 27

In thinking about additional accommodation (pitches) how much emphasis would you put on each of the following approaches. Please rate each on a scale of 1 – 5 with 1 being the least important and 5 being the most important factor in shaping distribution of additional pitches

'Meeting need where it arises' 4

A more even spread (with or without specifying that every authority should make some provision) 5

Access to services such as schools and health facilities 4

Avoiding environmental constraints e.g. areas of flood risk or nature conservation sites 4

QUESTION 28

Are there particular instances where need for additional provision arises in one local authority, but where all, or part, of that need should be met in neighbouring local authority areas ? If yes, please specify the areas concerned and say why this is the case.

The uneven pattern of existing Gypsy Traveller pitches and the historical failure of some local authorities to make any local provision, has led in part to the pattern of additional demand reflecting the existing provision. There is a clear need for any new provision to address the equity of provision. In this context a sub-regional or regional approach would be appropriate.

QUESTION 29

Some parts of the wider Travelling community have established patterns of travel for work and social/cultural reasons for which the accommodation on the more permanent sites may not be appropriate.

- **Should transit be identified separately from residential provision or is mixed provision on the same site desirable ?**

The West Yorkshire GTAA has indicated a preference from the community for inclusion of transit provision on the same site as residential provision. However such mixed provision would potentially create significant management issues on such sites.

- **What level of provision is needed for transit purposes ?**

The WY GTAA has indicated a potential sub regional need for 32 pitches.

- **What form should transit provision take ?**

Transit provision needs to be planned, as part of wider provision and tightly managed and controlled to ensure use is maximised.

- **What should be the main reason for the distribution of transit accommodation ?**

To reduce the impact of unauthorised encampment and to provide an equitable distribution of transit provision nationally. If developed within a sub-regional or regional context, good practice indicates that it needs to be linked with protocols with partner agencies particularly the police in respect of S62 CJPOA 1994.

QUESTION 30

What date should policy H6 go up to ? On what basis should longer term estimates be made ?

Ideally, the forecasts for Gypsies & Travellers should be consistent with that for general housing, i.e. to 2026. The West Yorkshire Gypsy & Traveller Accommodation Assessment (GTAA) sets out needs for general sites, transit sites and Travelling Showpeople sites up to 2015 with further predictions 2016-2026 (not including Transit Sites) as a one page add-on in appendix G. The RSS Update might also set requirements for the two periods.

QUESTION 31

What process should be introduced to ensure that estimates and associated planning documents/policies are updated ?

The RSS Update shouldn't merely reproduce national guidance which already expects GTAAs to be regularly updated and local authorities to address Gypsy & Traveller and Travelling Showpeople's accommodation needs through LDF documents.