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Richard Askham
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Dear Richard

Aire Valley Leeds Area Action Plan - Preferred Options

The Yorkshire and Humber Assembly welcomes the opportunity to comment on the Aire Valley Leeds Area Action Plan: Preferred Options document for Leeds City Council and to continue its involvement in the development of a coherent spatial planning framework for the region. The comments offered in this letter are intended to be within the spirit of continued and productive joint working.

At this stage, the Assembly's response to the consultation document is a set of officer comments. The aim is to highlight where issues related to general conformity with the Regional Spatial Strategy might arise. When the City Centre Area Action Plan is submitted to the Secretary of State a formal Assembly view on its general conformity with the Regional Spatial Strategy will need to be given.

The following officer comments are made in relation to the existing Regional Spatial Strategy for Yorkshire & the Humber (based on the selective review of RPG12 issued in December 2004), the Draft Regional Spatial Strategy – the Yorkshire and Humber Plan (submitted to the Secretary of State in December 2005) and the Secretary of State's Proposed Changes to the Yorkshire and Humber Plan (September 2007).

Government guidance (paragraph 4.19 in PPS12) states: "Where the regional spatial strategy...has been through an Examination in Public, and the proposed changes have been published, considerable weight may be attached to that strategy because of the strong possibility that it will be published in that form by the Secretary of State".

As the Proposed Changes are now published, Assembly responses to consultations on DPDs need to make it clear how the Proposed Changes impact on the policies quoted and to point out to local authorities that 'considerable weight' will need to be attached to them by the decision-making body and by Inspectors at Examinations of DPDs. At the same time, it will be important to note that the Assembly itself will be making comments on the Proposed Changes and that the final version of the new RSS is expected early in 2008.

General Conformity with the Regional Spatial Strategy

As you know, the Planning and Compulsory Purchase Act 2004 introduced mechanisms to help ensure that Development Plan Documents (DPDs) drawn up by local authorities as part of the Local Development Framework (LDF) are in general conformity with the Regional Spatial Strategy (RSS). The intention is to ensure that DPDs are contributing to the delivery of the RSS and that the two strands of the Development Plan for an area (the RSS and DPDs) are mutually supportive and not in conflict.

It will be important in the submitted Aire Valley Leeds Area Action Plan to highlight the need for there to be 'general conformity' between the RSS and the Aire Valley Leeds Area Action Plan, to ensure that the two strands of the development plan are mutually supportive. The Assembly welcomes the reference made in Appendix A to draft RSS, however it is suggested that this would be better placed at the start of the document.

It would be helpful if the dates and status of the current and draft RSS were explained. For clarification current RSS was published in December 2004 and draft RSS was published in December 2005. It will also be helpful to note that the Secretary of State's Proposed Changes to draft RSS (September 2007) has now been published. The Yorkshire and Humber Plan should be published early in 2008.

Overall comments

The Aire Valley is identified as a Growth Area Priority in Policies LCR1 and LCR2 of draft RSS (2005). Policy LCR1 of draft RSS (2005) recognises the Aire Valley as a sub regionally significant economic development and housing regeneration opportunity, which will require major infrastructure investment.

Leeds City Region and the Assembly jointly conducted a bid for growth point status, which includes the Aire Valley area of Leeds.

Employment Uses

The Assembly is pleased to see reference made to the Leeds Employment Land Review, which was completed in June 2006 and has been used to inform this document. Policy E3 of draft RSS (2005) states that all plans, strategies, and programmes in the Region should seek to support the availability of sufficient land in sustainable locations to meet the needs of a modern economy. Policy E3 requires that the pattern and scale of provision of allocated employment land should be determined by local employment land reviews, which take account of the forecast change and spatial context set out in draft RSS (2005).

The Assembly is encouraged by **Preferred Option 1: Employment Uses (non-office)** which seeks to identify 200 hectares of land for the development of B1 (b) Research and Development; B1 (c) Light Industry; B2 General Industry; and other commercial uses. Policy E4 of current RSS (2004) states that provision for warehousing and distribution "should be made for activities with high goods volume and low labour content close to major inter-regional road/rail/water transport nodes, ports and airports, integrated wherever possible with freight access and transport improvements." Policy T4 current RSS (2004) seeks to locate development which generate high levels of freight and commercial traffic closest to intermodal freight facilities, rail freight facilities, ports and wharves or roads designed and managed as traffic distributors.

The Secretary of State's Proposed Changes to draft RSS (2007) recommends changes to Policy E4 of draft RSS (2005) to provide for plans, strategies, investment decisions and programmes to support key sectors including Financial and Business Services; Tourism; Logistics; and Construction, and regional priority clusters including Advanced Engineering and Metals; Chemicals; Bio-Science; Digital; Food and Drink; Healthcare Technologies; and Environmental Technologies.

Housing

As stated previously, the Aire Valley is identified in draft RSS (2005) as an area housing regeneration opportunity. The Assembly welcomes the reference made to draft RSS (2005), which emphasises the need to make better use of urban areas for housing growth and regeneration.

The scale of housing provision is now greater; therefore the Aire Valley may well need to accommodate more housing. The Assembly feels that it would be helpful if this document made reference to housing provision targets set out in draft RSS (2005). Draft RSS (2005) sets an average annual completion rate of 2260 dwellings for Leeds between 2004-11 and 2011-2016 and 2950 dwellings between 2016-

2021. It should be noted that the Secretary of State's Proposed Changes to draft RSS recommends an annual average net addition of 2260 dwellings between 2004-2008 and 4300 dwellings between 2008-2026.

The Assembly welcomes **Preferred Option 2: Housing** as it seeks to address housing mix in the Aire Valley through stating that housing developments will provide for a mix of house types, sizes and tenures, including family housing. Policy H4 in draft RSS (2005) emphasises the need for the current mix of housing in the Region to change so that it better supports the creation of more sustainable communities. The Secretary of States Proposed Changes to draft RSS (2007) recommends that plans, strategies, investment decisions and programmes should ensure the provision of homes for a mix of housing that reflects the needs of the area, including for family homes, to create sustainable communities.

The Assembly is encouraged that **Preferred Option 2: Housing** also emphasises the need for developments to provide for affordable housing. However, this document does not set an affordable housing target for the Aire Valley area. It is worth noting that the Regional Housing Strategy 2005 identifies affordable housing need in the Leeds district as being medium. Policy H3A of draft RSS suggests that in areas of 'medium need' (including Leeds) between 30 and 39% of homes (on sites of 15 homes or more) should be affordable. Current RSS (December 2004) encourages local authorities to set targets for the provision of affordable housing based on housing needs assessments (Policy H4). The Secretary of State's Proposed Changes to draft RSS (2007) recommends that LDFs should set targets for the amount of affordable housing to be provided. Provisional estimates of the proportion of new housing that may need to be affordable in Leeds are between 30 and 40%.

Character Area Frameworks

The Assembly would like to raise concerns over Character Area 11 – Skelton Business Park. The document states that this area is proposed for a mixed-use development of which 102,000 sq m will comprises of office development. The Assembly wishes to raise concerns to this spatial approach to office development. Both current and draft RSS seek to locate office uses in city or town centres. Policy E4 of current RSS (2004) states that "offices should be located in town and city centres" and Policy E2 of draft RSS (2005) reinforces these principles by stating, "city and town centres will be the main focus for office...and other uses which generate a high level of people movements" (for example B1 uses). These uses should not be located outside these centres if they would undermine the delivery of the Plan's Core Approach (YH1-YH8)". Policy E3 of draft RSS (2005) further reinforces that office use should mainly be located in or adjacent to town or city centres. The Secretary of State's Proposed Changes to draft RSS (2007) does not alter the policy context of Policy E2.

I trust that these comments are helpful to you as you prepare the Aire Valley Leeds Area Action Plan for submission to the Secretary of State. If you wish to discuss any of the points made here please do not hesitate to get in touch. We look forward to continuing to work with you on your Aire Valley Leeds Area Action Plan.

Regards

A handwritten signature in blue ink, appearing to read 'Jenny Poxon', written in a cursive style.

Jenny Poxon
Head of Planning Delivery and Conformity