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Dear David

**Core Strategy – Issues & Alternative Options (Regulation 25)  
Leeds Local Development Framework**

The Yorkshire and Humber Assembly welcomes the opportunity to comment on the Core Strategy Issues and Alternative 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 Core Strategy 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 States 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.

Both the existing and draft Regional Spatial Strategies aim to achieve a more sustainable pattern and form of development, investment and activity across the region, putting a greater emphasis on matching needs across the region with opportunities and managing the environment as a key resource. There is a particular emphasis on achieving the regeneration and renaissance of the region’s city and town centres by making them the focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region (for example Policy P1, existing RSS, December 2004 and Policy YH5, Draft RSS, December 2005).

### **Key Points on the Core Strategy: Issues and Options**

Overall, we feel that the Issues and Options document, the options within it and the sustainability appraisal provide a comprehensive review of the issues facing Leeds and how they might be tackled in order to achieve sustainable development.

Below is a summary of the main points the Assembly wishes to raise with regards to the Core Strategy: Issues and Options (in the order in which they appear in the document). **Annex A** provides further detail for each of these issues.

1. We welcome the references to RSS within the overall context for this Issues and Options document.
2. We welcome the reference made to the renewable energy targets set out in the draft RSS (2005).
3. We are encouraged by Option 2 d) which requires an increasing percentage of the energy needs of new development to come from on-site renewable energy generation.
4. The Assembly is surprised that planning for a step up in the scale of growth is not reflected as an “option” or explored more fully as an “issue”.
5. The Assembly feel that it would be helpful if this document made reference to housing provision targets set out in draft RSS (2005) and in proposed changes to draft RSS (2007).
6. We are pleased to see that the issue of affordable housing has been covered in the Issues and Options document.

7. We feel that it would be helpful to detail the contribution to the Regional target of 65% for the development of housing on previously developed land.
8. We welcome the reference made in paragraph 4.47, which emphasises the need for the Core Strategy to address the need for potential new gypsy and traveller accommodation across Leeds.
9. The Assembly feels that it would be helpful for alignment with RSS and clarification if a differentiation were made between Principal Town, District Centres and Local Centres and the scale / type of development to be distributed to each type of centre set out.
10. The Assembly would support the further development of spatial options scenarios 2 and 4 rather than 1 and 3.

I trust that the comments provided here, and expanded on in Annex A, are helpful to you as you prepare the Core Strategy. Clearly we wish to see the Core Strategy developing in general conformity with the Regional Spatial Strategy and I would be happy to discuss the points we raise here further if it would help this process.

Please do not hesitate to get in touch if anything is not clear. We look forward to working with you further on your Core Strategy and to commenting on the Preferred Options document in due course.

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

## **ANNEX A: BACKGROUND INFORMATION RELEVANT TO THE PREPARATION OF CORE STRATEGY ISSUES AND OPTIONS INITIAL CONSULTATION (REGULATION 25)**

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.

We therefore welcome the references to RSS within the overall context for this Issues and Options document. There is clearly a strong link between the vision for the Local Development Framework and both the current and draft Regional Spatial Strategy. It will be important in the preferred options and submitted versions of the Core Strategy to highlight the need for there to be 'general conformity' between the RSS and the Core Strategy, to ensure that the two strands of the development plan are mutually supportive. We therefore welcome the reference in **paragraph 2.13**, which sets out this need for general conformity between the LDF and the RSS.

It would be helpful if the dates and status of the current and draft RSS were explained in future drafts of the Core Strategy. 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.

The aim of the existing RSS (December 2004) is to guide development to sustainable locations and to focus development in main urban areas, market and coalfield towns (Policy P1). This key strategic approach is reinforced in the Yorkshire and Humber Plan (Draft RSS December 2005), which is more specific about the desired location of development in Policies YH1 to YH8. These clearly provide a policy context and direction that emphasises the need to concentrate development in Regional and Sub-Regional Centres, provide for sufficient development in Principle Service Centres for them to fulfil their important role and to allow limited development in Local Service Centres, primarily to meet local need for affordable housing and to enable economic diversification. The overall aim is to reverse the trend of dispersal of development, encouraging a settlement pattern that helps to fulfil the RSS objectives.

It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) replaces the terms "Regional Centres" with "Regional Cities", "Sub Regional Centres" with "Sub Regional Cities and Towns" and "Principal Service Centres" with

“Principal Towns”. The Core Approach of draft RSS is not changed by the Proposed Changes. The new terminology is used in this response.

## **The Environment**

The Assembly welcomes the issue of climate change being addressed in the Issues and Options document. The Assembly welcomes the reference made to the renewable energy targets set out in the draft RSS (2005). Draft RSS Policy ENV5 sets out a sub-regional renewable energy target for West Yorkshire of 88 MW to 2010. **Table 15.12** sets an indicative renewable energy generation target for Leeds of 11.3 MW to 2010. The Core Strategy acknowledges that the District has concerns that there is little capacity for off-site renewable energy, such as medium or large wind turbines and therefore it may only be possible to provide renewable energy through on-site micro-generation. The Secretary of State’s Proposed Changes to draft RSS (2007) sets an indicative local target for installed grid-connected renewable energy target of 11 MW by 2010 MW and 75 MW by 2021 for Leeds.

The Assembly is encouraged by **Option 2 d)** which requires an increasing percentage of the energy needs of new development to come from on-site renewable energy generation; at least 10% up until 2010, at least 15% up until 2015, and at least 20% thereafter. Policy ENV5 of draft RSS (2005) requires at least 10% of the energy to be used in sizeable development is to come from on-site renewable energy sources. The Secretary of State’s Proposed Changes removes the 10% target from Policy ENV5 but requires Development Plan Documents to set an appropriate local target for on-site renewable energy generation, which you have done.

## **Housing in Leeds**

We recognise that the Core Strategy has been prepared alongside an emerging RSS and that the RSS Proposed Changes present significant challenges in planning for a step up in the scale of growth in Leeds. However, the Assembly is surprised that this scale of growth is not reflected as an “option” or explored more fully as an “issue” given that the document points to the likelihood of such an increase in **paragraph 4.36**.

Specifically with regard to housing, we welcome the reference made in **paragraph 4.36**, to the draft RSS (2005). The document rightly recognises that it is anticipated that housing targets for the Leeds district in the draft RSS (2005) are expected to substantially increase. **Paragraph 4.36** states that although these figures are not yet finalised, gross house building rates in the order of 2700 per annum (2007-2011) and an estimated 4200 thereafter (2011-2021) are likely to be required. However **Table 1** states that the RSS requirement for 2007-26 is 73800, which we understand to originate from the Panel Report (and is a proxy of the overall figure for West Yorkshire maintaining the 2004-11 proportionate split and giving an annual figure of 3690 dwellings).

While the Assembly understands that this was the most up to date figure available at the time the Core Strategy was prepared, we feel it would be helpful if the document is now developed to make reference to the most recent housing provision targets set out in the Secretary of State's Proposed Changes to draft RSS (2007). These recommend an annual average net addition of 2260 dwellings between 2004-2008 and 4300 dwellings between 2008-2026 (totaling 83960 between 2007-26). The evidence published with the Proposed Changes and the most recent demographic and other evidence supports this higher level.

The Assembly is pleased to see the assumption that brownfield sites would continue to be given priority but are surprised not to see the beginnings of a local target for development on Previously Developed Land. The regional target for the proportion of housing development taking place on Previously Developed Land and through conversions of existing buildings is 65% over the period 2004-2026 (RSS Policy H1C). The Assembly would expect to see the extent to which Leeds intends to contribute to this figure explored at this stage of Core Strategy preparation.

We are pleased to see that the issue of affordable housing has been covered in the Issues and Options document. **Paragraph 4.46** refers to the current Leeds affordable housing policy, which requires each housing development of 15 units or above to provide between 15-25% affordable units, depending on the location within the Leeds district.

As the Council prepares the Core Strategy it will need to take into account the Leeds Strategic Housing Market Assessment 2007 (referred to in **paragraph 4.45**) which has highlighted that house prices rose dramatically between 2000 and 2006, which means that home ownership is out of reach of many low to middle income households. Draft RSS (2004) Policy H3 advises local authorities to seek between 30-39% of affordable housing on developments of more than 15 homes in areas of medium need, of which Leeds is one. However, the Assembly recognises that different markets lead to a varying need for affordable housing in some parts of the district. Policy in the draft RSS gives local Planning Authorities the discretion to vary targets within the Plan area. It should be noted that the forthcoming Strategic Housing Assessment to be undertaken by Ecotec should provide additional evidence to support Leeds' affordable housing targets.

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%.

The Assembly welcomes the reference made in **paragraph 4.47**, which emphasises the need for the Core Strategy to address the need for potential new gypsy and traveller accommodation across Leeds. Policy H5 of draft RSS (2005) emphasises the need for local authorities to ensure that there is adequate provision of sites for Gypsies and Travellers.

The Secretary of State's Proposed Changes to draft RSS (2007) sets a requirement for additional provision to meet the housing needs for Gypsies and Travellers to address an overall shortfall of at least 255 pitches across the Region. For West Yorkshire, the Proposed Changes sets a requirement to address a shortfall of at least 86 pitches by 2010. It is also worth noting that the Proposed Changes also requires local authorities to carry out an assessment of the housing needs of Gypsies and Travellers by July 2008. We understand that a West Yorkshire wide study is currently underway.

The Assembly is encouraged that the Issues and Options document recognises that there is a need to ensure that there is a mix of dwellings in the District. It is also stated that the Leeds Housing Market Assessment reveals a need for a wider range of housing sizes and types than is currently being built. 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 State's Proposed Changes to draft RSS (2007) states in Policy H4 that plans, strategies, investment decisions and programmes should ensure the provision of homes for a mix of housing that reflects the needs of an area, including for family homes, to create sustainable communities.

## **The Economy of Leeds**

The Assembly is encouraged by **paragraph 4.56**, which makes reference to the Employment Land Review (March 2006), which provides background on how much employment land will be needed to 2016. 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 Secretary of State's Proposed Changes to draft RSS (2007) reinforces the importance of this requirement.

Table 14.8 in draft RSS (2005) provides spatial guidance on the future development patterns for employment development in each local authority area. The spatial guidance for the Leeds area recognises that "to support the role of Leeds there should be an evaluation of the provision of sites for purely office uses in accordance with the Core Approach of RSS, informed by the findings of the West Yorkshire Office Space Study. This will require a specific city centre appraisal based on more detailed split between business and office uses and their different locational requirements". In quantitative terms Table 14.6 in draft RSS (2005) sets out a net change of total employment land of between 27 to 167 ha of total employment land in the Leeds District between 2006-2016 (this allows for loss of employment land to other uses and gains through allocations/new uses).

It should be noted that Table 14.8 has been deleted in the Secretary of State's Proposed Changes to draft RSS (2007) and Table 14.6 has been modified. The Proposed Changes has also inserted Table 14.7A, which sets out the potential

annual job growth from 2006 by different land uses. In Leeds the potential job growth for Industry (B1b/B2) is forecasted at 2,180 and is 440 for Storage/Distribution (B8) from 2006.

The Assembly is encouraged that **paragraph 4.62** states that the emerging Aire Valley Area Action Plan proposes to deallocate 100 –125 ha of employment land (including land identified for offices). The Assembly would however like to draw to your attention to concerns that were raised on 16 November in response to the Aire Valley Leeds Area Action Plan – Preferred Options that stated that Skelton Business Park would accommodate 102, 000 sq m of office development.

The Assembly is encouraged that the Core Strategy: Issues and Options clearly emphasises that new office proposals should be guided to the City Centre. 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. It should be noted that the Secretary of State’s Proposed Changes to draft RSS (2007) does not alter the policy context of Policy E2.

### **The Role of the City Centre, Town and District Centres, and Local Centres**

The Assembly welcomes the reference made to draft RSS (2005) in **paragraph 4.66**, which states that the RSS provides the framework to designate the higher order centres, in which Leeds City Centre is recognised as a ‘Regional Centre’. It is also stated that the RSS provides criteria for identifying Principal and Local Service Centres and it is left to individual authorities to define the lower order centres within the general framework in the RSS.

It should be noted that the Secretary of State’s Proposed Changes to draft RSS (2007) replaces the terms “Regional Centres” with “Regional Cities”, “Sub Regional Centres” with “Sub Regional Cities and Towns” and “Principal Service Centres” with “Principal Towns”. The Core Approach of draft RSS is not changed by the Proposed Changes. The new terminology is used in this response.

The Secretary of State’s Proposed Changes to draft RSS (2007) suggests that LDFs may exceptionally include other Principal Towns to those identified in draft RSS (2005) providing that they are consistent with the Plan’s Core Approach and meet set criteria (Policy YH6).

The Assembly appreciates that the designations of Principal Towns and Local Service Centres currently identified in RSS may need to be supplemented so as to reflect local circumstances and evidence. To that end, the Secretary of State’s Proposed Changes to Policy YH6 should be noted. Given the geography of the Leeds area, we would also anticipate the City Council identifying a number of

District Centres so as to facilitate the delivery of the RSS's and Core Strategy's objectives. The identification of such Centres, as with the Principal Towns, should be evidenced in terms of their potential role, opportunities, type of development to be distributed to them and their relationship with the wider settlement hierarchy. As currently presented, **Table 4** is confusing in that it does not distinguish between Principal Towns and District Centres and the accompanying text does not spell out how the Core Strategy is further developing the RSS Core Approach to suit local circumstances.

### **Spatial Options**

Notwithstanding the overall concern that there are not options presented to examine the potential implications of an increased scale of growth in Leeds, the Assembly believes that, at this stage, **Scenario 2 and Scenario 4** have the potential to deliver the RSS Core Approach. The Assembly would not support Scenario 1 as this would not deliver the levels of growth identified in emerging RSS. Nor would support be given to Scenario 3, which would run contrary to the settlement strategy of the RSS Core Approach.