



Our Ref: General 40b – Planning Conformity/final responses/local development frameworks/Leeds, Core Strategy Preferred Approach, Dec 09

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Dear David

Leeds Local Development Framework– Core Strategy ‘Preferred Approach’

The Regional Planning Body (RPB) welcomes the opportunity to comment on the Leeds Core Strategy – Preferred Approach Consultation document 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 RPB’s response to the consultation document is a set of comments aimed at highlighting where issues related to general conformity with the Regional Spatial Strategy might arise. When the DPD is published prior to being submitted to the Secretary of State a formal RPB view on its general conformity with the Regional Spatial Strategy will need to be requested (Regulation 29, 2008). However these regulations will be amended when the relevant provisions of the new Local Democracy Construction and Economic Development Act come into force in April 2010.

The following comments are made in relation to the current RSS – The Yorkshire and Humber Plan, which was issued by the Secretary of State in May 2008. The Yorkshire and Humber Plan aims 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.

Previous Correspondence

The RPB sent a number of officer comments in response to the Core Strategy Issues and Alternative Options document on 4 December 2007. In this response we highlighted some key issues to take into account:

- The RPB was surprised that planning for a step up in the scale of growth was not reflected as an “option” or explored more fully as an “issue”.
- There was a need to make reference to housing provision targets set out in draft RSS (2005) and in proposed changes to draft RSS (2007).
- That it would be helpful to detail the contribution to the Regional target of 65% for the development of housing on previously developed land.
- 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.

As you will be aware these comments were made in relation to the then current Regional Spatial Strategy (based on the selective review of RPG12 issued in December 2004) and the draft Regional Spatial Strategy – the Yorkshire and Humber Plan (December 2005). This response will set out officer comments in relation to the current RSS – The Yorkshire and Humber Plan, which was issued by the Secretary of State in May 2008.

Key Points on the Core Strategy: Revised Further Options

Below is a summary of the main points the RPB wishes to raise with regards to the Core Strategy: Preferred Approach Consultation document. **Annex A** provides further detail for each of these issues.

1. It would be helpful to set out the requirement for the Core Strategy to be in general conformity with the RSS.
2. The RSS provides a useful strategic context for Leeds's future development through its sub-area policies. We suggest the Core Strategy should reflect on and set out the relationship that Leeds has with the rest of the Leeds City Region sub area and identifies the key cross boundary considerations that the core strategy needs to respond to.
3. The document includes welcome reference to housing targets as set out in RSS (2008). However, it is worth highlighting that that the RSS housing figures are not a ceiling target and that more recent evidence suggests a further increase in the rates of household formation.
4. It is encouraging that the Core Strategy Preferred Approach document has taken the ‘sequential approach’ as set out in Policy YH7 of RSS (2008) as a starting point to set a clear approach to where development should be focussed.
5. It is considered that the Core Strategy should make reference to the *West Yorkshire Gypsy and Traveller Accommodation Assessment (May 2008)*.

I trust that the comments provided here, and expanded on in Annex A, are helpful to you as you continue to prepare the Core Strategy for submission. Clearly we wish to see the Core Strategy developing in general conformity with the Regional Spatial Strategy. 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 final document in due course.

Yours sincerely

Martín - Elliot

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Planning Delivery

Please note: from 1 April 2009 officers supporting the work of the Joint Regional Board, the new Regional Planning Body, will work in LGYH; please amend your contact databases accordingly

Annex A

General Comments

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. The RSS (2008) has an important role in providing a strategic policy context for local policies. Therefore it would be helpful for the need for there to be 'general conformity' between the RSS and the Development Plan Document to be explained at the start of this document

The RPB welcomes references made throughout the document to RSS (May 2008) and welcomes the regional planning policy context that is set out throughout the Preferred Approach document.

Leeds in Context and Spatial Vision

Policies in RSS (2008) seek to focus development on the region's town and city centres. The Core Approach (Policies YH1-YH9) makes clear that most new development, and high trip generating uses, should be focussed on Regional Cities and Sub-Regional Cities and Towns and that away from these sufficient development should be permitted in Principal Towns to enable them to fulfil their role as service centres.

Leeds is identified as a Regional City in RSS (2008). Policy YH4 of RSS (2008) provides for Sub Regional Cities and Towns to be the prime focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region. More specifically, Policy LCR1 A of RSS (2008) provides for plans, strategies, investment decisions and programmes for the Leeds City Region sub area to develop the role of Leeds as a Regional City, by accommodating significant growth in jobs and homes and continuing to improve the city centre's offer of high order shops and services.

Wetherby is identified as a Principal Town in RSS (2008). Policy YH5 (2008) provides for Principal Towns to be the main focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities. More specifically, Policy LCR1A of RSS (2008) provides for the service centre roles of Principal Towns to be strengthened.

Paragraph 2.2 and accompanying table sets out the proposed Leeds Settlement Hierarchy. It rightly identifies Wetherby as a Principal Town as identified in RSS (2008). However, it is not clear as to whether the other settlements identified as "major settlements" are intended as Principal Towns in the future, what the strategy is to develop the roles of these places to enable them to function as Principal Towns and what evidence there is to demonstrate the delivery of such a strategy. Bearing in mind that Policy YH5 of RSS (2008) in particular circumstances allows for further Principal Towns to be identified where they will support the delivery of the Core Approach; will provide employment, community facilities and services for local and supporting populations; and will have good accessibility by public transport to Regional Cities and Sub Regional Cities and Towns.

It will be important for the Core Strategy to set out the context provided by the sub area policies and the relationship that Leeds has with the rest of the Leeds City Region sub area and the key cross boundary relationships. It will also be important for the Spatial Vision of the Core Strategy to set out the different roles and relationships of places identified within the identified Leeds Settlement Hierarchy and to highlight how the District intends to develop over the next 10-15 years. It would be helpful for the document to include a draft key diagram highlighting the spatial distribution of development and the key spatial issues in the Leeds District.

Strategic Themes

Green Infrastructure

Since the RPB commented on the Issues and Alternative Options consultation document, Policy YH8 "Green Infrastructure" has been included as a Core Policy within the current RSS (2008). Green infrastructure is an important component of ensuring that future development provides positive benefits for the region and helps deliver sustainable communities.

Policy YH8 of RSS (2008) states that it is the role of the LDF to: define green infrastructure; identify and require the retention and provision of substantial connected networks of green infrastructure; ensure that policies have regard to the economic and social as well as environmental benefits of green infrastructure assets; and identify the functional role of green infrastructure in supporting the provision of renewable energy, urban microclimate control, and flood risk management.

The RPB is encouraged that the issue of Green Infrastructure has been covered in the document. It would be helpful if the work that has already been done to address this issue is linked to work that Natural England has already carried out in identifying current Green Infrastructure in the Leeds City Region and the current work by LDA on a City Region Green Infrastructure Strategy.

It is also worth noting that in terms of infrastructure delivery the RPB is currently developing a guide in order to offer practical support and guidance to local planning authorities in preparing infrastructure delivery plans, which may be of use to you alongside the preparation and development of your Core Strategy. This guide will be available on the Local Government Yorkshire and Humber website (www.lgyh.gov.uk).

Sustainable Communities

The RPB is encouraged that the document identifies key *Regeneration Priority Areas*. Policy LCR1E encourages growth areas across the south of the Leeds City Region (broadly south of Bradford and Leeds city centres), particularly within the Regeneration Priority Areas. More specifically, Policy LCR1E encourages regeneration and growth in the Bradford-Leeds Corridor to restructure and regenerate west Leeds to better support economic growth of both cities and in the Aire Valley and East Leeds to help deliver housing regeneration, housing growth and economic development.

Housing Challenge

The document rightly states that RSS (2008) requires 73,900 homes to be built in Leeds between 2009-2026. Policy H1 of RSS (2008) states that plans, strategies, programmes and investment decisions should ensure the delivery of the annual net additions to the dwelling stock set out in Table 12.1 in locations that accord with the Core Approach. Table 12.1 in RSS (2008) sets an annual average net addition to the dwelling stock in Leeds of 4300 units between 2008-2026. Paragraph 5.3.8 correctly states that RSS requirement for Leeds of 4300 dwellings per year from 2008. It is also stated that adjustments have been made to account for an oversupply of dwellings

during the 2004-08 period. However in the context of the over supply adjustments you should be aware that that the RSS housing figures are not a ceiling target. This is set out in Policy H2 of RSS (2008) which provides for local planning authorities to adapt a flexible approach to the delivery of housing by not treating housing figures as ceiling targets, whilst ensuring that development is focussed on locations that deliver the Plan's Core Approach and Sub Area policies.

The document rightly considers how the District will deliver the RSS (2008) housing requirement. However, it would be helpful if the document could also provide scenarios for housing that explore what may happen if the housing figures were to increase. More recent evidence suggests that this may well be the case.

The RPB is encouraged that the Core Strategy Preferred Approach document has taken the 'sequential approach' as set out in Policy YH7 of RSS (2008) as a starting point to set a clear approach to where development should be focussed. The RPB is extremely encouraged that it is proposed that Leeds will achieve at least 75% of development on PDL, with 85-95% expected during the 5 years of the plan period. It is worth noting that Policy H2 of RSS (2008) includes a regional target for 65% of housing development to be on previously developed land and through conversions of existing buildings.

The RPB is concerned that **paragraph 5.3.23** implies that in order to meet the RSS (2008) requirement of 73,900 dwellings the Core Strategy envisages that 11% of housing will be provided on windfall sites and 89% on identified land. Windfall figures should not be included in the overall housing supply figures. The RPB is surprised that this is the case as the SHLAA should have identified much of what was previously windfall sites.

Gypsies and Travellers

The RPB is encouraged that the issue of Gypsies and Travellers is covered in paragraph 5.3.10 and Policy H1. The RSS (2008) recommends that the region needs to make additional provision to meet the needs of Gypsies and Travellers to address a shortfall of least 255 pitches. Policy H6 states that in the West Yorkshire district at least 86 pitches will be required by 2010 to address the shortfall in the region. Policy H6 also requires local authorities to carry out an assessment of the needs of Gypsies and Travellers by May 2008. This now in place.

Policy H6 was therefore set as an interim policy until all local authorities had carried out their own local assessments. The estimates set out in Policy H6 will be superseded by the findings of local Gypsy and Traveller accommodation assessments which are expected to conclude that greater numbers of additional pitches will be required.

We consider that the Core Strategy should make reference to the *West Yorkshire Gypsy and Traveller Accommodation Assessment (May 2008)*, which identifies a need for 48 additional pitches in the Leeds District for the period up to 2015. The DPD should also make reference to the evidence from the Regional Benchmarking study that has sought to derive from the GTAAs a comparable picture of the need for additional pitches which shows a need greater than that in the West Yorkshire Assessment. This benchmarking study will be the subject of further testing and will inform the approach taken in the new Integrated Regional Strategy to meeting the accommodation needs of travelling communities. Planning for the Gypsy and Traveller Community should not be treated separately from housing allocations for the settled community.

Affordable Housing

The RPB welcomes Policy H5 which states that over the plan period to 2026 affordable housing will be sought to deliver up to 40% of total dwellings as affordable depending on housing needs and market conditions pertaining during phases of the core strategy. The Regional Housing Strategy 2005 identifies affordable housing need in the Leeds district as being 'medium'. Policy H4 of RSS (2008) states 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 is between 30-40%.

Housing mix

The RPB is encouraged that the issue of housing mix is covered in this document. Policy H5 in RSS (2008) 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 Policy recommends that plans, strategies, investment decisions and programmes should ensure the provision of homes for a mix that reflects the needs of the area, including homes for families with children, single persons, and older persons, to create sustainable communities.

The Leeds Economy

The RPB is encouraged that Policy EC4 states that the City Centre will be the main focus for office development in the District. Policy E2 of RSS (2008) highlights the importance of the role and performance of existing town centres. Policy E2 provides for plans, strategies, investment decisions and programmes to strengthen the role and performance of existing town centres. It emphasises that centres of Regional Cities (of which Leeds is one) should be the focus for offices, retail, leisure, entertainment, arts, culture, tourism, and more intensive sport and recreation across the region.

Managing Environmental Resources

The RPB is encouraged that Policy CC1 states that all developments of 10 dwellings or more or over 1,000 sq of floorspace will be required to provide a minimum of 10% of the predicted energy needs of the development from decentralised, renewable or low carbon energy.

The sustainable use of resources is a key theme in RSS (2008). Policy ENV5 states that in advance of local targets being set in DPDs, new developments of more than 10 dwellings or 1000 sqm of non-residential floorspace should secure at least 10% of their energy from decentralised and renewable or low carbon sources. More guidance on how this requirement can be delivered is available from our Renewable Energy Toolkit which can viewed on: www.renewable-energy-toolkit.org.uk.

The RPB is encouraged that paragraph 5.4.19 makes reference to the renewable energy targets as set out in RSS (2008). The RSS sets indicative targets for installed grid-connected renewable energy for Leeds of 11 MW by 2010 and 75 MW by 2021 (Table 10.2, Policy ENV5).