



# Response form

Leeds Local Development Framework

Core Strategy – Preferred Approach

October – December 2009

This response form is for your views on the Leeds Core Strategy Preferred Approach. You should read the full document or summary document before filling in this form.

The Core Strategy is available to view at all libraries and One Stop Centres across the Leeds District, at the Development Enquiry Centre, or online at [www.leeds.gov.uk/ldf](http://www.leeds.gov.uk/ldf) under 'current consultations'. Alternatively email [ldf@leeds.gov.uk](mailto:ldf@leeds.gov.uk) or ring 0113 247 8075 for more information.

Consultation forms must include a name and address otherwise your comments will not be taken into account.

Your details

If the details opposite are for an agent, enter the client's details here

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Please return your response form by  
5pm on 7<sup>th</sup> December 2009 to:

LDF Consultation (Core Strategy), Forward Planning and Implementation,  
 2 Rossington Street, Leeds, LS2 8HD

*Personal information provided as part of a representation cannot be treated as confidential as the Council is obliged to make representations available for public inspection. However, in compliance with the Data Protection Act 1998 the personal information you provide will only be used by the Council for the purposes associated with the LDF consultations*

DO YOU AGREE...?...		Yes	No
<b>Spatial Vision and Objectives</b>			
1.	With the spatial vision and objectives?		✓ note 1
<b>(i) Green Infrastructure and Natural Environment</b>			
2.	That the policies will sufficiently protect and enhance Leeds' green infrastructure?		✓ note 2
3.	That the policies will sufficiently protect and enhance habitats and biodiversity, including woodlands and wetlands?	✓	
<b>(ii) Sustainable Communities</b>			
4.	With the hierarchy of centres?	✓ note 3	
5.	With our approach to directing new shops, offices, arts, leisure and entertainment uses to centres?	✓	
6.	That the greenspace policies of the UDP be carried forward into the Core Strategy		✓ note 4
7.	Do you agree that larger new developments should be required to meet higher standards of sustainable construction?		✓ note 5
8.	With the policies on design, conservation, landscape, and disabled access?		✓ note 6
<b>(iii) Managing the Needs of a Growing City - (a) The Housing Challenge</b>			
9.	With the sequential preferences for the location of new housing?	✓ note 7	
10.	With seeking to control the mix of new dwellings on an annual basis?	✓ note 8	
11.	With the approach to setting requirements for affordable housing based on needs and market conditions assessed periodically, up to a maximum of 40%	✓	
12.	With the policy on student and other specialist housing?	✓ note 9	
<b>(iii) Managing the Needs of a Growing City - (b) The Leeds Economy</b>			
13.	With the proposals to enhance the economic role of the City Centre?	✓ note 10	
14.	With the proposed location of employment land, including offices?	✓ note 11	
15.	With the approach to help grow and diversify the rural economy?	✓	
<b>(iv) Managing Environmental Resources</b>			
16.	That the suite of biodiversity policies is appropriate to protect and enhance biodiversity in Leeds?	✓	
17.	With the policies aiming to reduce and mitigate against climate change, including wind energy, green roofs, and street trees?		✓ note 12
18.	With the approach to preventing and dealing with flood risk?	✓ note 13	
<b>(v) A Well Connected City</b>			
19.	With the transport investment priorities?	✓ note 14	
20.	With the accessibility requirements for new development?	✓	
21.	With the policy to manage the growth of Leeds Bradford International Airport?	✓ note 15	
<b>Policy or Para</b>	<b>Please use the boxes below to write any comments in relation to particular paragraphs or policies.</b>		
Note 1 Section 4 'Vision'	<p>While the Leeds Civic Trust concurs with the overall approach of the Core Strategy in terms of the spatial development of the city, we consider that the Core Strategy vision (para 4.4) is fairly anodyne and does not further the Vision for Leeds.</p> <p>Para 4.5 expands on the Vision but is centred on places and not people. It is acknowledged that the Core Strategy needs to focus on the physical environment but the key is the way this 'serves' people. We should be aiming for a city:</p> <ul style="list-style-type: none"> <li>• where mixed communities of families, independent young and elderly can live close to work, school, shopping and leisure</li> <li>• where communities can have pride in the local distinctiveness and heritage of their neighbourhoods and the city</li> </ul>		

	<ul style="list-style-type: none"> <li>• where walking, cycling or travel by public transport are the easiest and most attractive options for getting around</li> <li>• with a city and town centres which all can enjoy and feel safe in at all times including the evenings.</li> </ul> <p>In 4.5, why the specific references to the 'lower' Aire Valley? If the Destination is the Lower Aire Valley that is different! West of the city centre also has a key role to play eg. Kirkstall Forge, KV Park and Kirkstall Road between YEP and the viaduct.</p> <p>In 4.6, we consider that there is potential for some additional strategic objectives on the following lines:</p> <ul style="list-style-type: none"> <li>• SC6: "The promotion of pride of place, both at the local neighbourhood and city level through engagement with local communities to understand, appreciate and manage the local distinctiveness of their neighbourhoods"</li> <li>• MER5: "reduce the overall carbon emissions of the city by 30% by 2020" (a firm commitment is needed).</li> </ul>
<p><b>Note 2</b> 'Green infrastructure'</p>	<p>5.1.15: the list of key green infrastructure elements should include private gardens as part of a policy to prevent inappropriate 'garden-grabbing' development – as noted in 5.1.16, this would not preclude development but ensure that it has to be properly considered and justified.</p> <p>Throughout the built up areas of the city there are small areas of land, some designed, some SLOAP (spaces left over after planning), some green and some hard, some valued and some not, including grass verges, banks, highway sightlines, etc. These areas should be locally managed, maintained and/or improved through consultation with local communities as part of a programme of improvements to the public realm. A policy to this end should be included here and mirrored in the Well Connected City section where there should be reference to removal of redundant road-space for reuse for more appropriate purposes.</p> <p>Policy G2. We have concerns that in a difficult market and with many competing pressures on S106/other agreements, insufficient development value will be captured to fund investment in green infrastructure.</p> <p>Policy G4. A statement such as USUALLY (relating to prevention of development with an adverse impact) provides a significant let-out clause – the policy should be strengthened to ensure the integrity of the Network.</p>
<p><b>Note 3</b> Hierarchy of Centres</p>	<p>While the Hierarchy of Centres is appropriate, we feel that there needs to be some flexibility in the hierarchy to accommodate changes over time – ie. some subsidiary parades are contracting (with vacant or poor quality units on the fringes) and it may be that other uses would be suitable here (eg conversion back to residential use?). The most appropriate mechanism for this is likely to be at a more local level of planning. However, we also see a need to give additional strength to direct a wide range of other developments to appropriate locations. In particular, the co-location agenda which is seeing the provision of community hubs encompassing schools, leisure centres, libraries, health facilities, other Council services and associated local retailing, could lead to the development of new sustainable local centres – we welcome the discussion of these issues in paras 5.2.24-28.</p> <p>We welcome the commitment to no further out of town retail developments.</p> <p>It is noted that the Moortown Corner centre is not shown on the Sustainable Communities map.</p>
<p><b>Note 4</b> Carried forward greenspace policies</p>	<p>In view of the limited time available to comment on the Core Strategy, we have been unable to carry out a full review of the saved policies. However, we feel that individual policies may need to be strengthened to ensure that there is a more strategic approach to the creation of greenspace within developments. Rather than laying out lots of small plots which are then of limited ecological value and costly to maintain, developers should be required to create larger areas which are of greater value to the community.</p>
<p><b>Note 5</b> Sustainable construction</p>	<p>We feel that the sustainable building standards should be extended to all development, not just major schemes, in line with the responses to earlier consultation on the Core Strategy – there is also the issue of schemes coming in just under the threshold to avoid needing to comply. Mechanisms for monitoring compliance will also need to be established.</p>
<p><b>Note 6</b> Design, etc policies</p>	<p>SC8 We feel that this policy does not reflect the objective that is sought and while it covers many aspects of good design, it says nothing about the psychology of design – "lifting the spirit" or the concept of "delight". We are not looking for 'excellent design' but for 'quality places'. We suggest that an amendment on the lines below would be more appropriate:</p> <p><i>"...expected to create <b>stimulating and attractive places through excellent design that protects and enhances those elements which contribute to the distinctive identity of the City</b> ....."</i></p> <p>Otherwise, the policies are appropriate as further detail would be provided through SPDs and the like eg</p>

	<p>Tall Buildings, materials, etc. This also applies to policies which should commit the authority to continue Conservation Area appraisals until all areas are done, a start on CA management plans and a heritage audit to be a key first element in any regeneration strategy. These should be identified in the LDF.</p> <p>We feel that there is potential to create local management teams including local residents, businesses and the Council with a budget to look after the public realm within individual communities – this would be a positive policy to encourage community involvement.</p>
<b>Note 7</b> Housing development sequence	<p>We agree with the sequence identified for housing development but it should be acknowledged that there may be occasions when greenfield development might be appropriate – if brought forward by developers, S106 agreements should reflect the additional cost to the community of servicing such sites and be significantly more onerous than on brownfield sites. Developers should be required to cover both on-site affordable housing and contributions to infrastructure (highways, public transport, leisure, community facilities, etc), potentially through a infrastructure development levy on each unit of accommodation (including single plots).</p> <p>If family homes are to be encouraged on the edge of the city centre, appropriate infrastructure will be needed (schools, play areas, medical centres, local shops, etc).</p>
<b>Note 8</b> Mix of new dwellings	<p>We have some concerns over the practicality of determining housing mix as this will be very much market led – the current issues with small flats in the city centre being an example. In an ideal world, we would wish to see a mix of types on all sites but this may not be achievable.</p> <p>We feel that there may be parts of the City Centre and/or town centres where larger dwellings might be appropriate and we question whether a maximum figure is required. Eg extending the proposed 'Eco-settlement' into the south of the river section of the City Centre could provide an opportunity for larger homes close to the regional hub. This might also be a location for developments such as live/work units.</p>
<b>Note 9</b> Specialist housing	<p>We question the practicality of distributing eg. student housing around the city but other classes should follow this policy.</p>
<b>Note 10</b> Economic role of city centre	<p>We welcome the acknowledgement of the importance of the City Centre to the economy of both Leeds and the City Region. All the bullets in Policy EC2 are welcome but we feel that some of these are very detailed and project-specific for a Core Strategy (eg we hope the Arena will be built by the time this is adopted!). To that end, we feel the policies should embrace such as the quantum/location of retailing (will there be demand for all the new shops?), the protection of the markets, the enhancement of the amenities that will be key to drawing visitors to Leeds, etc.</p>
<b>Note 11</b> Employment land policies	<p>We welcome the commitment to no further out-of-town office parks as these are very difficult to service in a sustainable way. Where major parks already exist, there should be an additional policy to enhance their accessibility by sustainable modes of transport.</p> <p>We feel further encouragement should be given to mixed use areas which would enhance the potential for people to work from home. This will require the provision of employment land in the growth areas to ensure that there is potential for limiting commuting.</p> <p>There is potential for an additional policy to improve the quality of the environment in employment areas (and access routes to them) as this could be a key differentiator when selling the city to potential investors.</p>
<b>Note 12</b> Climate change	<p>We welcome the general tenor of the policies in this section, including the City Council's commitments to minimising CO<sub>2</sub> production linked to its own developments and activities – however, there is still an issue to ensure the private sector and individual dwellings adopt these and, in future, more stringent standards.</p> <p>Policy CC1: this should be rewritten on the lines of "10% of the predicted energy needs of the development from either on-site or neighbourhood scale (low carbon) renewable energy". As written, with a comma after 'decentralised', the policy could allow the development of carbon-intensive decentralised energy generation! We also feel that the policy should extend to smaller developments although it is appreciated that this will be through a contribution to off-site provision – smaller sites should also be required to meet the 20% less than Building Regulations target.</p> <p>The Civic Trust welcomes the policies on green roofs but feels that this should be extended to all such developments around the city – the roofs of large buildings are an important elements in generating run-off and green roofs can mitigate any adverse effects. We do wonder why the roof area is stated as 0.25ha – are not roofs normally measured in square metres? But we feel that there may be occasions where</p>

	<p>development of less than 2,500 m<sup>2</sup> (?) should be required to have green roofs and we question the choice of this figure – how many of the current city centre developments would have green roofs if this policy were to have been in place?</p> <p>We welcome the commitment to the planting of additional street trees.</p> <p>NB. With regard to the question, should this not be ‘mitigating climate change’, not ‘mitigating against climate change’?</p>
<b>Note 13</b> Flood risk	<p>We welcome the policies regarding flood alleviation and will continue to support the Council in ensuring that any measures implemented add to, rather than detract from, the amenity of the Waterfront – we feel that the importance of the riverside to the amenity of the city is such as to require the introduction of innovative approaches such as moving barriers, overflow channels and up/downstream storage.</p> <p>We also feel that the policies should be extended to ensure that Sustainable Urban Drainage Systems are employed throughout the city to restrict outflows at peak rain periods.</p>
<b>Note 14</b> Transport investment priorities	<p>Generally, we concur with the approach to transport planning set out in these policies but we would wish to make the following comments regarding detail:</p> <ul style="list-style-type: none"> <li>• public transport improvements should also consider orbital movements – particularly with a legacy of out-of-town employment and shopping sites, these routes are poorly served at the moment. The objective should be to develop a ‘network facilitating a wide range of transport opportunities’. This should include support for ticketing initiatives.</li> <li>• pedestrian priority should be given far more consideration in the design of highway schemes - in built-up areas, put the pedestrian first, cycles second, public transport third and cars last.</li> <li>• specific regard should be given to the need to enhance the railway station, including issues such as car parking, taxis and pedestrian links to the city centre – it is appreciated that is not within the direct control of the Core Strategy but strong support should be given to the enhancement of the rail network. It is important that any high speed rail network planned for the UK should feed into Leeds and any station provided should be in the city centre so as to build on its high accessibility – a park &amp; ride station on the outskirts would force more people to use their cars to reach it when travelling away from Leeds and make those going to the city change mode.</li> <li>• amongst the strategic measures, consideration should be given to alternative approaches to reducing traffic in the city centre including charging for workplace parking, demand management, etc.</li> <li>• the map illustrating these policies retains the Park&amp;Ride site on the A64 on the edge of the urban area but does not envisage NGT reaching this point – can it act as a true P&amp;R site without some effective links to the city centre? People will just drive further in if they are either put on buses overtaken by NGT vehicles or just not make the modal shift we seek</li> <li>• it is noted that there are no improvements proposed to the A6120 between the A61 and the A58 although this is a stretch with a number of junction issues.</li> </ul>
<b>Note 15</b> LBI Airport	<p>In view of potential constraints on growth of air traffic as part of policies to reduce CO<sub>2</sub>, potentially linked to new high speed rail lines, any spend on surface access to LBIA should be very carefully balanced against other transport priorities.</p>
3.13	<p>A suggested addition to the ‘How can we...?’ questions:</p> <p><i>Make our city and town centres places all can enjoy and feel safe in at all times including the evenings?</i></p>
General comments	<p>There are a number of issues with document which make it very difficult to use:</p> <ul style="list-style-type: none"> <li>• maps are not included in the printed copy and those which can be obtained from the website are of a very poor quality when enlarged to a size which is meaningful</li> <li>• the numbering of themes, objectives and policies is very confusing – within the Strategic Theme 2 (is that what ST is – it is not defined!) there is a SC2 (presumably a Sustainable Communities strategic objective?) but later we come up with a different SC2 (a Sustainable Communities policy?). Hardly a sensible approach.</li> </ul>