

Part 1 - Your details

*This information must be completed

Personal details / Client details

Agent details

Only complete if you are an agent

Title	Ms	
First name*	Joanne	
Last name*	Hebden	
Job title <i>(where relevant)</i>	Clerk & RFO to the Council	
Organisation <i>(where relevant)</i>	Micklefield Parish Council	
Address*	6 Churchville Avenue	<div style="border: 2px solid black; padding: 5px; text-align: center;"> RECEIVED - 6 NOV 2015 OVER COUNTER </div>
	Micklefield	
	Leeds	
Post code*	LS25 4AS	
Phone/Mobile		
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Part 2 - What comment do you wish to make?

Please use a separate response form for each site/ part of the Plan(s) you wish to comment on.

2.1. Which Plan do your comments relate to?

- Leeds Site Allocations Plan
 Aire Valley Leeds Area Action Plan

2.2. Which section of the Plan do your comments relate to?

a. **A specific site/designation in the Plan**

Site reference from the document or Map (e.g. HG2-1 (3026))

HG2-124 (1232B)

Do you agree with the proposed use of this site? Yes No

Please tick all the themes you wish to comment on;

- | | | |
|--|--|----------------------------------|
| <input type="checkbox"/> Ecology/Landscape/Tree(s) | <input checked="" type="checkbox"/> Local services/facilities | <input type="checkbox"/> Schools |
| <input type="checkbox"/> Conservation/Heritage | <input checked="" type="checkbox"/> Loss of Greenbelt | |
| <input checked="" type="checkbox"/> Highways/transport | <input type="checkbox"/> Site Boundary <i>(please submit a revised boundary)</i> | |
| <input type="checkbox"/> Other <i>(please specify)</i> | | |

IF YOU HAVE COMPLETED 2.2 a - PLEASE GO STRAIGHT TO PART 3

b. Another part of the Plan

Title of document (e.g. Publication Plan, background paper, sustainability appraisal)

Policy Ref. (e.g. - RTC1)

Paragraph Number

Diagram / Inset Map

Other

IF YOU HAVE COMPLETED 2.2 b - PLEASE GO STRAIGHT TO PART 3

c. A site previously considered and not allocated in the plan

(See Housing & Employment Background Paper)

Reference No (e.g. SHLAA ref)

Address

IF YOU HAVE COMPLETED 2.2 c - PLEASE GO STRAIGHT TO PART 3

d. A new site which has not been considered. Please attach a site plan.

Address

IF YOU HAVE COMPLETED 2.2 d - PLEASE GO STRAIGHT TO PART 3

Part 3 - Is the Plan sound?

At this stage, before the Plan is sent to the Secretary of State for Public Examination, we are asking for your views about the 'soundness' of the plan. An independent Inspector will examine the plan against the 'tests of soundness' (Please read the guidance notes on how to complete this section)

3.1. Do you consider the plan to be sound?

Yes (go to Q3.3)

No (go to Q3.2)

3.2. Which test of soundness are your comments about? (You must select at least one option)

Positively Prepared

Effective

Justified

Consistency with National Policy

3.3. Please set out why you think the Plan is sound / unsound? Your comments should briefly cover all the evidence and supporting information necessary to support or justify your view. It helps us if you can use subheadings to deal with specific issues. Please continue on a separate sheet if you need to. There may not be another opportunity to make further comments before the plan is sent to examination.

Site HG2-124 (Land at Sturton Grange Farm South, Selby Road and Ridge Road, Garforth) is outwith the settlement boundary of Garforth and the land is currently in the Adopted Green Belt. Please see separate sheet for a fuller explanation as to why Micklefield Parish Council objects to the allocation of site HG2-124 as a housing allocation, why the 'Positively Prepared', 'Justified' and 'Consistency with National Policy' tests are not satisfied and why the Plan is thus fundamentally unsound in terms of this site.

3.4. Please set out what change(s) you consider necessary to make the Plan sound.

You will need to say why this change will make the Plan. It helps us if you can be precise as possible and providing any suggested revised wording. Please continue on a separate sheet if you need to.

Site HG2-124 should not be allocated for housing. The site should remain in the Adopted Green Belt.

Part 4 - Is the Plan legally compliant?

Please give evidence in support of the comment you gave in Part 2.

4.1. Do you consider the Plan to be legally compliant?

- Yes No Don't Know
(Please read the guidance notes on how to complete this section)

4.2. Which part of legal compliance is your comment about?

- | | |
|---|---|
| <input type="checkbox"/> Local Development Scheme | <input type="checkbox"/> Planning and Compulsory Purchase Act 2004 |
| <input type="checkbox"/> Statement of Community Involvement | <input type="checkbox"/> Sustainability Appraisal Report |
| <input type="checkbox"/> Consultation of appropriate Statutory Bodies | <input type="checkbox"/> Town & Country Planning (Local Planning) Regulations |
| <input type="checkbox"/> Duty to Cooperate | |

4.3. Please give details of why you consider the Plan is/or is not legally compliant.

Please try to be as precise as possible, using headings to break up your comments and continue on a separate sheet if you need to.

In terms of this specific proposed housing site, HG2-124, the Plan is legally compliant.

Part 5 - Take part in the public examination

5.1. Your comments will be taken into account by the Planning Inspector. Would you like to take part in the forthcoming Public Examination?

- Yes No

N.B. The Planning Inspector will decide the best way to hear from those who wish to take part in the examination

Part 6 - Future updates

6.1. Would you like to be notified of any of the following? (Please tick as appropriate)

- The Submission of the Plan(s) for Public Examination
 The Adoption of the Plan(s)

Please sign and date this form

Signature:

Date: dd/mm/yy

Thank you for taking the time to give your comments on the Leeds Site Allocations Plan and/or Aire Valley Leeds Area Action Plan.

If you would like to make another comment on another site or different part of the Plan (s), please use a separate response form.

Submit your form

MICKLEFIELD PARISH COUNCIL

Sole Trustee of Micklefield Recreation Ground Charity



APPENDIX TO CONSULTATION RESPONSE

Leeds Local Development Framework (LDF) Leeds Site Allocations Plan – Publication Draft (Public Consultation:- September - November 2015)

Site HG2-124

3.3 Please set out why you think the Plan is sound / unsound?

Site HG2-124 is currently within the Adopted Green Belt, between the settlement boundaries of Garforth and Micklefield. To allocate this land for housing development or even as a PAS designation would be profoundly unacceptable because it would be in direct contravention of the 2nd purpose of the Green Belt. The Green Belt separation between Garforth and Micklefield would not just be reduced by a mile – literally – it would implode to a distance of just 12 metres, ie. the width of the A656 Ridge Road itself.

The 2nd purpose of the Green Belt is to prevent neighbouring towns from merging into one another and yet Leeds City Council does not seem to recognise that deleting site HG2-124 from the Green Belt would effectively join the settlement boundary of Garforth to that of Micklefield. As a result there would be an absolute coalescence of the town of Garforth and the village of Micklefield, given that the settlement boundary of Micklefield extends all the way to the A656 Ridge Road, south of the railway, including Peckfield Business Park and Ridge Bridge Cottage.

Furthermore, because the current eastern edge of Garforth is on or just below the watershed extending northwards from Garforth Cliff to Hook Moor, the new housing would appear to spew over the watershed sprawling all the way to the A656 Ridge Road. Therefore, not only would there be absolute coalescence of the two settlements, there would also be the visible perception of coalescence on the ground.

This effect would be acutely apparent when standing on the public footpaths near Hartley Wood Cottages at Micklefield. Because of the elevated landscape to the east of Micklefield, when looking west across the village one would see the mass of houses of 'new' Garforth visibly encroaching on Micklefield, when currently the two settlements are separated by a significant stretch of Green Belt and, equally importantly, appear to be separated by open countryside.

The 3rd defined purpose of the Green Belt "to assist in safeguarding the countryside from encroachment" would be nullified, as the open countryside between the two settlement boundaries would be lost. The only part of site HG2-124 which would cause no issue whatsoever in this Green Belt context would be what were previously the separate SHLAA sites 1244 (land to north of Garforth Cliff Park) and 3110 (land to west of Green Lane, Garforth).

Any other extension of *any part* of Garforth further eastwards than those two SHLAA sites would reduce the Green Belt separation between that town and Micklefield (facing each other along their planes of separation in a geographical context), and the Plan should have positively sought to avoid such an outcome. This holds true for the land north of the railway line as well, although the Green Belt separation between Garforth and Micklefield would be slightly greater (a distance of 40 metres, diagonally across Ridge Bridge).

To allocate any part of site HG2-124 east of Green Lane would, as far as Micklefield Parish Council can see, inevitably lead to the whole site (and, as an inevitable consequence, SHLAA site 1232a to the north) being eventually allocated over time in subsequent Plans right up to the A656 Ridge Road. In our view, that end result must be avoided at all costs and resisted throughout the plan process.

Site HG2-124 is therefore not 'Consistent with National Policy' and unequivocally fails to meet this fundamental test of the Plan. It is one thing for the Adopted Leeds Core Strategy 2014 to legitimately require deletions from the Green Belt in the Outer South East HMCA, it is quite another to drive a coach and horses through the very reason why the Green Belt was created between Garforth and Micklefield in the first place.

Garforth is a very large village which is to all intents and purposes a town. It has a vibrant central retail area, with two main highways and excellent access to both the M1 and the A1. It has not one, but two railway stations on a high frequency railway line and high frequency bus services to Leeds and Castleford, all of which operate throughout the day every day up to 11.00pm. Garforth is therefore a settlement that, in itself, can support sustainable housing development, certainly more so than any other community in the Outer South East HMCA.

However, an extension of this magnitude, and on the *wrong* side of Garforth, would result in the new 2800 residential units in site HG2-124 being so far away from the main retail area and significant core facilities at Garforth Town Centre as to render any concept of sustainability meaningless. Most of the houses would actually be closer to the non-existent core facilities in Micklefield and virtually all journeys to and from Garforth Town Centre by the new residents would be by car, rather than on foot.

The only bus service that could plausibly serve site 1232B is the 175, which is Monday to Saturday only, runs at two-hourly intervals, finishes at around 6.00pm and operates between Castleford and Wakefield via Micklefield. The 402 bus service between Selby and Leeds via Micklefield will not under any circumstances be diverted through or next to site 1232B and neither will the 163 or 166 bus services between Leeds and Castleford.

There are other sites on the edge of the existing settlement boundary of Garforth which have been discounted by Leeds City Council, yet their deletion from the Green Belt, or in one case, revision from PAS, to provide housing allocations would not take the built up extent of Garforth any closer to any other settlement (facing Garforth along the same plane or planes of separation).

The same sites are also within a sensible walking distance to the main retail area and significant core facilities at Garforth Town Centre and are within 400m of the frequent 402, 163 and 166 bus routes and the 19 bus service which runs between the north east area of Garforth and Leeds.

These are the SHLAA sites and the single HG3 site listed below:

- Site HG3-18 (the existing PAS land to the south of Selby Road, Garforth) also listed as 2132
- Site 1044 (land between Wakefield Road and Barrowby Lane, Garforth)
- Site 1100 (Clear View Farm, Wakefield Road, Garforth)
- Site 1226 (land between Nanny Goat Lane and the M1, Garforth)
- Site 1366 (3 detached portions of land south of Selby Road, Garforth)
- Site 2156 (land to the west of Hawks Nest Wood and north of Lotherton Way, Garforth)
- Site 3114 (land to the west of Barwick Road, Garforth)

The allocation of site HG2-124 as a housing allocation does not satisfy the 'Justified' test because Leeds City Council has not correctly compared the potential sites around the edge of Garforth, in terms of which sites would best fulfil the housing need in the Outer South East HMCA that the Adopted Core Strategy has already set out.

We can find no comparative analysis as to which sites have the least value to the purposes and function of the Green Belt and which ones would be the most sustainable ones to choose in terms of their actual development for housing.

Even if one takes the Sustainability Appraisal (which is arguably deficient in its scope, content, analysis and ability to rank sites against each other) at face value, site HG2-124 scores unfavourably in comparison to most of the above SHLAA sites that were considered but not chosen by Leeds City Council as housing allocations.

Sites 1044, 1100, 1226 and 1366 all appear to have more positive Sustainability Appraisals than site HG2-124 and yet they were not chosen. Inexplicably so, as they have no unusual spatial constraints otherwise articulated on their ability to form viable housing allocations.

Site 3114 does not appear anywhere in any of the documents relating to the Sustainability Appraisals, so Micklefield Parish Council is unable to conclude whether it would have scored more favourably or not. However, we suspect it would as it is closer to the main retail area and significant core facilities at Garforth Town Centre and the aforementioned bus routes than the favourably scored site 1226.

Micklefield Parish Council also has serious doubts as to the sustainability appraisals for sites 2132 (HG3-18) and 2156. They appear to score less favourably compared to site HG2-124, but this cannot be the case, given their greater proximity to the main retail area and significant core facilities at Garforth Town Centre and the aforementioned bus routes.

It is worth pointing out that Leeds City Council in its reasons for choosing SHLAA site 1232B as a housing allocation (HG2-124) on page 87 of the Housing Background Paper, states: "South portion [of 1232] chosen through local preference". This so-called reason is both incorrect and, in the context of Garforth, invalid as a rational reason for the allocation of sites around the edge of that settlement.

At the Site Allocations Plan – Issues and Options stage in 2013, SHLAA sites 1232B (to the south of the railway line) and 1232A (to the north of the railway line) were suggested as one site, ie. site 1232. At no point was site 1232B offered as a potential distinct housing allocation in its own right, separate from what is now site 1232A.

~~Various individuals submitted comments in support of site 1232 and a number of respondents objected to the concept of any part of SHLAA site 1232 being allocated for housing. In any event, the concept of "Local Preference" in the formulation of a Site Allocations Plan is not simply a *vox populi* of an arbitrary number of local residents as a snapshot in time. Otherwise we will finish up with the Plan being determined by an online survey, with landowners, developers and objectors all trying to see who can get the most 'likes' for their proposal.~~

It is the material planning issues that carry weight, regardless of how many people object to an element of the Plan or support it, and even if it is only one respondent who actually identifies a relevant and material planning issue. The only time when "Local Preference" would be a material planning consideration is in the context of a Neighbourhood Plan. If a Neighbourhood Plan for Garforth and/or Sturton Grange had already been adopted before the Site Allocations Plan got to the Publication Draft stage, then clearly this "Local Preference" would be an absolute, as the Site Allocations Plan would have to conform to the Neighbourhood Plan.

Garforth has an adopted Neighbourhood Plan Area (NPA) and a constituted Neighbourhood Plan Forum (NPF), but the formulation of the Garforth Neighbourhood Plan is in its very early stages. Garforth does not have an adopted Neighbourhood Plan, it doesn't even have a Publication Draft that has been through a referendum of the electorate of the NPA, nor does it even have an initial draft from an Issues and Options stage.

In truth, any justification of site HG2-124 using the phrase "Local Preference" would only be valid if an emerging Neighbourhood Plan for Garforth and/or Sturton Grange had at least passed its referendum stage (popular consent) and ideally having satisfied its own Examination In Public (confirmation that the material planning issues arising from the proposals in the Neighbourhood Plan had been thoroughly tested and correctly determined).

Regardless of the existing settlement boundary of Garforth, only just over half of site HG2-124 is in the NPA for the non-parished area of Garforth. The rest is in the parish of Sturton Grange, currently amalgamated with two other parishes as the Aberford & District Parish Council. There is no adopted NPA for the parish of Sturton Grange, no constituted NPF and no germ of a Neighbourhood Plan.

Therefore, "Local Preference" in the correct interpretation of the term, does not apply in this case and can be given no weight as a stand-alone criteria for deciding whether this Site Allocations Plan is sound.

In our view, the Plan falls woefully short of passing the 'Justified' test in its attempt to advocate site HG2-124 above, effectively, any other Green Belt site on the edge of Garforth. What is being proposed by the City Council is verging on the point of being nonsensical and needs to be carefully and rigorously examined.

Site 1226 does have the potential alignment of the HS2 railway shaving across its north western portion, which may have led Leeds City Council to discount it as a possible housing allocation. The same is the case for site 2156 across its north eastern portion. The same two sites and, one assumes, site 3114 also have constraints on their development for housing due to the narrowness of Barwick Road where it goes under the Leeds-Selby/York railway line.

However, this is where the City Council has also singularly avoided addressing the need for the Plan to be 'Positively Prepared'. The three sites are large enough collectively to fund a new railway overbridge and the required widening of Barwick Road, and the potential alignment of HS2 through sites 1226 and 2156 could easily be accommodated in the Site Requirements by curtailing the site boundaries to provide a 60m buffer zone south of the HS2 alignment.

It is not rational to suggest, for example, that no part of site 1226 and no part of site 2156 are deliverable or achievable as housing allocations simply because HS2 might shave across a small portion of each site. Nor is it a tenable proposition to say that because Barwick Road is too narrow where it passes under the existing railway line, there is no possible mechanism for funding and designing a solution to that problem even though the three sites would collectively provide approximately 1000 new dwellings.

If one did not know better, Micklefield Parish Council could conclude that Leeds City Council, for some arbitrary and unsound reason, has chosen site HG2-124, without thinking about its existing function and purpose as Green Belt or its real levels of sustainability compared to the other Green Belt sites around the edge of Garforth, and has then tailored its arguments to suit.

It is for all the reasons outlined above why Micklefield Parish Council considers the Plan to be unsound.

3.4 Please set out what change(s) you consider necessary to make the Plan sound.

Site HG2-124 should be deleted as a housing allocation and the land should remain in the Adopted Green Belt.

Joanne Hebden
Clerk & RFO to Micklefield Parish Council
5th November 2015