

PDH01396

Part 1 - Your details

RECEIVED
13 NOV 2015
OVER COUNTER

*This information must be completed

Personal details / Client details

Agent details

Only complete if you are an agent

Title

First name*

Last name*

Job title
(where relevant)

Organisation
(where relevant)

Address*

Post code*

Phone/Mobile

Email
(We'd prefer to contact you by e-mail)

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))

Do you agree with the proposed use of this site?

Yes No

Please tick all the themes you wish to comment on;

Ecology/Landscape/Tree(s) Local services/facilities Schools

Conservation/Heritage Loss of Greenbelt

Highways/transport Site Boundary *(please submit a revised boundary)*

Other *(please specify)*

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 HG3-18 (Land to the south of Selby Road, Garforth) was deleted from the Green Belt in the Leeds UDP 2001, and is therefore within the settlement boundary of Garforth. Please see separate sheet for a fuller explanation as to why Micklefield Parish Council objects to the continued designation of site HG3-18 as Safeguarded Land (PAS), why the 'Positively Prepared' and 'Justified' and 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 HG3-18 should not remain designated as Safeguarded Land (PAS). The site should be allocated for housing.

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 Safeguarded Land (PAS) site, HG3-18, 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 HG3-18

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

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.

Site HG3-18 is one of the sites on the edge of the existing settlement boundary of Garforth which have been discounted by Leeds City Council as housing allocations, yet a revision of site HG3-18 from safeguarded land (PAS) to provide a housing allocation would not take the settlement of Garforth any closer to Kippax, Swillington, Great Preston or any other settlement (facing Garforth along the same plane or planes of separation).

Any extension of *any part* of Garforth further eastwards than what were previously the separate SHLAA sites 1244 (land to north of Garforth Cliff Park) and 3110 (land to west of Green Lane, Garforth), would reduce the Green Belt separation between that town and Micklefield (facing each other along their planes of separation in a geographical context). The Plan should have positively sought to avoid such an outcome and has thus, arguably, not been 'Positively Prepared'.

Site HG3-18 is also within a sensible walking distance to the main retail area and significant core facilities at Garforth Town Centre and is within 400m of the frequent 19 bus service which runs between the north east area of Garforth and Leeds and the half-hourly to hourly 402 bus service which runs between Selby and Leeds.

The continued designation of site HG3-18 as safeguarded land (PAS) instead of 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 (this site clearly has none, as it ceased to be part of the Green Belt in 2001) and which ones would be the most sustainable ones to choose in terms of their actual development for housing.

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 HG3-18 appears to score unfavourably in comparison to site HG2-124, the site chosen by Leeds City Council as a housing allocation.

However, Micklefield Parish Council has serious doubts as to the sustainability appraisal for site HG3-18. This site appears to score less favourably compared to site HG2-124, but this cannot be the case, given its greater proximity to the main retail area and significant core facilities at Garforth Town Centre and the aforementioned bus routes.

In our view, the Plan falls woefully short of passing the 'Justified' test in its attempt to advocate site HG3-18 remaining as safeguarded land (PAS) instead of its more sensible role as a housing allocation. What is being proposed by the City Council is verging on the point of being nonsensical and needs to be carefully and rigorously examined.

Micklefield Parish Council believes that it is almost impossible to justify any existing PAS allocations remaining as such, if this means that further deletions from the Green Belt and allocation of land for housing would be necessary in order to provide the required number of residential units for Outer South East Leeds.

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 sites around the edge of Garforth, such as site HG3-18, that could plausibly be housing allocations, 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 HG3-18 should not remain designated as Safeguarded Land (PAS). The site should be allocated for housing.

Joanne Hebden
Clerk & RFO to Micklefield Parish Council
10th November 2015