

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	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	
	Micklefield	
	Leeds	
Post code*	LS25 4AS	
Phone/Mobile		
Email <i>(We'd prefer to contact you by e-mail)</i>		

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;

- | | | |
|--|--|----------------------------------|
| <input type="checkbox"/> Ecology/Landscape/Tree(s) | <input type="checkbox"/> Local services/facilities | <input type="checkbox"/> Schools |
| <input type="checkbox"/> Conservation/Heritage | <input type="checkbox"/> Loss of Greenbelt | |
| <input 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)

1100

Address

Clear View Farm, Wakefield Road, Garforth

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.

SHLAA site 1100 (land at Clear View Farm, Wakefield Road, Garforth) is currently in the Adopted Green Belt and is therefore outwith the settlement boundary of Garforth. Please see separate sheet for a fuller explanation as to why Micklefield Parish Council objects to this land remaining in the Green Belt (at the expense of the deletion of site HG2-124 from the Green Belt), 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.

SHLAA site 1100 should be deleted from the Green Belt and 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 SHLAA site, 1100, 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)

SHLAA Site 1100

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.

SHLAA site 1100 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 the deletion of SHLAA site 1100 from the Green Belt to provide a housing allocation would not take the settlement of Garforth any closer to Austhorpe, Cross Gates, Scholes, Barwick-in-Elmet or any other settlement (facing Garforth along the same plane or planes of separation). Because of the topography, it is also the case that this site would not even appear to be encroaching towards the facing settlements, as listed, from any publicly accessible vantage point.

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'.

SHLAA site 1100 is also within a sensible walking distance to the main retail area and significant core facilities at Garforth Town Centre. The site is also within 400m of the frequent 163 and 166 bus services which operate throughout the day every day up to 11.00pm between Castleford and Leeds via Garforth.

The continued designation of SHLAA site 1100 as part of the Green Belt 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 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, SHLAA site 1100 appears to score more favourably in comparison to site HG2-124, the site chosen by Leeds City Council as a housing allocation.

SHLAA site 1100 appears to have a more positive Sustainability Appraisal than site HG2-124 and yet it was not chosen. Inexplicably so, as SHLAA site 1100 has no unusual spatial constraints otherwise articulated on its ability to form a viable housing allocation.

In our view, the Plan falls woefully short of passing the 'Justified' test in its attempt to advocate SHLAA site 1100 remaining as part of the Adopted Green Belt 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.

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 SHLAA site 1100, 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.

SHLAA site 1100 should be deleted from the Green Belt and allocated for housing.

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