

Report authors: Kathryn Holloway

Tel: 24 78203

Report of the Chief Planning Officer

Report to Development Plan Panel

Date: 20th May 2015

Subject: Site Allocations Plan – Strategic Housing & Employment issues Outer North East (ONE)

Are specific electoral Wards affected? If relevant, name(s) of Ward(s): Harewood and Wetherby	⊠ Yes	☐ No
Are there implications for equality and diversity and cohesion and integration?	☐ Yes	⊠ No
Is the decision eligible for Call-In?	☐ Yes	⊠ No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	☐ Yes	⊠ No

Summary of main issues

- 1. Members will recall that site proposals for the Site Allocations Plan (SAP) and the Aire Valley Leeds Area Action Plan (AVLAAP) were previously considered by Development Plan Panel (6th and 13th January) and were subsequently agreed by Executive Board (11th February), as a basis to prepare the Publication draft Plans. As part of the Executive Board report (para. 3.83), a number of outstanding matters were identified, where further technical work was required. One such area related to the strategic housing (and employment) issues, relating to the Outer North East (ONE) Housing Market Characteristic Area (HMCA).
- 2. Within this context, the purpose of this report, is to report back to members on these issues as a basis to determine a way forward in the preparation of the SAP Publication Plan.

Recommendation

Members of the Development Plan Panel are invited to consider the approach set out in this report and to recommend to the Executive Board, the strategic housing (and employment) allocations for Outer North East for inclusion within the SAP Publication Draft Plan.

1.0 Purpose of this Report

1.1 Within the context of the site allocations proposals agreed by Executive Board on 11th February, the purpose of this report, is to report back to members on the strategic housing (and employment) issues within the ONE HMCA, as a basis to determine a way forward in the preparation of the SAP Publication Plan.

2.0 Background Information

The Core Strategy Housing Target for ONE HMCA

- 2.1 The National Planning Policy Framework (NPPF) requires the City Council to have an up to date Development Plan (or 'local plan'). This needs to include both strategic policies and the site specific allocations, that put the Policies into effect. The City Council has recently adopted its Core Strategy (November 2014) which amongst other things, sets the overall housing target for the District and provides the context for site allocations. Core Strategy Policy SP7 sets the target for the ONE HMCA of 5,000 (8%).
- 2.2 Site allocation is part of a process that must ultimately lead to the delivery of new development of an appropriate form and quality, alongside the necessary infrastructure. It is not simply a matter of allocating land but about place making and the "liveability" of the communities we create. Work on site allocations is a continuation of the work undertaken on the Core Strategy involving dialogue with other Council services, infrastructure providers, communities and other stakeholders. It will be important to recognise the changing demographic circumstances to ensure that the schools, older persons accommodation care facilities, recreation facilities and provision for other community needs reflects the requirements for the Plan period.
- 2.3 At the Development Plan Panel meetings of the 6th and 13th January 2015, members considered potential development proposals at Thorp Arch and across the ONE HMCA. At the 6th January meeting, it was considered that Thorp Arch had the potential to make a significant contribution to general employment land both locally and across the District. In considering the strategic issues relating to the use of brownfield land, the potential scale of Green Belt release and the merits of Headley Hall as a new settlement (in contributing to the overall level of housing provision within the HMCA), Development Plan Panel requested (and subsequently agreed by Executive Board) that further work should be undertaken to review the strategic housing options within this area in relation to the potential for housing at Thorp Arch (as part of a mixed use proposal) and the scale of Green Belt release at Headley Hall.

3.0 Main Issues

Outer North East HMCA, Thorp Arch (Site 1055 A/1055B;EMP00326) and Headley Hall (Site 3391)

3.1 The Core Strategy sets out its preferred approach to the spatial distribution of land with focus being within existing settlements (the Settlement Hierarchy identified in Policy SP1), with the majority of growth within the Main Urban Area. The overall distribution for growth is set out in Table 2 of Policy SP7. Exceptionally, the Core Strategy sets out an approach to consider opportunities outside of the settlement hierarchy, where the delivery is consistent with the overall principles of the Plan, including the regeneration of previously developed land and in locations which are or can be made sustainable. This approach is set out under Core Strategy Policy SP10: Green Belt:

"Exceptionally, sites unrelated to the Main Urban Area, Major Settlements and Smaller Settlements, could be considered, where they will be in sustainable locations and are able to provide a full range of local facilities and services and within the context of their Housing Market Characteristic Area, are more appropriate in meeting the spatial objectives of the plan than the alternatives within the Settlement Hierarchy...."

- 3.2 The ONE area is characterised by a broad sweep of open countryside and a number of free standing settlements, mostly small and rural. These include the major settlement of Wetherby (constrained by the A1(M) motorway on its eastern edge and the District boundary to the west and north, therefore providing limited opportunities for expansion); a number of smaller settlements of Bardsey, Barwick-in-Elmet, Boston Spa, Bramham, Collingham and Scholes and rural villages of Clifford, East Keswick, Harewood, Linton, Scarcroft; Shadwell, Thorner, Thorp Arch and Walton. The area is served by the A61, A58 and A64, with the A1(M), to the East, running North/South across the District. The distinctive landscape character and biodiversity (including the Limestone Ridge) of the area also create important networks of Green Infrastructure.
- 3.3 Within this strategic context, as noted in para. 2.1 above, the Core Strategy sets a target of 5,000 for the ONE area for the Plan period. Through the preparation of the SAP Issues and Alternative Options and members workshops, there has been considerable debate as to how best to achieve this figure. Options include development within the pattern of existing settlements (subject to the suitability and availability of sites), the role of major brownfield land within the area (consistent with overall Core Strategy objectives) and other strategic options in locations that are or can be made sustainable. Through this latter approach, proposals at Thorp Arch and Headley Hall have been identified as proposed strategic site allocations for employment and housing.
- 3.4 The material presented today reiterates the recommendations presented to DPP on 6th and 13th January; reflecting the debate through the member

workshops and site visits. Members, both at Panel and more generally, remain concerned about the scale of development and the impact this has on the Green Belt and other greenfield sites. It is recognised that all Green Belt land is sensitive and the debate has aimed to achieve a range of sites that have least impact on the purposes of Green Belt, whilst also recognising the Core Strategy aspirations to respect local character and identity.

Housing proposals

3.5 Proposals for housing and mixed uses are being pursued by the owners of Thorp Arch and Headley Hall. Both sites fall within the "exceptions" application of Policy SP7 and SP10 and each site would need to show that the sites can be made demonstrably sustainable to accord with the overall principles set out in the Core Strategy. At the time of the Issues & Options public consultation (summer 2013) the following reasons for their consideration as a housing allocation (including colour coding) were given:

Site Ref and colour coding	Site Address	Ward	Site Area (Ha)	Site Capacity	Summary reason for colour coding
1055 (Green)	Thorp Arch Trading Estate	Wetherby	161.53	1700	Major brownfield site suitable for large scale redevelopment in principle. The wider development of the Thorp Arch Trading Estate is likely to require commercial, employment, leisure, education and greenspace supporting elements in order to create a comprehensive and sustainable masterplan for the area. Any development of this scale would be required to invest significantly in public transport measures and a new relief road.
Site Ref and colour coding	Site Address	Ward	Site Area (Ha)	Site Capacity	Summary reason for colour coding
(Amber Hatch)	Spen Common Lane, nr Bramham	Wetherby	261.41	3000	Green Belt site. Development of the site would create a significant new settlement within the Green Belt. The site could be a suitable alternative option given it's scale if a sustainable settlement could be planned. Additional information is required to assess the sites sustainability and capacity credentials, including a detailed feasibility study.

Employment Proposals

3.6 Sites assessed for employment as part of the Issues & Options public consultation (summer 2013) only included the retention of a smaller element of the larger existing Thorp Arch Trading Estate (TATE) employment site.

Colour Code	Site Ref	Address	Site Area (Ha)	Assessment Type	Conclusion	Reason for colour coding
Industry						
Green	3104030	Ph2 Plot 361 Street 7 & Ave E TATE, Wetherby	1.41	ELR	Retain	The site is located within an existing larger employment site (TATE) and is appropriate for continued employment.

Thorp Arch (1055A/B)

- 3.7 Thorp Arch Trading estate (TATE) is located approximately 2.5 miles from the A1(M) motorway at Wetherby and is approximately equidistant between Leeds, Harrogate and York. It is a largely brownfield (mixed) site, situated within the wider current UDP "Rural land" designation (this matter was is subject to its own commentary in a report to DPP on 16th December and as part of the 11th February Executive Board report). According to the Estate's own website, TATE is "home to over 140 businesses (employing over 1,800 people) and has over 2msqft of business space set in a spacious parkland setting. There are a range of industrial premises comprising warehouses, factories and small business units available to rent on flexible and fixed term leases. In addition, the Estate has offices to let ranging from small units to larger detached offices". The Estate has also seen recent investment through the availability of super-fast Broadband.
- 3.7 The Estate is also home to the Thorp Arch Retail Park, believed to be the UK's first out of town Retail Park when it opened in 1961. The Thorp Arch Retail Park is home to a range of national retailers including DFS, Bensons Beds and Furniture Shed, as well as locally run businesses including a café and bistro and a garden centre.
- 3.8 The Estate clearly offers existing commercial opportunities, however the owners are investigating alternative options and this includes the submission of a residential/mixed-use planning application for the Estate. The timing of this application coming forward was reflected in the SAP Issues & Options public consultation and as noted in 3.5 above, was identified as a site suitable in principle for residential development, subject to a comprehensive and sustainable masterplan for the area and significant investment in public transport measures and a new relief road. It is important to note that the SAP is a separate plan-making process and does not pre-judge the determination of detailed planning and highway considerations (including viability and deliverability) of any planning application.

Outline Planning Application - 13/03061/OT Thorpe Arch Estate (TAE)

- 3.9 The Trustees of Rockspring Hanover Property Unit Trust have submitted an outline application in June 2013 for residential development (of up to 2000 dwellings). Associated with this is provision for car parking, landscaping, a 2.5FE primary school, a village centre, retail development, sports pavilion, play area, amenity space, retention and mitigation of the Site of Ecological and Geological Importance (SEGI); and off site highway works on 112.51 Ha of previously developed land, at the Estate. See plan 1 in Annex 1.
- 3.10 The application was advertised as a Departure from the Development Plan and the Highways England also issued a 'Holding Direction', which has now been lifted. The application was last presented to the City Plans Panel of 12th December 2013 where a number of key issues, focusing on the relief road; off-site highways mitigation and viability (affordable housing and other costs) were considered, amongst other local concerns. It should be noted that City Plans Panel were supportive of the principle of development subject to the delivery of the Relief Road up front and the resolution of issues in and around highways, contamination and viability.
- 3.11 Development of TATE for this number of residential units is likely to have a significant impact upon the capacity of the rural road network in and around Thorp Arch, Walton, Boston Spa and Wetherby. It was considered that there are a range of measures that could be implemented to mitigate that impact, at a substantial cost.
- 3.12 The applicant submitted a viability statement which had regard to the cost of the delivery of the relief road and other significant costs including securing the de-contamination of the site. The viability position was in regard to providing an off-site payment in lieu of the provision of affordable units on site.
- 3.13 Further progress on the application is awaiting the resolution of issues in relation to viability. There is no current timetable in place for determination, but it is understood that the applicant has now re-entered discussions to progress the application. Whilst progress has been slow the applicant is actively seeking to address these issues and is confident these matters can be resolved. The applicant has also stated that they will soon provide a draft Sec.106 Agreement that will serve to clarify the precise nature and the final form of development (including timing of the delivery of the relief road and affordable housing provision). It is feasible that the final form of development will address the outstanding matters identified at City Panel. The application would also need to be considered in the light of the introduction of the Community Infrastructure Levy (CIL) which would have a much higher financial impact on the proposed scheme and therefore viability and deliverability of the site may remain an issue.

Headley Hall (SITE 3391)

- 3.14 The University of Leeds owns just under 300ha (740 acres) of land in total at Headley Hall (Spen Common/Braham Moor), see plan 2 in Annex 1. The University also have land options on a further circa 8 hectares of land under the control of the Church Commissioners. Within this context, the University have engaged Hallam Land Management and David Lock Associates to prepare proposals for the site. This includes working up a number of detailed technical briefing papers (including economic benefits and wider sustainability issues) which are expected to be submitted as evidence to support their site through the Publication Draft consultation and ultimately, examination.
- 3.15 The delivery of a new settlement on this scale is something that the team working behind it has amassed significant experience of around the UK. It is recognised that to deliver a sustainable settlement, it is important that the entire site is identified in any allocation. This will allow flexibility in the delivery and phasing of growth to support the delivery of a comprehensive vision for a sustainable new settlement and establish suitable long-term Green Belt boundaries.
- 3.16 Around 5,000 new homes could be provided alongside the required supporting education, retail, community uses and infrastructure. An initial master planning exercise has indicated that employment will also be an important part of the mix of uses at Headley, and as such the consultancy team are preparing an economic and employment strategy to support the employment elements. At this early stage it is suggested that an allocation of 7ha of general employment land be identified. This will be subject of further analysis and included in representations at the appropriate time, and resolved ultimately in any outline planning application.
- 3.17 The University's landholding extends across the Leeds Metropolitan District boundary into Selby District and as such there will be a need for continued joint working with Selby, at the very least to secure the timely provision of supporting infrastructure within Selby District. Both Leeds City Council and the University of Leeds have held early dialogue with Selby District Council. The 5,000 housing numbers identified above are for the entire land holding. Looking at Leeds only this would reduce to circa 4,200, with an optimistic delivery rate of 3,000 within the plan period up to 2028 this is contingent on the assumption that a deliverable planning permission is progressed alongside the examination and adoption of the SAP. This assumes an outline planning permission might be in place by the end of 2017 and RM applications for advance infrastructure assumed to be approved to allow a start on site late 2018.
- 3.18 The site is wholly within the Green Belt, located within open arable farmland surrounded by limestone villages and farmland. There is a Special Landscape Area to the west of the site (Bramham Estate) which is visually isolated from the site by the A1(M). The land has a mixture of soil types, the most common of which is a fine loamy topsoil over subsoil of limited depth. This results in land of primarily subgrade 3a quality (62%) with 19% at Grade

- 2 and 14% at Sub-grade 3b. The remaining 5% is non-agricultural land. Development of the site would need to define new defensible boundaries. It is considered that there is minimal risk of settlement coalescence.
- 3.19 There are two strategic roads in close proximity to the site; the A1(M) to the west of the Site and the A64 to the south. These roads intersect at J44 of the A1(M) immediately south west of the site. Local access to this junction is provided by Paradise Way which runs along the eastern side of the A1(M) and forms the western boundary of the site. Initial assessments undertaken by the consultancy team acting on behalf of the University suggest that there is:
 - spare capacity in the local and strategic road network; and
 - the potential to provide upgrades to the existing local road network in the vicinity of the site.

Further detailed discussions with the Highways England and highway colleagues in both Leeds and Selby would be needed should any allocation/application proceed.

ONE Housing and Employment supply & proposed allocations

3.20 There is a Core Strategy target for the Outer North East HMCA of 5,000 dwellings. Appendix 4 of the Executive Board report recorded that at the time some 1,093 units were accounted for from identified sites with 850 units in proposed allocations, leaving a deficit against the target of 3,036 dwellings (subject to further consideration of site 3,391. The identified sites have now been updated to 6th April 2015. The table below summarises the updated position:

Outer North East HMCA	TARGET 5,000		
Housing	Number of sites	Estimated Capacity: Dwellings	% of CS district wide target ¹
Identified Housing Sites (updated to 6 th April 2015)	32	1, 540	-
Proposed Housing Allocations	12	850	-
Proposed Mixed use with housing	1	3,000*	-
	Total	5,390	8%

^{1:} CS district-wide housing target 66,000 (net) / PAS = 10% (6,600)

3.21 The District wide target for general employment (there is no employment target at HMCA level) is set out in the Core Strategy at 493Ha. Appendix 1 of the Executive Board report recorded that at the time the total General Employment land supply equates to 508.49ha. It should be noted that this included provision at Thorp Arch for 72.2Ha ((based on the developable area proposed in the planning application for 2000 dwellings). There has been no update to the identified sites (at 6th April 2015). The table below summarises the employment position in ONE:

^{*}Subject to recommendations set out in this report.

Outer North East HMCA			
EMPLOYMENT	Number of sites	Estimated Capacity: Floorspace/Hectares	% of CS district wide target ²
Identified office	1	579sqm	-
Identified general	3	4.1Ha	-
Proposed office	0	-	-
Proposed general	2	79.2Ha*	-
_	Total	83.3Ha (General) and 579sqm (office)	17 (Gen) & 0.05 (office)

^{2:} CS district-wide employment target 493Ha (General Employment) 1,000,000sqm (office space)

3.22 The tables above show how the officer recommendations for site allocations would help to meet the Core Strategy Targets. If the sites of Headley Hall (housing) and Thorp Arch (employment) were taken out of the respective 'allocation categories' the following implications could apply which has consequences for the rest of the ONE HMCA and the rest of the District (in regard to employment).

<u>Implications for ONE housing target:</u>

- 3.23 If Headley Hall (3391), with an estimated capacity of 3,000 (within the Plan period) were not to be allocated, the housing shortfall would be 2,610. This could be met substantially, if Thorp Arch is alternatively allocated for housing (or permission is granted) at 2,000 units, reducing the shortfall to 610. On the assumption that Thorp Arch is retained as an employment allocation and determination of the outline application for residential on the site is rejected, additional sites would then be needed to be identified. As previously indicated this would mean identifying sites adjoining smaller settlements, which are not the priority established in the Core Strategy and would involve further incursions into the Green Belt.
- 3.24 Although both Thorp Arch and Headley Hall sites are isolated with limited access to public transport, Headley Hall is considered to offer a critical mass and flexibility to develop a sustainable settlement from scratch which may be difficult to achieve at Thorp Arch where there is a need to integrate with the existing development. Thorp Arch is likely to have a greater impact on nearby communities given the relationship of the rural highway network around the site, whereas Headley hall is well placed on the strategic road network to access Leeds, Tadcaster and York.

Implications for (General) Employment:

3.25 Para 3.21 of the 11th February Executive Board Report sets out that the total General Employment land supply equates to 508.49ha. It should be noted that this includes provision at Thorp Arch for 72.2Ha ((based on the developable area proposed in the planning application for 2000 dwellings). If the 72.2Ha of land at Thorp Arch were to come forward for housing instead of employment then there would be a District wide shortfall of General Employment land of 56.7ha. Retaining TATE as an employment allocation builds on its longstanding position as a significant employment hub.

^{*}Subject to recommendations set out in this report.

4.0 Other considerations

Duty to Co-operate

- 4.1 The City Council has engaged with City Region (particular neighbouring authorities) in the preparation of the emerging Publication SAP. Council officers have had a number of meetings since January 2015 with Selby planning officers specifically to consider the Headley Hall site. A number of cross-boundary issues have been raised and it has been resolved to keep dialogue open with Selby, particularly in regard to transport modelling outcomes. Selby have just completed initial consultation (November 2014-Jan 2015) on their Site and Policies Local Plan and are aiming for a further round of consultation later this year to submit their Publication Draft next summer (2016). In regard to the Headley site, Selby are awaiting the strategic position/outcome from Leeds.
- 4.2 Leeds University representatives have also had early dialogue with Selby Executive members and officers around the Headley Hall site, sharing early work/masterplanning.
- 4.3 Cross-boundary implications of the Headley Hall site will require ongoing and detailed dialogue following the outcome of both Leeds's and Selby's emerging site allocation plans. A prime example would be the consideration of a bespoke CIL rate for the site, agreed across both Districts.

5.0 Corporate Considerations

5.1 <u>Consultation and Engagement</u>

The Core Strategy has now been adopted and has been found by an independent Inspector to be sound (this also includes compliance with the Duty to Co-operate and the regulated requirements for public consultation and engagement). The preparation of the SAP and AVLAAP has been subject to earlier stages of public consultation and engagement. Further engagement will take place at Publication stage, prior to submission for examination (anticipated autumn 2015).

5.2. Equality and Diversity / Cohesion and Integration

In the preparation of the Core Strategy, due regard has been given to Equality, Diversity, Cohesion and Integration issues. This has included the completion of EDCI Screening of the Core Strategy and meeting the requirements of the Strategic Environmental Assessment Directive, which has meant that these Plans are subject to the preparation of a Sustainability Appraisal. The purpose of such Appraisals is to assess (and where

appropriate strengthen) the document's policies, in relation to a series of social (and health), environmental and economic objectives. As part of this process, issues of Equality, Diversity, Cohesion and Integration, are embedded as part of the Appraisal's objectives. The SAP and AVLAAP material reflects the approach set out in the Core Strategy. Nevertheless an Equality Impact Assessment Screening will been undertaken on the proposed site allocations and will be part of the package to be presented to Executive Board. Equality, diversity, cohesion and integration issues are being considered as part of the preparation of the plan and through the sustainability appraisal work which is ongoing.

5.3. Council Policies and City Priorities

The adopted Core Strategy, the emerging SAP and AVLAAP, play a key strategic role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to the 'the Best City in the UK'. Related to this overarching approach and in addressing a range of social, environmental and economic objectives, where these Plans also seeks to support and advance the implementation of a range of other key City Council and wider partnership documents. These include the Best Council Plan (2013-17) and Leeds Joint Health and Wellbeing Strategy (2013-2015).

5.4 Resources and value for money

The preparation of statutory Development Plan Documents (the 'local plan') is an essential but a very resource intensive process. This is due to the time and cost of document preparation (relating to public consultation and engagement), the preparation and monitoring of an extensive evidence base, legal advice and Independent Examination. These challenges are compounded currently by the financial constraints upon the public sector and resourcing levels, concurrent with new technical and planning policy pressures arising from more recent legislation (including the Community Infrastructure Levy and Localism Act). There are considerable demands for officers, members and the community in taking the Development Plan process forward.

- 5.4.2 For the Local Development Framework to be as up to date as possible, the Council now needs to produce the SAP and AVL AAP as quickly as practicable, to deliver the priorities set within the Core Strategy and the Best Council Plan. Without an up to date plan the presumption in favour of development by the Government means that any development in conformity with national policy will be acceptable, regardless of any previous positions of the authority, which could have implications in terms of resources and value for money.
- 5.5 Legal Implications, Access to Information and Call In

The Site Allocations Plan will follow the statutory development plan process (Local Development Framework). The report is not eligible for call in as no decision is being taken.

5.6 Risk Management

Without a current allocations plan(s), aspects of the existing UDP allocations will become out of date and will not reflect or deliver the Core Strategy policies and proposals. Early delivery is therefore essential to enable the Council to demonstrate that sufficient land will be available when needed to meet the Core Strategy targets. As identified at 5.4 above, without an up to date plan the presumption in favour of sustainable development by the Government means that any development or neighbourhood plan in conformity with national policy will be acceptable, regardless of any previous positions of the authority. The more the work progresses, the more material weight can be given to it.

6.0 Conclusion

- 6.1 The Core Strategy advises that a review of Green Belt boundaries will be necessary in order to meet the need for development land for housing and employment. In selecting sites for allocation it is important to have regard to the purposes of Green Belt and to identify sites that have the least impact on those purposes. It is also necessary to consider other aspects of the Core Strategy approach such as the settlement hierarchy and the accessibility standards and to recognise that circumstances will vary across the district, including the need to meet the targets in each of the HMCAs.
- 6.2 As set out earlier in this report it is considered that development of the sites at Headley Hall for residential and Thorp Arch for employment are strategic planning options for the Outer North East HMCA. The previous reports to Panel considered these sites in the context of the alternatives available in each of the HMCAs and concluded that their respective allocations are appropriate. Given the earlier work looking at the range of site options available for residential it is not evident that better sites would emerge. It is concluded that in the context of the need for housing land and Core Strategy policy that Headley Hall is the better site, suitable for residential allocation and that retaining TATE as an employment allocation builds on its longstanding position as a significant employment hub.

7.0 Recommendation

7.1 Members of the Development Plan Panel are invited to consider the approach set out in this report and to recommend to the Executive Board, the strategic housing (and employment) allocations for Outer North East for inclusion within the SAP Publication Draft Plan.

8.0 Background Papers¹

8.1 None

¹ The background documents listed in this section are available to download from the Council's website, unless they contain confidential or exempt information. The list of background documents does not include published works.

KEY Application Boundary Ownership Boundary Redline Boundary: Offsite Highways Works to Privas Way / Walton Rd Junction Shown @ Scale 1:2500 Thorp Arch (20)001 - Parameters Plans - Development Boundaries Scale 1:5000 @ A1 ROCKSPRING PLANNING think architecture+design

ANNEX 1
Plan 1 – Application boundary for TATE

ANNEX 1
Plan 2 – proposed allocation boundary for Headley Hall



Key

Site boundary

---- District boundary

Not to scale