

Report of Head of Strategic Planning

Report to Director of City Development

Date: 10th February 2017

Subject: Deputation Save Parlington Action Group

Are specific electoral Wards affected? If relevant, name(s) of Ward(s): All	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Summary of main issues

1. This Deputation concerns the allocation of the Parlington allocation (MX-2 39) in the Site Allocations Plan. The purpose of this report therefore is to respond to the issues raised.

Recommendations

2. The Director of City Development is asked to note the contents of this report as an appropriate response to the issues raised by the Deputation.

1 Purpose of this report

- 1.1 This Deputation concerns the allocation of the Parlington allocation (MX2-39) in the Site Allocations Plan and outlines a number of objections to the inclusion of the proposal in the Plan. These include: the impact of the proposal upon the countryside (and the amenity of the site which is used by local residents for informal recreation), the loss of Green Belt (and the need for clarity on the basis of 'exceptional circumstances'), increased urbanisation, the need to consider alternative sites (such as Protected Areas of Search and brownfield land) lack of sustainable Highways, Transport and employment opportunities and loss of heritage assets. The purpose of this report therefore is to respond to the issues raised.

2 Background information

- 2.1 The preparation of the Leeds Site Allocations Plan is now at an advanced stage. Following consideration by Executive Board on 8th February, it has been agreed that the Plan, together with a number of pre-submission changes (to be advertised for public comment, February – March 2017) can be submitted to the Secretary of State for independent examination in April 2017 (subjected to final consideration by Council in March).
- 2.2 Following earlier stages of public consultation on the Plan, on 21st September 2016, Executive Board approved Revised Publication Draft Proposals for the Outer North East (ONE) Housing Market Characteristic Area (HMCA). These proposals were subsequently subject to a 6 week period of public consultation 26th September – 16th November. The focus of this consultation was to provide a further opportunity within the ONE HMCA, to comment on revised proposals to meet the overall Core Strategy housing target for the area, following the withdrawal by the University of Leeds of the new settlement proposals at Headley Hall in summer 2015. As a consequence of the Headley Hall decision, through the Development Plan Panel and subsequently Executive Board, Parlington was identified as a suitable opportunity for housing (as part of a new package of housing proposals – including an urban extension to the East of Wetherby), when considered against alternative options.

3 Main issues

- 3.1 This Deputation concerns the allocation of the Parlington allocation (MX2-39) in the Site Allocations Plan and outlines a number of objections to the inclusion of the proposal in the Plan. These include: the impact of the proposal upon the countryside (and the amenity of the site which is used by local residents for informal recreation), the loss of Green Belt (and the need for clarity on the basis of 'exceptional circumstances'), increased urbanisation, the need to consider alternative sites (such as Protected Areas of Search and brownfield land) lack of sustainable Highways, Transport and employment opportunities and loss of heritage assets.
- 3.2 In response to these matters, the City Council fully appreciates the concerns raised by the Action Group and the potential implications of the proposals upon

the countryside and local communities. In formulating the Revised Publication Draft Proposals for the ONE HMCA the issues raised by the Save Parlington Action Group have been considered, balanced against alternative options and addressed comprehensively as part of the Sustainability Appraisal. It is also important to emphasise, that all of this information (including the representations received from local residents objecting to the Parlington proposals) and evidence will be made available to an independent Planning Inspector, once that Plan has been submitted for examination. Local residents will also be given the opportunity to participate in the examination process, including the specific hearing session relating to this particular site.

- 3.3 In terms of the issues raised through the Deputation, in support of the Site Allocations Plan (including the proposals for the ONE HMCA), the City Council has prepared extensive material, including Background Papers on Housing, Transport, the Green Belt Review and Heritage to clarify and explain the approach taken. In relation to site specific proposals also, integral to the Plan are site specific site requirements, which are intended to address and mitigate particular issues in relation to the delivery of appropriate development. At the City Council's Development Plan Panel meeting in November 2016, members also considered a report on major sites in the Site Allocations Plan, where the Council is committed to working with local communities (through the preparation of further planning guidance) to further address the issues raised.
- 3.4 As outlined in the Deputation, the City Council received over 4,000 representations to the Revised Publication Draft proposals for the ONE HMCA, the majority in response to the Parlington proposal. In considering the issues raised by local residents and a number of statutory bodies, the City Council has given further consideration to the proposal and a number of pre-submission changes identified to address these points and the matters of soundness raised. As noted above, these pre-submission changes were considered and agreed by Executive Board on 8th February and will be subject to a 6 week consultation period in February – March for public comment. The pre-submission changes and any further comments received will be made available in turn for the Secretary of State at submission stage, to be considered as part of the examination process. In relation to Parlington, the pre-submission changes amend the site boundary (to reduce the extent of land to be removed from the Green Belt in this plan-period) and strengthen Policy and site requirements in relation to heritage, access and amenity issues. Importantly also, the further revised proposals set the number of homes at 1,850, with future growth beyond the plan period (i.e. after 2028) to be subject to major Highways interventions being identified following a Plan Review.
- 3.5 A key point raised in the Deputation relates to the demonstration of 'exceptional circumstances' for Green Belt development. Whilst 'exceptional circumstances' are not specifically defined in national guidance, national legislation and the Planning Policy Framework provide the scope for Green Belt reviews and the basis for exceptional circumstances. Within this overall strategic context, the adopted Leeds Core Strategy demonstrates the exceptional circumstances for the District-wide Green Belt review. This is specifically set out in Spatial Policy 10 (SP10) of the Plan, through a criteria based approach. This Policy states that, *'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. This broad approach in turn is also reflected in the recently issued Housing White Paper, which notes, 'Green Belt boundaries should only be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements'. As outlined above, this comprehensive process has been undertaken as part of the preparation of the Core Strategy (though the scale of housing growth required to meet objectively assessed needs) and the options and site choices (including maximising the use of brownfield land the comparative assessment of safeguarded land and Green Belt release) in relation to the Site Allocations Plan.

- 3.5 Within this overall context, the City Council accepts that there have been challenging issues both for the Council and local communities in taking the Plan forward, in the identification of site allocations. Consequently, the Council have made a clear priority to ensure as much use as possible of brownfield land in meeting the need for new homes across the District and we are actively engaged with incentivising the bringing back into use of brownfield sites. The Council has a Housing Growth Team which works across planning, regeneration, asset management and housing to identify and implement interventions to stimulate housing growth primarily in areas in need of regeneration. An adopted Housing Investment Land Strategy (HILS) sets out its proactive approach to the use of all surplus land and buildings for the delivery of new homes. The HILS provides an up to date and 'live' view of all the surplus brownfield land in the Council's ownership that has potential for residential development and brings together all proposals for market-led or public sector funded housing on these into a co-ordinated approach to how, when and where housing can be delivered.
- 3.6 More recently the Council has continued in its commitment to identifying brownfield sites for development as a pilot authority for the Government's brownfield land register project to help lead the way in bringing forward previously developed land for new homes. The registers will help house builders identify suitable sites quickly, speeding up the construction of new homes. The Council has made use of a variety of source to identify as wide a range as possible of brownfield sites for development including: the Site Allocations Plan, Aire Valley Leeds Area Action Plans & Neighbourhood Planning; regular monitoring information from Development Management officers; discussions with landowners; local authority land ownership records; discussions with Asset Management officers; National Health Service disposals and a comprehensive Call For Sites exercise through the Strategic Housing Land Availability Assessment.
- 3.7 However, as outlined above, it is not possible to meet all the housing needs of the district with brownfield sites alone. Whilst we have been able to identify 342 suitable sites with a total capacity of 30,644 new homes on brownfield sites, this is set against a requirement to allocate 66,000 as part of the Site Allocations Plan which means it has been necessary for difficult decisions on greenfield land to

have been made. The adopted Core Strategy sets out that 70,000 (net) new dwellings are needed between 2012 and 2028 with a previously developed land target of 65% for the first 5 years and 55% thereafter.

3.8 The Council are therefore confident that exceptional circumstances can be demonstrated to justify the development of land at Parlington. In summary these stem from the following factors:

- i. There are limited opportunities for significant main urban area expansion in the Outer North East due to the delivery of the East Leeds Extension strategic allocation (East HMCA) and setting of a clear defensible eastern edge of the City.
- ii. There is a limited suitable previously developed land supply in the Outer North East and there are no regeneration areas.
- iii. Only one major settlement exists within the HMCA and has significant physical constraints and also lacks rail infrastructure. Nevertheless significant extensions on previously safeguarded land and Rural Land are proposed alongside identified infill housing sites.
- iv. The smaller settlements have limited opportunities for significant scale development within them and extensions are considered to harm rather than support local services on the basis that they will not be of sufficient scale to bring forward necessary infrastructure and service improvements. The scale of growth envisaged in these settlements therefore has regard to the settlement size, function and sustainability.
- v. Opportunities in Rural Land are limited to a sustainable extension to the major settlement of Wetherby. Other opportunities are unsuitable and/or lack evidence that they are achievable.
- vi. Therefore a new settlement has been exceptionally considered at Parlington and compared to other reasonable alternatives in the HMCA as being more appropriate in meeting the spatial objectives of the Core Strategy to deliver a significant level of housing.

4 Corporate Considerations

4.1 Consultation and Engagement

4.1.1 This report is in response to a Council Deputation and does not require any further consultation specifically in relation to the Deputation. Following consideration by Executive Board on 8th February 2017, the pre- submission changes described in this report will be advertised for public comment, with Plan submission to the Secretary of State for independent examination in April 2017 (subject to consideration by Council in March 2017).

4.2 Equality and Diversity / Cohesion and Integration

The Site Allocations Plan has been subject to Equality Impact Assessment (EIA) and further EIA screenings will be carried out at the appropriate stages of the progression to a final document. An EIA screening of this Executive Board report reaches the conclusion that the Site Allocations Plan is the appropriate document to be subject to EIA because it determines policy and proposals.

4.3 Council policies and City Priorities

- 4.3.1 Preparation of the Site Allocations Plan is a key corporate priority which aims to deliver the Best Council Plan, objective 5 to promote sustainable and inclusive economic growth and support the Housing Growth Breakthrough project.

4.4 Resources and value for money

- 4.4.1 There are no resource/value for money considerations.

4.5 Legal Implications, Access to Information and Call In

- 4.5.1 There are no legal considerations, other than to note that the Site Allocation Plan has been prepared in accordance with national planning legislation and guidance.

4.6 Risk Management

- 4.6.1 Town Planning as a process of managing land use change inevitably generates strong objections from people affected by plans and decisions. Therefore, the Council needs to be responsive to deal with concerns effectively.

5 Conclusions

- 5.1 This Deputation concerns the allocation of the Parlington allocation (MX-2 39) in the Site Allocations Plan. In describing the steps taken in the preparation of the Site Allocations Plan, pre-submission changes, the issue of exceptional circumstances (for Green Belt review), housing growth and the City Council's commitment to the development of brownfield land, report provides a response to the important issues raised.

6 Recommendations

- 6.1 The Director of City Development is asked to note the contents of this report as an appropriate response to the issues raised by the Deputation.

7. Background documents¹

- 7.1 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.