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Ref: L:\FPI\Neighbourhood  
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Dear Mr Clark,

**Leeds City Council response to the Pre-Submission Draft Walton Neighbourhood Plan**

Thank you for consulting the Council on the Pre-Submission Draft Walton Neighbourhood Plan. The parish council and the steering group have done an excellent job preparing a neighbourhood plan which is user-friendly, locally distinctive and of the highest quality. The plan neatly tells the story of its preparation and this is followed through in a vision, a set of objectives and a series of policies which are positive, joined-up and complimentary.

The key aim of the plan, to deliver housing to meet the locally identified needs of the village on sites that have the highest quality design is welcomed. The Council has worked closely with the steering group on this for many months. This has involved advice on consultation and engagement, site selection and design and more general support on the neighbourhood planning process. This has also involved a regular overview of the risks, not least the uncertainties associated with the allocation of housing in a neighbourhood plan. We suggest that a review of the pre-submission comments takes place at an appropriate time with the Council to more fully assess these.

I hope that these formal comments on the pre-submission plan will help the neighbourhood plan steering group and the parish council in making changes to the document prior to formal submission for examination. Although these are formal comments, you will be aware that there is no obligation to take them on board. At an appropriate time, we are happy to work with the Parish Council to consider all of the representations more generally and appropriate changes to make to the plan prior to submission for examination.

**1. Timing / Risks**

- 1.1. As you will be aware, the Site Allocations Plan was submitted to the Secretary of State for Examination in Public on 5<sup>th</sup> May 2017. The Examination is due to start in October of this year. As you are aware, a 'Statement of Common Ground' will be

prepared to assist the Inspector and set out an agreed position regarding the Rural Land to Green Belt proposals within the SAP and the proposed housing allocations in the Neighbourhood Plan.

## **2. Basic Conditions**

- 2.1. At examination, a neighbourhood plan will be judged on whether it complies with the Basic Conditions set out in paragraph 8 (2) of Schedule 4B to the Town and Country Planning Act 1990. These are:
- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State**
  - b) The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development**
  - c) That making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority.**
  - d) The making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.**

## **3. General comments**

- 3.1. The Parish Council may wish to explore the inclusion of a policy criterion that directs those wanting to pursue self-build on the smaller sites in the village.
- 3.2. As the Plan is allocating sites it could be more specific about potential CIL receipts from the proposed allocations/developments and tie these to the proposed community actions that come in each section of the Plan – Holbeck’s Delivery Plan is a good example of this.

## **4. Specific comments**

- 4.1. Para 1.2 (page 6) and Map 1 (page 7) – Further explanation as to why the neighbourhood planning area differs to the Parish area would be useful.
- 4.2. 6<sup>th</sup> line, 4<sup>th</sup> Paragraph, (page 8) – should be “LCC Neighbourhood Planning Manager.”
- 4.3. Para 2.1 – 2.2 (pages 11-12) The history section could benefit from a description of how Walton village has developed incrementally, with the oldest parts of the village developing in a piecemeal way, resulting in a degree of variation between buildings. Would the community want to then reflect this historic development going forward?

- 4.4. The first paragraph of each theme e.g. para 4.1.1 (page 16), para 4.2.1 (page 24) could be clearer. The opening part of each section should demonstrate how the following policies deliver the plan's vision.
- 4.5. Core Strategy Policy G1 ENHANCING AND EXTENDING GREEN INFRASTRUCTURE partly covers Walton parish. This should be mentioned in terms of the need to retain, enhance or extend Green Infrastructure.
- 4.6. Any development on the edge of the village needs to consider Unitary Development Plan Policy N24 requirements (buffer to Green belt/open space).
- 4.7. There is an opportunity for the plan to make a more explicit reference to trees as they do influence character as well as contributing to carbon storage and air quality etc.
- 4.8. Appendix 1 contains a comprehensive Character Assessment for Walton. The supporting text to Policies could make better use of this Character Assessment to provide further clarity.

## 5. **Policy Comments**

### ***Heritage and Green Spaces***

#### Policy HG1: Local Green Spaces

- 5.1. LGS1 Churchyard is proposed for green space designation in the Submission Draft Site Allocations Plan (G1465). LGS2 and LGS3 are not proposed for designation as such. The Plan should include clear evidence for the designation of these three areas against the criteria contained in the NPPF which could be clearer. Could the supporting evidence on page 17 make more of an explicit reference to the assessment process and include the reference to Appendix 2?

#### Policy HG2: New Green Spaces

- 5.2. a) Provision of green space through new housing development is embedded in Core Strategy Policies G4 and G5. The policy appears to be replicating higher order policy which is not recommended as most examiners delete such references. Could the first criterion be more explicit in the expected typologies that new housing development should deliver, i.e. to mitigate identified deficiencies.

#### Policy HG3: Local non-designated heritage assets

- 5.3. Similar to 5.1 above, could the supporting evidence for Policy HG3 on page 21 be more explicit about the assessment process with a clear reference to Appendix 3?

#### Policy HG4: Local design

- 5.4. It is suggested that the design policy (in the heritage and green spaces section) should be at least referred to in the Housing Section or may be relocated there.
- 5.5. An illustration of the medieval tofts and crofts would be beneficial. It may also be useful to clarify whether this refers to new development outside the village core, or just within areas already of a toft and croft form. This could help to avoid generic suburban forms based around cul-de-sacs and encourage generous garden sizes. It is worth bearing in mind that whilst protecting the historic toft and croft layout is favoured, the proposed housing allocation at Policy H3 would not be policy compliant in this respect.
- 5.6. The plan may benefit from some images of architectural details on vernacular buildings that could be referenced by new development.
- 5.7. 2<sup>nd</sup> bullet point under “...development proposals should:” - It would be beneficial to define and clarify “...the best of current design...” to ensure decision makers understand terms and phrases used.

#### Policy HG5: Key views

- 5.8. Map 4 (page 20) - The images of key views from outside the village are clear to understand, however the views from within the village are slightly less legible.

#### Policy HG6: Former Thorp Arch Royal Ordnance Filling Factory

- 5.9. This policy is a welcome approach.

#### Key Community Actions (page 23)

- 5.10. The ‘Key community actions’ inset is a little vague. The Parish Council may want to elaborate and clarify its intention; under 4.0 - perhaps the Parish Council could add “the delivery of Key Community Actions will also support the Policies in the Neighbourhood Plan.”?

### ***Community Facilities***

#### Policy CF1: Protecting and improving existing community facilities

- 5.11. Para 4.2.4 the plan states “The following community facilities will be registered as Assets of Community Value with Leeds City Council” and lists the following assets:
- St Peter’s Church.
  - The Village Hall.
  - The Fox and Hounds Public House.
  - The Post Box.

- 5.12. The parish council can nominate assets of community value but the Council determines whether or not the asset meets the criteria set out in the Localism Act. The plan should make this clear. The legislation only applies to land and buildings so the post box would not be eligible for nomination or subsequent registration.

Policy CF2: New and improved community facilities

- 5.13. This policy could be simplified to something like “Proposals to improve or provide new community recreational facilities will be supported.”

***Transport***

Policy T1: Traffic management

- 5.14. The plan could be clearer and advise on the type of traffic calming measures – some features may be inappropriate for such a small village.

Policy T2: Public Rights of Way

- 5.15. The following comments have been received from the Leeds Local Access Forum:
- 5.16. The Plan, well presented and easy to read, acknowledges that Walton is the only parish within Leeds to have no definitive public rights of way (PROW). Nevertheless the Plan recognises the important role that walking and cycling play in improved health. Furthermore, the development of cycleways and footpaths increases connectivity. This is reflected in Policy T2, which the Forum welcomes and supports.
- 5.17. One of the Key Community Actions is to develop an improved network of paths and tracks around the village, and to develop opportunities for path connections to all neighbouring villages. In this regard it would be helpful if the Plan included an extract from the Definitive Map which would show the PROW network in the adjacent LCC area, and, in particular, show two Thorp Arch footpaths meeting the boundary of the area covered by the Plan - Thorp Arch Footpath 1 in the north west and Thorp Arch Footpath 6 in the south. It would also be helpful to include on this map the aspirational routes shown on page 28, together with the route north to Bickerton. Officers in Public Rights of Way will be pleased to supply the extract from the Definitive Map.
- 5.18. A final small suggestion is to replace 'footpath' with 'footway' in paragraph (e) on page 33.

***Housing***

- 5.19. It is considered that the emerging NP is in general conformity with the existing strategic policies of the Leeds development plan. However, the allocation of the rural land housing sites is not a clear-cut one and will ultimately be a decision for the SAP Inspector, the neighbourhood plan examiner and local people at Referendum. A

Statement of Common Ground is being prepared between the City Council and Walton Neighbourhood Plan Steering Group which clarifies the position.

- 5.20. The Core Strategy does make provision for limited housing development in rural areas as set out in paragraph 4.1.15 which talks of “limited development opportunities” in other rural locations and through Policy SP7. This policy sets a framework for the distribution of new housing allocations which favours the settlement hierarchy, but still sees 1% or 700 dwellings being located in the other rural areas. The Site Allocations Plan is currently proposing 617 dwellings. Policy H2 of the Core Strategy addresses development of windfall sites which ties the scale of development to infrastructure availability.
- 5.21. The introductory section to the housing policies could say more about the strategic vision for the village which is about what the Plan is seeking to deliver **as a whole** – tying the sites together as well as other policies in the Plan.
- 5.22. Para 4.4.3 – It would be useful to include further evidence to support the figure of 20 new dwellings in the Plan. The parish council may wish to consider what would be the implications on the other two sites if the larger site ends up being allocated and comes forward for 15 homes rather than 14.
- 5.23. Para 4.4.4 – It is suggested that further information is included on how the original 7 sites were identified. It would be useful to put at least a summary of the analysis and information in the “Site Assessments and Rationale” supporting document into the plan so there is a clear, easily found rationale for their inclusion. This could be as an appendix.
- 5.24. The site specific policies could go further in setting requirements as well as design guides e.g. the Springs Lane Site policy (Policy H2) could include highways mitigation measures required, i.e. a S106 Agreement to provide a path (not the circulatory public footpath) but along Springs Lane to the centre of the village as currently there isn’t one. It is recommended that this is discussed and agreed with the Council after the pre-submission consultation.

Policy H1: Sites for new homes

- 5.25. See para 5.19 – 5.20 above.

Policy H2: Land west of Springs Lane / Walton Cricket Pitch

- 5.26. See para 5.19 – 5.20 above.

- 5.27. The Parish Council may wish to emphasise that red pantiles are just one roof material used in the village and that stone tiles are also common.

Policy H3: Land south of Main Street (Coal Yard)

5.28. This site could provide opportunities for downsizing as it is in the centre of the village with good accessibility which could be highlighted in the Policy.

Policy H4: Land north of Hall Park Road

5.29. The site is currently Rural Land but it is considered that a case can be made for infill development as there is already housing located either side of this site.

Policy H5: Residential car parking

5.30. Clarification of “adequate off street parking” would be useful. The Leeds Parking Supplementary Planning Document provides guidance on parking provision. Clifford Neighbourhood Plan includes a Policy on parking – the Parish Council may wish to consider this.

### ***Business and Employment***

5.31. The evidence for the business and employment section could be improved. Further evidence justifying the support improved ICT capabilities and SME development on the TAE would be beneficial.

Policy BE1: Information and communications technology

5.32. “The Building Regulations 2010: Physical infrastructure for high-speed electronic communications networks, Draft Approved Document R1 In-building physical infrastructure” covers the provision of infrastructure and communications technology.

Policy BE2: Supporting employment and enterprise

5.33. a) – it would be useful to define “the character and vitality of the local area.”

Policy BE3: Thorp Arch Estate

5.34. The Submission Draft Thorp Arch Neighbourhood Plan contains a policy on the Thorp Arch Estate (Policy LE1) <http://www.leeds.gov.uk/docs/Thorp%20Arch%20NP%20Submission%20Draft%20M%20arch%202017.pdf> which the examiner, Rosemary Kidd, has recommended for deletion with the insertion of a community aspiration along the lines of “*The Parish Council will support the retention / allocation of the Thorp Arch Estate for mixed use employment.*” Whilst it is acknowledged that the Walton policy is less explicit, it is recommended that the Parish Council considers the Thorp Arch examiner’s report <http://www.leeds.gov.uk/docs/Thorp%20Arch%20Examiners%20Report.PDF>.

## **6. Other Comments**

Children’s Services

- 6.1 The Plan doesn't mention education or school places, particularly in relation to development of new homes. The Parish Council may like to include reference to the fact that the size of the proposed developments would generate relatively small numbers of additional children, the majority of whom would be likely to access school places within the Boston Spa or Wetherby area.

I hope these comments are useful and help the neighbourhood planning group to review the pre-submission draft Walton Neighbourhood Plan before it progresses to examination. If you would like to discuss any of these comments in more detail, please contact Ian Mackay to arrange a convenient time.

Yours sincerely,



Tim Hill

Chief Planning Officer