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Dear Dr Cove,

Leeds City Council Response to the Oulton and Woodlesford Neighbourhood Plan Pre-Submission Consultation (Regulation 14).

Thank you for consulting the Council on the Pre-Submission Draft Oulton and Woodlesford Neighbourhood Plan. The Forum have done an excellent job over a number of years with engagement of the highest quality resulting in a well-considered draft plan that is locally distinctive and will help to make Oulton and Woodlesford a more sustainable place.

I hope that these formal comments will help the forum and steering group improve the plan prior to formal submission for independent examination. Although these are formal comments, you will be aware that there is no obligation to take them on board. The comments are intended to help ensure that there are as few modifications and policy deletions as possible at examination and to strengthen the plan more generally.

A number of issues would benefit from further input from officers and an offer to do this has already been made.

1. Timing / Risks

- 1.1 As you will be aware, the Site Allocations Plan (SAP) was submitted to the Secretary of State for Examination in Public on 5th May 2017. That Examination started in October 2017 and Stage 2 Hearing Sessions are due to take place in the summer of 2018.
- 1.2 It is worth bearing in mind that there may be potential implications for the Neighbourhood Plan (with regard to the proposed housing and mixed-use allocations in the submission draft SAP), and if the SAP is adopted after the Neighbourhood Plan is made (subject to successful examination and referendum), elements of the Neighbourhood Plan may be superseded or may become out of date.

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.**
- 2.2 It is considered that the draft Oulton and Woodlesford Neighbourhood Plan broadly meets the Basic Conditions. The examiner will make more detailed recommendations in this regard.

3. Comments on the Plan

- 3.1. The contents page is incorrect, HS2 is referenced as 3.6 on the contents page but is 3.8.
- 3.2 A thorough spelling and grammar check recommended.
- 3.3 Wording and referencing could be tidied up throughout, e.g. there should be consistent references to the Community Design Statement and the Conservation Area Appraisals. It is suggested that a “future proofing” exercise takes place as there are references throughout the document to “recent” events.
- 3.4 At the start of each policy theme, it would be helpful to demonstrate how the policies that follow will help to deliver the Vision, perhaps by linking it to the “Purpose” section provided in the tables.
- 3.5 The details of each consultation provided before each policy are helpful for the purposes of the Pre-Submission Plan, but for the Submission draft this could be summarised, and the full details provided in the Consultation Statement. The Plan could make better use of “objective” evidence available throughout, while community support is helpful (and indeed, necessary for the Plan), the evidence base should refer to objective / factual evidence to make the Policies more robust.
- 3.6 Page 5, second paragraph: suggest “Woodlesford and Oulton together would make an excellent unit for *neighbourhood* planning.”
- 3.7 Page 5, last paragraph, page 10 4th paragraph: the Steering Group minutes are difficult to find on the website, suggest that these are made more readily available, which will aid the examiner when the Plan has been submitted. Note: the examiner will have a close look at the website.

- 3.8 Page 6: National Planning Policy Framework should be capitalised.
- 3.9 Page 6, para 1.2: This paragraph is repetitive of the first paragraph on page 5, suggest they are combined and slimmed down.
- 3.10 Page 8: Neighbourhood Areas are designated rather than “accepted”, Oulton and Woodlesford Neighbourhood Area was designated by the Council on 15th July 2014, reference could be made to the 6 week publicity that was undertaken on the Neighbourhood Area application.
- 3.11 Page 10: Some of this text is repetitive of text on page 5, suggest that they are combined to form the introduction and to avoid repetition. Was there an AGM in 2017? If so, should include in list.
- 3.12 Pages 10 and 11: Suggest that these pages are summarised and full details are provided in the Consultation Statement that will be submitted alongside the Plan.
- 3.13 Page 11: The Neighbourhood Area and Neighbourhood Forum were designated on 15th July 2014, not August.
- 3.14 Page 15: The chart on percentage of residents by religion is difficult to read (is there a reason to include this?).
- 3.15 Page 14 and Page 16: The number of households is repeated, recommend just the chart is included.
- 3.17 Page 16: references the evidence base but suggest that this is consolidated into one “package” and provided on a distinct tab on the website, this will make the examination run more smoothly as evidence will be easier to find. This is not only for the benefit of the examiner but also for interested parties more generally who may wish to view during the 6 week publicity period.
- 3.18 Page 17: More detail would be helpful on how the vision and objectives were approved by the Forum and then endorsed by the wider community. This could be included in the revised plan and the Consultation Statement.

4. Specific Policy Comments

4.1. Housing

Page 19: the summary of the Arc4 Housing Market Assessment is useful, this evidence could be referenced more directly to support the policies.

Page 20, 3.3.1 makes reference to evidence “that affordable housing obligations may not be delivered on site by developers”, are you able to provide this evidence? A study of Leeds planning permissions between April 2014 and March 2017 shows that 77.3% of schemes were policy compliant in the delivery of affordable dwellings on-site with a further 5.3% providing commuted sums.

Policy H1A - Smaller Homes

Why has the figure 10 been used? Policy H4 of the Core Strategy has a target of 60% for 1-2 bedroom homes so this policy (when the NP is 'made') would lower the level of smaller homes expected on a site. Suggest referring to the Arc4 HMA which states that "additional 1-bedroom market and affordable homes would enable newly forming and existing households to be retained in the local community" which will provide a more robust justification for the policy requirements beyond community support.

Policy H1B - Affordable Homes

The proposed affordable housing policy H1B asks for 20% of dwellings (in schemes of 10 or more dwellings) to be affordable. Currently, the NPPF expects affordable housing requirements to be justified not only by evidence of need, but also evidence that the requirement will not make housing development unviable. Evidence of need is provided in the SHMA 2017 by Arc4, and in all areas of Leeds there is a need for higher percentages of affordable housing than set out in Leeds' affordable housing policy. However, it is evidence of viability that has capped affordable housing targets at a lower level than needed.

The percentage for Zone 2 (which covers Rothwell and Oulton / Woodlesford) is currently 15%. It will be difficult for local areas to do their own viability evidence because it needs to take account of impacts of all planning requirements (green space, CIL etc) and have up to date figures of sale values and development costs. LCC's recent evidence was provided by GVA and is available on LCC web site.

The higher target (paragraphs 4.2 to 4.8). Part c) as written states that new housing should be delivered on the development site or elsewhere in the neighbourhood area. It is assumed that it is intended to refer specifically to affordable housing (the policy can only refer to "where possible" with regard to off-site provision unless there is a prior agreement with a social housing provider).

Policy H2 - Design of New Housing Developments

The character assessment undertaken should be used to support this policy where possible. The policy encourages high-quality design and also encourages phasing and provision of housing that can be adaptable. Generally speaking, it is better to set out development which would be acceptable (based on evidence and locally distinctive). Care should also be taken with the policy wording, in particular to ensure that it is clear, precise and appropriate.

The reference to mix in a) should be more flexible to take into account exceptions (for example, the plans stated preference for flats on HG2-176).

There does not appear to be any evidence to support b). It is appreciated that on-road parking may be regarded as unsightly but this may have unintended consequences. Additional car parking spaces would encourage increased car use, whilst there are nationwide incentives to reduce car use and improve/increase active travel. The Plan (in other places) encourages active travel and non-motorised accessibility and this aspect of the policy is inconsistent. The Plan should encourage use of the train station. The Ministerial Statement of 2015 states that

plans should not identify any “additional technical standards” for sustainable buildings, although reference could be provided to Building for Life guidance.

Vague statements should be avoided, for example at c) “Developments should be designed with the security of residents in mind”. A reference to ‘Secured by Design’ principles would be appropriate.

The importance of pre-application discussion in e) is recognised and highlighting this in a neighbourhood plan is helpful but it can only be an aspiration. There is no provision in the Core Strategy to support either of these aspirations. Suggest the reference is to the forum and not the steering committee and that this section is simplified.

The phasing requirement at f) is potentially too onerous and could be an issue for general conformity.

It would make more sense to have g) as part of policy H1A.

Policy H3 - Design Principles for Identified Site Allocations

The policy may need to be revised to reflect the outcome of the Site Allocations Plan Examination. Generally, the policies refer to the potential of each site rather than how the site could be developed. The starting point for NP policies that are seeking to “shape” proposed allocations should be the site requirements in the proposals.

There is an opportunity for the NP to “shape” development that takes place in the neighbourhood area during the plan period. In addition to the comments below, the Council are able to provide a resource to help maximise this opportunity, after the neighbourhood forum have had time to consider all of the representations.

The Arc4 HMA could be better used to shape these sites to suit local needs.

You will be aware that the Council has recently submitted a Revised Submission Draft Site Allocations Plan to the Secretary of State, for Stage 2 of Examination in Public hearing sessions in the summer of 2018. The Revised Submission Draft SAP does not propose any changes to the proposed allocations, other than bringing forward the allocations in the Oulton and Woodlesford Neighbourhood Area to Phase 1. The proposed allocations can be viewed: https://www.leeds.gov.uk/SiteAllocationMaps/SAP_Submission_Documents_May%202017/CD1-1i%20Submission%20Draft%20Plan%20-%20Outer%20South,%20May%202017.pdf

HG2-176 - are the mature trees referred to the ones at the eastern boundary of the site? The SAP allocation policy recommends that an ecological assessment is carried out and that a biodiversity buffer (not private garden space) is provided alongside the eastern boundary of the site. The policy could say more about key guiding principles for development.

HG2-177 - the site is located within a Conservation Area, which already affords protection to the trees on site. However, there is no harm in reinforcing the importance of the trees. The policy could say more about key guiding principles for development.

HG2-178: This part of the policy could encourage a higher density development and should take account of on-site constraints, e.g. highways access, flood risk and ecology. Support for

a restaurant (A3 use) in an out of centre location would not comply with the NPPF or the Core Strategy, unless a sequential test to ensure that there were no suitable centre/edge of centre locations had been undertaken (Policy P8 of the Core Strategy). Non-residential uses on this site would also impact on the housing capacity. The policy could say more about key guiding principles for development.

MX2-14: The commentary on the existing on-site uses should be in the introductory text rather than in the policy. The policy could say more about key guiding principles for development. The site has not been identified in the SAP as suitable for elderly accommodation due to distance from a local centre. More evidence could be provided to show why the site is suitable for elderly accommodation. The policy could say more about key guiding principles for development

HG2-179

If this site is allocated, it will be required to provide on-site greenspace in accordance with policies G3 and G4 of the Core Strategy. Where supply is considered sufficient, contributions will be sought to improve existing green space. There may be an opportunity to explore how allotments could be incorporated into the development of the site. However, the provision of allotments on this site could undermine its viability for housing. The policy could say more about key guiding principles for development

HG2:180

If the Forum does not wish to see this site developed in a piecemeal way, why does the policy go on to encourage the development of the site in a number of separate developments? Further clarity needed. The Council have proposed a modification to the SAP that states “allocations should be developed comprehensively rather than piecemeal.” This policy could encourage the use of a design code or brief for this site to provide a comprehensive overview of how the development will come forward (the Council can assist with this). The site requirements include the highways considerations and mitigation measures and the need to consider the adjacent Conservation Area. It is advised that the reference to the site not being favoured as an allocation is not within the policy wording itself. The policy could say more about key guiding principles for development

4.2 Design of the Built Environment

Page 29: should read “Conservation Area Appraisals”.

Policy DBE1 - Design of the Built Environment

As written, the policy suggests all development should protect and enhance the Conservation Area. This is not possible. The Policy should be more positively worded, to encourage development to respect local character. Policy LAND2 of the Natural Resources and Waste Local Plan introduces a 3:1 replacement tree policy, which is stronger than Clause D).

The importance of gardens and their setting is understood generally but there does not appear to be any evidence to support the loss of any garden setting in any part of the neighbourhood area, not to mention no clarity on how “garden setting” would be defined. It would also be

difficult to justify in every part of the neighbourhood area. It is likely also that an examiner would find the term “garden setting” to be imprecise. With regard to infill development, there may be circumstances where infill development is entirely appropriate and could enhance the area. Are there particularly sensitive parts of the neighbourhood area where infill development should be resisted at all costs for example? A blanket resistance to any infill development does not have regard to the National Planning Policy Framework.

Generally speaking, it is not good practice to include a reference to an Appendix in the policy. Suggest that this is re-written and a reference is provided in the introductory text. The Character Areas should be identified on a Map (as provided on page 66). Important policy considerations should be within the policy, not an appendix.

Policy DBE2 - Develop Village Centre Shopping and Leisure Environments

The evidence for this policy is better although the introductory text could say more about the importance of local shopping and links to sustainability. The policy encourages the enhancement of neighbourhood shopping parades but it is vague - how would a Development Management officer judge whether a proposal “supports a more integrated, high street style village centre”? The policy could give more guidance in this respect.

Policy DBE3 - Protection and Enhancement of Local Non-Designated Heritage Assets

Suggest “Non-Designated Heritage Assets” is used to provide consistent wording with ‘made’ neighbourhood plans. The introductory section could be clearer in describing the identification and assessment process of the NDHAs and could provide a better reference to Appendix 3 which provides a useful commentary. Policy encourages development to be sympathetic to identified NDHAs. As a matter of good practice, they should be listed in the policy rather than referred to as an appendix. Policy otherwise OK in principle if the wording is tidied up and is similar to other policies in ‘made’ neighbourhood plans.

4.3 Community Facilities

Policy CF1 - Community Facilities

The Forum can *nominate* the facilities listed as Assets of Community Value, but it is the Council that registers them. It is not recommended to include local schools.

Policy CF2 - Sports and Recreation Facilities

Ok in principle, the policy seeks to enhance existing sports facilities that serve the needs of the community.

Little weight can be given to “support from the community”?

Page 35: would be better to say the ‘travelling library’ is not accessible to those who work *during the day* rather than those who are employed in general.

Policy CF3 - Educational Facilities

Policy seeks to ensure ongoing provision of educational facilities and also encourages the development of a library. The policy could be more positively worded and the library aspect is aspirational. Could benefit from tightening up and greater clarification of phrases used.

4.4 Green Environment

Policy GE1 - Local Green Spaces

It is difficult to find some of the sites as the thumbnail plans do not give enough context. It is also unclear what is in some of the proposed LGS boundaries – these should be clearly shown (the Council can provide assistance with this). This is likely to be an issue at examination.

The successful designation of a Local Green Space relies to a large extent on providing evidence that the spaces are “demonstrably special” to the local community. It is important to note that the NPPF states that a Local Green Space designation will *not* be appropriate for most sites. It is acknowledged that an assessment of proposed Local Green Spaces is appended to the draft Plan although there are gaps in the “local significance” column.

The introductory text doesn’t give an indication of surpluses or deficiencies of green space in the neighbourhood area, so reference could be provided to the Leeds Open Space, Sport and Recreation Assessment which will provide additional evidence. As written GE1 doesn’t include any policy statement, typically LGS policies read as follows: “The following sites (shown on Map X) are designated as Local Green Spaces, where development will be ruled out unless there are very special circumstances, equivalent to national policy on Green Belts...”

It is important to note that boundary plans are provided in the Appendix although they are not shown on Map 2 (and should be shown here, too). The boundary plans provided in the supporting appendix are sometimes unclear, and refer to multiple different “patches” of green space as a single space. This approach has been used in the SAP Green Space proposals but only where the site is contiguous but separated by, perhaps, a through-road. Dispersed “patches” of green space being referred to as a single site is not recommended.

A number of the proposals are verges adjacent to roads. It would be difficult to convince an examiner that these are “demonstrably special” with clearly identified characteristics that justify their inclusion. It would be helpful if more details were included in the analysis table relating to why the proposed areas are special. Please refer to the criteria contained in paras 76 - 77 of the NPPF https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/60777/2116950.pdf. The Open Space Society has produced a useful information sheet on local green space designation <http://www.oss.org.uk/wp-content/uploads/2017/01/C20-Local-Green-Space-Designation-2.pdf>.

Proposed sites

Given the nature of the following comments, a meeting to discuss and clarify is important and can take place once the forum have had time to consider. In particular, further information will be needed by the examiner to demonstrate why each proposal is

“demonstrably special” and should be designated as a Local Green Space (this particularly applies to the grass verges):

Albert Road amenity green spaces (AR1 -4) – small area of verge, no designation/allocation in SAP.

Albert Road allotments (ARA) – Mostly SAP Holmsley Field Lane Allotments designation (G1008, Allotments, Site Area 0.46ha).

All Saints Road amenity green space (ASR) – no designation/allocation in SAP. It is not clear which areas are included within the proposed LGS, but it appears to include the narrow strips of green adjacent to roads. Some of the western green areas lie within the November 2016 HS2 Safeguarded Areas.

All Saints Road/ Eshald Place amenity green space (ASE) – small part of western edge lie within the November 2016 HS2 Safeguarded Areas. No other designations/allocations.

Applegarth Manor amenity green space (AGM) – it appears that this site lies within identified housing site HG1-403 Fleet Lane (land off), Oulton (Site Area 3.38 ha, Capacity 77 units, Phase 1). If this does lie within the proposed housing site then designation as LGS not supported (this comment raises a wider issue about identification of sites).

Ashleigh Gardens amenity green space (AG1) – small area of verge, no designation/allocation in SAP.

Bernard Street allotments (BSA) – part lies within November 2016 HS2 Safeguarded Areas.

Calverley Road amenity green space (CR1) – no designation/allocation in SAP.

Canal-side from Woodlesford lock NW towards Leeds (CSE) – partly River / Canal Towpath TPT East (G816, Green Corridor, Site Area 59.74 ha), partly Canal Side Ponds - Woodlesford Lock (G1138 , Natural, Site Area 4.45 ha), green belt.

Canal tow path, Woodlesford lock to Lemonroyd lock (CSW) – partly Fleet Bridge Wood (G1010, Natural, Site Area 4.3 ha).

Clumpcliffe access road (CCA) – this looks like just an access road. Used for walking and other informal recreation but will need to demonstrate how this area is sufficiently special to justify LGS designation. No designation/allocation in SAP.

Farrer Lane amenity green space (FL1) – Are all the areas publicly accessible? How do they function? No designation/allocation in SAP.

Fields to SE of The Maltings (FSM) – It is not clear where this site is. In Green Belt and the south east extent is cut by the November 2016 HS2 Safeguarded Areas.

Gipsy Lane amenity green space (GL1) - small area of verge, no designation/allocation in SAP.

Green Lea amenity green space (GL2) - small area of verge, no designation/allocation in SAP.

Holmsley Field Lane amenity green space (HFL) – no designation/allocation in SAP. How is this used? Informal recreation?

Holmsley Lane verges (HL1) – narrow verge, no designation/allocation in SAP Suggest the site is removed.

Holmsley Walk amenity green spaces (HW 1 & 2) – HW2 – small areas of verge, no designation/allocation in SAP. How are they used? HW1 – incidental open space, no designation/allocation in SAP. How is it used?

Linwood Avenue amenity green space (LA1) – area of verge, no designation/allocation in SAP.

Linwood Crescent amenity green space (LC1) - area of verge, no designation/allocation in SAP.

Midland Street (MS1) – very small area that is well maintained by Woodlesford in Bloom. No designation/allocation in SAP.

Northwood Park amenity green spaces (NP1) - area of verge, no designation/allocation in SAP.

Oulton Community Sports Club (OSC) – mainly covered by Rothwell Sports Centre (G1100, Outdoor Sport, Site Area 3.97ha), Hugh Calverley Playing Fields (G1101, Outdoor Sport, Site Area 7.99ha) and Wordsworth Drive (G1099, Local Recreation Area (Part and Garden), Site Area 1.1ha).

Oulton Hall Park (OHP) – Grade II registered park and garden. Grounds mainly a private golf course therefore not designated as green space in the SAP.

Oulton Primary School (OPS) – Oulton Primary School (G1259, Outdoor sport, Site Area 1.64ha)

Oulton War Memorial (OWM) – small grassed area with war memorial. No designation/allocation in SAP. Local significance related to war dead.

Pickpocket Lane (PPL) – It is recognised that the area is used for walking and other informal recreation but will need to demonstrate how it is sufficiently special to justify LGS designation. No designation/allocation in SAP.

Pymont Drive (PD1) – partly covered by Mowbray Chase (3) (G1127, Amenity, Site Area 0.22ha) and Mowbray Chase (1) (G1126, Amenity, Site Area 0.27ha).

Quarry Hill green space (QH1) – no designation/allocation in SAP What are its special characteristics? How is it locally important?

Sherwood Way sports field (SW1) – mainly Sherwood Way, Playing Pitch (G1884, Outdoor sport, Site Area 0.73ha).

South Oulton amenity green space (SHC) - no designation/allocation in SAP. What are its special characteristics? How is it locally important?

Station lane, green space adjacent to Woodlesford Station (WS1) - no designation/allocation in SAP. What are its special characteristics? How is it locally important? Some of it appears to be verge.

Sydney Street amenity green space (SS1) – incidental open space mainly surrounded by roads. No designation/allocation in SAP.

The Maltings amenity green space (MA1) – mainly Juniper Avenue POS (G1134, Amenity, Site Area 0.81ha).

The Maltings entrance (MA2) – mainly an area of verge, no designation/allocation in SAP

Water Haigh Park, canal- and river-side (WH1) – WH1 appears to be in the wrong place on the plan. Partly Fleet Lane Woods (G1135, Natural, Site Area 23.37ha) and River / Canal Towpath TPT East (G816, Green Corridor, Site Area 59.74ha).

Water Haigh Park, Eshald Woods (WH2) - Eshald Wood (G1121, Natural, Site Area 6.57ha). Southern part covered by the November 2016 HS2 Safeguarded Areas.

Water Haigh Park, Fleet Bridge Woods (WH3 – should this be WH4?) – partly Fleet Bridge Wood (G1010, Natural, Site Area 4.3ha) and part of Fleet Wood (G1123, Natural, Site Area 4ha).

Water Haigh Park Football pitches (WH3) - Water Haigh (G1119, Natural, Site Area 7.16ha), G1131 (Outdoor Sport, Site Area 2.14ha), Pit Head Wood (G1120, Natural, Site area 14.23ha), Fleet Wood (G1123, Natural, Site Area 4ha).

Water Haigh Park, part adjacent to Eshald Lane, SE of buildings on Aberford Road (WH4 – should this be WH1?) - Fleet Lane Rec (G1009, Local Recreation Area (Park and Garden), Site Area 8.19ha). The November 2016 HS2 Safeguarded Areas cuts through the site.

Woodlesford Primary School - Woodlesford Primary School (G1258, Outdoor Sport, Site Area 1.21ha). The November 2016 HS2 Safeguarded Areas cuts through the site.

Woodlesford Village Green - All Saints POS (G1541, Amenity, Site Area 0.24ha).

Page 41 Leeds Habitat Network – “Areas around Leeds have been protected as ‘Habitats’. Once an area has been designated it cannot be built on or altered in a way that changes the effect and look of the habitat unless the developer relocates the habitat.” This is not strictly true as the areas identified in the Leeds Habitat Network are not protected in the sense that development is unacceptable, and this seems to infer that translocation is acceptable. Instead it could be worded “Where any part of the Leeds Habitat Network is to be affected it must be demonstrated that the physical and functional connectivity of the Network and its component habitat types can be retained – this is likely to require enhancement of land to compensate for any physical loss of the Network and positive management within the existing Network.” The reference to Map 2 should be Map 3.

Biodiversity enhancements in new buildings – it would be beneficial to encourage integral bat roosting and bird nesting features in new buildings (Bat Tubes/Bricks and Swift Bricks) together with a ratio of what would be expected i.e. New residential properties will provide biodiversity features for bats and nesting birds with a minimum of 50% of all dwellings providing an integral bat roosting or Swift nesting feature. New industrial, library and school buildings will provide a minimum of 5 features.

Policy GE2A - Green Corridors

Policy identifies local green corridors for protection. Need to clearly identify on a plan the two green corridors in Policy GE2A or refer to the Polices Map. No indication how the green corridors will be “improved” so it could benefit from redrafting and greater clarity. The policy is ok in principle but there is an opportunity for the policy to contribute to the Leeds Habitat Network by suggesting links and local extensions (and aim to strengthen its physical linkages i.e. from Oulton Golf Course to the River Aire along Oulton Beck, and encourage positive management of all land in the Network).

Policy GE2B - Green Infrastructure

Policy encourages developments to contribute positively to green infrastructure. This is Ok in principle. However, the Natural Resources and Waste Local Plan (Policy LAND2) requires a 3:1 replacement of trees and this policy encourages 1:1 replacement. What are the identified deficits? Suggest referring to the local aspiration for allotments as stated in Policy H3.

Page 43, Map 3: Refers to the map being of the Leeds Landscape Network when it should be the Leeds Habitat Network.

Policy GE3 - Protecting Views in the Landscape

Policy identifies 15 key views that should be respected and maintained and these have been transposed from the CAAMPs. This is Ok in principle but a visual to demonstrate the trajectory of the views would be a helpful inclusion.

Page 45: Suggest the wording regarding the Trans-Pennine Trail as follows: “The Trans Pennine Trail runs through the neighbourhood area *‘on its way between Leeds and Barnsley’* to link with the route from east to west coast of England.

Page 45: Suggest replacing the wording relating to the new Skelton bridge which reads “.....provides a walking and cycling link across the lower Aire valley to above the Trans Pennine Trail....” with to *‘Skelton Lake and Temple Newsam’*.

Policy GE4 - Improve Access to Public Rights of Way

Policy requires new development to contribute to PROW network and encourages linkages between both villages and with surrounding communities.

Page 46, Map 4: The PROW Map should show the Neighbourhood Area boundary. As presented, Map 4 does not show all of the Neighbourhood Area. The Council can provide a replacement Map 4. Information from the Definitive Statement on PROW could be provided

as part of the evidence base in an appendix. Could Map 4 show aspirations for improvements or new routes?

4.5 Business and Economy

Policy BE1 - New Business and Employment Development

The policy is missing. This is a serious issue for its inclusion in the final plan. All policies that are in the final submission draft Plan should be consulted on at the formal Pre-Submission Stage. An examiner will take a strict view on this.

4.6 High Speed Rail

Policy HSR1 - Managing the Impact of the Development Phase

The policy seeks to minimise disruption caused by the construction of HS2 through the Neighbourhood Area. HS2 is a national infrastructure project and strategic. Most examiners have deleted references to such projects in neighbourhood plans. However, there have been exceptions and a positive and aspirational policy could have a place in the plan.

Policy HSR2 - Design, Community and the Landscape

The policy seeks to minimise disruption caused by the construction of HS2 through the Neighbourhood Area. HS2 is a national infrastructure project and strategic. Most examiners have deleted references to such projects in neighbourhood plans.

The policy seeks to encourage good design of HS2 route through active community consultation which is welcome, but repeats policy HSR1 and the NPPF which is unnecessary and bad practice.

Page 55, Map 5: could be much clearer as it is difficult to see the inset box identified.

Pages 60 to 61: The Policies Map should show the proposed Local Green Space designations.

Page 64, 5.0 Delivering the Plan: Could refer to how the Forum (or Steering Committee on behalf of the Forum) will monitor the implementation of the policies within the Plan. The Forum could also consider applying to be re-designated to continue to act on behalf of the community (in the absence of a Parish Council).

Appendix 1 – there is some useful information here but in some parts it reads more like a policy. It is recommended that appendices focus on description rather than prescription.

Appendix 2 – the map would benefit from a key. It is recommended that the evidence to support the identification of the views is set out in this appendix.

Appendix 3 – this is a well-considered and detailed assessment but the list at the beginning of the appendix doesn't relate as well as it could to the table (should these not follow chronologically?).

Appendix 4 – see previous comments.

Appendix 5 – recommend a ‘future-proof’ check.

I hope these comments are useful and help the forum review the draft plan before it progresses to examination. Please contact Ian Mackay to discuss these comments in more detail and to access any further support needed.

Yours sincerely,



Tim Hill

Chief Planning Officer