

## **Leeds City Council**

### **Decision Statement – Garforth Neighbourhood Development Plan**

#### **Planning & Compulsory Purchase Act 2004 and The Neighbourhood Planning (General) Regulations 2012**

#### **Regulation 18 Decision Statement**

##### **1. Summary**

- 1.1 Following an independent examination, Leeds City Council now confirms that it is making modifications to the Garforth Neighbourhood Development Plan (Garforth Neighbourhood Plan) as set out in Table 1 below. The Plan will then proceed to a Neighbourhood Planning Referendum.
- 1.2 In accordance with the independent examiner's recommendations, the Garforth Neighbourhood Plan will proceed to referendum within the Garforth Neighbourhood Area as designated by Leeds City Council on 29th June 2023.
- 1.3 This Decision Statement, the examiner's report and the draft Garforth Neighbourhood Plan and supporting documentation are available on the Council's website:  
<https://www.leeds.gov.uk/planning/planning-policy/neighbourhood-planning/garforth-neighbourhood-plan>
- 1.4 They are also on the Garforth Neighbourhood Forum website:  
<http://www.garforthplan.co.uk/>

##### **2. Decisions and Reasons**

- 2.1 The examiner has concluded that subject to the specified modifications being made to the Plan, the Garforth Neighbourhood Plan meets the Basic Conditions stated and other relevant legal requirements.
- 2.2 The Council accepts all of the modifications and the reasons put forward by the examiner for them. The examiner's reasons and Recommendations are set out in Table 1, followed by the Council's decisions.
- 2.3 The Council is satisfied that subject to the modifications specified in Table 1 below the Plan meets the relevant Basic Conditions mentioned in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990, is compatible with the Convention Rights and complies with the provision made by or under s38A and s.38B of the Planning & Compulsory Purchase Act 2004.

- 2.4 To meet the requirements of the Localism Act 2011, a referendum which poses the question “Do you want Leeds City Council to use the Neighbourhood Plan for Garforth to help it decide planning applications in the neighbourhood area?” will be held in the Garforth Neighbourhood Area.

**TABLE 1 Schedule of Modifications Recommended in the Examiner’s Report**

Modification Number <sup>1</sup>	Page/Part of the Plan	Examiner’s recommended changes	Examiner’s reason	Leeds City Council’s decision
<b>Throughout</b>				
OM1	Throughout	[Address the detailed issues relating to the Plan’s presentation identified in this section]	<p>The Plan is clearly structured and has a consistent format. The Policies are clearly identified by tinted boxes and generally supported by evidence although there are issues which I address in relation to individual policies. The evidence base is brought together in the appendices and available online. It would be preferable if every paragraph was numbered for ease of identification when the Plan is being used to inform planning decisions.</p> <p>The Plan includes a number of maps which relate to specific policies. These are generally adequate although there are instances in relation to individual policies where they do not provide the necessary clarity due to the scale or quality of the base map. In these cases an enlarged version and/or link to one online would be helpful although there are instances where the base map is not adequate. I address this in my assessment of relevant policies. It would be helpful if all maps (including enlargements) had a scale bar.</p> <p>The penultimate paragraph in Section 1.4 incorrectly states that the Appendices come after the Glossary when the Glossary precedes them. A</p>	Agree to modify the text and numbering as indicated to comply with the examiner’s recommendations.

<sup>1</sup> Please note that the examiner has included Optional Modifications in his report, which are marked in the report and in this decision statement as “OM”.

			<p>number of Maps are repeated through the Plan and they are not numbered sequentially (e.g. see page 25 and repeat of Map 11 on pages 52 and 65). Some Maps could be more helpfully located near to the policies for which they are most relevant. 11</p> <p>It is not immediately apparent that the footnote references throughout the Plan are detailed in Appendix 7 and this could helpfully be explained more in Section 1.4. The footnotes should also be reviewed to ensure completeness and consistency – for example Section 3.2.2 is titled “<i>Town Centre</i>” in the Plan and “<i>Town Centre Retail</i>” in Appendix 7. Appendix 7 is also missing footnote 3 from the fifth paragraph of page 43. Where documents are mentioned in a Plan policy then both references and links should be provided.</p> <p>38. The Plan’s policies use different conventions for identifying sections. A majority of the plan uses alphabetical list (e.g. a) b) c)) but this is not the case for all policies (e.g. Policies HBE8, HBE11, HBE13). It would aid clarity of the Plan to adopt a consistent approach. The numbering convention is most appropriate where it relates to the identification of locations or assets (e.g. Policy HBE12).</p>	
<b>Housing and the Built</b>				

Environment (HBE)				
M1	20	Amend Policy HBE1 to: <ul style="list-style-type: none"> <li>• Replace "houses" with "dwellings"</li> <li>• Replace the second sentence with "The provision of dwellings which meet the need for 2-bedroom and 4-bedroom units will be supported."</li> </ul>	There is a lack of clarity as to what is meant by "a majority of" and "in equal proportion" which might relate to provision across the Plan period or provision on individual sites. The Policy is intended to relate to dwellings or homes and is not restricted to "houses".	Agree to modify the text as indicated to comply with the examiner's recommendations.
M2	20	Amend Policy HBE2 to replace "houses" with "dwellings" and "house" with "housing"	The Policy is intended to relate to dwellings or homes and is not restricted to "houses".	Agree to modify the text as indicated to comply with the examiner's recommendations.
M3	21	Amend Policy HBE3 to replace the text after "Garforth" in the second sentence with "and affordable homes which meet the needs of younger and older people will be supported."	Definitions of "younger" and "older" persons are provided in the Glossary but not in the supporting text. There is a lack of clarity as to what is meant by a "high proportion" or "low proportion" meaning the Policy does not provide necessary certainty.	Agree to modify the text as indicated to comply with the examiner's recommendations.
OM2	21	[Provide definitions for of "younger" and "older" persons in		Agree to modify the text as indicated to

		the supporting text or by reference to the Glossary]		comply with the examiner's recommendations.
M4	23	Amend Policy HBE5 to delete the second sentence.	There is no evidence supporting the use of water butts over other methods for increasing water efficiency and this should otherwise be a matter for the applicant. It would be appropriate to indicate support for particular measures in the supporting text.	Agree to modify the text as indicated to comply with the examiner's recommendations.
M5	23	Amend Policy HBE6 to: <ul style="list-style-type: none"> <li>• In the first sentence replace "in order" with "where necessary"</li> <li>• In the second sentence replace "should" with "that"; the first "and" with "and/or"; and ", wherever possible" with "will be supported"</li> <li>• Replace the final sentence with "Hard standing areas which are permeable will be supported."</li> </ul>	The Policy drafting is more directional than others in this section, identifying a need to provide measures "wherever possible". The evidence base does not support such a prescriptive approach in relation to water quality. National planning policy on sustainable drainage systems is to expect them to be provided in relation to major development or where there is evidence of a clear flood risk (NPPF, paragraphs 167 and 169). The Policy also expects provision of particular attenuation measures when developers may prefer alternative ways to reduce surface water run off rates.	Agree to modify the text as indicated to comply with the examiner's recommendations.
M6	23	Amend Policy HBE7 to:	Policy HBE7 is highly restrictive in permitting surface water discharge only where it currently	Agree to modify the text as indicated to

		<ul style="list-style-type: none"> <li>• Replace “will only be permitted if” with “should demonstrate that”</li> <li>• Replace “if the” with “and”</li> </ul>	<p>exists and can be managed to greenfield levels. While there is some evidence of flood risk within the Lin Dyke catchment this is insufficient to support such a prescriptive approach. Existing development plan policy already states that “On sites which have not previously been connected to the drainage infrastructure, or watercourse, surface water run off rates will not exceed the ‘greenfield’ run-off rate” (Policy Water 7, Natural Resources and Waste Local Plan) and national planning policy is that policies should “serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area” (NPPF, paragraph 16f)). of the neighbourhood area. My recommended modification makes the Policy less prescriptive.</p> <p>I have considered whether Policy HBE7 serves a clear purpose and is positively prepared and conclude that there is value in the Plan amplifying the significance of existing development plan policy in relation to the Lin Dyke catchment given it includes the majority of the neighbourhood area. My recommended modification makes the Policy less prescriptive.</p>	<p>comply with the examiner’s recommendations.</p>
OM3		[Rename Appendix 4 as “Garforth Character Assessment”]	The policies in this section are supported by a Character Assessment which identifies seven character areas within the built up area of Garforth.	Agree to modify the text as indicated to comply with the

			It would be helpful if Appendix 4 was retitled Garforth Character Assessment to provide clarity as to the document which should be considered.	examiner's recommendations.
M7	26	Amend Policy HBE8 to replace "houses" with "dwellings"	The Policy is informed by spatial planning principles developed by Public Health England and the drafting is positively worded and supportive. The Policy is intended to relate to dwellings or homes and is not restricted to "houses".	Agree to modify the text as indicated to comply with the examiner's recommendations.
M8	27	Amend Policy HBE9 to read "Proposals for development within any of Garforth's character areas (as shown in Map 4) should have regard to the Garforth Character Assessment (Appendix 4)."	<p>As drafted the Policy would apply to all development, including changes of use and minor development without any impact on local character and to other developments for which a requirement to demonstrate consideration of the character area would be disproportionate. There may also be developments in the neighbourhood area which fall outside any of the character areas.</p> <p>The Policy includes "guiding principles" for each character area. These are selectively drawn from the summary of the Character Study provided in Appendix 4 and the rationale for what is included within the Policy and what remains in the Appendix is unclear.</p> <p>This is especially the case with selective references to some but not all of the proposed Local Green Spaces and Non Designated Heritage Assets. The</p>	Agree to modify the text as indicated to comply with the examiner's recommendations.



			selective inclusion of guiding principles creates ambiguity which can be addressed by simplifying the Policy so development has regard to the full range of issues identified in the Character Study. This will include all the matters currently identified in the Policy	
OM4	28	<p>[Amend Policy HBE10 to:</p> <ul style="list-style-type: none"> <li>• In the second line replace “for” with “to” In section a) replace “,” with “means that”</li> <li>• At the end of section e) insert “; and”]</li> </ul>	I visited the site and consider the issues identified in the Policy to be appropriate and reasonable albeit that the site now has an extant planning permission. It is unnecessary for the Policy to reference other development plan policies as all policies must be considered when determining a planning application. Section a) is poorly drafted and it is a planning convention to have regard “to” instead of “for”. The drafting can also make it clearer that all the considerations apply,	Agree to modify the text as indicated to comply with the examiner’s recommendations.
M9	31	<p>Amend Map 6 to:</p> <ul style="list-style-type: none"> <li>• Be of a scale and clarity that enables the location of each asset to be accurately identified</li> <li>• Provide a Key to all maps</li> <li>• Replace “Non-Listed” with “Non-designated” in the Key</li> </ul>	<p>The location of each non-designated heritage asset is shown on Map 6 and an expanded version. The latter map lacks a Key and neither map is of a sufficient scale to be able to locate the asset with sufficient accuracy. Map 6 also describes non-designated heritage assets as “non-listed”</p> <p>Four potential non-designated heritage assets have been identified just outside the neighbourhood area. Given they are not within the formal scope of</p>	Agree to modify the text and Map 6 as indicated, and provide a key to all maps, to comply with the examiner’s recommendations.

		<ul style="list-style-type: none"> <li>Remove reference to heritage assets outside the neighbourhood area</li> </ul>	<p>the Plan they are appropriately addressed by a Project to have them recognised by Leeds City Council. They are, however, also identified on Map 6 and the expanded version as relating to Policy HBE13. If a map is needed for these four assets then it should be separate to that supporting the Plan policy.</p> <p>Eight listed heritage assets are also identified although, unusually, one is described as “not found” and potentially removed during road widening. It would be helpful to clarify the position with Leeds City Council and Historic England to ensure the Plan contains the most up to date information. To be consistent the assets photographed on page 30 should be described on page 29 as “non-designated heritage assets”.</p>	
M10	32	Delete Policy HBE11	The Policy is positively worded and supportive but serves no clear purpose as it duplicates Leeds Core Strategy Policy P11 and adds no additional local dimension.	Agree to modify the text as indicated to comply with the examiner’s recommendations.
M11	32-33	Amend Policy HBE12 to <ul style="list-style-type: none"> <li>In the first line replace “were” with “are”</li> </ul>	The Policy drafting includes an explanation of the process through which the assets were identified, including the potential for future additions. This is	Agree to modify the text as indicated to comply with the

		<ul style="list-style-type: none"> <li>• In the second line insert “:” after “Assets” and delete remaining two lines to “future”</li> <li>• Delete assets numbered 6, 7, 8, 9, 18, 33, 35, 42 and 57</li> </ul>	<p>best addressed in the supporting text. It is drafted in the past and not present tense.</p> <p>105.</p> <p>I visited a majority of the proposed non-designated heritage assets, including all those where the description in Appendix 2 is limited. I am satisfied with the evidence base for a majority but not all of the proposals. A key consideration is that age alone is not sufficient to warrant inclusion without further evidence that the assets retain sufficient historic significance in the present day. Consequently I do not consider there to be sufficient evidence to include the following assets as the only description of their significance relates to their age:</p> <p>6. Dar Villas</p> <p>7. The Beeches</p> <p>8. Garforth House</p> <p>9. Westbourne House</p> <p>18. Hilderthorpe Terrace</p> <p>35. Firthfield</p> <p>I do not consider there to be sufficient evidence of the heritage value of more recent buildings of 33. St</p>	<p>examiner’s recommendations.</p>
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			<p>Armands Court and 42. Library and One-stop Centre notwithstanding their positive contribution to the townscape.</p> <p>There is also insufficient information on 57. Lines Way, including a lack of detail on the boundaries of this linear asset which passes through a significant part of the neighbourhood area.</p>	
M12	35	Delete Policy HBE13	<p>The supporting text relates only in general terms to the Policy as it considers a wide range of sustainability issues and the Policy relates only to the location of new housing development. The Policy considers only the “principle of residential development” and I do not consider it to serve a clear purpose. The principle of development being focused on site allocations and infill sites and not coming forward on greenfield sites outside the development plan is established both in the Leeds Core Strategy (e.g. Spatial Policy 6) and national planning policy (e.g. Paragraph 120).</p>	<p>Agree to modify the text as indicated to comply with the examiner’s recommendations.</p>
M13	36	<p>Amend Policy HBE14 to:</p> <ul style="list-style-type: none"> <li>• Replace “maximise” with “improve</li> <li>• Delete subsections k) and l)</li> </ul>	<p>The Policy is drafted to require development proposals to “maximise” energy efficiency. Energy efficiency requirements are a matter for Building Regulations and it is only appropriate for planning policies to support higher levels of energy efficiency.</p>	<p>Agree to modify the text as indicated to comply with the examiner’s recommendations.</p>

			It is unclear how provision of water butts contributes to energy efficiency and subsection l) is addressed by the final paragraph.	
M14	36	Amend Policy HBE15 to: <ul style="list-style-type: none"> <li>• Replace “must” with “should”</li> <li>• Delete from the second instance of “development” to end</li> </ul>	The Policy references a Leeds City Council document without providing details and it is unnecessary to duplicate existing planning requirements as specified in an adopted Supplementary Planning Document. The drafting is unduly assertive in stating what “must” be provided.	Agree to modify the text as indicated to comply with the examiner’s recommendations.
M15	36	Amend Policy HBE16 to replace “must” with “should”	The drafting is unduly assertive in stating how development “must” be designed.	Agree to modify the text as indicated to comply with the examiner’s recommendations.
<b>Business Employment and the Town Centre (BETC)</b>				
M16	41	Amend Policy BETC1 by: <ul style="list-style-type: none"> <li>• Replacing the first sentence with “The employment sites on the Newhold Industrial Estate (Map 7)</li> </ul>	The Policy refers to four employment sites. It incorrectly references these as being shown on Map 11 instead of Map 7. Map 7 shows only two sites – Lotherton and Newhold Industrial Estates. Three of the four sites are on the Newhold Industrial Estate	Agree to modify the text as indicated to comply with the examiner’s recommendations.

		<p>allocated in the Site Allocations Plan (2019) will be safeguarded in their existing uses.”</p> <ul style="list-style-type: none"> <li>• In the second sentence replace “will not be supported unless it is demonstrated” with “should demonstrate”</li> <li>• Delete the numbered parts of the Policy identifying four locations</li> </ul>	<p>(incorrectly identified as “Newhold Estate”) and these are merged into one area in Map 7. The single area shown in Map 7 is not the same as the site allocation on the Leeds Policies Map. My recommended modification seeks to remove ambiguity from the way the locations of the allocated sites in Newhold Industrial Estate are identified.</p> <p>Leeds City Council has confirmed that Lotherton Industrial Estate is not allocated in the Site Allocations Plan as it is in a range of existing employment uses.</p> <p>The supporting text identifies Policy BETC1 as adopting a more restrictive approach than Leeds Core Strategy Policy EC3. The neighbourhood area is not in an “area of shortfall” for the purposes of the Leeds Core Strategy and so the test for Newhold Industrial Estate as an allocated site is whether “The proposal would not result in the loss of a deliverable employment site necessary to meet the employment needs during the plan period”. Policy BETC1 will also require proposals involving a change of use away from employment to demonstrate a lack of viability in employment use through a minimum six month marketing period. I note that Leeds City Council requires a 12 month period to</p>	
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			<p>demonstrate non-viability in relation to unallocated employment sites in employment use and so do not consider Policy BETC1's 6 month test on an allocated site to be unduly restrictive. The Policy is negatively worded in stating what "will not be supported".</p> <p>The effect of Policy BETC1 on Lotherton Industrial Estate will be to reduce the ability to control changes of use away from employment uses by comparison to existing Local Plan policy by introducing a six instead of a 12 month marketing period in order to demonstrate a lack of viability. This is contrary to the intention of the Policy and I recommend reference to the Lotherton Industrial Estate is deleted.</p>	
M17	41	<p>Amend Map 7 to</p> <ul style="list-style-type: none"> <li>• Retitle it as "Policy BETC1 – Newhold Industrial Estate</li> <li>• Delete Lotherton Industrial Estate</li> <li>• Amend the boundary of Newhold Industrial Estate to align with the Leeds Policies Map and the site</li> </ul>		<p>Agree to modify the text and Map 7 as indicated to comply with the examiner's recommendations.</p>

		<p>allocations EG1-40, EG1-41 and EG1-42</p> <ul style="list-style-type: none"> <li>• Replace “Employment Sites” with “Newhold Industrial Estate” in the Key</li> </ul>		
M18	41-42	<p>Amend Policy BETC2 to</p> <ul style="list-style-type: none"> <li>• Insert “significant” before “adverse” in sections a), g) and h)</li> <li>• Delete “and in line with LCC standards” in section e)</li> <li>• Delete “, such as drainage, highways” in section f)</li> <li>• Insert “; and” at end of section g)</li> <li>• Delete “e.g. screening by tree/hedge planting” in section h)</li> </ul>	<p>The Policy is enabling and positively worded. In three instances it would not support development with only minor adverse impacts and this is disproportionate. There is a lack of clarity as to the “LCC standards” referenced in the policy and duplication with existing planning policies should be avoided, including in relation to saved policies in the Unitary Development Plan. The Policy should be clear in identifying the specific infrastructure issues that need to be addressed or how pollution should be avoided or otherwise provide examples in the supporting text. It is unclear whether all the considerations should be addressed.</p>	<p>Agree to modify the text as indicated to comply with the examiner’s recommendations.</p>
OM5	BETC3 Page 43	<p>[Insert “from” before “within Garforth”]</p>	<p>There is an opportunity to improve its clarity of drafting.</p>	<p>Agree to modify the text as indicated to comply with the examiner’s recommendations.</p>
M19	46	<p>Amend Map 8 to:</p>	<p>The policies in this section relate to an area depicted in Map 8 which shows both the Town</p>	<p>Agree to modify Map 8 as indicated to</p>



		<ul style="list-style-type: none"> <li>• Show the Town Centre Boundary as provided in the Site Allocations Plan</li> <li>• Show the Town End boundary as shown in the amended Map 9</li> <li>• Remove Policy BETC9 from the title</li> <li>• Be of a scale and quality that is equivalent to the Site Allocations Plan</li> </ul>	<p>Centre and Town End. No evidence is provided for the boundary identified and I was informed that the Town Centre boundary was intended to align with that already agreed in Leeds Site Allocations Plan. The scale and quality of Map 8 does not clearly show the boundary of the Town Centre and it should be depicted at a scale at least as clear as that used in the Site Allocations Plan. The Town Centre boundary in the Plan is also larger than than in the Site Allocations Plan with the inclusion of Town End and this is shown in more detail in Map 9. I was informed that this area is considered to be part of the Town Centre and, having visited the area, I am content with the approach. The area should include that proposed for a car park in Policy BETC9 given the functional and visual relationship.</p>	<p>comply with the examiner's recommendations.</p>
M20	46	<p>Identify the boundary for the Town Centre as being defined in Leeds Site Allocations Plan in the supporting text</p>		<p>Agree to modify the text as indicated to comply with the examiner's recommendations.</p>
M21	47	<p>Amend Map 9 to</p> <ul style="list-style-type: none"> <li>• Show Town End as a single area including the proposed car park</li> </ul>		<p>Agree to modify Map 9 as indicated to comply with the</p>

		<ul style="list-style-type: none"> <li>• Show the proposed car park as an area within Town End</li> <li>• Additionally reference Policy BETC 9 in the title</li> <li>• Be of a scale and quality that is equivalent to the Site Allocations Plan</li> </ul>		examiner's recommendations.
M22	44	<p>Amend Policy BETC4 to:</p> <ul style="list-style-type: none"> <li>• Insert "and Town End" after "Town Centre" in two instances</li> <li>• Delete the last paragraph</li> </ul>	<p>The Policy is intended to apply to Town End as well as the Town Centre as depicted in the Site Allocations Plan.</p> <p>The Policy drafting is enabling and positively worded except in relation to hot food takeaways. No evidence is provided for a restrictive approach beyond a single reference to public concern about "Too many takeaways" at a 2015 workshop. On request I was informed of the Leeds Observatory health profile for the ward confirms that the incidence of obesity is one of the highest within the city although no reference for this work was given to me. I was also informed the policy follows that of Leeds City Council's 2019 Supplementary Planning Document Hot Food Takeaways "the guidelines in which have been followed". Given the limited evidence and that the approach follows that in an existing Supplementary Planning Document I do not</p>	Agree to modify the text as indicated to comply with the examiner's recommendations.

			consider that this part of the Policy serves a clear purpose.	
M23	44	Amend Policy BETC5 to insert “and Town End” after “Centre”	The Policy should relate also to Town End.	Agree to modify the text as indicated to comply with the examiner’s recommendations.
M24	45	Amend Policy BETC6 to insert “and Town End” after “Centre”	The Policy is enabling and positively worded. For clarity it needs to recognise its application to Town End.	Agree to modify the text as indicated to comply with the examiner’s recommendations.
M25	45	Amend Policy BETC7 to: <ul style="list-style-type: none"> <li>• In the first line insert “in the Town Centre and Town End (as shown on Map 8” after “frontages”</li> <li>• Replace section a) with “the Garforth Character Assessment (Appendix 4), including Character Area 7 (as shown in Map 4)”</li> <li>• In section b) replace “town centre” with “Town Centre and Town End”</li> </ul>	The Policy is enabling and positively worded. For clarity it needs to specify its application to the Town Centre, including Town End. The reference to other policies in the Plan does not serve a clear purpose as all policies must be considered when determining a planning application. I propose modifications to the way the Policy addresses the character area assessment to be consistent with the approach to character areas in Policy HBE9. I note that character area 7 does not include the full area of Town End, including the proposed car park. It is unclear whether all the considerations should be addressed.	Agree to modify the text as indicated to comply with the examiner’s recommendations.

		<ul style="list-style-type: none"> <li>• Insert “and Town End” after “Town Centre” in three instances</li> <li>• Insert “; and” at end of section e)</li> </ul>		
OM6	45	[Provide supporting text which identifies and justifies the approach to Town End in Policy BETC8]	The Policy is enabling and positively worded. There is no supporting text justifying the approach to Town End. It is unnecessary and serves no clear purpose to reference other Plan policies although the general nature of the Policy does not make this a matter for the Basic Conditions. It is unclear whether all the considerations should be addressed.	Agree to modify the text as indicated to comply with the examiner’s recommendations.
OM7	45	[Replace “reflect the Neighbourhood Plan town centre policies of” with “contribute to” and insert “; and” at end of section b)]		Agree to modify the text as indicated to comply with the examiner’s recommendations.
M26	49	Amend Policy BETC9 to: <ul style="list-style-type: none"> <li>• Insert “where it can demonstrate the need for additional parking provision and is” after “supported”</li> <li>• In section b) delete from “at a rate” to end and insert “for 10% of parking</li> </ul>	The evidence supporting a new car park is relatively limited. The Plan asserts periods of “gridlock” and provides some evidence of parking spaces being used all day thereby restricting access for short term users of Main Street. One representation raises issues relating to traffic and parking. A 2012 study by Leeds City Council included recommendations for a relatively modest increase	Agree to modify the text as indicated to comply with the examiner’s recommendations.

		<p>spaces ensuring that electricity infrastructure is sufficient to enable further points to be added at a later stage.”</p> <ul style="list-style-type: none"> <li>• In section c) delete “in accordance with Leeds Transport SPD”</li> <li>• Insert “; and” at end of section c)</li> <li>• Begin section d) at “Future adaptability”</li> </ul>	<p>in the area of car parking and focused more on the management of existing parking spaces. The Policy must also be considered alongside other policies in the Plan supporting alternatives to car use (e.g. Policy BETC 6, Policy T1). Given this context my recommended modification requires further evidence of the need for additional public car parking space before the Plan can support the proposal.</p> <p>The supporting text should also explain the rationale for locating new provision on the site identified in Map 9 and the current use and ownership of the site.</p> <p>There is no clear purpose in duplicating requirements in Leeds Core Strategy or Supplementary Planning Documents. I note that Core Strategy Policy EN8 does not directly address electric vehicle charging infrastructure in relation to new public car parks but consider it reasonable to apply the same standards as for “Office/Retail/Industrial/Education”. Policy EN8 and the full details of “Leeds Transport SPD” should be referenced in the supporting text.</p> <p>The fact of anticipated changes in future demand for parking is not a matter of planning policy and should be addressed as justification for the Policy</p>	
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			drafting in the supporting text. It is unclear whether all the considerations should be addressed.	
<b>Transport</b>				
M27	53	<p>Amend Policy T1 to:</p> <ul style="list-style-type: none"> <li>• In the third line replace “must” with “should”</li> <li>• In the fifth line replace “or to providing” with “or make provision for new walking and cycling infrastructure”</li> <li>• In the sixth line insert “the existing Public Rights of Way Network,” before “public”</li> </ul>	The drafting is overly prescriptive in stating what “must” be demonstrated and lacks clarity in relation to the provision of new infrastructure. With a small addition the Policy also addresses all the matters included in Policy T2.	Agree to modify the text as indicated to comply with the examiner’s recommendations.
M28	53	Delete Policy T2	Policy T2 is already addressed by the final sentence of Policy T1 in respect of major development. It is disproportionate to require all housing and employment development to demonstrate how active travel measures have been provided and so it is appropriate for this to be focused on major development. I recommend a small modification to Policy T1 so it also addresses the existing Public Rights of Way Network	Agree to modify the text as indicated to comply with the examiner’s recommendations.

Green Space and the Rural Environment				
M29	Throughout	Use consistent naming and numbering for Local Green Spaces throughout the Plan and its appendices	Policies GSRE1 to GSRE4 address a large number of locations throughout the neighbourhood area. Many of these also use the identification number in the Leeds Site Allocations Plan. There is some inconsistency in the naming of the same site in different policies (e.g. G1232 is Goosefieds in Policy GSRE1, Goosefield Westbourne Avenue in Policy GSRE3 and both Goosefields and Long Meadows/Shaw Close in Policy GSRE4) and some errors in the use of identification numbers (e.g. Green Lane cricket club is G1228 in Policy GSRE1 and G1128 in Policy GSRE4). Some different variations in naming are also used in Appendix 9.	Agree to modify the text as indicated to comply with the examiner's recommendations.
M30	62	Amend Policy GSRE1 to replace the first paragraph with "The following sites as shown in Map 16 are designated as Local Green Spaces:"	The Policy is supported by Map 13 showing 23 green spaces designated in the Site Allocations Plan. The supporting text incorrectly states there are 24 such allocations on pages 57 and 60. Map 16 (with an expanded version that lacks a Key) shows the location of all the proposed Local Green Spaces. The quality and scale of the maps is too poor to enable the detailed boundaries to be located and the boundaries between adjacent areas are not shown with the result that they merge into each other.	Agree to modify the text as indicated to comply with the examiner's recommendations.

			<p>Detailed boundaries can be found in a combination of the Site Allocations Plan and Appendix 9 (for the newly designated locations). Map 13 also includes Green Space outside the neighbourhood area and some locations not included in the 42 sites to be designated.</p> <p>One site designated in the Site Allocations Plan was not taken forward at the request of the landowner and another was considered not to be at risk of development. The location of some of the numbers on Map 16 obscures the location of the proposed Local Green Spaces (e.g. 3, 4, 6, 9, 11, 12, 15, 16, 17, 18). Site 34 is incorrectly identified as Kennett Lane Meadows instead of Long Meadows.</p> <p>There is evidence of wide public support for the proposals. Site notices were placed at each of the 19 new locations during public consultation on the Plan. The Community Project on page 64 incorrectly references up to 20 additional Local Green Spaces.</p> <p>The 23 sites designated in the Leeds Site Allocation Plan are recognised in Policy G6.</p> <p>While this is not equivalent to Green Belt policy as for a Local Green Space the process for identifying the locations in the Site Allocations Plan through the Unitary Development Plan or the Leeds Open</p>	
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			<p>Space Sport and Recreation Assessment (2011) is equivalent to the requirements of national planning policy for identifying Local Green Spaces (paragraph 102, NPPF). Leeds City Council has indicated it is content with this approach.</p> <p>The results of the assessment of the 19 additional sites identified through the neighbourhood planning process are provided in Appendix 9. This includes some but not all of the considerations in national planning policy and includes an additional consideration relating to green infrastructure. I am satisfied with the broad approach although it offers a minimum of the evidence required.</p> <p>I visited each of the 19 additional sites during my visit and broadly agree with the assessment. In some locations there have been changes since the assessment was completed – e.g. Site 1 has no football posts and has had some tree planting.</p> <p>I recommend a small amendment to the boundary of Site 16 to exclude both the building and the small area of road to the front.</p> <p>To be afforded a level of protection consistent with them being Green Belt, Local Green Spaces need only be designated by the Plan. This follows a Court of Appeal case relating to a Local Green Space</p>	
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			<p>policy in a neighbourhood plan (Lochailort Investments Limited v. Mendip District Council and Norton St Philip Parish Council, [2020] EWCA Civ 1259) which means it is inappropriate without clear justification to include any wording that sets out how development proposals should be managed.</p> <p>The sites identified in the Policy are Local Green Spaces as a result of the neighbourhood plan and not “LCC” Local Green Spaces. It is more appropriate for the description of how the sites designated which are also in the Leeds Site Allocation Plan are identified as part of the supporting text.</p>	
M31	56-62	<p>Amend the supporting text and Maps to:</p> <ul style="list-style-type: none"> <li>• Amend the boundary of Site 16 to exclude both the building and the small area of road to the front</li> <li>• Correctly identify the number of sites designated in the Site Allocations Plan</li> <li>• Explain the use of identification numbers consistent with those used</li> </ul>		<p>Agree to modify the text and Maps as indicated to comply with the examiner’s recommendations.</p>

		<p>by the Site Allocations Plan Provide direct links to maps of a quality and scale that enables the boundary of each Local Green Space to be identified</p> <ul style="list-style-type: none"> <li>• Exclude locations designated in the Site Allocations Plan that lie outside the neighbourhood area</li> </ul>		
M32	59	Number the locations of each of the four proposed children's play areas in Policy GSRE3 on Map 15	The proposed locations are shown on Map 15. This does not number the proposals and so there is a lack of clarity as to the location of the sites included in the Policy. The scale and clarity of the map is also poor.	Agree to modify Map 15 as indicated to comply with the examiner's recommendations.
M33	63	Amend Policy GSRE4 to replace the first four lines with "Proposals to improve the following sites to the overall quality standard in Core Strategy Policy G3 will be supported:"	<p>The Policy is supported by an analysis in the Green Space Background Paper prepared for the Site Allocations Plan by Leeds City Council. This reviews each of the Green Spaces designated in the Plan against quality measures and those included in Policy GSRE4 do not meet the required standard.</p> <p>The drafting of the Policy includes the rationale which is better provided in the supporting text to improve the clarity of the Plan.</p>	Agree to modify the text as indicated to comply with the examiner's recommendations.

M34	69	<p>Replace Policy GSRE5 with:</p> <p>“Policy GSRE5 – Public Rights of Way Networks – trees and hedgerows</p> <p>Where appropriate development proposals should retain trees and hedgerows along the Public Rights of Way Network (as shown in Map 11) and additional tree and hedgerow planting in these locations will be supported.”</p>	<p>The Policy is supported by two maps. Map 11 shows the Public Rights of Way Network and Map 17 shows Green Corridors. The purpose of Map 11 is unclear as there is no necessary relationship between Green Corridors and rights of way. Map 17 is also based on the Rights of Way Network and no other evidence is provided to support the location of the Green Corridors beyond a statement that they “have been identified by local knowledge”. When evidence was requested I was informed that “the location of the green corridors was based on the LCC PROW map of the area (map 11). This map was amended to remove the hard surfaced footpaths situated within the housing estates. It also includes a possible extension to the Lines Way based on the original track of the railway line”. The Glossary defines Green Corridors as Wildlife Corridors - “areas of habitat connecting wildlife populations”. This is a narrow definition of the role of Green Corridors as described on page and no evidence has been provided of the wildlife interest of the locations identified. I conclude that it is not appropriate to identify the rights of way in Map 17 as Green Corridors. It is also unclear that the Lines Way extension is intended to be treated as a Green Corridor.</p>	<p>Agree to modify the text as indicated to comply with the examiner’s recommendations.</p>
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			My visit confirmed that trees and hedgerows are a feature of the Public Rights of Way Networks and my proposed modification addresses this.	
M35	69	Replace Policy GSRE6 with “Development proposals should have regard to the opportunities to improve links between the green infrastructure shown in Map 18 including those identified in the Garforth Character Assessment.”	<p>The Policy is supported by Map 16. This shows a wealth of other environmental information in addition to the identified green infrastructure opportunities and it is unclear how this information relates to the Policy. No evidence is provided for the locations identified as green infrastructure opportunities beyond reference to “a mapping exercise which has identified existing green spaces, green corridors and other parts of the green infrastructure network identifying opportunities to link them together”. There are no details of this mapping exercise and none were provided when further evidence was requested. It was also acknowledged that there is no identified “Green Infrastructure Network”.</p> <p>The benefits of improved linkages between different areas of green space and habitat are well understood but there needs to be a clear evidence base to support identifying specific locations. There could be multiple other ways in which linkages could be made to those shown in Map 18. Map 18 additionally shows the Green Corridors which also lack an evidence base.</p>	Agree to modify the text as indicated to comply with the examiner’s recommendations.

			My recommended modification addresses the opportunities for making links between existing green spaces and habitats without specifying the locations.	
M36	68	Rename Map 18 as “Green Infrastructure” and delete the “Green Infrastructure Opportunities” and “Green Corridors”		Agree to modify Map 18 as indicated to comply with the examiner’s recommendations.
M37	70	Amend Policy GSRE7 to: <ul style="list-style-type: none"> <li>• In the third line replace “must” with should</li> <li>• Replace “PROW” with “Public Rights of Way” in the title and three other instances</li> <li>• Delete “and Green Infrastructure Network”</li> </ul>	The drafting is overly restrictive in stating what “must” happen and uses the acronym “PROW”. The Policy supports new routes being provided by development which link to the “Green Infrastructure Network”. No details are provided on the location of this Network and I was informed the Green Infrastructure Network is “not actually identified in the Plan”.	Agree to modify the text as indicated to comply with the examiner’s recommendations.
M38	70	Amend Policy GSRE8 to: <ul style="list-style-type: none"> <li>• Replace “must preserve” with “should protect”</li> <li>• Replace the last sentence with “Improved connectivity between the</li> </ul>	From my visit it is clear that as a former railway line the Lines Way makes a distinct contribution to connectivity in the neighbourhood area. The existing route is not shown in Map 17 other than as one of many Green Corridors. The relationship between the Lines Way extension in Map 17 and the support for improved connectivity to the Lines	Agree to modify the text as indicated to comply with the examiner’s recommendations.

		existing Lines Way and the Local Green Space at Green Lane Cricket Club via the Lines Way Extension shown in Map 17 will be supported.”	Way from Green Lane Cricket Club also lacks clarity. The Policy is unduly restrictive in stating development “must preserve” connectivity. I note representations from Chris Hardy that security considerations should rule out an extension of the Lines Way. I am satisfied, however, that this issue can be addressed during consideration of a relevant planning application.	
M39	69	Amend and retitle Map 17 to delete the “Green Corridors” and show both the existing Lines Way and the “Proposed Lines Way Extension”		Agree to modify Map 17 as indicated to comply with the examiner’s recommendations.
OM8	78	[Insert “;and/or” at end of section c)]	The Policy addresses relevant considerations and seeks improved environmental outcomes. It is unclear whether all the considerations should be addressed.	Agree to modify the text as indicated to comply with the examiner’s recommendations.
M40	78	Amend Policy GSRE10 to: <ul style="list-style-type: none"> <li>• Insert “Priority Habitat and” before all instances of “Leeds Habitat Network”</li> <li>• In the second line delete “and include measures that would fill in gaps or further</li> </ul>	The Policy is supported by information on the Leeds Habitat Network shown in Map 22 although no reference is provided. It also relates to the Priority Habitat shown on Map 26 and Map 22 though not identified in the title of Map 22 and not mentioned in the Policy.	Agree to modify the text as indicated to comply with the examiner’s recommendations.

		<p>extend the Leeds Habitat Network”</p> <ul style="list-style-type: none"> <li>• Replace “must” with “should”</li> <li>• Insert “; and” at end of section b)</li> </ul>	<p>There is unnecessary overlap between the first and second paragraphs in supporting development which fills in gaps or extends the existing network. The Policy is unduly restrictive in stating what “must” be demonstrated. It is unclear whether all the considerations should be addressed.</p>	
M41	74	<p>In the title of Map 22 replace “Biodiversity” with “Priority Habitat” and provide a reference to the Leeds Habitat Network (and link) in the supporting text</p>		<p>Agree to modify the text as indicated to comply with the examiner’s recommendations.</p>
M42	79	<p>Delete Policy GSRE11</p>	<p>The best and most versatile agricultural land is a strategic resource and planning policies for the protection of agricultural land are a strategic matter addressed in national planning policy and the Local Plan (e.g. saved UDP Policy N35). Policy GSRE11 recognises the strategic nature of this land resource and applies the same approach as Natural England would in its consideration of development proposals. There is no local evidence or insight in the application of the Policy and so I conclude that it serves no clear purpose and addresses a strategic matter.</p>	<p>Agree to modify the text as indicated to comply with the examiner’s recommendations.</p>
M43	79	<p>Replace Policy GSRE12 with “Development proposals which</p>	<p>The first paragraph is an explanation of current and potential future planning requirements and does</p>	<p>Agree to modify the text as indicated to</p>



		include features that support wildlife, including swift bricks, bat boxes and wildlife corridors that improve connectivity, will be supported.”	not constitute a planning policy. The second, unnecessarily bulleted, paragraph should be drafted as a freestanding policy and it is unnecessary to specify the need for agreement with the local planning authority as this is a consequence of any development management decision.	comply with the examiner’s recommendations.
M44	79	<p>Amend Policy GSRE13 to:</p> <ul style="list-style-type: none"> <li>• In the first sentence delete from “characteristics” to end and replace with “character of Garforth”</li> <li>• In section a) <ul style="list-style-type: none"> <li>○ replace “will only be supported” with “should demonstrate”</li> <li>○ in i. delete “It can be demonstrated” and insert “reasonable” before “alternative”</li> <li>○ in ii. delete from “consistent” to end</li> <li>○ in iii. delete from “Garforth” to the end and replace</li> </ul> </li> </ul>	<p>The Policy is supported by Map 21 summarising key elements of landscape character, including key views, individual trees and hedgerows. Map 21 is incorrectly referenced as Map 18 on page 74.</p> <p>The first part of the Policy serves no clear purpose where it duplicates strategic Policy P12 in the Leeds Core Strategy and Policy LAND2 in the Natural Resources and Waste Local Plan.</p> <p>Section a) is negatively drafted and partly overlaps with existing planning policy.</p> <p>Section b) seeks to protect 31 key views identified in Map 21. The quality and scale of this Map means it is difficult precisely to locate each view. The views are classified into Very Long, Long and Medium views in Appendix 6 which includes a photograph for each view and a very brief descriptive notation. There is very little evidence supporting either the identification of the views or describing what is significant about them. On requesting further</p>	Agree to modify the text as indicated to comply with the examiner’s recommendations.

		<p>with “the neighbourhood area”</p> <ul style="list-style-type: none"> <li>○ in iv. replace “the LCC Land” with “Local Plan”</li> <li>• in section b) replace “must not significantly alter or harm” with “should have regard to”</li> </ul>	<p>information I was told “the selection of these sites was taken by the Steering group and reflects the views expressed by Garforth residents throughout the public consultations”.</p> <p>The number and extent of the key views means that they will be relevant to development proposals across the neighbourhood area and the Policy approach – “must not significantly alter or harm” – is potentially restrictive. There is an added ambiguity as to what elements of each view should not be significantly altered or harmed. I conclude that while it is appropriate to retain the key views in the Plan the policy approach should not be so restrictive in light of the limited evidence on which the views are based.</p> <p>Section d) relates to specific landscape features shown on Map 21. The Policy references “Trees edging Garforth Cliff” but these are not shown on Map 21. I was informed that this could be corrected.</p>	
M45	75	Amend Map 21 to show the trees edging Garforth Cliff		Agree to modify Map 21 as indicated to comply with the examiner’s recommendations.

M46	80	<p>Replace the first three lines of Policy GSRE14 with:</p> <p>“Development proposals which help realise opportunities for new hedgerows and small-scale woodland planting in line with the Leeds Landscape Assessment in the following locations, as shown on Map 25, will be supported:”</p>	<p>The planting of trees and hedges does not require planning consent and the Policy needs to relate to development which is relevant to the identified planting opportunities.</p> <p>No rationale for the sites identified in the Policy is provided and the Leeds Landscape Assessment does not address the urban area of Garforth. On request I was informed that these are “the largest green space sites left within Garforth”. While this is not true of Main Street and size is not necessarily the best guide for the location of new planting this is a positively worded enabling Policy and I am content with the approach. It is consistent with Local Plan policies LAND 2 and G2. The name used for each of the locations should be consistent with that used in Policy GSRE1.</p> <p>There are differences between the sites shown in Map 25 and those listed in Policy GSRE14. The boundary of LGS22 Glebelands is different to that in Map 16 (and includes some of LGS21) and LGS42 East Garforth Field is not shown on Map 25. The area south east of Garforth station shown on Map 25 is intended to be LGS3 but shown in a different location.</p> <p>The second part of the Policy serves no clear purpose as it duplicates Policy LAND2 in the Natural</p>	<p>Agree to modify the text as indicated to comply with the examiner’s recommendations.</p>
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			Resources and Waste Local Plan and could have a contradictory impact if the Local Plan was to be reviewed to increase the requirement.	
M47	75	Amend Map 25 to make the boundaries consistent with those used to support Policy GSRE1 and use consistent names for the same sites where referenced in different policies		Agree to modify Map 25 as indicated to comply with the examiner's recommendations.
<b>Community and Leisure</b>				
M48	84	Amend Policy CL1 to: <ul style="list-style-type: none"> <li>• Delete "will not be supported" to end of sentence and replace with "should make provision for alternative equivalent facilities in Garforth or demonstrate that there is an insufficient level of need."</li> <li>• In the second sentence replace "and are" with "which shows they are"</li> </ul>	The Policy is supported by Map 27 (and an enlarged version without a Key) identifying the location of 45 community facilities and two additional locations outside the neighbourhood area. For consistency with the title of Policy CL1 the Map should identify "community and leisure" facilities. The Plan's policies cannot address issues outside the neighbourhood area. There is a community ambition to have one location outside the neighbourhood areas designated as an Asset of Community Value and this can be identified in a separate Map which is not used to support a Plan policy.	Agree to modify the text as indicated to comply with the examiner's recommendations.

		<ul style="list-style-type: none"> <li>In line four replace “must” with “should”</li> </ul>	<p>The facilities have been identified in two surveys undertaken in 2017 and 2022 and included in the evidence base. I visited a selection of the facilities and am satisfied with the approach.</p> <p>The drafting of the Policy is negatively worded in stating what “will not be supported” and unduly restrictive in stating what “must” be demonstrated.</p> <p>The approach develops that provided by Core Strategy Policy P9 in terms of the location of facilities and the considerations when development proposals would result in their loss. The purpose of the requirement for a marketing campaign in order to demonstrate a lack of viability needs to be clarified.</p>	
M49	83	<p>Amend Map 27 to</p> <ul style="list-style-type: none"> <li>Insert “and leisure” after “community” in the Title and Key</li> <li>Delete locations outside the neighbourhood area</li> </ul>		Agree to modify Map 27 as indicated to comply with the examiner’s recommendations.
M50	85	<p>Amend Policy CL2 to</p> <ul style="list-style-type: none"> <li>Insert “Community and Leisure” before “facilities” in the title and first line</li> </ul>	The Policy applies to all facilities and not just those identified in Policy CL1 and for clarity it should reference both community and leisure facilities as indicated by the title of the section of the Plan	Agree to modify the text as indicated to comply with the

		<ul style="list-style-type: none"> <li>• End section c) at “amenity”</li> <li>• Delete section d)</li> <li>• Insert “; and” at end of penultimate section</li> </ul>	<p>within which it falls. It is unclear whether all the considerations should be addressed.</p> <p>Section c) addresses “areas of identified parking stress, see Map 10 and Car Parking Summary”. Map 10 does not identify areas of parking stress and shows the existing and desired future parking locations. The evidence base for the Plan does not include a “Car Parking Summary”. The Car Park Review (also named as 2017 Survey of Main Street Car parks) does not identify areas of parking stress and records use of selected car parks.</p> <p>Section d) lacks clarity in what is meant by “enhanced environmental performance” and addresses matters controlled through Building Regulations and so outside the scope of planning policy.</p>	<p>examiner’s recommendations.</p>
M51	85	<p>Amend Policy CL3 to:</p> <ul style="list-style-type: none"> <li>• Insert “and Leisure” before “facilities” in the title and first line</li> <li>• End section b) at “amenity”</li> <li>• In section c) insert “an” before “identified” and delete “in collaboration with the local community”</li> </ul>	<p>On request I was informed it is intended to apply to both community and leisure facilities as indicated by the title of the section of the Plan within which it falls.</p> <p>Section b) needs modification in the same way as section c) of Policy CL2 in respect of its reference to unidentified areas of parking stress.</p>	<p>Agree to modify the text as indicated to comply with the examiner’s recommendations.</p>

		<ul style="list-style-type: none"> <li>• Insert “; and” at end of section d)</li> <li>• In section e) add “where appropriate” at end</li> </ul>	The “need” for development is not solely to be determined through local community collaboration. The provision of “flexible space” will not be relevant to all facilities. It is unclear whether all the considerations should be addressed.	
<b>Education and Health</b>				
M52	89	<p>Amend Policy EH1 to:</p> <ul style="list-style-type: none"> <li>• Replace “pupils or staff and their abilities” with “the ability”</li> <li>• Insert “significant” before “adverse” in two instances</li> <li>• Insert “; and” at end of section b)</li> </ul>	The Policy is supported by Map 28 which identifies the location of six existing schools in the area. The drafting is enabling and supportive. The relevant planning considerations relate to the impact on existing activities rather than “pupils or staff” and adverse impacts need to be significant to be material. It is unclear whether all the considerations should be addressed.	Agree to modify the text as indicated to comply with the examiner’s recommendations.
M53	90	Amend Policy EH2 to delete the final two sentences and insert “; and” at end of section f)	The Policy is positively drafted and enabling. It is unclear whether all the considerations should be addressed. The second part which defines the process for considering how best to plan for new schools in relation to new strategic housing allocations is not directly a matter for planning policy. It is an aspiration which can be addressed in the supporting text and through a community action/project.	Agree to modify the text as indicated to comply with the examiner’s recommendations.

OM9	90 - EH3	[Insert “; and” at end of section f)]	The Policy is positively drafted and enabling. It is unclear whether all the considerations should be addressed.	Agree to modify the text as indicated to comply with the examiner’s recommendations.
M54	92	Amend Policy EH4 to <ul style="list-style-type: none"> <li>• Insert the three named locations after “use” in the second line.</li> <li>• Delete “, with proposals prepared in collaboration with the local community via the Neighbourhood Forum or equivalent organisation”</li> </ul>	The clarity of the Policy will be improved by identifying the three locations near the beginning. The process for considering alternative uses is not of itself a matter for planning policy although it would be appropriate to be addressed in the supporting text.	Agree to modify the text as indicated to comply with the examiner’s recommendations.
M55	93	Amend Policy EH5 to delete the final two sentences and insert “; and” at end of section d)	The Policy is positive and enabling. The second part which defines the process for considering how best to plan for new healthcare in relation to new strategic housing allocations is not directly a matter for planning policy. It is an aspiration which can be addressed in the supporting text and through a community action/project. It is unclear whether all the considerations should be addressed.	Agree to modify the text as indicated to comply with the examiner’s recommendations.