

LEEDS SITE ALLOCATIONS PLAN

RESPONSE TO THE INSPECTOR'S MATTERS AND ISSUES

PREPARED ON BEHALF OF ABERFORD PARISH COUNCIL

MATTER 3

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1.0 INTRODUCTION

- 1.1 This response to the Inspector's Matters and Issues has been prepared by Directions Planning Consultancy Ltd on behalf of Aberford Parish Council. Directions Planning Consultancy Ltd has been instructed to represent the Parish Council during the Examination. The Parish Council has previously submitted representations at the various stages of the Site Allocation Plan preparation in connection with the allocation of a new settlement at Parlington under reference MX2-39.
- 1.2 Our comments in relation to the Inspector's Matters and Issues focus on the Parish Council's concerns regarding the allocation of the new settlement at Parlington within the last stage of the Plan's preparation. This means we have not responded to every Matter and Issue: only those relevant to concerns previously expressed and that are specific to MX2-39 Parlington Estate, Aberford.

2.0 MATTER 3

2.1 QUESTION 1. Are proposed revised boundaries of the Green Belt consistent with the intentions of the CS?

- 2.1.1 The revised boundaries of the Green Belt are not consistent with the intentions of the Core Strategy. The Core Strategy sets out in the strategic objectives how housing growth is to be delivered in sustainable location relating to the Settlement Hierarchy. Furthermore, Policy SP1, SP6 and SP7 set out how the intention is for development to be directed to within or adjacent to existing settlements that form part of the Settlement Hierarchy. Only in exceptional circumstances are sites to be considered that are unrelated to the Settlement Hierarchy, where they will be in sustainable locations.
- 2.1.2 This suggests the intentions of the Core Strategy are to see Green Belt boundaries amended to accommodate development adjacent to existing settlements to accommodate growth in accordance with the Settlement Hierarchy first, and where accessibility is promoted.
- 2.1.3 The Green Belt boundary alterations proposed to accommodate MX2-39 Parlington, which is a proposed new settlement, cannot be considered to be consistent with the intentions of the Core Strategy. Quite clearly, a new settlement does not relate to the Settlement Hierarchy, because the concept of a new settlement falls outside the intention to allocate sites within or on the edge of existing settlements, as set out in Policy SP1, SP6 and SP7 of the Core Strategy. Furthermore, the site has poor accessibility, which is stated in the Sustainability Appraisal (September 2016) that accompanied the allocation of the land. It therefore is not consistent with Policy SP10 either.
- 2.1.4 Furthermore, the Core Strategy does not set out how the Site Allocations Plan might deal with the situation where a particular HMCA cannot accommodate the level of development it is expected to absorb. So, the scenario of the need for new settlements is not specifically addressed within the Core Strategy. Policy SP10 hints at the possibility, but only where a site will be in a sustainable location; is able to provide a full range of facilities and services; and within the context of the HMCA it would be more appropriate than alternatives within the HMCA.

2.1.5 However, the exceptional release of land then needs to be assessed in accordance with the purposes of Green Belt. This is where allocations, such as Parlington fail the tests of soundness as the allocation of MX2-39 undermines the purposes of Green Belt. In addition, the balance of the tension between SP10 and with Policy SP1, SP6 and SP7 needs to be weighed in relation to whether triggering the allocation of land under exceptional circumstances then undermines the overall strategy of the Plan.

2.2 QUESTION 2. Is the release of Green Belt land in preference to some Protected Areas of Search identified in the UDP justified?

2.2.1 Within the Outer North East area there are a number of areas of safeguarded land, which includes:

- HG3-7 Linton 100
- HG3-8 Clifford 100
- HG3-9 Boston Spa 110
- HG3-10 Boston Spa 103
- HG3-11 Clifford 36
- HG3-12 Scholes 60
- HG3-13 Scholes 850

2.2.2 Collectively, these sites have the capacity to accommodate 1359 new dwellings in locations that form extensions to existing settlements. Allocation of these sites for residential development would have been consistent with the Core Strategy and Policies SP1, SP6 and SP7. This is because the sites are located adjacent to existing settlements that are named within the Settlement Hierarchy, as set out in the Core Strategy as having capacity to support growth. Also, new development would help support existing services and communities, which would contribute to promoting sustainable patterns of development consistent with the NPPF.

2.2.3 Instead of allocating these sites and undertaking a comprehensive Green Belt review of the Outer North East HMCA to identify additional sites to meet the identified housing requirement for this HMCA, the Council chose to allocate first MX2-33 Headley Hall and then MX2-39 Parlington instead. By adopting this approach, the Council appear to have disregarded the due process for drafting development plans. This is evident from how the Council chose to consider only sites presented to them for allocation through the Green Belt review, rather than undertaking a comprehensive Green Belt review. If the Council had undertaken a comprehensive review then it would have entailed proactively looking at existing boundaries before determining appropriate allocations, rather than just assessing sites presented to them.

2.2.4 Paragraph 1.1 and 1.2 of the Green Belt Review Background Paper (September 2015) is quite explicit that the Green Belt review was not comprehensive, as it states that it did not review the need to amend boundaries unless for the purpose of allocating land, and only where sites had been submitted for consideration for allocation. Furthermore, the Green Belt Review Background Paper Outer North East Addendum (September 2016) simply inserts the intention to remove MC2-39 Parlington from the Green Belt, but provides no reasoned justification or an assessment of how its release was preferable to any alternative options,

which might have reasonably included the allocation of the safeguarded land listed above. We believe that in presenting a new allocation that required the exceptional release of land from the Green Belt is contrary to the strategic objectives of the Core Strategy and the Council should have assessed its release against alternative options, but this clearly did not happen.

- 2.2.5 There is no explicit mention in the Core Strategy of the intention to allocate new settlements, or how the allocation of new settlements might fit within the Settlement Hierarchy in terms of sequential preference for selecting sites. A review of the Core Strategy should therefore have been undertaken to accommodate the concept of a new settlement within the overall strategy before any site was assessed against the appropriate considerations, given the lack of basic assessment of the strategic significance of such allocations within the context of the wider strategy. We do not believe that Policy SP10 of the Core Strategy provides a sound mechanism for the creation of a new settlement given the concept is not explicitly mentioned. Policy SP10 and the subsequent way in which the Council has allocated MX2-39 means there simply is no appreciation as to the implications of accommodating a new settlement within the district, and whether it is indeed appropriate.
- 2.2.6 The consequence is that the Council has not justified the preference for releasing Green Belt land ahead of protected areas of search. This is in terms of the strategic need for a new settlement and also the assessment of alternative options. Especially, as the release of Green Belt land has been made contrary to the Core Strategy. The Objectives of the Core Strategy categorically state that housing growth is to be delivered in sustainable location relating to the Settlement Hierarchy. Clearly, the release of Green Belt land in order to accommodate a new settlement that is blatantly in a relatively inaccessible location in sustainability terms does not in conformity with the strategic objectives of the Council's own strategy.
- 2.2.7 Furthermore, the strategy of the Core Strategy to see development located within or on the edge of existing settlements in accordance with a Settlement Hierarchy is consistent with the NPPF. Paragraph 84 of the NPPF sets out how local planning authorities should take account of the need to promote sustainable patterns of development when reviewing Green Belt boundaries. The consequences for sustainable development of channelling development towards urban areas inside Green Belt boundaries, towards towns and villages inset within the Green Belt and towards locations beyond the outer Green Belt boundary are made clear. It is therefore considered that Leeds City Council should have assessed the impact of the intention to release Green Belt land in preference to some protected areas of search through the Core Strategy process rather than through the Site Allocations Plan process. This is because the Site Allocations Plan has not assessed the conformity of the altered strategy in relation to the NPPF.

2.3 QUESTION 3. Do the sites selected meet with the criteria set out in the CS?

- 2.3.1 As we have explained above, the sites selected for allocation do not meet with the criteria set out in the Core Strategy, and neither are the sites consistent with the approach expected in the NPPF towards the release of land from the Green Belt. This is particularly clear in the case of MX2-39 Parlington, which is a proposed new settlement within the Core Strategy.

- 2.3.2 Policy SP1 makes clear how “the majority of new development within and adjacent to urban areas, taking advantage of existing services, high levels of accessibility, priorities for urban regeneration and an appropriate balance of brownfield and greenfield land.” However, the allocation of site MX2-39 is clearly contrary to this approach. Not least, because the site will not take advantage of existing services and it has very poor accessibility, which is stated in the Council’s Sustainability Appraisal (September 2016) for the site. Policy SP1 then goes on to state how development is expected to be on land within the Main Urban Areas or create suitable infill development or else form a sustainable extension. Clearly a new settlement does not fall into any of these categories.
- 2.3.3 Policy SP6 of the Core Strategy sets out further criteria for the selection of sites, which includes sites that are within sustainable locations and that meet the standards of public transport accessibility. As set out above, the Council have themselves identified how the site has poor accessibility, so the site is not consistent with the Policy SP6 of the Core Strategy.
- 2.3.4 Another criterion of Policy SP6 set out how sites should have the least impact on Green Belt purposes. In relation to the purposes of Green Belt, as set out in paragraph 80 of the NPPF, we believe the allocation of site MX2-39 fails to uphold these purposes. This is because the proposed new settlement is located in close proximity to Barwick in Elmet and Aberford. Historically, planning policy required at least two miles to be maintained between settlements surrounded by Green Belt in order to prevent settlements merging. However, in this instance there will be less than two miles between Parlington, and the existing settlements of Barwick in Elmet and Aberford. In some places there will be less than 500m of separation between settlements. Physically, this may mean there could be pressure in the future to see the settlements merge. However, visually, the proximity of Parlington to Aberford and Barwick in Elmet means any physical separation will be difficult to discern. Consequently, their merger will appear to have already taken place thereby undermining the purposes of Green Belt in respect of merging of towns.
- 2.3.5 Development of Parlington will also lead to the encroachment of the countryside, which Leeds City Council has already established through their Green Belt review process. The LCC DPP Report 19/7/15 states how “development of the site would create a significant incursion within the Green Belt and the site currently performs an important role in safeguarding the countryside from encroachment.” Furthermore, the report goes on to state how development at Parlington “would reduce the Green Belt gap between [the] settlements [of Aberford, Barwick in Elmet and Garforth].”
- 2.3.6 The sheer scale of development proposed during and beyond the Plan period of 5000 dwellings, plus the proximity of the proposed new town to Aberford and Barwick in Elmet, mean that a large tranche of open countryside will be lost in the North East of Leeds. This is an important area of open countryside within the district because it has the function of separating Leeds district from Selby district. To propose a large scale new settlement within this area of open countryside therefore undermines the strategic role of the open land in providing a buffer between the urban extent of Leeds and Selby. In turn, this could lead to further erosion of the Green Belt in the future and increase the likelihood of the two urban conurbations merging.

2.4 QUESTION 4. Are new boundaries defined clearly, using physical features that are readily recognisable and likely to be permanent?

2.4.1 In the case of MX2-39, only field boundaries have been used as the physical features to form the extent of the proposed allocation. Clearly, field boundaries are not defensible boundaries as they are not readily recognisable, unlike belts of woodland, watercourses and roads. It is therefore of grave concern that the wider extent of MX2-39, which includes land to be developed beyond the end of the Plan period, could be extended further to incorporate neighbouring fields. This in turn could lead to the merger of the new settlement with Aberford and Barwick in Elmet, which would undermine the purposes of Green Belt.

2.4.2 We appreciate the allocation of the site could result in new defensible boundaries being created, but this is not guaranteed and it is also not explicit in the Plan. The proposed allocation therefore undermines the purposes of Green Belt, and is contrary to the Core Strategy and the NPPF.