

WETHERBY TOWN COUNCIL



The Town Hall
Market Place
Wetherby
West Yorkshire
LS22 6NE

Tel: (01937) 583584
Email: admin@wetherby.co.uk
www.wetherby.co.uk

26th February 2018

Leeds SAP Revised Submission Draft Consultation
Policy & Plans Group
The Leonardo Building
2 Rossington Street
Leeds
LS2 8HD

Dear Sir or Madam,

Leeds Site Allocations Plan – Revised Submission Draft Response to consultation from Wetherby Town Council

Wetherby Town Council wishes to submit representations in respect of the following proposed Revised Submission Draft Amendments:

Change No:	1	
<i>Test of Soundness?</i>	<i>Positively Prepared</i>	
	<i>Effective</i>	No
	<i>Justified</i>	No
	<i>Consistent with NPPF</i>	No
<i>Comments:</i>		
<p>Whilst the Town Council recognises that the concept of 'broad locations' exists within the National Planning Policy Framework it suggests that what is being proposed by Leeds City Council does not meet the criteria laid out therein and is not therefore a sound policy. The locations identified in the document are too specific to meet the criteria of being 'broad'.</p> <p>The introduction of broad locations at this late stage of the Local Planning process is a hastily conceived idea to try and remedy the fact that the Council's overall housing target is too high. The adopted Core Strategy does not mention broad locations. To introduce them now will mean a significant clash between two key documents and could lead to the Site Allocations plan being found to be unsound.</p> <p>The introduction of broad locations does not sufficiently address the housing target issue and is a concept to which the Town Council objects.</p>		

Change No:	3	
<i>Test of Soundness?</i>	<i>Positively Prepared</i>	
	<i>Effective</i>	No
	<i>Justified</i>	
	<i>Consistent with NPPF</i>	
<i>Comments:</i>		
<p>The Town Council strongly disagrees with the Core Strategy Housing target of providing 66,000 new homes over the plan period.</p>		

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It agrees with the figure of 42,000 units recently put forward by the government and notes that this figure is line with the consistent level of housing delivered in the Leeds City Council area over the past 20 years.

If the principle of broad locations is to be applied as a potential method of safeguarding land from future development then the figures included in amendment 3 are significantly understated.

The creation of 'broad locations' identifies only 6,454 units. Wetherby Town Council considers that these, plus an additional 17,546 units should also be deleted from the plan.

Change No:	8	
<i>Test of Soundness?</i>	<i>Positively Prepared</i>	
	<i>Effective</i>	No
	<i>Justified</i>	No
	<i>Consistent with NPPF</i>	

Comments:

The Council objects to the sudden and unjustified decision to move all non-broad location allocated sites in to Phase 1.

The Town Council has always supported the use of a strategic site to deliver the housing requirement of the Outer North East Housing Market Character Area and notes that this was, and continues to be, the agreed strategy in the Core Strategy. The changes proposed at section 8 put the Site Allocations Plan in direct conflict with the Core Strategy and is therefore considered to be unsound.

Wetherby is a prime example of a settlement which will be negatively affected by the inconsistent policies in the Site Allocations Plan as proposed and highlights why a concept of broad locations based on greenbelts is too simplistic.

Wetherby, a market town of rural character, did not need a greenbelt since it is contained within natural boundaries; county boundaries to the north and west, a 6 lane motorway to the east and the outer edge of Leeds Greenbelt to the south. The inclusion of site HG2-226 (Land off Racecourse Approach in Wetherby) for potentially immediate development means that the eastern side of the town will be opened up to further, future urban sprawl on land. Wetherby Town Council suggests that this site should be removed from the site allocations plan.

The town is already experiencing significant housing development, beyond natural organic growth or any sustainability requirement. A strategic approach to development is required. If the principle of broad locations is to protect greenfield areas around settlements then exclusions from the plan should look at all the major planned developments and not just those in designated green belts.

Change No:	10	
<i>Test of Soundness?</i>	<i>Positively Prepared</i>	No
	<i>Effective</i>	No
	<i>Justified</i>	No
	<i>Consistent with NPPF</i>	

Comments:

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Given the Council's comments about the sudden decision to move all non-broad location sites in to phase 1, it also objects to the removal of this structured phasing approach. The table provides sensible priorities for housing development which could take on renewed relevance in the event of a reduced housing target as a result of future review.

Change No:	15	
<i>Test of Soundness?</i>	<i>Positively Prepared</i>	
	<i>Effective</i>	No
	<i>Justified</i>	No
	<i>Consistent with NPPF</i>	
<i>Comments:</i> The Council suggests that this change isn't needed if the concept of broad locations is removed.		

Change No:	66	
<i>Test of Soundness?</i>	<i>Positively Prepared</i>	No
	<i>Effective</i>	No
	<i>Justified</i>	No
	<i>Consistent with NPPF</i>	
<i>Comments:</i> As per the comments above, Wetherby Town Council has always supported the delivery of the Outer North East's housing target through a strategic site. In the Council's view, the Parlington Estate is only sustainable if allocated as a whole rather than the current proposal whereby part of the site will be included for development in phase 1 and part will become a broad location. The Council considers that a sounder policy, as part of the strategic view for the whole of the Outer North East HMCA the Parlington Estate should either be allocated as a whole, or made a broad location in its entirety.		

Please be advised that Wetherby Town Council wishes to participate at the forthcoming Public Examination (Stage 2) Hearing Sessions and would be pleased to be notified when the Revised Submission has been submitted for independent examination, upon the adoption of the plan and on publication of the Inspector's Report.

Yours faithfully

IONA TAYLOR (Mrs)
Town Clerk

By e-mail to: sap@leeds.gov.uk