

## OTLEY NEIGHBOURHOOD PLAN

### POLICY INTENTIONS DOCUMENT CONSULTATION – IMPLICATIONS FOR 1<sup>ST</sup> DRAFT PLAN

#### INTRODUCTION

This report is based on a review of the results from the consultation exercise carried out on the Neighbourhood Plan Policy Intentions Document (PID) over an eight week period ending 15<sup>th</sup> January 2016.

The review focuses on the following matters considered critical for the production of a first draft Neighbourhood Plan:-

- Implications for the basic conditions which the final plan must ultimately satisfy;
- Comments pertaining to planning policy within the Neighbourhood Plan's remit;
- Key issues with a planning dimension not covered by the PID.

As such, planning matters beyond the plan's remit (eg Core Strategy (CS)/Site Allocations Plan (SAP) matters), together with many non-planning matters (eg HGV bans) and issues simply beyond the overall scope of the Neighbourhood Plan (eg complaints re historical decisions) have not been noted for the purposes of this review. Obviously, non-planning matters will need to be properly assessed at some stage in order to produce a holistic Neighbourhood Plan.

In addition, the report also briefly highlights 'technical planning matters' identified by your consultant in relation to stated policy intentions which it is recommended be addressed in the first draft plan.

The report addresses each PID policy area in turn.

#### OVERVIEW

To place what follows in a general context, it should first be noted that the policies in all PID policy areas received majority support from consultation respondents, with only 'Housing' and 'Transport & Travel' attracting, what might be called, 'significant minority opposition' (35% and 42% respectively). In all other policy areas, 'opposition' was more limited, ie between 17% and 27%.

As will be seen, however, this does not necessarily translate into substantive implications for the first draft plan as many objecting comments do not relate to critical matters as defined above.

#### HOUSING

##### Consultation

**H2 Housing Size** – both 3 and 4 bedroom properties are also needed. Possible conflict between requiring both this and starter homes due to developer preference for the former.

**H4 Housing Tenure** – not achievable through planning system (see also 'technical planning matters' below).

**H5 Housing 'Size'** ('Housing for Older People') – where is the evidence?

## **New Issues:-**

- Flats above shops
- Phasing of new housing development, eg brownfield before greenfield
- House to flat conversions

## **Technical Planning Matters**

### **H1 Affordable Housing**

- Detailed statement of evidence required to underpin policy;
- Lifetime Homes dimension requires more consideration.
- Dispersion dimension (para 4) better covered in 'Built Environment' under 'Design & Development'.

**H3 Housing 'Size' ('Housing Type')** – 'design & development' matter, better covered under 'Built Environment'. Different character areas of town will determine which housing types are better where.

**H4 Housing Tenure** – unsure as to the validity of planning policy in relation to tenure, other than with affordable housing. Needs checking.

**H5 Housing 'Size' ('Housing for Older People')** – detailed statement of evidence required to underpin policy. What does this add to Core Strategy policy?

### **Other:-**

- Consider policy on 'development on non-allocated sites', ie a locally tailored version within context of Core Strategy policy.
- Consider site concept statements/outline briefs for all likely SAP housing sites.

## **EMPLOYMENT**

### **Consultation**

**E1 New Employment Land** – need to be more pro-active, ie re brownfield land, small business units/workshops, trading estate (?), identification/allocation of sites.

**E2 Existing Employment Land** – needs strengthening re protection of specific existing sites, where sustainable.

**E3 Supporting Employment Opportunities In Growth Sectors** – intention too prescriptive. Need to encourage any start-ups. What about niche manufacturing? Not just a single site.

**E4 Encourage Employment Sites that Support Tourism** – What is policy intention trying to do? (see 'Technical Planning Matters' below). Needs to be more specific. Hotel is needed. Enough pubs/cafes.

**E5 Develop Live/Work Accommodation** – unrealistic/unachievable (who would develop except for single units?). Concern re this being seen simply as route to develop big houses.

## **Technical Planning Matters**

### **E1 New Employment Land:-**

- Is this over/above existing SAP allocation?
- Is it the intention for plan to allocate sites (NB E3 intention is to do this!)?
- Recommend concept statement/outline brief re any allocated site.
- Consider need for criteria-based policy against which applications on non-allocated sites would be assessed.

### **E2 Existing Employment Land:-**

- Recommend deletion of 1<sup>st</sup> para intention because unnecessary.
- 3<sup>rd</sup> para – this seems to be about new ‘employment’ provision not existing. How does this fit with CS/SAP town centre retail policy? Wording woolly.
- What about protecting employment land not protected by the SAP?

**E3 Supporting Employment Opportunities In Growth Sectors** – needs to be underpinned by site assessment(s) and evidence. Recommend concept statement/outline brief for allocated site(s).

### **E4 Encourage Employment Sites that Support Tourism:-**

- What sort of development does intention have in mind – hotels, b&bs, cafes/ restaurants.....?
- Where to be located/where not?
- Intention currently provides carte blanche.
- Relation to relevant CS policies?

**E5 Develop Live/Work Accommodation** – ‘Live/Work’ has specific planning implications which need to be clarified.

## **TOWN ENVIRONMENT & DERELICT SITES**

### **Consultation**

#### **TE1 Undeveloped Sites & Unused Buildings**

General comments – Restaurant. No more supermarkets. Temporary/permanent parking areas.

Site specific suggestions –

- Civic Centre
- Summercross
- Old LCC offices/former LCC site (one & same? One Stop Shop?)
- Ogdens (behind Kirkgate/adj Beach Hill)
- Buildings around Lix (?) car park
- Wharfedale Press

### **Technical Planning Matters**

Needs discussion re how to take this intention forward. Possibilities include concept statement/outline brief for each identified site, an area-based approach, a general criteria-based

policy/policies, a mix of these. Possibly subsume within other policy areas dependent on agreed use(s)/approach.

## **COMMUNITY SERVICES & FACILITIES**

### **Consultation**

**General** - the overriding comment related to the need for the provision of community infrastructure of all types in order to match the proposed population increase and that this should take place before further housing development.

**CSF1 Community Buildings** – sort out the Civic Centre!

**CSF2 Sports, Leisure & Recreation Facilities** – better play areas south of the river, eg between Gallows Hill/Pool Road.

**CSF3 Entertainment & Tourism** – doubts re need for new venue. What exactly is the intention in mind? Hotel need.

**CSF5 Improvement to Retail & Shopping** – no more supermarkets; too many coffee/tea shops; oppose more edge of centre retail (eg Ashfield, Westgate); resist changes to non-retail.

**CSF6 Facilities for Older & Younger People** – where is the better deal for teenagers?

**CSF7 Educational Provision** – can the NP's planning policies do this? (see Technical Planning Matters below)

**New Issue** – need for a museum.

### **Technical Planning Matters**

#### **CSF1 Community Buildings:-**

- Need list of buildings to be safeguarded;
- Para 2 – is there evidence of need for additional buildings? If so, what/where?
- Para 3 – discuss meaning in order to ascertain if planning/non-planning/mix.

**CSF2 Sports, Leisure & Recreation Facilities** – site allocation will require proper site assessment and concept statement/outline brief.

#### **CSF3 Entertainment & Tourism:-**

- Para 1 – clarification as to whether this involves a site allocation, with attendant site assessment and concept statement/outline brief.
- Para 2 – duplicates E4. Delete from here.

#### **CSF4 Health Facilities:-**

- Para 1 - discuss meaning in order to ascertain if planning/non-planning/mix. Are we talking bricks/mortar development here or provision within existing building(s)?
- Para 2 – at least in part if not wholly non-planning.

### **CSF5 Improvement to Retail & Shopping:-**

- Requires CS policy context in order to ascertain additionality;
- Some of this is non-planning in nature, ie stipulation of local independent traders, supporting retention of markets.

### **CSF6 Facilities for Older & Younger People:-**

- Discuss meaning in order to ascertain if planning/non-planning/mix. Are we talking bricks/mortar development here or facilities within existing provision?
- What is the evidence re further older people provision?

### **CSF7 Educational Provision:-**

- Planning policy does not 'promote' – non-planning?
- How does this relate to Leeds Education plans, eg SAP G5 school at Cambridge? Any further school development likely in plan period?
- Is there scope for site concept statement/outline brief for this new school? And/or general locational/development criteria for any further school?

## **BUILT ENVIRONMENT**

### **Consultation**

**BE3 Conservation Area** – extend to include Otley Mills, Boroughgate and down to river.

**BE4 Local Heritage Assets** – 'encourage' too weak. Some useful suggestions as to suitable assets to be covered by policy.

**BE6 Design & New Development** – modern design has its place too.

### **Technical Planning Matters**

Suggest separating 'Built Environment' and 'Green Environment' sections.

**BE1 Public Realm** – suggest subsuming within BE6. Also suggest rethinking the idea of a suite of design guides and opting instead for detailed 'design and development' policies, with supporting appendices and back-up evidence.

**BE2 Walling etc** – would question how much of this is really planning.

**BE3 Conservation Area** – intention as stated needs much expanding to be effective. If Conservation Area extension is likely to take some time, consider 'Local Heritage Area' policy as means of providing interim protection for proposed extension areas.

**(NB BE2,3,4** – consider amalgamating into a detailed 'Design & Development in the Conservation Area' policy, based on the Conservation Area appraisal update. Consider also need for a separate 'Design & Development Outside the Conservation Area' policy, based perhaps on other distinct character areas of the town.

**BE5 'Local Heritage Assets'** – need to generate list & map, supported by citations.

## **GREEN ENVIRONMENT**

### **Consultation**

**General** – strengthen wording.

**GE1 Local Green Space Protection** – dislike of ‘unless special circumstances can be demonstrated’.

**GE2 Green Links** – suggestion that plan reference Leeds Habitat Network.

**GE3 Tree Protection** – strengthen policy re tree planting.

**GE5 Riverside Corridor** – revisit/refresh 2003 ‘Vision’. Wharfemeadows Park and former Cattle Market site both specifically highlighted.

**New Issue** – lack of policy on flooding/flood protection/flood storage.

### **Technical Planning Matters**

#### **GE1 Local Green Space Protection:-**

- Candidate list needed followed by assessments
- Improve wording, including deletion of reference to ‘wildlife’ and ‘special circumstances’.

#### **GE2 Green Links:-**

- Suggest retitle ‘Local Green Infrastructure’ to tie in with Leeds’s use of ‘Strategic Green Infrastructure’ in Core Strategy.
- Identify & map ‘links’ showing connections (actual/potential) with Wharfe Valley/Chevin Ridge Strategic Green Infrastructure which surrounds and runs through town.

#### **GE3 Tree Protection:-**

- 1<sup>st</sup> sentence is non-planning.
- Suggest subsume 2<sup>nd</sup> sentence within ‘design and development’ policies (NB Core Strategy policy deals adequately with tree planting generally).

#### **GE5 Riverside Corridor:-**

- Need to revisit/refresh 2003 ‘Vision’.
- Consider need for concept statements/outline briefs for key corridor sites.

**GE6 Local Wildlife Sites** – list/map sites and ensure citations in place.

**General** – lacks policy intentions re green space enhancement and creation.

## **TRANSPORT & TRAVEL**

### **Consultation**

**General** – has there been a traffic study/impact assessment in respect of 22% proposed population increase?

**TT2 Improved Integrated Bus/Train Services** – policy meaning and operation unclear. Is this non-planning/a CIL issue?

### **TT3 Eastern Relief Road:-**

- Timing/phasing in relation to new development a key issue – 5 years too long.
- This is a strategic Leeds issue and as such NP policy is duplication/unnecessary.

### **TT4 Car Parking:-**

- Adds nothing to LCC policy.
- Park & Ride very unrealistic – who will provide?

### **TT5 Rail Service & Station:-**

- Opposition/support split amongst detailed comments.
- Route issues raised re Eastern Relief Road route and current by-pass – is there a viable route to protect?

### **New Issues:-**

- Need for new road bridge over Wharfe.
- Need for western bridge and road link to the by-pass/Bradford Road.
- Bus station – new design or provide new.

### **Technical Planning Matters**

#### **TT3 Eastern Relief Road:-**

- Policy as stated unnecessary as duplicates Leeds policy.
- Consider scope for concept statement/outline brief.

#### **TT4 Car Parking:-**

- Policy intention is very involved and confused and needs unravelling as it presently has some five separate strands.
- Design & Access Statement required for most development will cover how development proposes to deal with parking.
- Housing parking standards are a 'no-no' in NDPs since early 2015, unless particular localised justification.