

Leeds City Council

**Rawdon
Neighbourhood Development
Plan
2023-2028**

Independent Examiner's Report

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2 December 2023

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Summary

I have been appointed as the independent examiner of the Rawdon Neighbourhood Development Plan.

Rawdon is located about eight miles northwest of Leeds and about six miles northeast of Bradford. With a population of approximately 5800 and its proximity to Leeds and Leeds-Bradford Airport, much of the Parish falls within the Green Belt. There are wooded hillsides, open countryside and long distance views. The area has an abundance of heritage including a Scheduled Monument and four Conservation Areas.

The Plan reflects some of the key challenges identified in the Core Strategy at a local level. It tackles housing for local needs, seeks to facilitate and support economic growth, encourages design which is both sustainable and respectful of local character and heritage, addresses infrastructure and preserves important green spaces.

Important consultations at City level and the Covid 19 pandemic meant the Plan has taken some time to reach this stage. Nonetheless sustained community engagement has taken place.

The Plan has been produced to a high standard. It is accompanied by an excellent Basic Conditions Statement, a comprehensive Consultation Statement and a helpful Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report. However, it has been necessary to recommend some modifications. In the main these are intended to ensure the Plan is clear and precise and provides a practical framework for decision-making as required by national policy and guidance.

Subject to those modifications, I have concluded that the Plan does meet the basic conditions and all the other requirements I am obliged to examine. I am therefore pleased to recommend to Leeds City Council that the Rawdon Neighbourhood Development Plan can go forward to a referendum.

In considering whether the referendum area should be extended beyond the Neighbourhood Plan area I see no reason to alter or extend this area for the purpose of holding a referendum.

Ann Skippers MRTPI
Ann Skippers Planning
2 December 2023



1.0 Introduction

This is the report of the independent examiner into the Rawdon Neighbourhood Development Plan (the Plan).

The Localism Act 2011 provides a welcome opportunity for communities to shape the future of the places where they live and work and to deliver the sustainable development they need. One way of achieving this is through the production of a neighbourhood plan.

I have been appointed by Leeds City Council (LCC) with the agreement of the Parish Council, to undertake this independent examination. I have been appointed through the Neighbourhood Planning Independent Examiner Referral Service (NPIERS).

I am independent of the qualifying body and the local authority. I have no interest in any land that may be affected by the Plan. I am a chartered town planner with over thirty years experience in planning and have worked in the public, private and academic sectors and am an experienced examiner of neighbourhood plans. I therefore have the appropriate qualifications and professional experience to carry out this independent examination.

2.0 The role of the independent examiner

The examiner must assess whether a neighbourhood plan meets the basic conditions and other matters set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

The basic conditions¹ are:

- Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan
- The making of the neighbourhood plan contributes to the achievement of sustainable development
- The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area
- The making of the neighbourhood plan does not breach, and is otherwise compatible with, retained European Union (EU) obligations²
- Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.

¹ Set out in paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended)

² Substituted by the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018/1232 which came into force on 31 December 2020

Regulations 32 and 33 of the Neighbourhood Planning (General) Regulations 2012 (as amended) set out two additional basic conditions to those set out in primary legislation and referred to in the paragraph above. Only one is applicable to neighbourhood plans and was brought into effect on 28 December 2018.³ It states that:

- The making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

The examiner is also required to check⁴ whether the neighbourhood plan:

- Has been prepared and submitted for examination by a qualifying body
- Has been prepared for an area that has been properly designated for such plan preparation
- Meets the requirements to i) specify the period to which it has effect; ii) not include provision about excluded development; and iii) not relate to more than one neighbourhood area and that
- Its policies relate to the development and use of land for a designated neighbourhood area.

I must also consider whether the draft neighbourhood plan is compatible with Convention rights.⁵

The examiner must then make one of the following recommendations:

- The neighbourhood plan can proceed to a referendum on the basis it meets all the necessary legal requirements
- The neighbourhood plan can proceed to a referendum subject to modifications or
- The neighbourhood plan should not proceed to a referendum on the basis it does not meet the necessary legal requirements.

If the plan can proceed to a referendum with or without modifications, the examiner must also consider whether the referendum area should be extended beyond the neighbourhood plan area to which it relates.

If the plan goes forward to referendum and more than 50% of those voting vote in favour of the plan then it is made by the relevant local authority, in this case LCC. The plan then becomes part of the 'development plan' for the area and a statutory consideration in guiding future development and in the determination of planning applications within the plan area.

³ Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018

⁴ Set out in sections 38A and 38B of the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act

⁵ The combined effect of the Town and Country Planning Act Schedule 4B para 8(6) and para 10 (3)(b) and the Human Rights Act 1998

3.0 The examination process

I have set out my remit in the previous section. It is useful to bear in mind that the examiner's role is limited to testing whether or not the submitted neighbourhood plan meets the basic conditions and other matters set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended).⁶

Planning Practice Guidance (PPG) confirms that the examiner is not testing the soundness of a neighbourhood plan or examining other material considerations.⁷

In addition, PPG is clear that neighbourhood plans are not obliged to include policies on all types of development.⁸ Often representations suggest amendments to the submitted policies or new policies or put forward other alternative suggestions or seek the inclusion of land for development. It is my role only to consider the submitted plan and not whether any new policies should be included. Where I find that the submitted policies do meet the basic conditions, it is not necessary for me to consider if further amendments or additions are required.

PPG⁹ explains that it is expected that the examination will not include a public hearing. Rather the examiner should reach a view by considering written representations. Where an examiner considers it necessary to ensure adequate examination of an issue or to ensure a person has a fair chance to put a case, then a hearing must be held.¹⁰ After careful consideration of all the documentation and representations, I decided that neither circumstance applied and therefore it was not necessary to hold a hearing.

In 2018, the Neighbourhood Planning Independent Examiner Referral Service (NPIERS) published guidance to service users and examiners. Amongst other matters, the guidance indicates that the qualifying body will normally be given an opportunity to comment upon any representations made by other parties at the Regulation 16 consultation stage should they wish to do so. There is no obligation for a qualifying body to make any comments; it is only if they wish to do so. The Parish Council commented on a Regulation 16 stage representations at a late stage of the examination and I have taken these into account.

The Government updated the National Planning Policy Framework (NPPF) on 5 September 2023 during the examination. The update focused on national policy for onshore wind. Transitional arrangements are set out in the updated NPPF. These explain that the policies on renewable and low carbon energy and heat only apply to local plans that have not reached Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 or that reach that stage within three months of the publication of the updated NPPF. Although that relates to Local Plans, I

⁶ PPG para 055 ref id 41-055-20180222

⁷ Ibid

⁸ Ibid para 040 ref id 41-040-20160211

⁹ Ibid para 056 ref id 41-056-20180222

¹⁰ Ibid

consider the same principle can pragmatically be applied to this Plan. I set out this proposed course of action and LCC confirmed their agreement to this approach.

I am very grateful to everyone for ensuring that the examination has run so smoothly and in particular Kwame Steadman at LCC.

I made an unaccompanied site visit to familiarise myself with the Plan area on 20 September 2023.

Where modifications are recommended they appear in **bold text**. Where I have suggested specific changes to the wording of the policies or new wording these appear in ***bold italics***.

As a result of some modifications consequential amendments may be required. These can include changing section headings, amending the contents page, renumbering paragraphs or pages, ensuring that supporting appendices and other documents align with the final version of the Plan and so on.

I regard these issues as primarily matters of final presentation and do not specifically refer to such modifications, but have an expectation that a common sense approach will be taken and any such necessary editing will be carried out and the Plan's presentation made consistent.

4.0 Neighbourhood plan preparation

A comprehensive Consultation Statement has been submitted.

Work on the Plan began in March 2013. A Steering Group of Parish Councillors and local residents was set up. A dedicated page on the Parish Council website was established.

A number of surveys were undertaken. The first in June 2013 related to potential housing sites identified by LCC.

Various public events have taken place. The Summer Fun Day was a chance to connect with a lot of people and resulted in a SWOT analysis. A stall at a Christmas event resulted in a mind map. A public meeting was held in April 2014. The Summer Fun Day in 2014 held a local knowledge quiz to encourage engagement.

This early, but important, engagement work culminated in the Issues and Options Survey in August 2014. Hand delivered to all households, a response rate of around 12.4% was achieved. This helped to develop themes and issues of concern. A public meeting run in the style of Question Time was held in September 2014.

Later that year, a Business Survey was carried out. Further informal consultation was held during Rawdon at Christmas and a further public meeting was held in December.

The Summer Fun Day in 2015 was a chance to set out progress. Another public meeting and further informal engagement at Rawdon at Christmas took place. LCC's Site Allocation Plan was the main focus.

Early 2016 saw another public meeting focusing on a proposed airport link road. A Survey about this was held in March 2016. Annual participation at the Summer Fun Day occurred. At the end of the year, a Draft Policy Intentions Survey was carried out. An informal presence at the Rawdon at Christmas event continued over the years.

Young people were particularly encouraged to take part.

Informal consultation on the emerging draft Plan was held in November 2019.

After the Covid 19 pandemic delayed matters, the draft Plan was ready for pre-submission consultation.

Pre-submission (Regulation 14) consultation took place between 28 February – 11 April 2022. This stage was publicised via the website, notices and in the Parish newsletter delivered to every household. Hard copies were available at various locations and on request. A public drop-in event was held.

I consider that work on the Plan has been successful in engaging the local community over a sustained period.

Submission (Regulation 16) consultation was carried out between 24 July – 18 September 2023. The period was extended by LCC to ensure that it had been carried out fully.

A total of five representations were received at Regulation 16 stage. I have considered all of the representations and taken them into account in preparing my report.

5.0 Compliance with matters other than the basic conditions

I now check the various matters set out in section 2.0 of this report.

Qualifying body

Rawdon Parish Council is the qualifying body able to lead preparation of a neighbourhood plan. This requirement is satisfactorily met.

Plan area

The Plan area is coterminous with the administrative boundary for the Parish. LCC approved the designation of the area on 3 June 2013. The Plan relates to this area and does not relate to more than one neighbourhood area and therefore complies with these requirements. The Plan area is shown on page 4 of the Plan.

Plan period

The Plan period is 2023 – 2028. This is clearly shown on the Plan’s front cover. Although the Basic Conditions Statement indicates a start date of 2022, I am satisfied that the Plan itself is clear. This requirement is therefore satisfactorily met.

Excluded development

The Plan does not include policies that relate to any of the categories of excluded development and therefore meets this requirement. This is also helpfully confirmed in the Basic Conditions Statement.

Development and use of land

Policies in neighbourhood plans must relate to the development and use of land. Sometimes neighbourhood plans contain aspirational policies or projects that signal the community’s priorities for the future of their local area, but are not related to the development and use of land. If I consider a policy or proposal to fall within this category, I will recommend it be clearly differentiated. This is because wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non-land use matters should be clearly identifiable.¹¹

In this case, the Plan captures those non-planning issues through Parish Council Actions.¹² They are clearly differentiated. I consider this approach is appropriate for this Plan.

6.0 The basic conditions

Regard to national policy and advice

The Government updated the National Planning Policy Framework (NPPF) on 5 September 2023. This revised Framework replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018, updated in February 2019 and revised in July 2021.

¹¹ PPG para 004 ref id 41-004-20190509

¹² As explained in the Plan, page 13

The NPPF is the main document that sets out the Government's planning policies for England and how these are expected to be applied.

In particular it explains that the application of the presumption in favour of sustainable development will mean that neighbourhood plans should support the delivery of strategic policies in local plans or spatial development strategies and should shape and direct development outside of these strategic policies.¹³

Non-strategic policies are more detailed for specific areas, neighbourhoods or types of development.¹⁴ They can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment as well as set out other development management policies.¹⁵

The NPPF also makes it clear that neighbourhood plans should not promote less development than that set out in strategic policies or undermine those strategic policies.¹⁶

The NPPF states that all policies should be underpinned by relevant and up to date evidence; evidence should be adequate and proportionate, focused tightly on supporting and justifying policies and take into account relevant market signals.¹⁷

Policies should be clearly written and unambiguous so that it is evident how a decision maker should react to development proposals. They should serve a clear purpose and avoid unnecessary duplication of policies that apply to a particular area including those in the NPPF.¹⁸

On 6 March 2014, the Government published a suite of planning guidance referred to as Planning Practice Guidance (PPG). This is an online resource available at www.gov.uk/government/collections/planning-practice-guidance which is regularly updated. The planning guidance contains a wealth of information relating to neighbourhood planning. I have also had regard to PPG in preparing this report.

PPG indicates that a policy should be clear and unambiguous¹⁹ to enable a decision maker to apply it consistently and with confidence when determining planning applications. The guidance advises that policies should be concise, precise and supported by appropriate evidence, reflecting and responding to both the planning context and the characteristics of the area.²⁰

¹³ NPPF para 13

¹⁴ Ibid para 28

¹⁵ Ibid

¹⁶ Ibid para 29

¹⁷ Ibid para 31

¹⁸ Ibid para 16

¹⁹ PPG para 041 ref id 41-041-20140306

²⁰ Ibid

PPG states there is no 'tick box' list of evidence required, but proportionate, robust evidence should support the choices made and the approach taken.²¹ It continues that the evidence should be drawn upon to explain succinctly the intention and rationale of the policies.²²

Whilst this has formed part of my own assessment, the Basic Conditions Statement sets out how the key issues identified through consultation and the Plan's aims and policies correspond to national policy and guidance. It does this in a way which is both comprehensive and helpful. I commend this approach to others.

Contribute to the achievement of sustainable development

A qualifying body must demonstrate how the making of a neighbourhood plan would contribute to the achievement of sustainable development.

The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development.²³ This means that the planning system has three overarching and interdependent objectives which should be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across each of the different objectives.²⁴ The three overarching objectives are:²⁵

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The NPPF confirms that planning policies should play an active role in guiding development towards sustainable solutions, but should take local circumstances into account to reflect the character, needs and opportunities of each area.²⁶

²¹ PPG para 040 ref id 41-040-20160211

²² Ibid

²³ NPPF para 7

²⁴ Ibid para 8

²⁵ Ibid

²⁶ Ibid para 9

Whilst this has formed part of my own assessment, the Basic Conditions Statement sets out how the Plan helps to achieve sustainable development as outlined in the NPPF.

General conformity with the strategic policies in the development plan

The development plan consists of a number of documents. Of relevance to this examination is the Leeds Core Strategy (as amended by the Core Strategy Selective Review) adopted in 2019 and the Site Allocations Plan adopted in July 2019.

The Core Strategy was originally adopted in November 2014 and amended by the Core Strategy Selective Review (CSSR) which was adopted in September 2019. The Core Strategy (as amended by the CSSR) sets a revised housing requirement for the period 2017 – 2033, amends policies on affordable housing, green space and sustainable construction and introduces new policies on housing space standards, accessible homes and electric vehicle charging points.

I note that the Site Allocations Plan (SAP) was subject to a High Court decision in 2020 which ordered relief. The effect of the relief is that all housing sites including mixed use sites which were in the Green Belt immediately before adoption of the SAP are remitted back to the Secretary of State for further examination. The latest update on the LCC website indicates that a further consultation was held earlier this year.

Whilst this has formed part of my own assessment, the Basic Conditions Statement contains an assessment of how the Plan policies generally conform to relevant strategic policies.

Where I have not specifically referred to a strategic policy, I have considered all strategic policies in my examination of the Plan.

Emerging Plans at LCC level

LCC is working on an update to the Local Plan. At the time of writing, consultation is taking place on the pre-submission changes until 11 December 2023. The update focuses on climate change following the climate emergency declared by LCC in March 2019.

LCC has started work on a Leeds Local Plan 2040. Earlier this year the scope and a call for sites took place. This work is therefore at an early stage.

There is no legal requirement to examine the Plan against emerging policy. However, PPG²⁷ advises that the reasoning and evidence informing the local plan process may be relevant to the consideration of the basic conditions against which the Plan is tested. Furthermore Parish Councils and local planning authorities should aim to agree the relationship between policies in the emerging neighbourhood plan, the emerging local

²⁷ PPG para 009 ref id 41-009-20190509

plan and the adopted development plan with appropriate regard to national policy and guidance.²⁸

Retained European Union Obligations

A neighbourhood plan must be compatible with retained European Union (EU) obligations. A number of retained EU obligations may be of relevance for these purposes including those obligations in respect of Strategic Environmental Assessment, Environmental Impact Assessment, Habitats, Wild Birds, Waste, Air Quality and Water matters.

With reference to Strategic Environmental Assessment (SEA) requirements, PPG²⁹ confirms that it is the responsibility of the local planning authority, in this case LCC, to ensure that all the regulations appropriate to the nature and scope of the draft neighbourhood plan have been met. It states that it is LCC who must decide whether the draft plan is compatible with relevant retained EU obligations when it takes the decision on whether the plan should proceed to referendum and when it takes the decision on whether or not to make the plan.

Strategic Environmental Assessment and Habitats Regulations Assessment

The provisions of the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations') concerning the assessment of the effects of certain plans and programmes on the environment are relevant. The purpose of the SEA Regulations, which transposed into domestic law Directive 2001/42/EC ('SEA Directive'), are to provide a high level of protection of the environment by incorporating environmental considerations into the process of preparing plans and programmes.

The provisions of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'), which transposed into domestic law Directive 92/43/EEC (the 'Habitats Directive'), are also of relevance to this examination.

Regulation 63 of the Habitats Regulations requires a Habitats Regulations Assessment (HRA) to be undertaken to determine whether a plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects. The HRA assessment determines whether the Plan is likely to have significant effects on a European site considering the potential effects both of the Plan itself and in combination with other plans or projects. Where the potential for likely significant effects cannot be excluded, an appropriate assessment of the implications of the Plan for that European Site, in view of the Site's conservation objectives, must be carried out.

A Screening Report for both SEA and HRA dated April 2023 has been prepared by LCC. It concluded that the Plan was unlikely to have significant environmental effects.

²⁸ PPG para 009 ref id 41-009-20190509

²⁹ Ibid para 031 ref id 11-031-20150209

Consultation with the statutory bodies was undertaken. A response from Historic England concurred whilst Natural England offered no comments; no response was received from the Environment Agency.

I have treated the Screening Report to be the statement of reasons that the PPG advises must be prepared and submitted with the neighbourhood plan proposal and made available to the independent examiner where it is determined that the plan is unlikely to have significant environmental effects.³⁰

Taking account of the characteristics of the Plan, the information put forward and the characteristics of the areas most likely to be affected, I consider that retained EU obligations in respect of SEA have been satisfied.

Turning now to HRA, the South Pennine Moors Phase 2 Special Protection Area (SPA) and Special Area of Conservation (SAC) is around 6km from the Plan area and the North Pennine Moors SPA/SAC around 10km away at its nearest points.

The Screening Report concludes that no likely significant effects are predicted, either alone or in combination with other plans and projects. Further assessment was not needed.

On 28 December 2018, the basic condition prescribed in Regulation 32 and Schedule 2 (Habitats) of the Neighbourhood Planning (General) Regulations 2012 (as amended) was substituted by a new basic condition brought into force by the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018 which provides that the making of the plan does not breach the requirements of Chapter 8 of Part 6 of the Habitats Regulations.

Given the distance from, the nature and characteristics of the European sites and the nature and contents of the Plan, I agree with the conclusion of the Screening Report and consider that the prescribed basic condition relating to the Conservation of Habitats and Species Regulations 2017 is complied with.

Conclusion on retained EU obligations

National guidance establishes that the ultimate responsibility for determining whether a plan meets EU obligations lies with the local planning authority.³¹ In undertaking work on SEA and HRA, LCC has considered the compatibility of the Plan in regard to retained EU obligations and does not raise any concerns in this regard. LCC will also review this again in reaching a view on whether the Plan can proceed to referendum following receipt of my report.

³⁰ PPG para 028 ref id 11-028-20150209

³¹ Ibid para 031 ref id 11-031-20150209

European Convention on Human Rights (ECHR)

The Basic Conditions Statement contains a statement in relation to human rights and equalities.³² Having regard to the Basic Conditions Statement, there is nothing in the Plan that leads me to conclude there is any breach or incompatibility with Convention rights.

7.0 Detailed comments on the Plan and its policies

In this section I consider the Plan and its policies against the basic conditions. As a reminder, where modifications are recommended they appear in **bold text** and where I suggest specific changes to the wording of the policies or new wording these appear in ***bold italics***.

The Plan is presented to a clear and very high standard with lots of photographs of the local area that give a strong sense of place. The Plan has a lovely front and back cover design. It begins with a helpful contents page that lists the 12 policies.

1. Introduction and Background

This is a helpful introduction to the Plan that sets out the background and includes a useful diagram showing the timetable for completion of the Plan.

Some natural updating to this section will be needed as the Plan progresses.

The NPPF 2021 is referred to in this section and throughout the Plan and these references should be changed to reflect the updated NPPF which was published after the Plan was submitted. This modification is not repeated elsewhere in my report.

- **Update references to the NPPF throughout the Plan**

2. A Spatial Portrait of Rawdon Parish

This is an interesting section that sets out the context for the Parish.

³² Basic Conditions Statement page 43

3. A Neighbourhood Development Plan for Rawdon

Summarising the engagement which has taken place over eight years, this section sets out the events held and signposts further information in the Consultation Statement.

4. Key Issues, Vision and Objectives

It is apparent from the previous section and the Consultation Statement that engaging the local community has been a key component in producing the Plan.

A number of key issues arose from consultation. These are detailed here. They cover character, village identity and heritage, countryside protection, housing character and supply, economy and jobs including farming and infrastructure. The key issues are detailed and articulated well. They translate into the vision for Rawdon. The vision states:

“Rawdon identifies itself as a Village with a semi-rural, semi-suburban nature. Rawdon is a distinct community within the outer suburbs of the City of Leeds. Rawdon consists of a mixture of residential housing and also encompasses large rural areas as well as business and farming activities which combine to define its unique nature.

Over the Plan period, Rawdon will continue to be a distinctive semi-rural, semi-suburban village, whilst evolving in a way that respects and reflects the views of the community. It will retain its distinctive character of a village, largely physically separate from nearby communities. Its interesting heritage will continue to be enjoyed and valued, and development proposals will be sensitively designed to respect local character. It will continue to consist of a wide mixture of residential properties alongside large open areas of mixed farming and woodlands which also contain more isolated small pockets of residential property. There will be a range of community facilities, businesses and farms that will prosper within an attractive environment. Current and future generations will enjoy a strong sense of community, a high quality of life, and a flourishing natural environment.”

The vision is supported by 12 aims. All are articulated well and relate to development and use of land issues.

5. Neighbourhood Plan Policies

This section starts off with a general introduction and signposts further information.

There is a natural update to the reference to the NPPF in paragraph 5.0.2 and a typo on page 20 to correct.

In addition, the Parish Council asked for clarification to be added to the Plan in respect of Site HG2-11. In the interests of clarity, I have recommended a modification.

- **Correct the typo in paragraph 5.0.3**
- **Add a new sentence at the end of paragraph 5.1.10 that reads: *“It should be noted that this site is allocated through Leeds City Council’s Site Allocations Plan and is not an allocation made by the Neighbourhood Plan.”***

5.1 Housing and Population

Policy R1 Meeting Local Housing Needs

The NPPF states that the needs of groups with specific housing requirements should be addressed to support the Government’s objective of significantly boosting housing supply.³³

The Plan explains that CSSR Spatial Policy 1 directs most development to the Leeds Urban Area and Major Settlements with smaller settlements contributing to development needs depending on size, function and sustainability. Parts of the Plan area fall within the Major Settlement category of Guiseley/Yeadon/Rawdon whilst the remainder of the Plan area is in the Green Belt.

Rawdon falls within the Aireborough Housing Market Character Area. CSSR Spatial Policy 7 sets a housing target of 3% of the overall need with this Housing Market Character Area.

The SAP contains one site allocation in Rawdon; Larkfield Drive (off), Ivy House (adjacent) HG2-11 for six dwellings. The SAP notes the site is suitable for older persons housing/independent living and that the site is within the setting of a listed building and falls within the setting of Littlemoor Conservation Area. This site is not identified in this Plan, but in the SAP. Two sites (26-28 New Road Side and Batter Lane) are also identified in the Annex of the SAP for a total of nine dwellings. These two sites have permission or have expired permission.

³³ NPPF para 60

CSSR Policy H4 supports an appropriate mix of dwelling types and sizes to address long term needs taking into account the nature of the development and the character of the location.

CSSR Policy H8 expects developments of 50 or more dwellings to support independent living, for example through the provision of bungalows on smaller schemes. Housing suitable for older people or those with needs should be located with good access to community facilities.

A Local Housing Market Assessment (2017) found a lack of affordable rented housing. It identified a need for smaller housing units aimed at older households downsizing and suitable for young couples and starter households, rented and owner options for older singles and those seeking to leave family housing as well as extra care provision. The CSSR identifies a target of 35% affordable housing. The local community considers there is a lack of starter homes and retirement homes.

This leads onto Policy R1 which sets out the expectations for new housing developments. It reflects the evidence summarised above. However, I am mindful that the Housing Market Assessment, as the Plan recognises, is some years old. For this reason, a modification to add a phrase which future proofs the policy is recommended.

With this modification, the policy will have regard to national policy, contribute to the achievement of sustainable development and be in general conformity with strategic policy, and is a local expression of, CSSR Policy H4 and takes momentum from CSSR Policy H8.

- **Add a new sentence at the end of the policy that reads: *“The mix of local housing needs provided should be based on the latest available local housing needs information.”***

5.2 Design

The NPPF states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.³⁴

It continues that neighbourhood plans can play an important role in identifying the special qualities of an area and explaining how this should be reflected in development.³⁵ It refers to design guides and codes to help provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design.³⁶

It continues that planning policies should ensure developments function well and add to the overall quality of the area, are visually attractive, are sympathetic to local character

³⁴ NPPF para 126

³⁵ Ibid para 127

³⁶ Ibid para 128

and history whilst not preventing change or innovation, establish or maintain a strong sense of place, optimise site potential and create places that are safe, inclusive and accessible.³⁷

CSSR Policy P10 seeks high quality inclusive design based on contextual analysis and community consultation. It sets out a number of key principles.

Policy R2 Design Guidelines for New Development

Recognising the rich mix of design styles and materials to be found in the Plan area, which give Rawdon its unique character, Policy R2 sets out a series of principles for new development.

The principles cover design, character, transport, car parking, gardens and open spaces and health and wellbeing. Shopfronts are referred to. All are articulated well and are appropriate. There is flexibility within the policy recognising that innovative design can be appropriate. Reference is made to Appendix 4 which is like a mini design guide with photographs of examples of good design.

I am concerned about using the word “guidelines” in the policy’s title; this potentially weakens its application. It is very clear that the policy sets out principles which developers are expected to adhere to.

On this note, the word “should” is used in the policy. A modification to make the policy more robust is recommended.

The policy asks for “adequate” car parking; this may not meet standards or be sufficient. A modification is recommended to change this to make it more robust to ensure sufficient parking is provided.

The loss of open spaces and gardens is made more robust by a modification to ensure character, appearance or function can be taken account of individually as well as collectively.

A syntax change is also recommended.

With these modifications, the policy will have regard to national policy, contribute to the achievement of sustainable development and be in general conformity with strategic policy, and is a local expression of, CSSR Policy P10 in particular.

- **Change the policy’s title by replacing the word “Guidelines” with “Principles”**

³⁷ NPPF para 130

- Substitute the word “should” in the first sentence of the policy with “*are expected to*”
- Change criterion 1. C. to read: “Shop frontages should be of traditional design (see Appendix 4) or where contemporary shopfronts are proposed they *must be of a high quality design and be appropriate to the building and street scene.*”
- Change criterion 2. C. to read: “*Satisfactory* car parking should be provided on site.”
- Change the word “and” before “...function...” in criterion 3. A. to “*or*”

Policy R3 Sustainable Design

This policy seeks to address climate change and energy issues. It encourages conversions and retrofits. It encourages new development to maximise resource and energy efficiency referring to LCC’s Net Zero carbon and climate change objectives. It sets out nine principles for sustainability.

A number of policies in the CSSR refer to climate change and sustainable design and construction.

A WMS³⁸ explains that neighbourhood plans should not set out any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings; instead these must be contained in local plans.

Therefore the third part of the policy is subject to modification to reflect the WMS.

With these modifications, the policy will meet the basic conditions. It takes account of the NPPF, is in general conformity with the CSSR and will help to achieve sustainable development.

- Change the last part of the policy to read:

“The design of new development should reflect the following key principles:

1. **Surface drainage should not increase pressure on existing wastewater and natural drainage systems.**
2. **Gardens and parking areas should use permeable surfacing to reduce run off and rainwater and grey water should be stored and reused, for example from water butts.**
3. **Use of re-used, reclaimed and recycled materials is encouraged, and where**

³⁸ Written Ministerial Statement 25 March 2015

- possible materials should be sourced from local suppliers.
4. External and accessible electric vehicle charging points should be provided.

and is encouraged to:

5. *perform well against Passivhaus standards.*
6. *demonstrate adaption and mitigation against the effects of climate change including through design layout and orientation, use of technology and energy efficiency.*
7. *provide high quality, accessible and attractive garden areas and open spaces suitable for food growing.”*

5.3 Environment

Policy R4 Protecting and Enhancing Natural Biodiversity Assets

The NPPF³⁹ is clear that planning policies should contribute to and enhance the natural and local environment including through the protection and enhancement of valued landscapes, sites of biodiversity value and soils, recognising the intrinsic character and beauty of the countryside and minimising impacts on biodiversity and providing net gains.

CSSR Policy G8 seeks to protect important species and habitats. CSSR Policy G9 seeks biodiversity improvements including an overall net gain.

Policy R4 supports the enhancement of biodiversity encouraging the appropriate provision of gardens and species, establishing new wildlife corridors and protecting natural assets.

The policy meets the basic conditions as it has regard to national policy, is in general conformity with, and is a local expression of, CSSR Policies G8 and G9 in particular and will help to achieve sustainable development. No modifications are therefore recommended.

Policy R5 Protecting Local Green Spaces

The Plan proposes three areas as Local Green Space (LGS). They are shown on Map 2A the Policies Map and more detailed boundaries are shown in Appendix 1 of the Plan alongside further information about each proposed LGS.

The NPPF explains that LGSs are green areas of particular importance to local communities.⁴⁰

³⁹ NPPF para 174

⁴⁰ Ibid para 101

The designation of LGSs should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.⁴¹ It is only possible to designate LGSs when a plan is prepared or updated and LGSs should be capable of enduring beyond the end of the plan period.⁴²

The NPPF sets out three criteria for green spaces.⁴³ These are that the green space should be in reasonably close proximity to the community it serves, be demonstrably special to the local community and hold a particular local significance and be local in character and not be an extensive tract of land. Further guidance about LGSs is given in PPG.

I saw the proposed areas on my site visit.

1. The Billing is described as an iconic landmark of the village. The hill is around 230 metres high and offers the possibilities of long as well as short distance views. The area around the hill is popular for walks. Remains of a quarry and concrete foundations in connection with World War II are apparent and a gold torc was also found there in the 1770s. The Billing also falls within the Green Belt.
2. Littlemoor is a triangle of grass surrounded by mature trees. A centenary stone and garden commemorating World War I are situated here with pleasant seating. It is valued for the park which was originally named Victoria and later renamed Jubilee Park and is known now as Littlemoor. It is a very picturesque space.
3. Micklefield Park is used for community events and has a playground, skateboard park, assault course and a millennium garden. It includes the bowling club and tennis courts. There is local historic interest as well.

In my view, all of the proposed LGSs meet the criteria in the NPPF satisfactorily. The proposed LGSs are demonstrably important to the local community, are capable of enduring beyond the Plan period, meet the criteria in paragraph 102 of the NPPF and their designation is consistent with the local planning of sustainable development and investment in sufficient homes, jobs and other essential services given other policies in the development plan and this Plan.

I have also considered whether there is any additional benefit to be gained by the designation for sites located in the Green Belt or falling within other designations such as a Conservation Area. I consider that there is additional local benefit to be gained by identifying those areas of particular importance to the community.

I also note that CSSR Policy G6 sets the principle of protecting green space from development though it acknowledges there may be cases where the loss of green space

⁴¹ NPPF para 101

⁴² Ibid

⁴³ Ibid para 102

to development would allow wider planning benefits to be realised.

The SAP then identifies some green spaces above a 0.2 hectare threshold. All three proposed LGSs are identified in the SAP. Littlemoor has the same site boundaries. Micklefield Park is essentially the same as the proposed LGS although there are some minor boundary differences. The proposed LGS designation for The Billing is a larger site although it includes the two separate designations of Billing Hill and Billing View Pond and part of the separate designation of Larkfield Dam.

The designation of these green spaces as LGSs will take precedence over their SAP designation.

Turning now to the wording of the policy, it designates the LGSs and indicates how development proposals will be managed. The NPPF is clear that policies for managing development within a LGS should be consistent with those for Green Belts.⁴⁴ I consider the policy should simply refer to this in order to have regard to the NPPF. A modification is therefore recommended.

With this modification, the policy will meet the basic conditions.

- **Amend the last paragraph of the policy to read: “New development *will be managed in accordance with national policy on Green Belts.*”**

Policy R6 Conserving and Enhancing Rawdon’s Conservation Areas and Policies R6 (a), (b), (c) and (d)

In relation to heritage assets, the Plan area boasts four separate Conservation Areas (CA) and a number of listed buildings as well as a Scheduled Monument.

The NPPF is clear that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance.⁴⁵ It continues⁴⁶ that great weight should be given to the assets’ conservation when considering the impact of development on the significance of the asset.

CSSR Policy P11 seeks to conserve and enhance heritage features.

Policy R6 is a general policy which applies to all four CAs which then has four adjunct policies on each CA.

Policy R6 is a long and detailed policy. In essence, it seeks to deliver locally distinctive development of a high quality that protects, reflects and enhances local character, both

⁴⁴ NPPF para 103

⁴⁵ Ibid para 189

⁴⁶ Ibid para 199

built and natural and historical, taking account of the NPPF and leading on from CSSR Policy P11 in particular. It sets out expectations for impact assessments.

It also refers to non-designated heritage assets. Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes which have heritage significance, but do not meet the criteria for designated heritage assets. PPG advises there are various ways that such assets can be identified including through neighbourhood planning.⁴⁷

In relation to non-designated heritage assets, the NPPF is clear that the effect of any development on its significance should be taken into account and that a balanced judgment will be needed having regard to the scale of any harm or loss and the significance of the heritage asset.⁴⁸

The policy does not identify any non-designated heritage assets. The identification of such assets is subject of a Parish Council Action. When any are identified in the future, the policy introduces a presumption in favour of their retention if demolition and redevelopment would cause unacceptable harm when assessed against potential enhancement. I consider this is a locally expressed version of the NPPF and is acceptable when any such assets are identified.

Turning now to the adjunct policies, all four are based on and reflect the very detailed Conservation Area Appraisal and Management Plans (CAA) for each area. In relation to Policies R6 (a), (b) and (c), the criteria in each policy reflect the actions in the CAA document. Policy R6 (d) reflects the character analysis in the relevant CAA.

There is a common issue across the main and adjunct policies to modify. Each policy starts with “Where feasible”. Given the nature of the policies, the importance of the CAs and given they are evidenced based, this is too weak. A modification is therefore recommended to make the policy more robust.

Map 6 on page 50 of the Plan shows the four CAs. This is helpful and is referred to in the supporting text. Three of the CAs share a boundary and for me the Map could be clearer in the distinction between each CA. It would also assist clarity if colours outside the Plan area were removed.

With these modifications, Policy R6 and R6 (a) to (d) inclusive will meet the basic conditions.

- **Delete the words “Where feasible” from the start of the third paragraph of Policy R6 and at the start of Policies R6 (a), (b), (c) and (d)**
- **Make the boundaries of each CA clearer on Map 6 and remove any information relating to outside the Plan area**

⁴⁷ PPG para 040 ref id 18a-040-20190723

⁴⁸ NPPF para 203

Policy R7 Protecting the Historic Environment and Rawdon's Distinctive Character

This policy seeks to protect and enhance the historic features that contribute to the special character of Rawdon. In particular "areas of separation" are referred to, but have not been identified on any Map. However, it is clear that there are distinct areas within the Parish and so with some modifications to the policy, this principle can be retained.

CSSR Policy P12 seeks to conserve and enhance the character, quality and biodiversity of townscapes and landscapes including their historical and cultural significance.

Some changes are recommended to the policy to make it clearer and more robust.

With these modifications, the policy will have regard to the NPPF, be a local expression of CSSR Policies P11 and P12 in particular and help to achieve sustainable development.

- **Substitute the word "should" in the first sentence of the policy with "must"**
- **Revise the second paragraph of the policy to read: "*The established pattern of development must be respected and maintained. The different areas that comprise the civil parish of Rawdon parish must remain distinct and separate reflecting their unique character and sense of place. Development which results in further coalescence in such areas of separation will not be supported.*"**

5.4 The Local Economy

Policy R8 Supporting the Local Economy

The NPPF is clear that planning policies should help create the conditions in which businesses can invest, expand and adapt.⁴⁹ The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.⁵⁰

To help ensure that town centres keep their vitality, the NPPF indicates that policies should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.⁵¹

CSSR Spatial Policy 8 sets out a number of economic development priorities including supply of land and buildings, growth and diversification including of new businesses. It refers to the development of Local Centres as the core location for new retail, office employment and other main town centre uses.

⁴⁹ NPPF para 81

⁵⁰ Ibid

⁵¹ Ibid para 86

CSSR Policy P1 identifies Leeds Road as a Lower Order Local Centre. The SAP identifies the Leeds Road boundary.

CSSR Policy P3 explains that Local Centres meet day-to-day needs. It sets out those uses which are acceptable in principle in and on the edge of Local Centres. This includes small food stores, other shops, banks, health care, community facilities, restaurants, cafes and takeaways, offices and housing above ground floors or outside of shopping frontages.

For Lower Order Local Centres, CSSR Policy P3 resists the change of use of retail units where the vitality and viability of the centre to meet local needs would be undermined. Amongst other things, the cumulative impact, amenity, traffic generation and other transport considerations and character of the area would be taken into account. In this Plan area, shops, services and cafes are concentrated in the Harrogate Road/Leeds Road area and Town Street. Appendix 5 of the Plan lists these and there is a great number and variety of local businesses and services.

Policy R8 supports the expansion of existing businesses and new business uses appropriate to the hierarchy of centres set out in CSSR Spatial Policy 2 subject to three criteria. The supporting text indicates the types of uses which are considered appropriate and includes more than those indicated in CSSR Policy P3, but which are nonetheless appropriate to this location.

The three criteria in Policy R8 relate to traffic, car parking and residential amenity. The criteria are appropriate, but some modifications are made to the wording to ensure that no adverse effects result as the current wording may not fully address these.

The next element of the policy relates to offices; small scale development is supported in or on the edge of Leeds Road Local Centre. This aligns with CSSR Policy P2. The threshold of a small office referred to in the policy aligns with that in the CSSR Policy EC2.

The policy then refers to housing development and parking addressing local issues.

Paragraph 5.4.7 of the supporting text appears to set out additional policy requirements. In fact this is a selective quote from CSSR Policy P4. I consider that the CSSR should be referred to in the interests of clarity.

With these modifications, the policy will have regard to national policy, be in general conformity with CSSR Spatial Policy 8 and Policies EC2, P1, P2 and P3 and help to achieve sustainable development, particularly the objective of building a strong, responsive economy.

- **Amend the first criterion in the policy to read: “1. Any adverse impacts from traffic on the existing local road network are *satisfactorily addressed* through suitable traffic management measures; and”**

- Change the word “adequate” in the second criterion in the policy to “*satisfactory*”
- Amend the third criterion in the policy to read: “3. Local residential amenity is protected and *any necessary* measures are put in place to *ensure that living conditions are not materially harmed before the first use of the premises.*”
- Add a new sentence at the start of paragraph 5.4.7 on page 54 of the Plan that reads: “*Amongst other things, Core Strategy Policy P4 supports proposals...*”

Policy R9 Protecting Existing Local Employment Premises

The CSSR explains that a key aim is to secure long term economic growth and job creation.

CSSR Policy EC3 safeguards existing employment land. The CSSR explains that there is a shortage of employment sites in certain locations and an oversupply in others. However, this was based on employment land reviews undertaken some years ago. In those areas where there is a shortfall, CSSR Policy EC3 indicates that the loss of employment sites can be offset by the general availability in the surrounding area.

The SAP does not identify any allocated sites for office use or general employment use within this Plan area.

Recognising the importance of employment, this policy seeks to retain local employment sites notwithstanding changes permitted by the Use Classes Order.

It only supports changes of use after unoccupation for at least two years and active marketing or where the site is no longer suitable for such uses. I consider that two years is a significant period of time. There is no explanation for this timescale in the Plan. I note that the supporting text to CSSR Policy EC3 refers to a minimum period of 12 months.

The NPPF indicates that planning policies should, amongst other things, be flexible enough to accommodate needs, allow for new and flexible working practices and enable a rapid response to changes in economic circumstances.⁵²

Therefore having regard to the NPPF and the CSSR, a modification is made to alter the time period.

With this modification, the policy will have regard to the NPPF’s support for

⁵² NPPF para 82

economic growth and productivity.⁵³ It is a local expression of CSSR Spatial Policy 8 and EC3 and will help to particularly achieve the economic objective of sustainable development.

- **Change the phrase “...at least two years...” in criterion 1. of the policy to “...at least *one year*...”**

5.5 Community Facilities

Policy R10 Protecting Existing Community Facilities

To provide the social, recreational and cultural facilities and services the community needs, the NPPF indicates that planning policies should plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.⁵⁴ The NPPF guards against the loss of facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs.⁵⁵

In relation to rural economies, the NPPF expects planning policies to enable the retention and development of accessible local services and community facilities.⁵⁶

The NPPF cites open space and sports venues as part of the local services and community facilities which planning policies should retain and enable.⁵⁷ In addition, the NPPF recognises that planning policies should help to achieve healthy, inclusive and safe places which enable and support healthy lifestyles.⁵⁸ It also encourages policies to provide recreational facilities and to guard against their unnecessary loss.⁵⁹

CSSR Policy P9 recognises the importance of community facilities and other services including education. It supports new provision subject to accessibility and impact on residential amenity. The loss of any facility should be compensated by the provision of a suitable alternative if need is identified.

15 facilities are listed in the policy and shown on Map 2B. These range from the cricket club to public houses. This policy seeks to protect these existing services and facilities from changes of use or seeks to ensure equivalent provision is made. The principle is sound, but the policy refers to “reasonable efforts”. It is hard to see how this policy could be applied in practice as no guidance is offered as to what is expected from applicants. Therefore a modification is made to address this concern.

⁵³ NPPF para 81

⁵⁴ Ibid para 93

⁵⁵ Ibid

⁵⁶ Ibid para 84

⁵⁷ Ibid para 93

⁵⁸ Ibid para 92

⁵⁹ Ibid para 93

With this modification, the policy will have regard to national policy. It is in general conformity with CSSR Policy P9. It will help to achieve sustainable development.

- **Add a new paragraph at the end of the policy that reads: “Reasonable efforts could include demonstrating that every effort has been made to secure or market the premises for its current or last use or for another community use for at least 12 months, or that there is no longer a local need for the use or that an equivalent use is provided elsewhere or that the use is no longer viable.”**

Policy R11 The Extension of Existing Schools

This policy supports the extension of existing schools subject to four criteria. These cover traffic impacts, pedestrian connectivity, parking and the loss of playing fields.

I note that some of the playing fields, for example at Littlemoor Primary School and St Peters School are identified as green space in the SAP and subject to CSSR Policy G6. The CSSR policy acknowledges there may be cases where the loss of green space to development would allow wider planning benefits to be realised.

Therefore I consider that the policy takes a proactive approach. I note the CSSR also identifies that new educational facilities will be needed and that CSSR Policy P9 recognises the importance of education.

It therefore meets the basic conditions by having regard to the NPPF which emphasises the importance of having a sufficient choice of school places is available to meet the needs of existing and new communities,⁶⁰ being in general conformity with relevant strategic policies referred to above and helping to achieve sustainable development. No modifications are therefore recommended.

5.6 Movement and Traffic Management

Policy R12 Travel Hierarchy, Traffic Management and Transport Improvements

Policy R12 is a long policy. The first part supports the concept of a 20-minute neighbourhood. Essentially this is the idea that most daily needs can be met within a short walk or cycle. It has already been put in place in a number of towns and cities and is gaining momentum.

The second part relates to traffic and transport issues including the provision of parking and support for pedestrian and cycling networks.

⁶⁰ NPPF para 95

The NPPF states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that the potential impacts of development on transport networks can be addressed and opportunities to change transport usage and to promote walking and cycling are pursued.⁶¹ It encourages patterns of growth to be managed to support the objective of sustainable transport.

The NPPF also seeks to protect and enhance public rights of way.⁶²

I consider the policy meets the basic conditions by having regard to national policy, being in general conformity with, and a local expression of, CSSR Policies T1 and T2 which support sustainable travel in principle and helping to achieve sustainable development. No modifications are therefore recommended.

5.7 Community Infrastructure Levy

This section of the Plan refers to Community Infrastructure Levy (CIL). It sets out a list of priorities for CIL monies.

6. Next Steps

This section explains the next steps. It will need deleting or amending as the Plan progresses through the process, but is helpful at this stage.

Appendices

Appendix 1 contains details of the three LGSs.

Appendix 2 contains details of Green/Open Spaces. The Plan explains that these are the green spaces protected under CSSR Policy G6.⁶³

Appendix 3 has details of listed buildings in the Plan area. This list should be future proofed. A modification is made to address this point.

Appendix 4 has examples of architectural styles and shopfronts in conjunction to Policy R2.

Appendix 5 lists local businesses which are referred to in the context of the section of the Plan on the local economy.

⁶¹ NPPF para 104

⁶² Ibid para 100

⁶³ The Plan, page 39

- Add a sentence to Appendix 3 that reads: *“Up to date information on listed buildings should be sought from Historic England or another reliable source.”*

8.0 Conclusions and recommendations

I am satisfied that the Rawdon Neighbourhood Development Plan, subject to the modifications I have recommended, meets the basic conditions and the other statutory requirements outlined earlier in this report.

I am therefore pleased to recommend to Leeds City Council that, subject to the modifications proposed in this report, the Rawdon Neighbourhood Development Plan can proceed to a referendum.

Following on from that, I am required to consider whether the referendum area should be extended beyond the Neighbourhood Plan area. I see no reason to alter or extend the Plan area for the purpose of holding a referendum and no representations have been made that would lead me to reach a different conclusion.

I therefore consider that the Rawdon Neighbourhood Development Plan should proceed to a referendum based on the Rawdon Neighbourhood Plan area as approved by Leeds City Council on 3 June 2013.

Ann Skippers MRTPI

Ann Skippers Planning
2 December 2023

Appendix 1 List of key documents specific to this examination

Rawdon Neighbourhood Development Plan 2023 – 2028 Submission Version March 2023

Basic Conditions Statement March 2023 (Kirkwells)

Consultation Statement March 2023 (Kirkwells)

Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report April 2023 (LCC)

Rawdon Cragg Wood Conservation Area Appraisal and Management Plan 2012 (LCC)

Rawdon Little Moor Conservation Area Appraisal and Management Plan 2011 (LCC)

Rawdon Little London Conservation Area Appraisal and Management Plan 2011 (LCC)

Rawdon Low Green Conservation Area Appraisal and Management Plan 2011 (LCC)

Core Strategy amended by the Core Strategy Selective Review 2019) adopted November 2014, amendments adopted September 2019

Site Allocations Plan Section 1: Introduction and Section 2: Retail, Housing, Employment and Green Space Overview adopted July 2019

Site Allocations Plan Section 3: Proposals for the 11 Housing Market Characteristic Areas 1. Aireborough adopted July 2019

Other documents on the Parish Council website www.rawdonparishcouncil.gov.uk including the Local Housing Market Assessment for Rawdon, February 2017 (Huw Jones, CHY) and Planning Policy Assessment and Review of the Evidence Base, January 2022 (Kirkwells)

List ends