

LEEDS GIRLS' HIGH SCHOOL ACTION GROUP

Leanne Palmer
Planning Inspectorate

2 Ashwood Terrace
LEEDS
LS6 2EH

29 March 2011

Dear Leanne

PLANNING APPEAL APP/N4720/E/10/214058764 ETC - STATEMENT OF COMMON GROUND

At the pre-Inquiry Meeting on 28 February it was agreed that the Appellant and the Council should submit a draft Statement of Common Ground by 14 March and that the Rule 6 parties would then be consulted on this with a view to submitting a final Statement by 4 April. The Leeds Girls' High School Action Group has now considered the Statement sent to it on 18 March and has the following comments.

Section 2 – The Proposed Development

First, it would be helpful if the headings referring to individual applications included the application and appeal reference number to ensure all parties are working to common information.

Second, the Action Group does not agree that the design and location of the Public Open Space as proposed would provide acceptable amenity space for, and be of value to, existing residents. This is mentioned in para 2 of section 2 and in the third para under the heading "Outline planning permission for 53 townhouses (including two in the lodge to the north west of the site) and 15 apartments".

Third, in the section headed "Conversion of Rose Court to 12 apartments", the Action Group does not agree with the statement that the proposed conversion "is respectful of the buildings current character and appearance".

Section 5 – the development of protected playing fields

The Action Group does not agree that the proposal meets UDP Policy N6(i). It considers that the appellant and the Local Planning Authority have not interpreted the term "locality" correctly. Therefore it does not agree that Policy N6(ii) does not apply.

In the final paragraph, we would point out that Sport England did object (non-statutorily) to the development of the site because of lack of recreational provision in the locality on the basis of their policy objective:

"to promote the use of planning obligations as a way of securing the provision of new or enhanced places of sport and a contribution towards their future maintenance to meet the need arising from new development."

and on the basis of guidance in PPG17 para 23.

Section 6 – Layout and scale considerations

The Action Group does not agree that all the proposed townhouses listed, and the apartment block, would have an acceptable impact on the residential amenity of proposed residents in terms of privacy. There are a variety of components of privacy: whilst some may be acceptable others may not, and the Group will be raising this issue as part of its Proof.

Section 8 – The conversion of Rose Court and the senior school building

The Action Group does not agree that the conversion of Rose Court (and its proposed access) would have no impact on the setting or fabric of the listed building.

Section 9 – Extent of demolition

On plan 2006-239/601 rev C the School Hall to be demolished is marked as "later addition hall extension". This is not correct. The Hall was constructed at the same time as the rest of the main building. The Group does not, therefore, agree that "all of the demolition in the remaining hatched area is considered acceptable"

Yours sincerely

Martin Staniforth