

1.	<p>Introduction</p>
1.1	<p>CPRE looks forward to participating in the Examination hearings, and generally our position on all matters remains unchanged since our pre-submission changes representation in February 2017. In the light of this, we have not sought to provide detailed hearing statements for each session of the Examination, but instead to summarise our key points and concerns in this general hearing statement, which will inform our oral evidence.</p>
1.2	<p>We have also used this statement to outline a proposed alternative approach to resolving the rather vexed question of how the impending Core Strategy Review should be regarded for the purposes of the SAP Examination.</p>
1.3	<p>At the time of writing we are in discussions with Leeds City Council with a view to agreeing a Statement of Common / Uncommon Ground. It is possible that this will result in slight modifications to our position on some matters, but it is highly unlikely that it will alter our key concerns about the soundness of the SAP.</p>
2.	<p>SAP's general fit with the Core Strategy and NPPF</p>
2.1	<p>The SAP is required to 'give effect' to the adopted Core Strategy. Our principle concern is that the SAP fulfills that requirement only in a quantitative sense, by translating numerical targets for housing and employment land into a quantity and capacity of sites; but is sorely lacking in the qualitative approach needed to ensure the totality of the Core Strategy can be delivered.</p>
2.2	<p>NPPF requires Local Plans to deliver sustainable development. The SAP Sustainability Appraisal recites the Core Planning Principles of NPPF, and notes 'wide ranging implications for site allocations'; but identifies only two key targets and indicators for SAP's compatibility with NPPF:</p> <ul style="list-style-type: none"> • Identify and update annually a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land; • Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.
2.3	<p>This is a catastrophically reductive approach to evaluating the SAP's performance against the wide range of principles in NPPF that add up to sustainable development. For example:</p> <p><i>'identify the size, type, tenure and range of housing required in particular locations'</i></p> <p><i>'create a shared vision with communities of the residential environment and facilities they wish to see'</i></p> <p><i>'adopt proactive strategies to mitigate and adapt to climate change'</i></p> <p><i>'plan for new development in locations and ways which reduce greenhouse gas emissions'</i></p> <p><i>'ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area'.</i></p>

2.4	We see no evidence that the SAP's contribution to these core planning principles of NPPF is being assessed or monitored.
3.	Sustainability and Climate Change
3.1	We have previously stated our view that the SAP is unsound, and possibly not legally compliant, in relation to climate change. The SA notes the legally binding obligations of the Climate Change Act 2008. The majority of the plan period falls within the 4th carbon budget period 2013-2027, during which there should be a 50% reduction in GHG emissions from 1990 levels. The SA assesses climate change against SA13 (greenhouse gas emissions), and in our view there are serious shortcomings in this regard.
3.2	Focusing on SA13 (GHG emissions), there is a mismatch between the assessment criterion (accessibility as defined by LCC Highways) and the site-specific mitigations, which alongside improvements to accessibility also uses energy efficient standards for new buildings. However, the CS contains no mechanism to 'ramp up' the energy efficiency of buildings within developments as a site-specific mitigation. The SA notes NPPF para 93 requiring 'radical reductions in GHG emissions', but when examining the matrix of site assessments against SA13 it is hard to see how the radical shift can be implemented.
3.3	It should also be noted that SA13 (GHG emissions), SA15 (transport network) and SA16 (local needs met locally) are all measured by essentially the same variable, LCC Highways' accessibility assessment. It is unclear how effectively this variable can measure three SD different objectives. Meanwhile, CS Policy EN1 (Climate change - CO2 reduction) makes no reference to transport-related emissions, so it is evident that the SA is judging the SAP's climate change performance in a way that the Core Strategy's climate change policy does not address.
3.4	<p>In the case of transport-related GHG emissions, we know that new residential development generates 5 to 7 new vehicle movements per day per dwelling on average (from TRICS data), so with a given housing target, an average distance per vehicle trip and an average CO2 emissions per kilometre, it is easy to extrapolate the CO2 impact of new housing development. We must assume that this average would need to be substantially reduced if the 'radical reductions' in transport-related GHG emissions envisaged by NPPF para 93 are to be delivered. Any reductions achieved through increased efficiency of vehicles during the plan period is clearly outside the remit of the SAP. The SAP's contribution to GHG must therefore focus on The relative GHG impact of different sites, which will depend on:</p> <ul style="list-style-type: none"> • the realistic potential of public transport, walking and cycling in the locality to reduce those vehicle movements; • the extent to which the location, type and density of development on the site facilitates sustainable travel options; • the extent to which the development of the site will contribute to investment in sustainable travel infrastructure.

3.5	<p>Further, if a level of GHG increases are deemed to be inevitable as a result of residential and employment development, then the Council should quantify this and articulate how other policies and programmes will effectively mitigate these increases such that the overall reduction in GHG emissions in Leeds will still fall. Good examples would be a major retrofitting programme for energy performance of existing buildings across the city in all tenures, and a strong focus on low-carbon enterprise within the employment growth envisaged over the plan period.</p>
4.	<p>Sustainability and Housing Density</p>
4.1	<p>We have previously referred to housing density in our representations, and we consider that the SAP would be justified in setting higher density standards on a site-by-site basis than are required by the Core Strategy. An important reason for this justification is that, generally, higher densities on new developments achieve four crucial sustainability benefits:</p> <ul style="list-style-type: none"> • more efficient use of land, including freeing up of land for green infrastructure and green space; • better ability to support local shops, schools, amenities and public transport, including raising the mean density of existing neighbourhoods and thereby their vitality; • lower GHG emissions per dwelling, partly through greater use of sustainable travel and partly through more energy-efficient layout and construction; • greater tendency to contribute to community cohesion through housing types and tenures that are more pertinent to local needs.
4.2	<p>It is perfectly clear that the potential of sites, and the form of development envisaged for them to contribute to these sustainability benefits, should significantly inform site selection, and it is not apparent that this has taken place for the SAP. Whilst housing density may be a relatively crude proxy for these benefits, there is a wealth of evidence to show that net densities of between 45 and 70 dpha are better able to deliver them; and CPRE's position therefore remains that, with a few localised exceptions, sites not considered suitable for at least 45dpha should not be allocated. In our view this is not a departure or conflict with the Core Strategy, because Policy H3 only sets minimum densities and there is no reason why higher densities in the SAP should not also give effect to H3. But to the extent that this may be seen by some stakeholders as a departure from the Core Strategy, we consider it entirely justified in relation to the SAP's ability to implement a range of other Core Strategy policies, and thereby deliver sustainable development.</p>
5.	<p>SAP's delivery of the settlement hierarchy and housing distribution</p>
5.1	<p>We note and warmly welcome the increased proportion of housing delivery taking place in the City Centre and Inner Area compared to the outer HMCAs (Table 1); and the improved focus of allocations on higher levels of the settlement hierarchy (Table 2). However, we would reiterate our view that the Outer North East apportionment should be reduced to eliminate the unsustainable allocations at Parlington and Land East of Wetherby, which appear to be based on an opportunistic approach to making up the HMCA numbers, rather than on strategic decisions to develop</p>

	<p>sustainable locations. If sustainable locations do not exist in Outer North East then the housing need should be met elsewhere.</p>
<p>5.2</p>	<p>In our view, the SAP is at liberty to vary the distribution compared to the CS in this way, because the identification and assessment of sites, and the Green Belt review, took place after the SAP, and provide a testing process. It is quite reasonable to expect that this testing process will find a need to vary the distribution it does not produce sufficient sites that are both deliverable and sustainable in each HMCA. CPRE considers that, in particular, the SAP and associated Green Belt review processes have found three reasons to diverge from the CS distribution:</p> <ul style="list-style-type: none"> • unsustainable locations of proposed sites, especially in Outer North East, in terms of public transport accessibility; • excessive pressure on infrastructure and congestion in the A65 corridor, particularly affecting allocations in Aireborough and Horsforth/Rawdon; • unacceptable Green Belt impact, especially in relation to coalescence of Leeds and Bradford urban areas around Pudsey, the Tong Valley and the proposed link road to Leeds-Bradford Airport.
<p>5.3</p>	<p>The tendency of development in these areas to create unsustainable outcomes, in our view undermines any case for exceptional circumstances for Green Belt releases in those areas, and the distribution should be altered accordingly.</p>
<p>5.4</p>	<p>It remains our view that the approach to safeguarded land (HG3) is ineffective and unsustainable, principally because any safeguarded land brought forward for development during the plan period will have the effect of skewing the settlement hierarchy towards peripheral, less sustainable locations which are in areas showing higher demand for larger, higher cost market housing. This in itself creates an incentive for speculative planning applications on safeguarded sites, with applicants on those sites seeking to disprove the existing of a 5-year land supply. Whilst we acknowledge that NPPF requires safeguarded sites to be identified, we consider that the SAP should be very specific about the negative sustainability consequences of the premature release of those sites. These negative consequences also add to the case in favour of a more precautionary approach to the housing need that is envisaged later in the plan period, as we have proposed.</p>
<p>6.</p>	<p>CPRE’s proposed alternative approach to distribution and phasing</p>
<p>6.1</p>	<p>CS Policy H1 provides for phasing that gives priority to locations which:</p> <ul style="list-style-type: none"> (ii) have the best public transport accessibility (iv) have the least impact on Green Belt objectives.
<p>6.2</p>	<p>CPRE does not wish the SAP Examination to examine the CS housing requirement: this should be done in due course through the CS review. Nevertheless, there is an important question about the SAP's approach to the 5-year land supply, because this should be informed by the most up-to-date evidence, including evidence which points to a significant reduction in Objective Assessed Needs (OAN). This is especially important in relation to phasing of sites, because those sites that best fit</p>

	<p>the requirements of CS Policy H1 should be the ones that should have priority in the event that housing needs fall during the plan period.</p>
6.3	<p>We therefore propose that:</p> <ul style="list-style-type: none"> • Phase 1 and 2 sites, except Green Belt sites, be allocated by the SAP at this stage, thereby fulfilling policy requirements in relation to five-year land supply; • Phase 3 sites and Green Belt sites be retained as broad locations for later in the plan period, but not allocated at this stage, pending the Core Strategy review; • A new Green Belt review should be undertaken to inform the CS review, and that this should be undertaken jointly with Bradford Council in order to address concerns about coalescence and cross-boundary impacts that the SAP is not currently equipped to deal with.
6.4	<p>Our proposed approach should be also considered specifically in relation to Core Strategy Policy SP6, Housing Requirement and Allocation of Housing Land, in the following ways:</p> <p>(i) the larger the supply requirement, the greater the risk that sites in less sustainable locations will need to come forward - this can be addressed to some degree by phasing so long as the phases give clear sequential preference to the most sustainable locations;</p> <p>(ii) a more precautionary approach to the amount of greenfield sites allocated will help to focus development on brownfield and regeneration sites</p> <p>(iii) the likelihood of a lower annual housing requirement being adopted early in the SAP's plan period reduces the case for exceptional circumstances to take land from the Green Belt, in particular by increasing the potential for brownfield windfall sites to make up a greater proportion of the ongoing land supply;</p> <p>(vi) phasing of sites should enable priority to be given to sites that enhance green infrastructure and to ensuring that provision of new and enhanced green infrastructure keeps up with the rate of built development.</p>
7.	<p>Housing Mix and Affordability</p>
7.1	<p>We have yet to see convincing evidence that the SAP will be effective in implementing CS policies H4 and H5. In our view, each site allocation should be specific about the housing mix and tenures it should deliver.</p>
8.	<p>Green Infrastructure</p>
8.1	<p>We have not assessed the SAP against the development management policies in the SAP, because these are assumed to apply to the decision-making process in any case. However, green infrastructure is a strategic issues and there is a need for the total and cumulative effect of development of allocated sites to contribute to strategic objectives. The SAP has a limited toolkit with which to implement these policies - allocating land and setting out site requirements and mitigations - and we do not see sufficient evidence that the SAP is equipped to deliver these strategic outcomes, nor that it will be monitored accordingly.</p>

9.	Outer North-East and Parlington
9.1	<p>The Parlington site bears no relation to the adopted Settlement Hierarchy, and a new settlement in this location is not envisaged in the Core Strategy. Therefore it is, in itself a significant departure from the Core Strategy, and in our view the consideration of Parlington - or an equivalent new settlement - could therefore only be considered through the Core Strategy review, and the proposal should be deleted from the SAP. To the extent that this creates a numerical shortfall in supply of sites, this should be dealt with through our proposed approach to the relationship between the SAP and the CS review.</p>
9.2	<p>Parlington is also at odds with CS SP10 Green Belt, because it is a stand-alone site that does not adequately connect to the Major Settlement of Garforth (therefore contrary to SP10(ii); scores poorly as a 'sustainable location' in the provisions of SP10 para 2; and is in itself a significant encroachment into the countryside (therefore contrary to SP10 (iv).</p>
9.3	<p>That East Garforth and Parlington are in different HMCA's is also unhelpful in terms of considering the merits of these proposed site allocations: any sustainability case for Parlington can only be made by addressing its links to Garforth, which already has considerable issues of infrastructure and delivery to address in its own right. East Garforth and Parlington together account for a very significant increase in transport needs in the area; and the CS also envisages strategic employment growth around M1 J47; yet CS Map 9 (Leeds Transport Strategy) does not appear to provide for this in terms of any public transport connectivity investment.</p>