

Green Belt (Q1-7)

CPRE has consistently argued that the Green Belt review has not been comprehensive, and does not meet the requirements set out by the Core Strategy Inspector. His recommendation was that the review must be comprehensive in order to ensure a sustainable outcome.

In our view, the Broad Locations approach is justified in this context, because it leaves the sites concerned within the Green Belt and provides the opportunity for the Green Belt review to be re-run in a comprehensive manner as part of the revised Core Strategy and SAP processes.

In our view, any case for exceptional circumstances to change the Green Belt must now be made by the emerging revised Core Strategy, and supported by a comprehensive Green Belt review that is pertinent to that Strategy. As explained in our representations, we will also be arguing that changes to the spatial distribution of new housing should be made in the revised Core Strategy, as the current one is unsustainable. In the meantime, the up-to-date evidence no longer supports the scale of development put forward in the adopted Core Strategy. Because the Broad Locations are remaining in the Green Belt, we do not see a need to justify exceptional circumstances for them.

As per our Matter 2A Hearing Statement, the remaining ex-Green Belt site allocations that have been left in the revised SAP are anomalous to this approach, and undermine the logic. There has been no robust evidence put forward to show that these allocations will result in a sustainable outcome. These sites should therefore also be moved into the Broad Locations category, so that they do not prejudice the comprehensive review.

This problem applies, in our view, to all the remaining Green Belt deletion sites; but most spectacularly to Parlington, because the proposals for Parlington have always been a sticking-plaster solution to the Outer North East allocations, and are therefore not a

strategic solution. This puts Parlington directly at odds with Core Strategy Policy SP10: it is not related to a major settlement and it has not been properly tested in relation to the following criterion of SP10:

“.....in sustainable locations and are able to provide a full range of local facilities and services and within the context of their Housing Market Characteristic Area, are more appropriate in meeting the spatial objectives of the plan than the alternatives within the Settlement Hierarchy.”

Therefore the proposed allocation MX2-39 is emblematic of the flaw in the current approach:

- The new Green Belt boundary that would result from allocating the site has not, in itself, been properly tested for its ability to create a sustainable outcome, in line with the Inspector’s recommendation on the adopted Core Strategy;
- If the allocation were developed without the remainder of the wider Parlington proposals, it would result in one-third of a new settlement, with costly and invasive infrastructure provision but without the scale to support a full range of local facilities and services;
- The allocation would therefore pre-empt and pre-determine the future of the remaining land in the Parlington Broad Location, which would also pre-determine the outcome of the Green Belt review associated with the revised Core Strategy.

With regard to NPPF Para 83 and permanence (Q6 and Q7) the real problem of Green Belt boundaries not enduring beyond the plan period is generated by these ‘partial’ allocations at at Parlington (MX2-39), East Garforth (HG2-124) and at Wills Gill, Guiseley (HG2-02). In each case, the allocation would depend on a new Green Belt boundary. In each case this new Green Belt boundary may prove to be temporary - and there is of course no policy provision for temporary boundaries; and the new boundary has also not been properly tested in its own right as a defensible, long-term boundary that defines a sustainable pattern of settlement and fulfills Green Belt purposes.

As a result, in our view, the only sound approach at this stage is to put all the proposed ex-Green Belt allocations into the Broad Location category and revisit them after the Core Strategy review.

Safeguarded Land (Q8-12)

Our position on safeguarded land is rooted in the policy principles that:

- It is not allocated for the current plan period because it is not deemed to be consistent with the delivery of the current spatial strategy;
- Its release depends on a plan review because this enables it to be tested for its consistency with a future spatial strategy.

By contrast, Broad Locations are considered by the Council (as we understand) to be consistent with delivery of the current spatial strategy, but are not allocated because the reality is that they are unlikely to be needed until after the spatial strategy has been revised, and may not be consistent with the future spatial strategy.

It is apparent, therefore, that there is a clear difference in the purpose of Broad Locations compared to safeguarded land, but in both cases the fact that a revised Core Strategy is already in process means that it is essential the SAP does not prejudice the emerging new strategy. In this context, it is appropriate to group Broad Locations and safeguarded sites together for practical purposes, because neither category would need to come forward for development until after the strategy has been reviewed.