

### The Principle of Broad Locations

The SAP is required to give effect to the adopted Core Strategy. As outlined in earlier representations, our principle concern has always been 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 full breadth of the Core Strategy can be delivered sustainably.

We strongly support the position in para revised SAP para 1.5 that the SAP should “*ensure that all sites are not immediately released for development and to enable flexibility for the Plan as a whole to respond to any potential changes to the overall housing requirement*”. This is the approach that CPRE has called for throughout the Local Plan process. In our view, aside from the impending change to the housing requirement that is now evident, there is no need for the SAP to allocate sites for the full Core Strategy housing requirement. NPPF requires the provision of a rolling five-year land supply plus an appropriate buffer, and for Local Plans to identify broad locations for growth beyond that five-year period. Even applying a 20% buffer and the adopted Core Strategy’s full gross annual requirement, the SAP therefore only has to show a land supply for 27,750 dwellings, and this includes existing permissions. In our view, so long as it can demonstrate that level of land supply, then there is no quantitative inconsistency with the adopted Core Strategy. The remaining question is therefore whether the approach is consistent with giving effect to the intentions of the adopted Core Strategy as a whole.

**In this context, we understand Broad Locations to be suites of sites whose development the Council believes would be consistent with the adopted Core Strategy, but whose development may not be needed for the delivery of, *and may not be consistent with*, the future Core Strategy that is already emerging.**

With regard to phasing (Q6), greater clarity is certainly needed. It would be irresponsible

of the SAP to allocate all the sites - and therefore give equal planning status to all the sites, when it is inevitable that some sites are better suited than others to delivering a sustainable pattern of settlement that is consistent with the spatial strategy. This is why CPRE has consistently supported a phased approach. In a situation where we know the Core Strategy is already under review, phasing becomes even more essential, because the later phases would be being developed for a revised spatial strategy, and the current strategy must not compromise that.

A key test of soundness for the Plan as a whole is that it must be justified by the available evidence; and the most up-to-date evidence is that the housing requirement is falling and that a significant number of sites in the previous version of the SAP may therefore not be needed. Establishing a new housing requirement is a matter for the Core Strategy Selective Review, and in our view the Broad Locations approach appears to offer the only workable interim position that the revised SAP can realistically take. That said, since the Broad Locations are not contributing to land supply during the period prior to the plan review, we believe it would be possible for all practical purposes to delete them altogether - should the Inspector's favour this approach - without compromising delivery of the current plan for the period it will be in force. But evidently, the rationale for retaining the Broad Locations is their consistency with the adopted strategy, and the rationale for deleting them would therefore be their future inconsistency with the revised strategy.

Clearly, the soundness of the proposal to retain the Broad Locations within the Green Belt is a matter for debate. The principal reason for that approach not being considered sound would be that it would require a future review of the plan - with a Green Belt review - to bring them forward. However, we consider that the approach is sound in principle, for two reasons:

- we already know that the future review of the plan is scheduled and will enable the Green Belt boundaries to change - if needed - by the time they would be needed to contribute to land supply;

- the most up-to-date evidence of development requirements, combined with the fact that a revised Core Strategy is in progress, remove any case for exceptional circumstances to change the Green Belt boundaries at this stage.

However, we are very concerned that the whole rationale and integrity of the Broad Locations approach is fatally weakened by the proposal to maintain partial allocations in the revised SAP that sit within Broad Locations - especially at Parlington (MX2-39), but also at East Garforth (HG2-124) and at Wills Gill, Guiseley (HG2-02). We will return to this issue under matter 3A, but the problem here is that in each case the remaining proposed allocations would result in developments that could not be considered sustainable in themselves, and whose comprehensive development would depend on future, adjacent releases from the Broad Locations. This pre-empts the future of land within the Broad Locations, and pre-empts the future plan and its associated Green Belt review and thereby totally undermines the basis for the Broad Locations.

As we have demonstrated in previous representations, removing all the Green Belt allocations from the SAP to which CPRE have objected, including the three mentioned above, still leaves a total capacity for 57,628 dwellings, which is more than double what is needed to maintain a five-year rolling land supply consistent with NPPF during the interim period before a new SAP is adopted after the Core Strategy review. Therefore we see no logic to leaving those allocations in the SAP at this stage, along with the interim Green Belt changes that they depend on. **A much more robust approach would be to move all proposed Green Belt allocations into the Broad Location category; and we consider this change is necessary to make the SAP sound.**