

## CPRE's General Position on the Submission Draft SAP

CPRE supports Leeds broad intention to meet its housing need, notwithstanding our longstanding view that an overall target of 70,000 new homes across the plan period is overstated and undeliverable, and that the adopted Core Strategy remains, in our view, unsound.

CPRE welcomes the intended emphasis of development on City Centre and Inner areas to promote regeneration and sustainable development, and recognises the efforts Leeds City Council has made to achieve that spatial distribution through its Core Strategy.

However, in our view the SAP falls well short of the critical role it should play, in translation the overall vision of the Core Strategy into a programme for shaping sustainable places. By this, we mean that it merely takes a quantitative, opportunistic approach to finding development sites to make up the required housing and employment land numbers. Instead, it should be giving leadership to development, identifying the scale and types of built development, public space and green infrastructure places need in order to make them better places; and where Neighbourhood Plans exist or are in preparation they should seek to delegate that leadership to the Neighbourhood Plan.

Specifically, the SAP will not achieve the Core Strategy's intentions, and will instead allow a drift of new development towards greenfield and Green Belt sites, the most damaging consequences of which will be:

- failure to deliver urban regeneration and sustainable patterns of development;
- worsening of road traffic congestion and associated public health problems of air pollution, noise pollution and physical disruption to communities along transport arteries;
- losses of green space and countryside amenity which, whilst localised, will be detrimental to affected communities and is unlikely to be satisfactorily mitigated by new green space provision.

We structure our detailed comments below as follows:

1. Our analysis of the problems on a policy-by-policy basis;
2. Why the SAP fails the tests of soundness;
3. Suggestions as to how the SAP's soundness can be improved.

## Policy HG2: Allocated sites

We have analysed of the data presented in Tables 1 to 3 of the SAP, and our own surveys of proposed site allocations. Our findings are explained below and supported by our Tables A and B in this representation.

With 12 years of the plan period left to run, the total greenfield allocation capacity of 31,660 would amount to 2,638 units per year, which exceeds the current total annual completion rate. This exposes the danger of brownfield sites - with or without planning permission - being abandoned by developers in favour of greenfield sites, and seriously undermining Leeds' spatial objectives.

CPRE is objecting to a number of greenfield allocations, almost all of which are in the Green Belt. Our Table A itemises these objections and explains our reasoning. In our view, there are fundamental weaknesses in the way the SAP deals with the continuing need to focus development on brownfield sites and assist in urban regeneration. Consequently we have objected to Green Belt deletions amounting to over 10,000 dwellings - in some cases because they harm the openness of the local area and/or encroach into open countryside, but in most cases on the basis that they undermine the urban emphasis needed to promote sustainable development.

We recognise that reducing the number of allocated sites in line with our objections may be criticised for limiting the SAP's ability to deliver the Core Strategy. We do not accept that, and our further analysis in our Table B explains our position.

Table A: CPRE site objections

site ref	Address	HMCA	notes	Harms openness	Encroaches/ breaches countryside	Undermines urban emphasis of Plan, creates infrastructure impacts
HG2-01	New Birks Farm, Ings Lane, Guiseley	Aireborough	Provides openness on Ings Lane	x		x
HG2-02	Wills Gill, Guiseley	Aireborough	Provides valuable openness within area otherwise characterised by new-build	x		x
HG2-03	Shaw Lane, Guiseley & Banksfield Mount, Yeadon	Aireborough	Merges Guiseley and Yeadon	x	x	x
HG2-05	Coach Road/Park Road, Guiseley	Aireborough	Coach Rd is currently a very clear edge between built-up area and countryside, so this would breach that edge.		x	x
HG2-119	Red Hall playing fields	East	Severe impact on local green space amenity.	x		
HG2-124	Stourton Grange Farm South, Selby Road/Ridge Road, Garforth	Outer South East	Lack of infrastructure and long distance from centre of Garforth. The site would need a major, masterplanned, upfront investment in placemaking and infrastructure, which is not evident.			x
HG2-136	Whitehall Road/Harpers Farm	Outer South West	Local impact on openness but main problem is very busy/congested roads			x
HG2-145	Bradford Road/Wakefield Road, Gildersome	Outer South West	Very significant traffic impact.			x
HG2-147	Highfield Drive/Harthill Lane, Gildersome	Outer South West	Local impact on openness but main problem is traffic impact.	x		x
HG2-148	Gelder Road/M621, Gildersome	Outer South West	Breaches Gelderd Road which is currently definitive edge of built form		x	x
HG2-167	Old Thorpe Lane, Tingley	Outer South West	Local impact on openness but very large development compared to existing settlement with no rail access.			x
HG2-168	Haigh Wood, Ardsley	Outer South West	Causes coalescence of Tingley and Ardsley	x		x
HG2-169	Haigh Wood, Ardsley	Outer South West	Causes coalescence of Tingley and Ardsley	x		x

Table A continued

site ref	Address	HMCA	notes	Harms openness	Encroaches/ breaches countryside	Undermines urban emphasis of Plan, creates infrastructure impacts
HG2-173	Haigh Side, Rothwell	Outer South	Very significant traffic impact.			x
HG2-175	Bullough Lane/Haigh Farm, Rothwell	Outer South	Traffic impact.			x
HG2-180	Fleet Lane/Methley Lane, Oulton	Outer South	Substantial sprawl impact on local openness. Scale compared to existing settlement amounts to major extension.	x		x
HG2-36	Alwoodley Lane, Alwoodley	North	Landscape impact may be bearable but far too remote from amenities to be sustainable.			x
HG2-41	South of A65 from Horsforth	North	Some impact on openness but key problem extremely busy, noisy, congested A65. Impossible to see how this could be developed sustainably.	x		x
HG2-42	Broadway and Calverley Lane, Horsforth	North	Hard to see how 18 units will fit alongside highway works. Air quality and noise problems likely for residents.			x
HG2-43	Horsforth Campus	North	Low landscape impact due to screening, but traffic impact is very significant.			x
HG2-76	Hough Side Road, Pudsey	Outer West	Hough Side Road is clear edge between built form and countryside; currently a nursery/smallholding area so it's in productive use; topography gives high local landscape impact. Main road (Swinnow Road) very busy.	x	x	x
HG2-81	Land of Gamble Lane	Outer West	High ground above current definitive edge of built-form, creates sprawl.	x	x	X
MX2-33	Headley Hall, Bramham	Outer North East	We understand this site has been withdrawn from the SAP.		x	x

Table B: Effects of a shift towards greenfield-only delivery; effect of CPRE objections on greenfield supply; effect of a marginal increase in densities on remaining sites

HMCA	Green-field capacity (SAP Table 3)	Less capacity of our objection sites	Remaining greenfield capacity after CPRE objections removed	Intended Distribution (SAP Table 1)	Distribution if all brownfield developed and CPRE objection sites removed	Distribution if no brownfield developed (SAP Table 3)	PAS capacity	Distribution if no brownfield developed and PAS is developed
Aireborough	1372	1109	263	3%	2%	4%		4%
City Centre	195	0	195	<b>15.5%</b>	<b>20%</b>	<b>0.1%</b>		0.1%
East	8808	50	8758	17%	19%	28%		25%
Inner	1224	0	1224	<b>15%</b>	<b>21%</b>	<b>4%</b>		4%
North	2082	1286	796	9%	8%	7%		6%
Outer NE	4468	3000	1468	8%	4%	14%	1259	17%
Outer NW	1229	0	1229	3%	3%	4%		4%
Outer S	1980	1054	926	4%	2%	6%		6%
Outer SE	3462	2314	1148	7%	3%	11%		10%
Outer SW	4751	1399	3352	11%	10%	15%	1673	19%
Outer W	2089	360	1729	7%	8%	7%		6%
Total	31660	10572	21088				(=34592 greenfield)	
	2638		1757	Per year 2016-2028 on greenfield				
	6181		5300	with annualised brownfield and windfall (34520+8000)/12				
	74172		63600	Total delivery. Increasing to....				
			<b>66780</b>	If density on non-CPRE objection sites increases by 5%				

Table B clearly shows that:

- A failure to prioritise brownfield sites within the proposed allocations, combined with a less-than-intended acceleration in the overall rate of completions, could have a dramatic impact on the spatial distribution, away from the intended focus HMCAs in the City Centre and Inner areas;
- By contrast, removing the proposed allocations to which CPRE objects, and fulfilling the objective to achieve high rates of brownfield development, would slightly reduce the dispersal of development to outer areas whilst, most importantly, improving the focus on the City Centre and Inner Areas and therefore improving delivery of the Core Strategy objectives as a whole;
- Removing the sites to which we object need not impinge upon the total housing supply, because a very slight increase in density requirements (of just 5% - for example from 35dpha to 37dpha) would easily compensate for the reduction in the number of sites.

On the basis of Tables 1 to 3 of the SAP, removing the sites to which we object would reduce the greenfield capacity to 21,088. Adding this to the 34,520 of brownfield capacity and the planned 8,000 windfalls gives 63,600 units, which would be 5,300 dwellings per year over the remaining 12 years of the plan period. This still permits an enormous, and almost certainly unachievable, increase in completion rates, without the need to develop Green Belt sites.

Furthermore, the shortfall of 2,400 dwellings this would create against the 66,000 target would very easily be made up by a marginal increase on development density on the remaining sites. Considering that a much greater increase in density is, in our view, imperative in any case, removing the proposed allocations in line with our objection would have no impact at all on the SAP's ability to deliver the Core Strategy; and in fact would improve that ability by providing for higher densities and a greater focus on inner urban sites, which better fulfil the spatial objectives of the Core Strategy. We are currently preparing an evidence paper on the advantages of higher densities,

Our Table B shows the effect on the spatial distribution of development if the SAP were to result in a significant shift of completions away from brownfield and towards greenfield sites, as we believe to be very likely; and the further effect of planning permissions being granted on safeguarded (PAS) sites.

### **Polict HG3: Safeguarded (PAS) sites**

Whilst we acknowledge that NPPF requires safeguarded sites to be identified, and the Core Strategy provides for this, it is painfully apparent that these sites are anything but safe from being developed during the plan period. This is evidenced by the number of existing and proposed PAS sites that are the subject of current planning appeals. The result of their being developed so profoundly out of sequence is to further skew the spatial distribution of development away from inner urban locations. There is no possible conclusion other than that the policy of identifying sites as a reserve for beyond the plan period is wholly ineffective., and that this undermines the plan as a whole. Consequently we must object to ALL the PAS sites on the basis that they do not fulfil their purpose in planning, and should therefore revert to Green Belt at least until such time as a workable policy for safeguarding those sites can be put in place.

### **Policy EG3: Leeds Bradford Airport Employment Hub**

This major employment site, and the associated link road to it, are a departure from the Core Strategy for which a strategic case has not been convincingly made. As an airport, LBIA is poorly connected to the cities it serves when compared to most other large airports, especially Manchester; public transport connections being especially unsatisfactory. What is proposed here is to select this poorly connected site as a major employment location, where it will provide business premises of a kind that does not appear relevant to the employment needs of the HMCA; and to seek to improve its connectivity by way of a link road that connects to Horsforth roundabout, an already chronically congested node on an already overstretched part of the highway network. This is, by all measures, an unsustainable proposal, and it has spatial and sustainability implications that go way beyond the scope of the SAP. It should therefore be deleted.

### **Policy GS1: Provision and Protection of Green Space**

The Core Strategy - in particular Policy G4 - commits Leeds to providing new green space of a scale proportionate to the scale of new built development. If Leeds is seeking to build 66,000 new homes, then at the 80sqm per dwelling identified in G4 it would be aiming to provide 528 hectares of new greenspace. Whilst we recognise that some of this provision may well be within the boundaries of development sites, and delivered directly as part of the development, it is important to point out that 528

hectares amounts to roughly 3.5 times the area of Roundhay Park. Consequently, identifying sites where this scale of new provision, in a suitable mix of small and large green spaces, must surely be a key task of the SAP, and it does not do so in any meaningful way. The green spaces shown on the HMCA site allocation maps are provided without any reference to what is required to deliver them and make them useful spaces, and we are left with the impression that they have merely been marked on the map so as to differentiate them from areas where built development would be permitted.

As a result, the SAP will inevitably fail to fulfil this aspect of the Core Strategy. This is especially worrying when most of the HMCAs show substantial deficiencies in their existing green space provision, particularly for allotments, outdoor sports, parks and gardens. So delivering new green space is not just a question of providing for the needs of new developments: it is an intrinsic part of improving the sustainability, wellbeing and quality of existing neighbourhoods by addressing those deficiencies. The SAP's approach to this challenge is at best tokenistic, and needs to be entirely revised.

We suggest that under the Greenspace Provision section of the SAP for each HMCA, there should be quantification of the types of green space uses that are needed to address the deficiencies identified in the background paper; and indication of which green space sites are likely to be suitable for those uses; and the degree to which they should be delivered through new built development or by other mechanisms.

## Why the SAP fails the Tests of Soundness

Our analysis above demonstrates that the SAP fails the tests of soundness in a number of ways.

It is not positively prepared, because it will fail to deliver a broad range of Core Strategy policies to deliver urban regeneration promote healthy communities and reducing the impacts of road traffic. These failings arise because the SAP allows a broad, non-strategic dispersal of new development in its implementation, even if this is not the intention in principle.

It is not justified by the evidence, because it creates a vast over-supply of allocated greenfield land compared to the likely rate of housing delivery, with result that:

- it undermines any prospects of placemaking and urban renewal;
- it enables the reality of development to badly skew the spatial distribution compared to the Core Strategy, most dramatically away from the City Centre and Inner areas, towards peripheral areas in the Outer North East and spread thinly across other outer areas.

It is also not justified because, we understand, it has not enabled Neighbourhood Plans to generate alternative site allocation scenarios, and has created strong objection from local communities on the grounds that the Green Belt review has not been comprehensive. The assessment of how well a site contributes to Green Belt purposes must be made with no reference developer interest. By basing the Green Belt review on SHLAA evidence (which draws very heavily on developer interest), the SAP cannot be said to be comprehensive, not having considered the full range of evidence about the efficacy of the Green Belt.

Finally, the SAP is woefully ineffective: by committing to land supply that far exceeds the reasonable prospects of delivery within the plan period, the Local Plan will inevitably be deemed to be underperforming. Consequently, its worthy attempts to phase the release of sites will come to nothing and, worse still, PAS sites will be vulnerable to development that should, by all rational judgement, be refused. As a result, the whole principle of sequential preference, to favour the development of sites that will better deliver the Core Strategy's spatial objectives, will be lost at a stroke.

## How can the SAP be made sound?

The fact that delivering 66,000 new homes in the plan period is wildly unachievable (irrespective of how well this reflects housing need) is something of an elephant in the room, since the adopted Core Strategy commits the SAP to pursuing that target. In that context, the key question is whether the SAP will nevertheless help Leeds to deliver the full suite of Core Strategy policies and the correct spatial distribution of development. That is to say, the SAP needs to demonstrate that it will, in practice:

- fulfil the Core Strategy's intended emphasis on brownfield land and inner urban sites, to assist regeneration;
- actively help to deliver other key Core Strategy policies.

In CPRE's view, the SAP could be vastly improved in its soundness by:

1. Undertaking a genuinely comprehensive Green Belt review that is not shaped by developer interest in sites, has a transparent methodology in line with best practice; and begins with the question of how to shape a sustainable settlement pattern, rather than simply to restrict the degree of harm to the Green Belt.
2. Reverting PAS sites to Green Belt until that comprehensive Green Belt review is completed, so that the existence of PAS sites in the interim does not prejudice a judgement as to if and where Green Belt deletions would be most sustainable.
3. Deleting the proposed site allocations to which we have objected in this representation. If any developments on sites removed from the Green Belt are to be progressed, then these need to be identified on the basis of creating sustainable neighbourhoods, as outlined in our recommendation (6) below, in full collaboration between council, community and developers; not as 'early wins' allocated in hasty pursuit of a numerical housing target.
4. Clearly itemising, for each allocated site, the Core Strategy policies against which it is expected to directly deliver, those policies for which it may present conflicts, and how those conflicts might be resolved. For example, key policies which the allocation and sequential preference of sites should clearly influence include (non-exhaustively):

- SP4 - regeneration priorities
- SP6 - especially (iv) opportunities to reinforce/enhance existing neighbourhoods
- T2 - development in accessible locations
- G1 - enhancing and extending green infrastructure
- G4 - new green space provision
- EN1 - carbon dioxide reduction

It should never be enough to justify a site allocation, or secure planning permission on a site, simply on the basis that it fulfils numerical housing targets.

5. Progressing from the crude approach of distributing sites according to Housing Market Character Areas and settlement hierarchies, to a much more pro-active plan to deliver sustainable neighbourhoods. For each sustainable neighbourhood, the SAP would identify (or defer to the relevant Neighbourhood Plan):
    - the amounts, types and mix of residential and commercial development that should take place;
    - the shortfalls in public transport, shops, services, green space and other amenities that need to be addressed in order to make the neighbourhood sustainable, and how they should be delivered;
    - the phasing, density and design considerations that new developments would need to meet in order that new development and the supporting infrastructure and amenities are synchronised.
  6. Replacing Policy EG3 with an employment growth policy better informed by the needs of the local labour market and infrastructure constraints, and more in line with the Core Strategy.
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