

### Para 1.5

We support the point 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 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. The Core Strategy is being reviewed and a revised housing requirement will be adopted well within the first five years of the SAP; and it should be noted that 27,750 is well within the total brownfield capacity of Leeds.

Therefore numerically it would be possible to withhold all new greenfield allocations until the revised Core Strategy is adopted. Whilst a ‘no greenfield’ approach might be argued to challenge Core Strategy Policy SP1’s intention of “...an appropriate balance of brownfield and greenfield land..” we would point out that SP1(i) specifies that relevance to each settlement is crucial. It is reasonable that a greenfield allocation might be justified on the basis of the needs of a given settlement, but we see no justification in terms of the overall development requirement during the early years of the Plan, prior to review.

### Para 2.33 and Policy BL1

Para 2.33 states that “land released from the Green Belt is only that which is exceptionally needed for the supply of housing for years 1 to 11 of the Plan”. However, we already know that the number of dwellings needed during that period will be substantially less than the adopted Core Strategy envisaged; 11 years of dwellings at the gross requirement proposed in the Core Strategy selective review (CSSR) is 37,026, and some of that will be accounted for by conversions and reinstatement of empty homes. Returning, then, to the SAP’s brownfield capacity of 36,540 - 8 years’ supply at the adopted Core Strategy requirement and almost 11 years’ supply at the CSSR gross requirement - we can see that the only argument for releasing Green Belt is to continue the pursuit of a numerical target that is now known to be defunct. That in itself cannot amount to the land being ‘exceptionally needed’; hence our position that no Green Belt land should be released by the SAP, and all the proposed Green Belt sites should be re-categorised as Broad Locations.

### Para 2.30

We strongly disagree with the statement that “in most cases those with the least impact on Green Belt purposes have been released, with the remainder being designated as Broad Locations pending a further review of the Plan”. In several cases the proposed Green Belt releases essentially lay the foundations for further releases coming from the Broad Locations in the future. This is most striking at Parlington, where the proposed allocation provides for the access infrastructure and part of the new settlement, with the remainder of the settlement retained as Broad Locations. The result would be the provision of ‘half a settlement’. Similarly the SAP provides for ‘half an urban extension’ East of Garforth and at Wills Gill, Guiseley. In other words the proposed Green Belt releases would have the effect of opening up developments that could not be considered sustainable in themselves, and whose comprehensive development would depend on future, adjacent releases from the Broad Locations, in which Green Belt impact is acknowledged to be greater. This is deeply flawed logic, especially when we already know that land in the Broad Locations is very unlikely to be needed during the plan period following the CSSR.

### Para 2.60 and Policy HG3

CPRE has consistently argued that safeguarding policies are ineffective, and this is evidenced in Leeds by the loss of safeguarded sites to speculative planning applications in recent years. We have argued that the only way to defend safeguarded sites against premature release is to leave them in the Green Belt. Therefore, given the interim nature of this SAP and the potential harm to any future spatial strategy that may result from early development of safeguarded sites, we generally support the proposed approach here.

### Policy HG2: Allocated sites

In our response to the earlier submission draft, CPRE objected to a number of proposed greenfield allocations, almost all of which were in the Green Belt. Generally, our objections to taking sites from the Green Belt arose from harm to the openness of the local area and/or encroach into open countryside, or - in most cases - on the basis that they would undermine the urban emphasis needed to promote sustainable development. In our view, if the result of a Green Belt change would be to enable an unsustainable pattern of development, then it should fail the test of exceptional circumstances.

**Table A: Remaining CPRE site objections**

The revised submission draft retain twelve sites to which we have previously objected, as shown in Table A below. We maintain our objections to these proposed allocations. In each case in Table A, we can see that not only would there be harm to the Green Belt's purposes locally, but that the allocation would undermine the urban emphasis of the Plan as a whole, and enable development in unsustainable locations with inevitable dependence on car-based travel. If a Green Belt change would enable an unsustainable outcome then it cannot be considered to be soundly based.

| site ref | Address  | HMCA        | Notes   | Harms<br>openness /<br>Causes<br>coalescence | Encroaches /<br>breaches<br>countryside | Undermines<br>urban<br>emphasis,<br>creates<br>infrastructure<br>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  |
| HG2-119  | Red Hall playing fields                          | East        | Severe impact on local green space amenity.   | x  |   |  |
| HG2-19   | Land at Sandbeck Lane, Wetherby                  | Outer NE    | Detached from Wetherby – inappropriate encroachment into countryside, unsustainable location                  | x  | x                                       | x  |
| HG2-226  | Land east of Wetherby                            | Outer NE    | Unsustainable location for an urban extension   | x  | x                                       | X  |
| MX2-39   | Parlington Estate, Aberford                      | Outer NE    | Unsustainable location for a new settlement   |  | x                                       | x  |
| HG2-175  | Bullough Lane/Haigh Farm, Rothwell               | Outer S     | Traffic impact  |  |   | x  |
| HG2-180  | Fleet Lane/Methley Lane, Oulton                  | Outer S     | Substantial sprawl impact on local openness. Scale compared to existing settlement amounts to major extension | x  |   | x  |
| HG2-124  | Stourton Grange Farm South, Selby Road, Garforth | Outer SE    | Lacks an infrastructure plan that would enable a sustainable outcome  |  |   | x  |
| HG2-168  | Haigh Wood, Ardsley                              | Outer S     | Causes coalescence of Tingley and Ardsley   | x  |   | X  |
| HG2-169  | Haigh Wood, Ardsley                              | Outer SW    | Causes coalescence of Tingley and Ardsley   | x  |   | x  |

Table B: Effect of deleting the CPRE objection sites from the SAP's identified capacity

Table B shows that removing those sites in Table A from the Plan, on the basis of our objections, would reduce the total capacity of the Plan to 57,628 dwellings: 12 years' supply at the adopted Core Strategy requirement and 17 years' supply at the CSSR requirement. It is therefore abundantly clear that our objection sites fail the exceptional circumstances test: not only would they produce harmful outcomes but there is also no numerical need for them.

| HMCA         | Greenfield Capacity (SAP) | Brownfield Capacity (SAP) | Total Capacity | Greenfield capacity in revised SAP allocation | Capacity of CPRE objection sites | Capacity of our objection sites remaining in revised SAP allocation | Greenfield capacity without CPRE objection sites | Total capacity without CPRE objection sites |
|--------------|---------------------------|---------------------------|----------------|---|----------------------------------|---|--|---|
| Aireborough  | 1148                      | 866                       | 2014           | 788   | 1109                             | 293   | 263  | 1129  |
| City Centre  | 195                       | 11714                     | 11909          | 195   | 0                                | 0   | 195  | 11909                                       |
| East Leeds   | 8006                      | 1680                      | 9686           | 8006  | 50                               | 50  | 8758   | 10438                                       |
| Inner Area   | 1451                      | 11591                     | 13042          | 1451  | 0                                | 0   | 1224   | 12815                                       |
| North Leeds  | 2193                      | 3765                      | 5958           | 2193  | 1286                             | 0   | 796  | 4561  |
| Outer NE     | 4524                      | 476                       | 5000           | 3165  | 3115                             | 2057  | 1409   | 1885  |
| Outer NW     | 1266                      | 489                       | 1755           | 726   | 0                                | 0   | 1229   | 1718  |
| Outer S      | 2046                      | 388                       | 2434           | 1826  | 1054                             | 544   | 926  | 1314  |
| Outer SE     | 3476                      | 902                       | 4378           | 1860  | 2314                             | 1090  | 1148   | 2050  |
| Outer SW     | 4918                      | 2051                      | 6969           | 3165  | 1399                             | 649   | 3352   | 5403  |
| Outer W      | 2054                      | 2618                      | 4672           | 1139  | 360                              | 0   | 1729   | 4347  |
| <b>Total</b> | <b>31277</b>              | <b>36540</b>              | <b>67817</b>   | <b>24514</b>                                  | <b>10572</b>                     | <b>4683</b>   | <b>21088</b>                                     | <b>57628</b>                                |

### The relationship to the Core Strategy Selective Review

We acknowledge that the soundness of the SAP must be primarily assessed against the adopted Core Strategy, to which it should give effect. We also support the principle of the approach the Council has taken to establishing an interim approach that is both compatible with the adopted Core Strategy and mindful of the CSSR. Nevertheless, it is disingenuous to suggest that the substantially reduced housing requirement emerging from the CSSR should be ignored at this stage; and when the two consultations are simultaneously live it is impossible for consultees to pretend that one should be considered without the other. In any case, the CSSR is based on the most up-to-date evidence, and we must judge the soundness of the SAP on whether it is justified by up-to-date evidence.

The CSSR evidence in itself negates the case for exceptional circumstances Green Belt deletions in the SAP. The Broad Locations approach goes some way towards addressing this, but the SAP retains certain allocations that impact on the Green Belt and build in the expectation of Broad Locations being subsequently released for a scale of development that the CSSR shows plainly not to be needed.

In Table C (page 6) we have modelled how we would anticipate the brownfield and greenfield capacity identified in the SAP being used in the future. Firstly, we note that even if all the CPRE objection sites are removed from the SAP, there would still be 11,772 dwellings of capacity beyond what is needed to deliver the new proposed CSSR housing requirement. Applying the proposed CSSR distribution, and taking away the brownfield capacity, we can see that the proposed level of greenfield capacity in the revised SAP - including Broad Locations - totals 21,961 dwellings; taking away the broad locations reduces this huge over-capacity to a still very large 16,198. So at the citywide level, it is clear that the CSSR figures could be delivered with only a fraction of the greenfield land proposed in the revised SAP.

However, if all the CPRE objection sites, that remain as proposed allocations in the revised SAP, were discounted, then this would generate a shortfall in capacity to deliver the CSSR requirement in some HMCAs, namely Aireborough, Outer NE, Outer S, and Outer SE. We have therefore modelled an adjustment to the distribution, which removes the key aspects of the site allocations that CPRE objects to and compensates by reinforcing the urban, 'brownfield first' emphasis of the Plan. It can be seen - as we noted in earlier representations - that small percentage increases in the allocations to the city centre and more urban HMCAs enables significant reductions in allocations to those HMCAs that are least served by public transport and least suitable for sustainable growth.

Table C: Why the CSSR is crucial evidence for the revised SAP

| HMCA         | Greenfield Capacity (SAP) | Total Capacity | Greenfield capacity without CPRE objection sites | Total capacity without our objection sites | Dist-ribution (CSSR) % | CSSR require-ment by CSSR dist-ribution | CSSR residual greenfield require-ment by CSSR dist-ribution | Spare greenfield capacity for CSSR | Spare greenfield capacity for CSSR without our objection sites | CPRE Adjustment for brownfield first | Adjusted require-ment for brownfield first | Adjusted distribution for brownfield first % | BL + safeguard ed needed to supply CSSR | BL + safeguard ed needed to supply CSSR adjusted for brownfield first |
|--------------|---------------------------|----------------|--|--|------------------------|---|---|------------------------------------|--|--------------------------------------|--|--|---|---|
| Aireborough  | 1148                      | 2014           | 263  | 1129                                       | 3                      | 1376                                    | 510   | 638                                | -247   | -247                                 | 1129                                       | 2  | 0                                       | 0   |
| City Centre  | 195                       | 11909          | 195  | 11909                                      | 16                     | 7337                                    | -4377   | 4572                               | 4572   | 644                                  | 7981                                       | 17   | 0                                       | 0   |
| East Leeds   | 8006                      | 9686           | 8758   | 10438                                      | 17                     | 7796                                    | 6116  | 1890                               | 2642   | 644                                  | 8440                                       | 18   | 0                                       | 0   |
| Inner Area   | 1451                      | 13042          | 1224   | 12815                                      | 15                     | 6878                                    | -4713   | 6164                               | 5937   | 644                                  | 7522                                       | 16   | 0                                       | 0   |
| North Leeds  | 2193                      | 5958           | 796  | 4561                                       | 9                      | 4127                                    | 362   | 1831                               | 434  | 434                                  | 4561                                       | 10   | 0                                       | 0   |
| Outer NE     | 4524                      | 5000           | 1409   | 1885                                       | 8                      | 3668                                    | 3192  | 1332                               | -1783  | -1783                                | 1885                                       | 4  | 27                                      | 0   |
| Outer NW     | 1266                      | 1755           | 1229   | 1718                                       | 3                      | 1376                                    | 887   | 379                                | 342  | 342                                  | 1718                                       | 4  | 161                                     | 0   |
| Outer S      | 2046                      | 2434           | 926  | 1314                                       | 4                      | 1834                                    | 1446  | 600                                | -520   | -520                                 | 1314                                       | 3  | 0                                       | 0   |
| Outer SE     | 3476                      | 4378           | 1148   | 2050                                       | 7                      | 3210                                    | 2308  | 1168                               | -1160  | -1160                                | 2050                                       | 4  | 0                                       | 0   |
| Outer SW     | 4918                      | 6969           | 3352   | 5403                                       | 11                     | 5044                                    | 2993  | 1925                               | 359  | 359                                  | 5403                                       | 12   | 0                                       | 0   |
| Outer W      | 2054                      | 4672           | 1729   | 4347                                       | 7                      | 3210                                    | 592   | 1462                               | 1137   | 643                                  | 3853                                       | 8  | 0                                       | 0   |
| <b>Total</b> | <b>31277</b>              | <b>67817</b>   | <b>21088</b>                                     | <b>57628</b>                               | <b>100</b>             | <b>45856</b>                            | <b>9316</b>   | <b>21961</b>                       | <b>11772</b>   | <b>0</b>                             | <b>45856</b>                               | <b>100</b>                                   | <b>188</b>                              | <b>0</b>  |

Crucially, even without the CPRE adjustment for ‘brownfield first’ the CSSR requirement would only reach into the Broad Locations by 188 dwellings - a figure that could easily be absorbed by a small redistribution to other HMCAs; and adding in the ‘brownfield first’ adjustment obviates the need for any use of Broad Locations at all.

On this basis there are two reasons why the CSSR provides crucial evidence at this stage.

1. It shows that there are no exceptional circumstances to remove the land now identified as Broad Locations from the Green Belt.
2. Further, it shows that the majority of the Green Belt changes and associated site allocations proposed in the revised SAP, which are adjacent to or form part of a larger development area extending into the Broad Locations, must also be found unsound, because the potential sustainability of those developments would depend on a scale of infrastructure and amenity investment that could only be delivered by the larger developments. But because those larger developments are now almost certain not to be needed, the remaining ex-Green Belt allocations in the SAP could only deliver partial and unsustainable developments.

Therefore there are also no exceptional circumstances to change the Green Belt for those allocations remaining in the revised SAP. Compared to the harm, in terms of an unsustainable pattern of development, that would result from trying to deliver a revised Core Strategy in the near future with a huge over-supply of peripheral sites, the requirement for the SAP to fulfill the adopted Core Strategy requirement must carry limited weight in assessing the exceptional circumstances for Green Belt change.

This leads us to conclude that the only sound approach for the revised SAP is to move all the proposed Green Belt allocations into the Broad Locations category, and assess the merits of Green Belt change holistically following the CSSR review. As this will be comfortably within the current plan period, and the aim of any Green Belt review would be to establish an effective and appropriate Green Belt boundary for the longer term, this is in our view the only workable option.

Table D: Effect of deleting CPRE objection sites on the the distribution by HMCA

| HMCA        | Distribution of capacity (SAP) % | Distribution of capacity without CPRE objection sites % | Distribution (CSSR) % | Distribution (CSSR adjusted for CPRE 'brownfield first' scenario) % |
|-------------|----------------------------------|---|-----------------------|---|
| Aireborough | 3                                | 2   | 3                     | 2   |
| City Centre | 18                               | 21  | 16                    | 17  |
| East Leeds  | 14                               | 18  | 17                    | 18  |
| Inner Area  | 19                               | 22  | 15                    | 16  |
| North Leeds | 9                                | 8   | 9                     | 10  |
| Outer NE    | 7                                | 3   | 8                     | 4   |
| Outer NW    | 3                                | 3   | 3                     | 4   |
| Outer S     | 4                                | 2   | 4                     | 3   |
| Outer SE    | 6                                | 4   | 7                     | 4   |
| Outer SW    | 10                               | 9   | 11                    | 12  |
| Outer W     | 7                                | 8   | 7                     | 8   |
| Total       | 100                              | 100   | 100                   | 100   |

Table D shows that the distribution of development by HMCA is broadly comparable in each scenario. Removing the CPRE objection sites and adopting a 'brownfield first' approach produces a slight shift in emphasis towards the City Centre, Inner Area, East and North Leeds and the Outer South-West; and a reduced allocation to Outer North-East and Outer South-East.

This would be consistent with a 'brownfield first' approach; and it would address the fundamental problem with the Plan, that significant development in more peripheral areas, especially Outer North-East, is broadly unsustainable without major investment in public transport.



### How can the SAP be made sound?

Delivering 66,000 new homes in the plan period was always wildly unachievable and, as we have shown, it is impossible to consider the soundness of the SAP without reference to the up-to-date evidence of housing need. In this context, the revised approach using Broad Locations is welcome, but it remains unsound, because it fails the test of exceptional circumstances for the remaining Green Belt changes proposed. The SAP needs to fulfil the Core Strategy's intended emphasis on brownfield land and inner urban sites, to assist regeneration.

In CPRE's view, the SAP could be made sound by:

1. Deleting the proposed site allocations to which we have objected in this representation;
2. Deferring any and all Green Belt changes to the future SAP that follows the Core Strategy Selective Review, and putting all currently proposed Green Belt allocations into the Broad Locations.

Additionally, in line with our earlier representations, the SAP should itemise, for each proposed allocation 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):

- SP1 - location of development
- 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