

Response To Site Allocation Plan Revision Submission Draft Consultation February 2018

In Summer 2017 Leeds City Council (LCC) submitted its Site Allocation Plan (SAP) for examination. Before the hearings took place in October 2017 it became apparent that two events materially affect the SAP and the exceptional circumstances for Green Belt (GB) sites. These two events were

- The release in September 2017 of a Government methodology for calculating Objectively Assessed Needs (OAN). The initial view of DCLG was that Leeds' Core Strategy target should now be **42,384 net** between 2012 and 2028, rather than 70,000net, a drop of 39%.
- The results of an 2017 exercise to look at a new housing target via a Strategic Housing Market Assessment (SHMA). This showed that the OAN should be around 52,000 net between 2017 and 2033: The 2033 date was 5years beyond the current Core Strategy end date of 2028, therefore by taking off 5years annual supply (16,250) and adding back the LCC housing delivery between 2012 and 2017 (13,824), the new Core Strategy housing target was likely to be around **49,574**.

This meant that the SAP's claim to need Green Belt sites for 12,385 units using housing target as the exceptional circumstances was no longer valid. Leeds had already delivered or had under construction 13,272¹ homes and had non-Green Belt allocations/identified sites for 43,769. Totalling **57,041 for the period 2017 - 2028** (point 3.10, SAP Board Paper 13th December 17) GB therefore did not appear to be needed.

As the SAP target remains at 66,000 until a new housing target is ratified, LCC deemed that it needed an approved SAP to support its 5yr land supply. Therefore it was decided to change the approach to the Green Belt by "*considering the minimum level of Green Belt required for the SAP to be a sound plan and a basis to meet the five year housing land supply requirements*" (point 3.1, SAP Board Paper 13th December 17) This new approach consists of

1. Maintaining the identified sites at policy HG1 as at 1 April 2017 (section 2 SAP Background)
2. Maintaining the non GB allocations at HG2 as at 1 April 2017 (section 2 SAP Background)
3. Adding . 47.9% of each HMCA's GB potential allocation to HG2 Allocations (Table 1 SAP Board Paper *ibid*). This is deemed the GB needed under exceptional circumstances. (amendment 15)
4. Putting all HG2 allocations into phase 1 of the plan for delivery before year 11 ie 2023 (amendment 13)
5. Putting 52.1% of each HMCA's GB potential allocation into Broad Locations² BD1 for release in later phases as and when required by the need for a 5yr land supply (amendment 16)
6. Putting identified GB PAS or Safeguarded land into Broad Locations BDI (amendment 18 and 19)
7. Maintain some Greenfield UDP PAS sites as Safeguarded sites HG3 (amendment 18 and 19)

We are invited to give our view on the soundness of these changes.

¹ It is not known why there is a difference between this 13,272, and the figure of 13,842 which is the delivery of housing 2012 – 2017.

² Broad Locations are identified as a "*Pool of sites identified as locations for growth*" (point 5.4 SAP Board Paper *ibid*)

RESPONSE -

We do not consider the SAP amendments to be sound on a number of grounds

The case for exceptional circumstances

We consider the SAP is currently not justified as there is no clear and transparent case made for the exceptional circumstances for Green Belt deletion being the required balance between housing need and land supply. There appears to be adequate land to fulfill housing need between 2012 and 2028, and in addition the SAP does not have to allocate sites for the whole of that period. Data and analysis needs to be brought together in one place to make the case – currently it is confusingly spread over a number of papers, some of which conflict.

The phase 1 GB numbers appear to have been massaged upwards from the initial 45% in the Executive Board paper - see table below. This means that 333 housing units are on GB sites technically not needed in phase 1. That is a equal to a number of GB sites could have gone into Broad Locations; and is not in line with the core strategy of least impact on GB (SP1 and SP6). (Table 1 Executive Board Paper)

Document	GB Phase 1	Broad Location
Original SAP	52.6% or 6,509	
Ex Board Paper 13 December 2017	45%	55%
Original calculation in Table 1 (SAP Submission)	45.2% or 5,598	54.8% or 6,787
After technical considerations (not given)	47.9% or 5,931	52.1% or 6,454

Other options to using Green Belt

It was confirmed in Parliament on 6 February 2018, *“Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.”* We do not consider the SAP justified as the case has not been made that there are no other options except to use Green Belt.

1. There are around 5,300 UDP PAS sites on green field, put in place for longer term housing needs in 2006, which are not being allocated in the SAP but kept as safeguarded land under HG3. The argument that these are less sustainable than the phase 1 GB allocated sites is not supported by scrutiny of the evidence – and the GB sites still fulfill GB purpose. (amendment 18 and 19)
2. The 2017 SHMA points out that LCC housing market now includes parts of north Kirklees, and Wharfedale in Bradford MDC. For Aireborough the fact that Wharfedale is part of the same HMCA is particularly significant to sustainability, housing allocations and land use, therefore there are opportunities for more cross boundary planning – including Leeds co-operating with Bradford on the latter's strategic Green Belt review.
3. Within the Neighbourhood Plan we have identified areas **within the urban environment** that could better accommodate the type of housing that Aireborough needs, some are brownfield some regeneration. This is part of a spatial strategy that local residents have said they want in consultation, and which has not been looked at for the SAP.
4. We are aware that by fixing the SAP at a date of 1 April 2016, with only updates to 1 April 2017 that the full picture of Aireborough housing land is not contained in HG1.
 - o There are planning permissions missing from pre 1/4/2017 which are of the type of property that Aireborough requires for its housing need= these total to around 26 units
 - o There is a planning permission made on 8 August 2017 for HG1-1 High Royds for 71 units.
 - o The site HG1-12 Green Lane Yeadon is listed as 171 units; however planning permission is for 203 units, 32 more.

Together, this makes 129 units and means there is no exceptional circumstances for deletion of the Green Belt site HG2-2 Wills Gill 133 units. This is especially the case when Wills Gill fulfills a significant Green Belt purpose and has a minus sustainability score, and conflicts with Core Strategy policy 11 (NPPF134) Conservation Policy N19 of the UDP and P12 (NPPF 109) Landscape (see ANDF Landscape Value report).³

5. The same applies to the non-GB part of HG2, which needs updating. Aireborough has had some additions to planning permissions since 1 April 2017 which are of the kind to give the HMCA the type of smaller properties and Independent Living accommodation which are required. These include the regeneration of Mickelfield House. At February 2018, these add up to 25. This, with other adjustments makes a total for non-GB Allocations and over estimates of more than 58. Which means there is no exceptional circumstances for deletion of the Green Belt site HG2-4 Hollins Hill 80 units. This is especially the case when Hollins Hill fulfills a significant Green Belt purpose and has a minus sustainability score, and conflicts with Core Strategy policy 11 (NPPF134) Conservation Policy N19 of the UDP and P12 (NPPF 109) Landscape (see ANDF Landscape Value report).⁴

Green Belt Phase 1 – Not in line with the Core Strategy

We do not consider that the proposals for Green Belt deletions are in line with the spatial strategy in the Core Strategy (CS), in particular SP1, SP6, H1. Policy SP7 was only the starting point with indicative targets, to be looked at using evidence on environmental constraints. The quotes below demonstrate this

Core Strategy	<i>"SP7 Table 3 provides an indication of overall scale and distribution of development in different HMCA. The percentage figures are intended as a guide rather than rigid targets". (4.6.17)</i>
Core Strategy	<i>"Areas with the highest potential include the City Centre, Inner Areas, North Leeds and East Leeds where opportunities for development of previously developed land and regeneration are greatest. Major growth can also be accommodated in the outer areas of Outer South, East and Outer South West..... The other areas provide opportunity for modest growthwhere appropriate"(4.6.17)</i>
SAP Revision	<i>"In order to ensure that HMCAs continue to provide housing opportunities to meet local needs as set out in the Core Strategy it is proposed that each HMCA make a pro rata contribution towards the 5,598 homes that are needed on Green Belt and thus in total help support the maintenance of the SAPs housing trajectory."(5.2 Sap Revision Background Paper)</i>
SAP Revision	<i>"The Green Belt release in the SAP is spread amongst 9 Housing Market Characteristic Areas (HMCAs)so as to ensure that all parts of Leeds have the opportunities for new homes for local people and for compliance with the spatial approach set out in the adopted Core Strategy" (3.15 Executive Board Paper 13 December and 5.1 SAP Revision Background paper)</i>
SAP Revision	<i>"The distribution by HMCA and the other characteristics set out in Core Strategy Policy SP7 provide the starting point for the provision of allocations and broad locations" (2.29 SAP Submission).</i>

Indeed, if the original phasing as outlined before amendment 9 is in line with the CS then the current proposal cannot be compliant, and has created some unsustainable allocations in various HMCAs that make the plan unsound due to lack of effectiveness.

- The Wills Gill site HG2-2 was part of a major urban extension with Banksfield HG2-3, highway access in particular was a dependent factor. HG2-3 has now been put into Broad Locations as

³ See Town And Country Planning Act 1990 (Section 78) Appeal By Thornhill Estates: Bagley Lane/Calverley Lane, Farsley, Leeds, West Yorkshire Application Ref: 12/04046/Ot

⁴ See Town And Country Planning Act 1990 (Section 78) Appeal By Thornhill Estates: Bagley Lane/Calverley Lane, Farsley, Leeds, West Yorkshire Application Ref: 12/04046/Ot

“there is no defensible boundary in Green Belt terms; thus creating a greater protrusion into land to the north of the settlement than alternative sites in the HMCA” However, this has left the Wills Gill site as an even greater protrusion from the urban boundary. This is exacerbated by the context of a large buffer on Wills Gill that Historic England insist on because of the significance of the site to the historic setting of listed building and conservation areas – something that the Banksfield site does not have to contend with.

- Parlington and Garforth are two other sites where only part of the site is in part 1 and the rest in Broad Locations. Surely, a major extension or a new village is only sustainable and enhancing to character if it can be masterplanned as one entity?

GB Policy is not informed by a Comprehensive GB Review

The cause of these ineffective allocations is the insistence of making the HMCA's the centre of spatial strategy for the revised SAP. The Core Strategy Inspector's foresaw the issue of using the HMCA as a basis for GB deletion. In his report he took out the idea of a selective GB review *“the core strategy only commits the Council to a selective review. This may lead to pressure to release land in the review area when having regard to the advice in paragraph 85 of the NPPF there is more suitable land elsewhere. A comprehensive review is also more likely to ensure consistency with the spatial strategy and increase the likelihood that boundaries will not need to be reviewed again at the end of the plan period”*. (point 29 Inspector's Report Sept 2014). You can read a 'review area' to mean HMCA – and this is exactly what has happened in the Leeds Revised SAP *“it is a combination of all these factors that have led to the suite of allocations in each area.”* (2.30 SAP Submission).

LCC maintain that their selective GB review, done for the Issues and Options stage in May 2013 only on the 2011 SHLAA sites (see 1.3.5 Issues and Options vol 2) is sufficient to meet the CS Inspector's instruction.. There has been no change to the method, only changes made to parts of the assessments following consultations, but not the overall conclusions. Conversely, Bradford MDC is currently (2018) carrying out a comprehensive review across its area, following an initial GB review for its Growth Strategy in 2013 (note the same year as LCC). This affects the Leeds/Bradford border in HMCAs such as Aireborough, and as can be seen from the 2017 SHMA, in essence this is the same HMCA. GB reviews are supposed to be strategic and cross borders.. We note that for areas such as Menston and Baildon, next to Aireborough, the findings in the Bradford Growth Strategy are markedly different on Leeds' side of the border to that on Bradford's !! For example, at the lngs HG2-1, Leeds say there is no merging of settlements whilst Bradford says that is a purpose of GB. There is a similar situation at Hollins Hill HG2-4. How can we have any confidence in the LCC Green Belt Review being used as justification for GB deletions?

GB Policy in the Revised SAP is not in line with Core Strategy or NPPF - Case of Bagley Lane, Farsley

Another issue with using the HMCA as the centre of spatial strategy is that of lack of consistency with the Core Strategy and NPPF. Considerations of issues such as conservation of historic assets policy 11 (NPPF134) Conservation Policy N19 of the UDP and the natural capital and ecosystem services of landscape, P12 (NPPF 109) Landscape, have not been addressed in the revised SAP's approach to housing allocations – neither in the GB phase 1 deletions or the GB put in broad locations. We would bring forward as supporting evidence the February 2018 case decided by the Minister on Bagley, Lane Farsley, where **environmental constraints have been a deciding factor overriding the issue of not having a 5 year land supply**. In addition, our Landscape Character and Value report make it quite clear that a large part of Aireborough is part of the South Pennines National Character Area, the only part of LCC that is. The South Pennines are currently going through a process to become a National Park, therefore it is even more pertinent to carefully consider the natural capital and ecosystem services of Aireborough.

GB Phase 1 sites are not those that fulfill least GB purpose

LCC maintain that the GB Sites chosen for Phase 1 are *“the most preferable sites to release in Green Belt Review Terms – those having least affect on 5 purposes of Green, site attributes (including local views), as well as sustainability assessments. In addition the assessment has considered sequential preference of the release of Green Belt sites, so that in most cases, those with the least impact on Green Belt Purpose have been released, with the remainder being designated as Broad Location pending review of the Plan”*. (amendment 5, 2.30 SAP Submission). This is not the case in Aireborough see table below, where the sites chosen are least sustainable and fulfill the most GB purpose, that is both within the HMCA, and also in comparison with other sites we know of outside. A comprehensive GB Review across Leeds, and in conjunction with Bradford and other LAs would provide better quality evidence.

Site	GB Purpose score out of 15	Sustainability Score	SAP	Landscape Character from 2017 report
HG2-1 Guiseley Ings lane	12	Minus 12	Phase 1	
HG2-3 Guiseley Wills Gill	12	Minus 6	Phase 1	Tension Point
HG2-4 Guiseley Hollins Hill	11	Minus 9	Phase 1	Tension Point
HG2-9 Victoria Avenue	8	1	Phase 1	
HG2-5 Guiseley Coach Road.	10	Minus 9	BL	Tension Point
HG2-3 Coppice Wood/Banksfield	9	Minus 2	BL	Tension Point
HG2-12 Rawdon Woodlands Dr	9	Minus 10	BL	N/A
HG3-2 Rawdon Knott Lane	9	1	BL	N/A
HG2-10 Yeadon Gill Lane	8	Minus 7	BL	Historical Tension Point
HG3-4 Rawdon Layton Lane	6	Minus 2	BL	N/A
HG3-1 Guiseley Ings Lane	6	Minus 1	BL	
HG3-3 Rawdon, south of Knott Ln	4	Minus 1	BL	N/A

Scoring on extent of GB purpose
 11 – 15 = Significant
 6 – 10 = Contributing
 1 – 5 = Marginal
 Below 0 = no GB purpose served

Summarising some of the key issues with each of the phase 1 GB sites and how they fail to meet consistency with GB purpose and with

SP1, Location of Development	P 11 Conservation
SP6 Allocation of Housing Lane	P12. Landscape
H1 Managed Release of Sites	G9 Biodiversity Improvements

INGS LANE, GUISELEY– HG2-1 160 houses- Mire Beck's Flood Plain Separating Guiseley & Menston

Green Belt The most significant GB purpose of this site is that it stops Menston and Guiseley from merging. Not only is this acknowledged in the Bradford Growth Assessment of 2013, but in a previous Inspector's report on the Ings site the Inspector concluded that *“I regard the continued openness of this land as fulfilling all the functions of separating the two existing communities of Menston and Guiseley and the contribution the site makes to Green Belt is so great as to override the need to identify land for immediate or possible longer term residential development”*

Leeds City Council conclude that – the site would not merge the settlements, is not important in safeguarding the countryside from encroachment, and would round off 'the settlement'.

Sustainability Assessment - In terms of sustainability, the Ings is less sustainable than a large number of sites across Leeds, both Green Belt and greenfield. The sustainability score for the Ings is a large minus, mostly because it is the floodplain for Mire Beck and a Zone 3 flood risk. Further, it is part of an important habitat corridor, contains good agricultural land, and in the Aireborough Landscape Character & Value Survey was identified as a site that should be part of the strategic Green Infrastructure that is so important for sustainability.

There could and should be a small amount of development around Birks Farm to regenerate that area.

WILLS GILL, GUISELEY – HG2-2 133 houses Historically Significant Site Being Part of Medieval Field System

Green Belt - This site performs very well on 4 of the 5 purposes of Green Belt, and contributes to the 5th – keeping Yeadon and Guiseley from merging, especially if more houses were built at the back of Banksfield and Coppice Wood – which could still happen as this site was linked to the Banksfield site as an urban extension in original plans. It is especially significant in preserving the setting and historic character of Guiseley as it is part of the Medieval Field system – an issue that Historic England has concerns about. In the Aireborough Landscape Character and Value Report it was identified as a place where the built-up area is in ‘tension’ with the neighbouring open landscape character, and that the *“Wills Gill landscape is fundamental to the character of Guiseley. This point of connection is already squeezed to its limit and could easily be lost”*. This is a conclusion that has also been reached by Leeds Planners in the past when they have turned down other housing applications in the area. In original assessments Leeds admitted that this site *“performed a role in safeguarding the countryside from further sprawl”*.

Leeds City Council conclude that – the site is well-connected to the urban area and that measures can be taken to mitigate the negative impacts on old Guiseley’s character – namely a buffer, which then leaves an isolated protrusion of development, that is not well-connected to the urban area, and would lead negatively to sprawl !!

Sustainability Assessment - In terms of sustainability the score for Wills Gill is a large minus – worse than a number of UDP PAS sites. Access on to Queensway is poor and Highways have said this is an issue. The site is also important for ecology networks. But its biggest failing is the effect on the character of an important historic area, and the potential for sprawl.

HOLLINS HILL, GUISELEY – HG2-4 80 houses Green Belt Working Farm Site

Green Belt - The important thing about the Green Belt in this location is that it is significant in stopping urban sprawl between Guiseley and Baildon along the A6038 (source Bradford Growth Assessment 2013). It is also significant in stopping the countryside from encroachment, and is actually part of the West Yorkshire Strategic Green Infrastructure. Leeds say in their core strategy policy SP6 that housing allocations should have the least negative and most positive impact on green infrastructure. Where such sites are allocated the function of the land should be retained and improved. (There is nothing in the SAP Hollins Hill site details on this). The Aireborough Landscape Study also identified this area as a point of tension between the built-up area and the countryside character. And, this site has not been evaluated for its effect on the setting of the nearby listed buildings.

Leeds City Council conclude that – the site has a low potential to sprawl, does not safeguard the countryside, and would only have a marginal effect on the listed buildings.

Sustainability Assessment - In terms of sustainability, taking away this field will destroy the viability of a working farm. Large road changes will have to be made at the top of Hollins Hill to accommodate access,

and the site has very limited access to facilities. Further comments on land stability due to old coal pits have not been taken account of. It scores a high minus on the sustainability appraisals; certainly higher than many of the UDP PAS greenfield sites.

VICTORIA AVENUE, YEADON – HG2- 9 102 Houses

Right Next To The Airport Runway

Victoria Avenue Yeadon is at the top of Tarnfield Park, it is right next to the runway and must be one of the least sustainable sites in Leeds for this reason. The site is owned by Leeds Bradford Airport, and was put in the site allocation plan by the last owners (not the current owners), who wanted to use the funds to build the Innovation Park on the 36.23 hectare Green Belt site on the other side of the airport.

The site of the Innovation Park is controversial as it is Green Belt land. At the October 2017 SAP hearing on employment there was a discussion on why Coney Park and the Avro building, both brownfield sites, had not been looked at as possibilities for the Innovation Park. The Innovation Park will need an airport link road. For all of these reasons it is unlikely that this site will be deliverable in phase 1 of the SAP.

The potential housing site at Victoria Avenue, would be a much better extension to Tarnfield Park as green infrastructure. It is moorland wetland, and could help in joining ecological habitat networks across Yeadon Moor.

Broad Locations

We understand the need for the Broad Locations (BL) category as a temporary measure; however we are of the view they are a device for spatial strategy and forward planning and should indicate **broad locations for growth**, not individual ad hoc sites. We do not believe some of the BL in Aireborough should be in that category at all owing to the CS spatial strategy, Green Belt purpose and sustainability. Therefore, we would advocate that the SAP allocate non GB land for year 1-11, using UDP PAS if necessary, and put all potential GB deletions into Broad Locations – for now. Meanwhile, the CSSR should carry on but include a comprehensive Green Belt review, which should be done in conjunction with Bradford. The Bradford methodology has been consulted on (both ourselves and LCC took part), as is deemed to be a reasonable one – LCC could therefore use this method (after its own quick consultation).

Conclusion

For Aireborough we do not believe the SAP demonstrates justified or positive planning, neither is the approach effective in places, or consistent with the NPPF or Core Strategy – this relates to housing targets based on OAN, environmental constraints, housing policy on mix, spatial strategy, and the evidence produced for and by the Neighbourhood Plan. Aireborough has a very specific need for types of housing to fulfill need, and both environmental constraints and the Neighbourhood Plan evidence dictate a spatial strategy that is not accommodated by the SAP. The SAP is therefore not in line with the distinctive character of the area, has not considered environmental factors or the view of local residents on how development should be accommodated.

Yours sincerely

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For and on behalf of Aireborough Neighbourhood Development Forum

26 February 2018