

LDF Publication Draft Consultation,  
Forward Planning & Implementation,  
Leeds City Council,  
The Leonardo Building,  
2 Rossington Street,  
LEEDS  
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2<sup>nd</sup> November 2015

**RE: LEEDS LOCAL PLAN – SITE ALLOCATIONS PLAN: PUBLICATION DRAFT**

I am writing to object to several sites which have been proposed for building in the site allocations plan. These are:

HG2-1, HG2-2, HG2-3, HG2-4, HG2-5, HG2-6, HG2-9, HG2-10, HG2-12, HG2-41, HG2-43, HG2-45, HG2-46, HG3-2, HG3-3 and HG3-4

Having been contacted by several hundred constituents, who have expressed grave concern over these sites, I have found there is an overriding concern surrounding building across the greenbelt, and the above sites would all involve building on the Green Belt.

As you will no doubt be aware from the National Planning Policy Framework (NPPF), the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Additionally, as with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and an alteration to a boundary should not be made in exceptional circumstances. Along with many constituents, I do not feel that these exceptional circumstances to change Green Belt Boundaries have been met within the Leeds Green Belt Review, which has not been the comprehensive review required by the Inspector in his report of September 2014 and accepted by Leeds City Council.

While I do understand the need for housing, the NPPF also sets out that: “unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development on a site within the green belt”.

Further Government guidance would suggest that the NPPF should be read as a whole, and that housing need alone is not the only factor to be considered when drawing up a local plan. The Framework makes clear that, constraints have to be considered and applied. This was also emphasised by the Core Strategy Inspector in his report. The need to respect Landscape Character and Local Distinctiveness are part of these constraints and apply to many parts of my urban/rural fringe constituency.

P.T.O.

I do feel that the Council has misinterpreted guidance from the Government, which has always suggested that we should instead be seeking to build on brownfield land prior to the Green Belt. I would argue that there are many brownfield sites in Leeds which could be utilised for new housing rather than initially building across the Green Belt land. There are in excess of 25,000 units worth of brownfield sites in the SHLAA which have not been allocated for housing, and which Developers have maintained is not viable as there is no market. While there may, of course, be some that are required for other purposes, it does leave a very large number unused, and the housing market has improved considerably since the days back in 2010 when the SHLAA was first being looked at in conjunction with the SHMA.

Having seen a copy of a report from Heritage England dated 21<sup>st</sup> October 2015, which backs up claims that the plan is unsound, I would again reiterate their point, that:

“There has been absolutely no evaluation of what impact the loss of these currently-open areas and their subsequent development might have upon those heritage assets... In the absence of any assessment of the degree of harm which the proposed Allocations might cause to the historic environment or, indeed, what measures the Plan might need to put in place in order to ensure that any harm is minimised, the plan cannot demonstrate that the development of the sites it is putting forward for development is compliant with the Plan’s policies for the protection of the historic environment as set out in the Core Strategy Policy”

As mentioned above, the Inspector who conducted the Core Strategy examination found that a comprehensive green belt review was necessary in order to ensure that development could be directed to the most sustainable locations in accordance with the underlying objectives of the Strategy. However, the Council have proceeded to prepare the Site Allocations Plan on the basis that the only purpose of the Green Belt review is to accommodate anticipated development needs during the plan period, with a small margin of reserve land to cater for unforeseen needs. I am concerned that the Council has allowed the selection of sites for development to lead the review, rather than looking into the permanence of developments. Based on the criteria laid out in the NPPF, the Site Allocations Plan cannot be considered to be positively prepared as it fails to deliver on key objectives and commitments of the Core Strategy.

The Council could have followed the Inspector’s advice and conducted a genuinely comprehensive Green Belt review, which could have been followed by site allocations. This could have also involved neighbourhood planning groups in the process where there are neighbourhood plans in preparation. In this way, I think that the site allocations plan would have commanded much more public support.

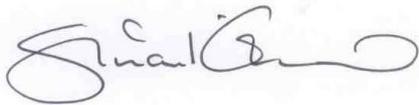
The Plans are very unclear on whether they have been positively prepared, as they do not seem to explain how they will meet the development needs of the area, only considering the need to share out the total commitment to housing developments in Leeds. It appears to completely ignore the infrastructure, road connections and employment. Additionally, there is a lack of primary school places, which means that many extensions to primary schools that are currently taking place will not cater for any future growth in the area.

As a whole, there are various issues with the site allocations plan, which makes it unsound:

1. Estimated future housing need is based on figures, which I feel are based on outdated population growth figures, which have not been adjusted;
2. The lack of adherence to the NPPF in respect of Green Belt land;
3. There appears to be no consideration of transport concerns, particularly given that some sites would result in further congestion, rendering the plans ineffective; and
4. The procedures relating to a comprehensive Green Belt review do not appear to have been followed.

For these reasons, I feel that the plans need to be looked at again, with a thorough green belt review in mind.

Kind regards

A handwritten signature in black ink, appearing to read 'Stuart Andrew', with a stylized flourish at the end.

Stuart Andrew MP