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Leeds SAP Revised Submission Draft Consultation
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Dear Sirs

SITE ALLOCATIONS PLAN REVISED SUBMISSION DRAFT

Thank you for the opportunity to respond to the current consultation on the revised submission draft of the Site Allocations Plan. Please find below our comments in relation to the various questions posed by the Inspector to the Council. We have structured our responses to fit the Council's consultation form.

AMENDMENTS

1 (para 1.5)	23 (para 3.1.7)	58 (para 3.5.10)	83 (para 3.7.10)	111 (para 3.10.5)
2 (para 2.27)	26 (para 3.1.9)	61 (para 3.6.5)	85 (para 3.8.5)	113 (para 3.10.7)
4 (para 2.29)	28 (para 3.1.10)	63 (para 3.6.7)	87 (para 3.8.7)	119 (para 3.10.9)
5 (para 2.30)	33 (para 3.2.5)	64 (para 3.6.7/HG2)	91 (para 3.8.9)	120 (para 3.10.9)
6 (para 2.31)	36 (para 3.2.9)	66 (site MX2-39)	92 (para 3.8.9)	121 (para 3.10.9)
7 (para 2.33)	37 (para 3.3.5)	67 (para 3.6.9)	93 (para 3.8.9)	125 (para 3.11.5)
8 (para 2.36)	43 (para 3.3.9)	68 (para 3.6.9)	94 (para 3.8.10)	127 (para 3.11.7)
14 (para 2.47)	44 (para 3.4.5)	70 (para 3.6.10)	97 (para 3.9.5)	131 (para 3.11.9)
15 (para 2.55)	47 (para 3.5.5)	72 (para 3.7.5)	99 (para 3.9.7)	132 (para 3.11.9)
16 (para 2.55)	50 (para 3.5.7)	74 (para 3.7.7)	105 (para 3.9.9)	133 (para 3.11.9)
18 (para 2.60)	55 (para 3.5.9)	80 (para 3.7.9)	106 (para 3.9.9)	134 (para 3.11.10)
21 (para 3.1.5)	56 (para 3.5.9)	81 (para 3.7.9)	107 (para 3.9.9)	
22 (para 3.1.6)	57 (para 3.5.9)	82 (para 3.7.9)	108 (para 3.9.10)	

Do you consider this Revised Submission Draft Amendment sound?

No

Which test of soundness are your comments about?

Justified

Effective

Justified Consistency with National Policy

Why is it Unsound?

Under paragraph 157 the NPPF refers to the identification of broad locations for strategic development on a key diagram. It then refers to identifying land-use designations on a proposals map. Clearly, the Council

should have identified broad locations within the Core Strategy. Now the Council is preparing a Sites Allocation Plan, which includes the Proposals Map, then it is no longer appropriate to be identifying broad locations. Instead, the NPPF is quite clear how the proposals map should be identifying specific land-use designations.

It therefore appears the Council is attempting to create a whole new green belt classification through this latest set of amendments in order to attempt to patch together the fraying threads of what is clearly no longer a sound plan. This is clear from amendment 26 (to para 3.1.9) which describes a wholly unsatisfactory situation where broad locations “remain unallocated but within Green Belt.” Either land is within the Green Belt, or exclude, or else safeguarded for future development. Especially as, Green Belt policy set out in the NPPF makes no provision for the designation of broad locations.

We do not believe the identification for broad locations is an appropriate means of trying to deal with the potential changes to the development targets a review of the Core Strategy will introduce. Quite simply, events have now overtaken the Site Allocations Plan process given how it appears a Core Strategy review is to be progressed. On this basis, completion of the Site Allocations Plan should be delayed until the Core Strategy review has been finalised. This would allow a comprehensive Green Belt review to be undertaken that complied with the requirements of the NPPF. Specifically, how the NPPF makes clear how land either fulfils the purposes of Green Belt, or it does not.

We are also concerned with the intention to designate broad locations as we are unclear how the designation differs from Safeguarded land?

The amendments referred to above confuse the situation as we are now left wondering whether the broad locations are indeed land-use designations or not? If the current housing requirement requires the release of the broad locations to meet development requirements then the areas identified form land allocations for development. To then suggest the broad locations are, in effect, safeguarded land until the review of the Core Strategy decide their fate is therefore contradictory in the circumstances. Are the broad locations land-use designations for the purposes of making clear what land is to be developed during the Plan period or not?

We find the whole situation unsatisfactory, especially as the NPPF makes clear under paragraph 157 how the Site Allocations Plan should be allocating land for development, rather than indicating areas of potential development. Especially, as the purpose of a plan-led system is to provide certainty to communities.

The implication is that the Site Allocations Plan is not actually a land-use designation document at all given some of its contents are intended for the Core Strategy. It is considered unsatisfactory for a review of the Core Strategy to determine the fate of the release of certain land, especially as it will leave the release of land in limbo for a considerable length of time given how long the plan preparation process realistically takes.

How can the Plan be made sound?

The appropriate way to make the Plan sound would be to delay preparation of the Site Allocations Plan until the review of the Core Strategy has been completed, or designate the broad location land as safeguarded land so that the document might conform with the NPPF.

AMENDMENT

19 (para 2.60)

So you consider this Revised Submission Draft Amendment sound?

No

Which test of soundness are your comments about?

Justified

Effective

Consistency with National Policy

Why is it Unsound?

In addition to the comments above, we would also like to raise the point that this proposed change reclassifies previously safeguarded land as broad location. Where is the review of the Green Belt in order to justify the intention to allocation previously safeguarded land for development within the Plan period?

We are most concerned that land that has not previously been allocated, or marked for development within the Plan period, is being brought forward early through a classification of land that is not appropriate for a Site Allocations Plan.

How can the Plan be made sound?

The appropriate way to make the Plan sound would be to delay preparation of the Site Allocations Plan until the review of the Core Strategy has been completed, or designate the broad location land as safeguard land so that the document might conform with the NPPF.

AMENDMENTS

66 Site MX2-39

71 Allocation MX2-39 (5372)

So you consider this Revised Submission Draft Amendment sound?

No

Which test of soundness are your comments about?

Effective

Justified

Consistency with National Policy

Why is it Unsound?

We strongly object to the continued allocation of Parlington Estate. Historic England have now confirmed the Listing of buildings and also the gardens at Parlington Estate. To this end, this historic significance of the original Estate, and its surrounding land, has changed significantly. We are concerned that the Policy does not set out sufficient guidance to provide an appropriate level of policy protection to the nationally recognised heritage assets across the Estate.

We are most concerned by the differences to the proposed allocation shown on pages 56 and 51 and 52. Pages 51 and 52 shows a much larger area outlined in yellow and described as 'location of new settlement' than on page 56. We are, however unclear as to the implication? We are concerned that the yellow line implies the future extent of the settlement, which would suggest the map on page 52 outlines a much greater area of Green Belt to be released in the future for development. Surely the yellow boundary should remain the same as that on page 56, and the altered boundary on pages 51 and 52 is a mistake? If it is intentional, then where is the justification and explanation for the change to the boundary?

As we have raised in previous consultation opportunities, too much of the Plan has not been fully explained or justified. Especially in relation to the allocation of Parlington, which was introduced at an advanced stage of the plan process, and in preference to other sites that are considered to be sequentially preferable. We are most concerned that the allocation of the land is unsound, particularly as there is no explanation for why this site is sequentially more sustainable than releasing a number of smaller sites on the edge of existing settlements which are well established and already sustainable.

How can the Plan be made sound?

The yellow boundary shown on page 56 should be applied to the plans included on pages 51 and 52. Although, the preferred action would be for the allocation to be deleted from the Plan.

Next Steps

Please do not hesitate to contact us if you would like to discuss any of the matters set out in this letter, otherwise we look forward to being notified of the next stage within the SAP process.

Yours faithfully



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Director

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