

Report of Chief Planning Officer

Report to Development Plan Panel

Date: 16th December 2014

Subject: Safeguarded Land / Protected Areas of Search (PAS)

Are specific electoral Wards affected? If relevant, name(s) of Ward(s): District-wide	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Summary of main issues

1. The adopted Core Strategy establishes that new PAS should account for at least 10% of the total land identified for housing over the Plan Period. In seeking to take forward emerging allocations proposals for the Site Allocations Plan, alternative options and working assumptions have been considered for the purposes of the workshop sessions. In addition, through this process a number of issues have arisen in relation to the potential of returning existing PAS sites, not proposed for allocation, to the Green Belt.

Recommendations

1. Development Plan Panel is requested to consider this report and the approach to PAS and to consider the merits of designating the UDP Rural Land as Green Belt.

1. Purpose of this report

- 1.1 The purpose of this report, is to consider Safeguarded Land / Protected Areas of Search (PAS) issues in relation to the preparation of the Site Allocations Plan (SAP). The focus of this is the overall methodology for the provision of PAS as part

of the SAP workshop sessions and for consideration of whether or not existing PAS sites not proposed for allocation, could be returned to the Green Belt.

2 Background information

2.1 Safeguarded Land/ PAS is 'reserve land' for consideration for development after the end of the plan period of the current development plan. PAS has previously been identified as part of the Leeds UDP and will need to be identified as part of the SAP, in order to be in conformity with the Core Strategy and to reflect national guidance. The National Planning Policy Framework (NPPF) defines safeguarded land as a specific planning tool to help maintain the permanence of Green Belt. It sets out:

“Where necessary (Local Planning Authorities), identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. (NPPF, Para 85).

2.2 The NPPF expects Green Belt boundaries to have “permanence in the long term” (para 83). It is normally assumed that permanence means long enough for two plan periods or 25-30 years.

2.3 The Core Strategy establishes that new PAS should account for at least 10% of the total land identified for housing over the Plan Period. This is despite considerable objection from volume house builders and their agents that this was insufficient to make Leeds' Green Belt boundaries “permanent” in accordance with the NPPF. This target (10%), is set within the context of a Core Strategy housing target of 66,000 and equates to a minimum of land for 6,600 dwellings.

3. Main Issues

3.1 In taking forward the Core Strategy requirements as part of the SAP process, a number of factors have been taken into account in developing a methodology and considering alternative options. These include the scope of the Core Strategy, the spatial characteristics of the District, the extent of the Green Belt and the scale of development.

3.2 The Core Strategy does not provide for a spatial distribution of PAS and there is no specific target for each Housing Market Characteristic Area (HMCA). However, Policy SP10 indicates that as with allocations PAS sites should be consistent with the settlement hierarchy (to reflect Spatial Policy 1) and take account of Green Belt purposes. Para. 4.8.6 to the Policy also notes, “Land not appropriate for housing might be needed for employment allocations or retained as future PAS in the LDF”.

3.3 The starting point for the approach is therefore to consider the application of the NPPF requirement, the approach of the Core Strategy being taken in Leeds and the relationship of the Green Belt opportunities to the Settlement Hierarchy and to consider alternative options. It should be noted that the Core Strategy policy set out in Spatial Policy 10, provides for some flexibility to consider distribution in other ways. For example, taking a view on the sensitivity of Green Belt in an area and the extent to which it is important to the purposes of Green Belt. It should be

emphasised also that the overall Policy approach of the Core Strategy is underpinned by a comprehensive sustainability appraisal (and compliance with the SEA Directive), consequently, consideration of the delivery of PAS through the Site Allocations process, needs to be consistent with this approach.

- 3.4 The Plan attached (plan 1) shows the current extent of the Green Belt covering Leeds MD. This is overlaid with the 11 HMCA boundaries. This highlights that the depth and extent of the Green Belt varies across the District. Broadly speaking, the extent of Green Belt to the North and North East of the District, is greater than the extent between Leeds and Bradford and to the south of the District (along the M62 corridor). In these areas, the Green Belt is particularly tight where it serves to separate Leeds from Bradford, Kirklees and Wakefield. Coinciding with the extent of Green Belt to the North and North East are major areas designated as local Special Landscape Areas (SLAs), with smaller SLA pockets elsewhere (to the South and West) and narrower parcels of Green Belt, separating the Main Urban area, Major and Smaller Settlements.
- 3.5 Against this overall strategic context, there are a number of options for considering, the quantity and distribution of PAS across the District. These include:
- i). The location of PAS in areas where the extent of Green Belt is at its greatest,
 - ii). The provision of PAS as a proportion of future housing growth requirements (as set out in SP7), within each HMCA,
 - iii). The equal distribution of PAS in each HMCA area, where it can be accommodated (on the basis of national guidance definitions).

Option i

- 3.6 An option is to consider the provision of PAS in locations where the Green Belt extent is at its greatest and therefore less critical in its function, in providing a strategic separation between settlements. Such an approach however is imprecise, as it is not clear whether such critical areas should contain no PAS or only a limited but unspecific amount. Further judgement would therefore be necessary. Whilst this approach may have some merit in broad strategic terms, other factors also need to be taken into account. This includes the role and function of Special Landscape Area (SLAs) and the relationship of site locations to major infrastructure and services. In addition, this approach does not take into account the need to plan for future growth beyond the plan period, across all of the District, as a basis to meet need at a local level.

Option ii

- 3.7 A potential option is to consider the provision of PAS as a proportion of the distribution and quantum for housing growth, set out in Spatial Policy 7. The delivery of such an approach is however difficult to apply in practice. As set out in Option iii below, due to the scope of national guidance, it is not possible for each HMCA to contribute to PAS. Even if this were to be possible, in locations where the housing target is already high, additional proportionate requirements for PAS, will further concentrate high levels of growth in specific areas/locations. This is likely to accentuate sustainability and infrastructure implications.

Option iii

- 3.8 In applying the NPPF definition of safeguarded/PAS land (i.e. land that falls between the urban area and the Green Belt) to Leeds and the approach of the Core Strategy, it is evident that there are certain HMCAs which because of their location, cannot provide for PAS (on the basis of para. 85 of the NPPF). This is because they are entirely contained by other urban land and have no Green Belt boundary or where there is little or no land within the HMCA beyond the urban edge. These areas are in the heart of the main urban area - the City Centre and Inner HMCA. In addition, the East HMCA has very little Green Belt to accommodate PAS. Given the need for both the Core Strategy and Site Allocations Plan to be compliant with the NPPF and for the Site Allocations Plan to be in conformity with the Core Strategy, these locational constraints need to be taken into account.
- 3.9 Consequently, if due to the above factors some areas cannot accommodate PAS, it follows that the other areas will need to take more than a proportionate 10% share. Taking into account the wider Policy issues of landscape quality and sustainability, a further option is for PAS (where this can be identified in locations consistent with national guidance) to be distributed on an equal share approach. This would mean that the figure would rise to 19%, in the remaining HMCA areas. The table below indicates the numbers:

HMCA	Core Strategy Housing Target	10% PAS	19% PAS
Aireborough	2,300	230	437
City Centre	10,200	-	-
East	11,400	-	-
Inner	10,000	-	-
North	6,000	600	1,140
Outer North East	5,000	500	950
Outer North West	2,000	200	380
Outer South	2,600	260	494
Outer South East	4,600	460	874
Outer South West	7,200	720	1,368
Outer West	4,700	470	893
TOTAL	66,000		6,536
			* NB this falls short of 6,600. The exact figure is 19.186%

- 3.10 Given the difficulties inherent in Options i and ii, Option iii, was considered to be a more practicable and realistic approach on which to base debate through the workshop sessions. In order to ensure that the overall housing and PAS requirement is met, a working assumption has therefore been adopted for a need to identify a target of 19% in the HMCAs able to accommodate PAS, as a basis for futures choices to be made.
- 3.11 This strategic approach can be considered to be an equitable option which needs to be worked through, as the analysis of the housing allocations and the outcome of the member workshops are reviewed. Development Plan Panel will need to review things in the round once all the individual areas have been considered and it will be for Development Plans Panel to recommend to Executive Board the final

distribution of PAS taking into consideration the discussions held for each HMCA, the Core Strategy principles and Green Belt functions. The final outcome is not expected to be an even distribution of 19% taking these factors into account together with the uneven distribution of existing PAS designations, should such sites not be selected for allocation.

Returning PAS Land to Green Belt

- 3.12 At the Outer South East member workshop, the issue was raised regarding the potential to return a PAS site to Green Belt, if it is not to be allocated. Clearly if this were to happen in one location, this would have implications for the District as a whole.
- 3.13 Within the context of the Leeds UDP and national guidance, returning land back to the Green Belt is a complex issue. Appendix 1, sets out the background to the overall approach. More recently, the (Planning) Minister's comments advise that any Green Belt deletion represents a difficult decision that must be properly justified suggesting that any such deletions should be the minimum necessary. He considers it better to take difficult decisions now rather than have to take land out of GB in future. The concept of Green Belt land 'swaps' is introduced.
- 3.14 Whilst returning land to the Green Belt, is recognised as a possibility in the Ministerial Statement and referred to in the LCR Interim Strategy Statement, the practicalities of achieving this in Leeds are more difficult to assess. At this stage we have given no indication to date through the CS or SAP that our GB review might include additions. There are no criteria in place to try to return PAS to GB and this approach will mean additional GB deletions. Existing PAS provision over and above the requirements in an HMCA creates the potential to depart from a 19% even spread approach, as a result, this may enable more sensitive sites in other areas to be protected.
- 3.15 Achieving the overall housing and PAS requirement is a major challenge. The delivery of this is contingent on being able to identify the optimum pool and quantum of sites, which meet our strategy (and reflect as far as possible member aspirations) that Council is able to defend through the examination process. From this pool, the Council intends to overlay phasing, as a basis to bring forward sites at the appropriate time, plan for infrastructure and to ensure that there is a sufficient mix of brownfield and greenfield sites. However, agreeing a strategy to seek to return sites to the Green Belt as a general principle is more problematic.
- 3.16 Fundamentally, returning PAS to Green Belt would result in a greater impact on Green Belt, than otherwise would be the case, which runs counter to the agreed thrust of local and national policy. Bearing in mind that the Policy refers to at least 10%, we would run the risk that an (SAP) Inspector opts to retain existing PAS and also accept new sites. It will be remembered that the UDP Inspector substantially increased the PAS provision compared to the Council's original proposals. Following comprehensive review, the UDP Inspector found that PAS sites did not need to be kept permanently open for Green Belt purposes and that the sites were in locally sustainable locations. It would be necessary to be clear what has

fundamentally changed, particularly given the continuing need to identify safeguarded sites.

- 3.17 A strategic matter for consideration however, relates to the future status of the “Rural Land” designation (to the NE corner of the District), as part of the SP10 review. The designation of this land as Rural Land, stems from a UDP Policy which was ‘carried over’ from the former Wetherby Local Plan (GB6 (29)). This area was initially identified as Rural Land, on the basis that the general extent of the West Yorkshire Green Belt, did not extend to most of the area North of the River Wharf, to the West and East of Wetherby. At the time it was considered that as the character of the area was essentially rural land, the intention was to retain this character through the Plan.
- 3.18 Within this overall context, it can be noted that the planning circumstances have now changed with the introduction of the LDF, the adoption of the Core Strategy and the preparation of the SAP. The ONE HMCA has a target of 5,000 to meet (8% of the overall total) and a number of strategic choices to be made i.e. making up the requirement from a pool of sites linked to Smaller Settlements, with limited growth at Wetherby (a Major Settlement) due to physical constraints or meeting the requirement via a small number of major sites i.e. Thorp Arch or Spen Common Lane – or some combination of the two. Within this context, is the Rural Land designation still relevant and appropriate ? Given the potential scale and location of the growth, impacting upon the character and composition of the area – there may be a case for seeking to designate the Rural Land Area as Green Belt. Para. 82 of the NPPF notes that, “New Green Belts should only be established in exceptional circumstances, for example when planning for large scale developments such as new settlements or major urban extensions”.

4. Corporate Considerations

4.1 Consultation and Engagement

- 4.1.1 The Core Strategy has now been adopted and has been found by an independent Inspector to be sound (this also includes compliance with the Duty to Co-operate). The Site Allocation Plan has been subject to Issues and Options consultation in summer 2013 and there will be a further opportunity for representations to be made at Publication stage, prior to submission. Outside of these processes, officers have been responding to community groups and individuals across the District on planning matters and in relation to the preparation of Neighbourhood Plans, for which there is a high level of interest. In progressing the plan to the next stage, extensive member engagement has taken place, through 11 member workshops (between June – December 2014), involving members of the DPP and ward members for the relevant HMCA.

4.2 Equality and Diversity / Cohesion and Integration

- 4.2.1 In the preparation of the Core Strategy and Site Allocations Plan, due regard has been given to Equality, Diversity, Cohesion and Integration issues. This has included the completion of EDCI Screening of the Core Strategy and meeting the

requirements of the Strategic Environmental Assessment Directive, which has meant that these Plans are subject to the preparation of a Sustainability Appraisal. The purpose of such Appraisals is to assess (and where appropriate strengthen) the document's policies, in relation to a series of social (and health), environmental and economic objectives. As part of this process, issues of Equality, Diversity, Cohesion and Integration, are embedded as part of the Appraisal's objectives.

4.3 Council policies and City Priorities

4.3.1 The Core Strategy and the emerging Site Allocations Plan, play a key strategic role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to the 'the best city in the UK'. Related to this overarching approach and in addressing a range of social, environmental and economic objectives, where these Plans also seeks to support and advance the implementation of a range of other key City Council and wider partnership documents. These include the Best Council Plan (2013-17) and Leeds Joint Health and Wellbeing Strategy (2013-2015).

4.4 Resources and value for money

4.4.1 The preparation of statutory Development Plan Documents is an essential but a very resource intensive process. This is due to the time and cost of document preparation (relating to public consultation and engagement), the preparation and monitoring of an extensive evidence base, legal advice and Independent Examination. These challenges are compounded currently by the financial constraints upon the public sector and resourcing levels, concurrent with new technical and planning policy pressures arising from more recent legislation (including the Community Infrastructure Levy and Localism Act). There are considerable demands for officers, members and the community in taking the Development Plan process forward.

4.5 Legal Implications, Access to Information and Call In

4.5.1 None at this stage.

4.6 Risk Management

4.6.1 Following the adoption of the Core Strategy there is considerable urgency to take the Site Allocations Plan forward. This is needed to help implement the Core Strategy, provide clarity for investment decisions (and the co-ordination of infrastructure), to take forward the Council's strategic priorities and to provide an up to date planning framework for emerging Neighbourhood Plans.

5 Conclusion

5.1 As highlighted in this report, the adopted Core Strategy sets out requirements for the safeguarding of land for development, beyond the plan period. However, as the Core Strategy does not determine how the safeguarded land is to be distributed

across the District, some working assumptions has been necessary in order to bring forward options. Following a review of alternatives a working assumption of 19%, in HMCA areas capable of delivering PAS, has been adopted for the purposes of the workshop sessions. Issues associated with this have been considered at the member workshops and the overall package of potential housing and PAS allocations will be put to DPP members in January. It is not anticipated that the final package of PAS sites will precisely match an even 19% distribution.

- 5.2 With regard to the issue of returning PAS sites to the Green Belt, this report emphasises that this is problematic for a number of reasons, including the conclusions of a previous UDP Inspector. However, in terms of a wider strategic option, there is some potential for the designation of the current area of Rural Land as Green Belt, within the context of options for major residential allocations within the ONE HMCA.

6 Recommendations

- 6.1 Development Plan Panel is requested to consider this report and the approach to PAS and to consider the merits of designating the UDP Rural Land as Green Belt.

7 Background documents¹

- 7.1 None

8. Appendices

- 8.1 See attached.

¹ The background documents listed in this section are available to download from the Council's website, unless they contain confidential or exempt information. The list of background documents does not include published works.

Appendix 1 – Returning PAS Land to the Green Belt, Background Information

Background - UDP position

1. In considering PAS, the UDP Inspector took the following view,

*“The Council and many objectors are very concerned about the risks involved in taking too much land out of the GB in order to identify it as PAS, in particular that land whose openness was capable of contributing to the aims of the GB might be developed unnecessarily. I do not share this view and wish to emphasise that there is no inevitable physical consequence in removing land from the GB to safeguard it as PAS land. Such land would be protected from most kinds of permanent development under the terms of PolicyN34. **If at some Review of the UDP it was felt that any particular site should not be developed and should after all remain permanently open for GB reasons it would still be possible at that stage to include it in the GB** subject to exceptional circumstances being demonstrated. Identification of land as PAS in the UDP should not be taken as implying that it is necessarily incapable of performing GB functions.”* (IR para 106.7 – LCC highlight).

“I regard the process of identifying land that might well be developed in later Plan periods as being preferable to a commitment to an early review of GB boundaries, requiring the predictable removal of large areas of land from the GB.” (IR para 106.7)

2. The inspector contemplated the possibility that an individual PAS site(s) could be returned to Green Belt through plan review but also cautioned that there are benefits in having a reserve of land to avoid Green Belt review in future.

“I consider that Policy N34 is very appropriate for such an approach as it would ensure that when reviewing the UDP it will be possible to choose whether or not to allocate development on potential sites which would not have at that time to be removed from the GB. This approach is not the same as attempting to make those future choices now, although clearly the smaller the amount of PAS land the less the choice that will be available to the Council.” (IR para106.14).

3. The Inspector is stressing the importance of having a reserve of non-GB land and by implication confirming that future plan review should use this land so that the need for GB land is the minimum possible.

UDP Review

4. The Inspector commented as follows, “Localised reviews should also consider whether exceptional circumstances exist to include additional land as GB [Policy P2].” (IR para 5.5 – P2 refers to RPG).
5. “The previous Inspector interpreted “permanence” in the PPG 2 context as meaning “lasting indefinitely” [i.e. having no definite end date] rather than “lasting for ever” and

he saw the longer term as extending 10 years beyond the Plan period [CD/DP/01(4), paras. 106.13 and 106.9]. There was considerable discussion at the Review Inquiry RTS on the matter and objectors argued that “permanence“ could mean GB boundaries remaining unchanged for up to 25-30 years.” (IR para 5.7).

6. It is doubtful that we could demonstrate anything like a 10yr reserve beyond 2028. In putting forward other sites as PAS we may find a SAP inspector taking a cautious approach and retaining existing PAS (not allocated or retained as PAS) to provide an additional buffer against future GB review notwithstanding the scale of PAS envisaged in the CS.
7. *“It follows from this, and from the national guidance summarised above, that any proposals for change, including any that might follow from the more localised review referred to in RSS, must be justified by exceptional circumstances. Carpets of Worth v Wyre Forest DC [1992][JPL, Jan 1992] established that the test of whether there are exceptional circumstances necessitating revision of GB boundaries applies to proposals to extend GB, as well as to reduce it; and Copas v The Royal Borough of Windsor and Maidenhead [2001][JPL, Oct 2001] made clear that in such cases **exceptional circumstances will not arise “unless some fundamental assumption which caused the land initially to be excluded from the GB is thereafter clearly and permanently falsified by a later event.”**” (IR para 5.8 – LCC highlight).*
8. The question will arise, what has changed that means a site now needs to be kept permanently open that did not apply when the PAS designation was originally made.
9. *“Furthermore, the Council have throughout stressed the selective nature and limited scope of the Review so there is nothing in the nature of the review process in itself that would compel changes to PAS now.”* (IR para 5.9)
10. The CS inspector removed “selective” from our GB review – but will we be able to demonstrate that we have undertaken a comprehensive review that helps justify returning PAS to GB ?
11. *“The Council’s response to the argument that retaining PAS would cause no harm is that there is nothing in national guidance to support it, and that retention would serve no policy purpose, especially as in their view much of the land in question is not in sustainable locations. However, at the last UDP Inquiry the Inspector had before him the current PPG2 which makes clear the importance of locating safeguarded land where it would promote sustainable development. It is evident both from his reports on Policy N34 and on individual PAS sites that he gave weight to this advice and also regarded compliance with Strategic Principle SP3 of the Plan [which deals with this matter] as important [CD/DP/01(4), para. 106.22]. SP3 is unaffected by the Review. Although the Council have questioned the sustainability credentials of some of the sites, they have not carried out any systematic overall review and, whilst I accept that the debate over sustainability has moved on somewhat since the last Inquiry, I have seen nothing in evidence or on the ground to suggest that the sites as a whole are so unsustainable as to justify rejecting them in their entirety. At the very least they comprise a substantial reservoir of land, possibly with varying degrees of sustainability, but from which in my view sustainable sites could be drawn [after a*

*proper appraisal] should the need arise in the long term. Certainly the Council have not produced substantive evidence to support their assertion that “the likely scale and distribution of future land needs beyond the life of the UDP Review are **certain** [LCC emphasis] to be different to those conceived at an earlier time” [LCC/060, para. 4.3.13]. I deal with the sustainability credentials of individual sites elsewhere but, because of their location, development on PAS sites would in most cases constitute urban extensions, and be well related to employment, shops and services, and accessible by modes of transport other than the car.” (IR paras 517/518).*

12. The inspector is pointing out the UDP inspector had considered the issue of sustainability and concluded that the locations were all relatively sustainable. In adopting the UDP in 2001 the Council accepted the inspector’s conclusions and reasoning.
13. *“Whilst a good many of the PAS sites may indeed have been within the GB under previous development plans, it is clear that the last UDP Inquiry was the first occasion on which their attributes were assessed on a common and comprehensive basis. It is also clear from a detailed reading of the previous conclusions on individual sites that the then Inspector was not as enthusiastic about the contribution that some made to the GB as the Council have suggested. Even those quotations they cite in support of their case refer, in most cases, to limited contributions to GB purposes and functions.” (IR para 5.31).*
14. *“They were therefore presumably satisfied that the GB merits of those sites were not so pressing as to justify retaining that designation. Indeed, the supporting text to Policy N34 in the AUDP states categorically that “this land is not now considered appropriate for inclusion in the GB”.*
15. *If that was the case then it is necessary to ask if anything has changed since in terms of GB purposes.” (IR para 5.32/5.33).*

“Availability of previously developed land might affect whether, when and how safeguarded land would be released but could not affect the original assessment that the latter did not need to be kept permanently open.” (IR para 5.36).

16. As the above quotations indicate we will need to be clear of the importance of the sites to GB functions and objectives and will have to be able to counter earlier views. It is not simply enough to find that a site is not in a sustainable location or at odds with strategy, we will have to demonstrate its importance in GB terms. The Inspector’s comments on the GB merits of individual PAS sites will also need to be considered.

NPPF/NPPG

17. The NPPF says GB boundaries should only be altered in exceptional circumstances through a review of the local plan and says that new GB should only be established in exceptional circumstances but suggests that this is related to large scale development proposals such as new settlements or major urban extensions. Therefore whilst the principle is established the particular examples given do not relate to any of our PAS sites.

18. The NPPF (para 82) goes on to say that if proposing new GB we should
- Demonstrate why normal planning and development management policies would not be adequate;
 - Set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
 - Show what the consequences of the proposal would be for sustainable development;
 - Demonstrate the necessity for the GB and its consistency with Local Plans for adjoining areas; and
 - Show how the GB would meet the other objectives of the Framework.
19. *“Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.”* (NPPG update 6.10.2014)
20. *“Unmet housing need (including for traveller sites) 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.”* (NPPG update 6.10.2014).
21. One of the consequences of not retaining PAS as PAS is that more land has to be taken from the GB than would otherwise be the case. This seems to run counter to the importance attached to GB in national policy.

Core Strategy

22. The CS advises that in identifying land to meet the housing target we should have *“the least impact on Green Belt purposes.”* (SP6 (iii)).
23. Green Belt review should be related to the settlement hierarchy or exceptionally other sustainable locations but *“Otherwise review of the green belt will not be considered to ensure that its general extent is maintained.”* (SP10).
24. There is nothing in the CS to suggest that GB review includes additions and the policies suggest that we should have as little impact as possible.

Site Allocations

25. The Issues and Options documents refer to GB review but there is no suggestion that this includes GB additions.

LCR Interim Strategy Statement

26. The LCR has adopted the YH policies of RSS as its Interim Strategy Statement on planning matters. YH9 says,

“A The Green Belts in North, South and West Yorkshire have a valuable role in supporting urban renaissance, transformation and concentration, as well as conserving countryside, and their general extent as shown on the Key Diagram should not be changed.

B Localised reviews of the Green Belt boundaries may be necessary in some places.....

E Green Belt reviews should also consider whether exceptional circumstances exist to include additional land as Green Belt.”

Ministerial Statements

27. The following extracts are from Hansard 13 May 2014 and are comments by Nick Boles.

“...local authorities can revise their green-belt boundaries through the local plan process involving intense consultation with local people.....It is painful and difficult, and it is right that it happens through an intensely transparent, open and democratic process that takes into account all the opinions expressed by all the different communities affected.”

“...the local authority has to pass a very high test: it has to be able to demonstrate that exceptional circumstances justify taking a particular site out of the green belt or re-drawing a green belt boundary, perhaps to swap land currently in the green belt for land that is not, but is of greater environmental importance.”

28. In relation to safeguarded land he said that the concept makes sense,

“...if future development needs are likely to require further difficult choices about some sites in the green belt, it is better to be clear that certain sites might some day have to have their status reviewed, rather than to have the entire green belt under some abstract possible future threat.....In some sense, therefore, more reassurance is gained than uncertainty created about what is being protected for ever.”